

# **Regeneration and Environment Local Plan Publication Draft Consultation Statement**

## **Appendix 2 – Responses to public consultations undertaken when preparing the Regeneration and Environment Local Plan**

### **Yarm and Eaglescliffe Area Action Plan Issues and Options Consultation**

- List of respondents 1
- Sample questionnaire 2
- Questionnaire responses 8

### **Regeneration Development Plan Document Issues and Options Consultation**

- List of respondents 36
- Sample questionnaire 37
- Questionnaire responses 45

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- Sample questionnaire 316
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### **Core Strategy Review Issues and Options Consultation**

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### **Regeneration and Environment Local Development Document Preferred Options**

- List of respondents 637
- Consultation responses 641

This appendix includes the consultation responses which have been received in response to the five consultations which have been undertaken during the preparation of Stockton-on-Tees' Regeneration and Environment Local Plan. The schedule relating to the Regeneration and Environment Local Development Document Preferred Options consultation includes a summary of how each representation has been taking into account in preparing the final draft of the Local Plan.

A original copy of each representation can be viewed by contacting the Council. Where respondents have been anonymised as 'individual', each respondent's identity can be provided by the Council on request.

## **Respondents to the Yarm and Eaglescliffe Area Action Plan Issues and Options Consultations**

Cllr A Graham, Ingleby Barwick Town Council  
Cllr J Kirby, Ingleby Barwick Town Council  
Cllr John Fletcher, Eaglescliffe Ward  
Cllr W Feldon, Ingleby Barwick Town Council  
CPRE Stockton  
Eaglescliffe Preservation Action Group  
Eaglescliffe and Eaglescliffe Council  
English Heritage  
Friends of Tees Heritage Park  
Government Office for the North East  
Highways Agency  
JG (Eaglescliffe) Ltd C/O Sanderson Weatherall  
Kirkleavington Property Co C/O Peacock & Smith  
Nathaniel Lichfield and Partners  
Natural England  
North East Assembly  
North of England Civic Trust  
Northumbrian Water Ltd C/O England and Lyle  
One North East  
Stockton-on-Tees Borough Council  
Tees Archaeology  
The Garden History Society  
Ward Hadaway  
Yarm & Willie Flatts Residents Group  
Yarm Residents Group  
Yorkshire Forward  
7 Individuals

**YARM AND EAGLESCLIFFE AREA ACTION PLAN - ISSUES AND OPTIONS REPORT  
CONSULTATION RESPONSE FORM**

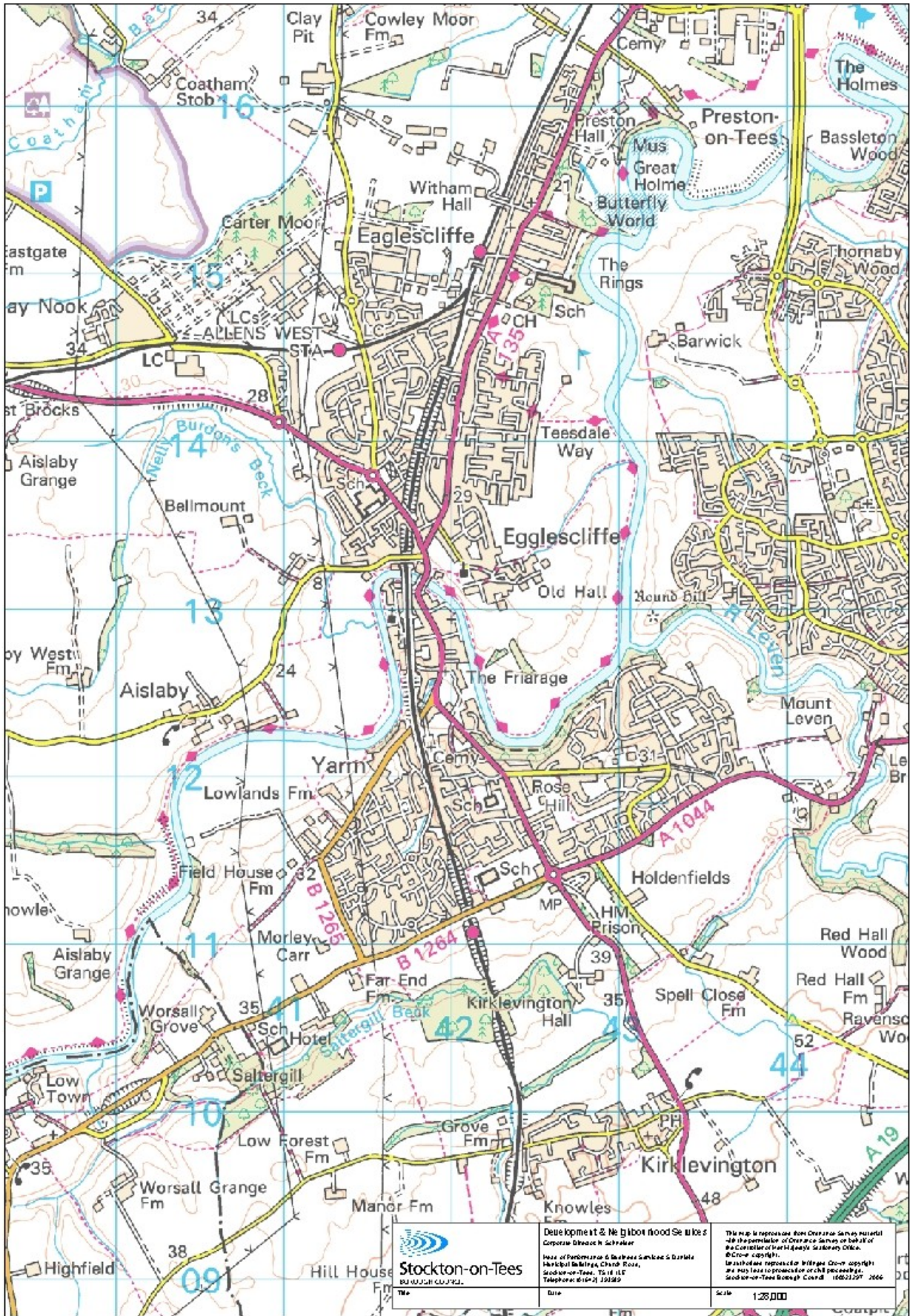
This form should be filled in alongside the Yarm and Eaglescliffe Area Action Plan Issues and Options Report, which gives background to the issues and has some useful points to consider when answering the questions. Please fill in as much of the form as you can (use extra paper if necessary), before returning it to us at the address below:

Spatial Planning Section  
Development and Neighbourhood Services  
Gloucester House  
72 Church Road  
Stockton on Tees  
TS18 1TW

You can also complete this form online at [www.stockton.gov.uk/spatialplanning](http://www.stockton.gov.uk/spatialplanning)

**Q1.How do you see Yarm and Eaglescliffe in 2021?**

**Q2.The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Are there any particular places that should or should not be included? Please draw your preferred boundary on the map of the Yarm and Eaglescliffe overleaf.**



 <p><b>Stockton-on-Tees</b> BOROUGH COUNCIL</p>	<p>Development &amp; Neighbourhood Sites Corporate Services &amp; Customer Care</p> <p>Units of Performance &amp; Business Services &amp; Support Market Services, Street Works, Stockton-on-Tees, Toilets Telephone: 01642 33282</p>	<p>This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. The Ordnance Survey copyright may have been reproduced or otherwise Stockton-on-Tees Borough Council 10001207 2004</p>
	<p>Title: _____</p> <p>Date: _____</p> <p>Scale: 1:25,000</p>	

**Q3.How could Yarm and Eaglescliffe be developed as tourist destinations?**

**Q4.What other tourism facilities should be promoted and where?**

**Q5.What type of housing will be needed over the coming years?**

**Q6.Where should new residential development be situated?**

**Q7.How can Yarm's role as a commercial centre be strengthened?**

**Q8. How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

**Q9. What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

**Q10. What changes should be made to car parking in Yarm and Eaglescliffe?**

**Q11. How can public transport be improved?**

**Q12. What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

**Q13. Is the provision of open space in Yarm and Eaglescliffe sufficient?**

**Q14. Could access to open spaces be improved?**

**Q15. Do some places need increased or better recreation facilities? Are some facilities under used?**

**Q16. What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

**Q17. Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

**Q18. Are there any other Key Issues you feel should be considered in preparing the YEAPP?**

**About you**

Please complete this section if you would like to be added to our Consultation Database and kept informed about further planning policy documents and consultations. We will use the information you give in this form to inform you of further consultations. The information will be held securely on a database or within a file and will be treated in the strictest confidence and will not be disclosed to any third parties unless allowed by law.

**Name** \_\_\_\_\_

**Address** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Postcode** \_\_\_\_\_

**Email address** \_\_\_\_\_



## Yarm and Eaglescliffe Area Action Plan Issues and Options Consultation Responses - 2007

### Cllr A Graham, Ingleby Barwick Town Council

#### How do you see Yarm and Eaglescliffe in 2021?

Sees the area much as it is now in 2021. This can be achieved with careful control of housing expansion and through traffic.

#### How could Yarm and Eaglescliffe be developed as tourist destinations?

The area can be development as a tourist destination by highlighting its river connections, shops and village atmosphere of the town centre.

#### What other tourism facilities should be promoted and where?

Other tourist facilities that could be developed are Preston Park, viaduct and the railway heritage.

#### How can Yarm's role as a commercial centre be strengthened?

Retaining the town centre identity and shops can strengthen Yarm's role as a commercial centre, but parking and congestion need to be addressed.

#### How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?

A balance of preserving and renovating historic building and structures can maintain historic buildings, structures and features. Control of future development in keeping with the area.

#### What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?

Goods delivery vehicles, traffic controls and crossings, parking, through traffic. All of these need to be addressed.

#### What changes should be made to car parking in Yarm and Eaglescliffe?

More parking means more cars, but local residents, disabled parking needs, are areas to be considered.

#### How can public transport be improved?

A park and ride scheme could be introduced. Public transport is only an option provided they do not add to congestion.

#### What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?

Provision of cycle and footpaths and road crossings, but again congestion is a problem.

### Cllr J Kirby, Ingleby Barwick Town Council

#### How do you see Yarm and Eaglescliffe in 2021?

More houses being built in North Eaglescliffe area putting pressure on facilities. More large houses being knocked down and apartments being built. Due consideration on any future large development of housing in either area. Preserve the charm of Yarm High Street.

#### The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?

Green areas and sensitive areas which both should be open for discussion with the residents it effects. Consultation always.

#### How could Yarm and Eaglescliffe be developed as tourist destinations?

Rail station - easy access to area.  
River- connections/trips.  
Airport - close by access easy to area  
Preston Park/Heritage Trail for area.

#### What type of housing will be needed over the coming years?

Low cost housing for younger people so they can afford to live and work in the area instead of having to live with parents

#### Where should new residential development be situated?

Not in green areas, brownfield sites if possible. Put restrictions on what they build. Allow no apartments where old established houses already are.

#### How can Yarm's role as a commercial centre be strengthened?

By improving road structure/access and parking facilities - park and ride?

#### How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?

Put preservation orders on so that the look of the buildings are preserved, restrict any new building even if on brownfield sites.

#### What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?

A way of altering flow of traffic - most hold ups at peak times, school term time, people looking for parking spaces. Park and Ride? Restrictive weight limits

#### What changes should be made to car parking in Yarm and Eaglescliffe?

Only residents and then Park and Ride facility.

#### How can public transport be improved?

Depending on whether a Park and Ride scheme was up and running, would that allow more buses to go from Yarm to surrounding areas not fully served like Maltby and Hilton, Seamer etc.

#### What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?

Provide more cycle paths where possible.

#### Is the provision of open space in Yarm and Eaglescliffe sufficient?

Preston Park provides both Yarm and Eaglescliffe with open space

#### Could access to open spaces be improved?

I believe investment is being made into Preston park and hopefully will be as successful as Ropner Park.

#### Do some places need increased or better recreation facilities? Are some facilities under-used?

Ingleby Barwick is crying out for facilities but Yarm and Eaglescliffe already have Preston Park.

**What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

Encourage low cost housing and for the elderly residents

**Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

No more building should be allowed

**Are there any other key issues you feel should be considered in preparing the YEAAP?**

Use the river, access from Ingleby Barwick via water taxi or a bridge.

**Cllr John Fletcher, Eaglescliffe Ward**

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn?**

**Are there any particular places that should or should not be included?**

The Plan should include the whole of Eaglescliffe Ward so far as within the limits of development and include Preston Park and Preston Lane.

**How could Yarm and Eaglescliffe be developed as tourist destinations?**

For Preston Park, please see the report last year of the Adults, Leisure and Culture Select Committee and the resultant work on the Masterplan.

The main feature of Yarm / Eaglescliffe which is underexploited is the railway heritage – the route of the 1825 Stockton & Darlington Railway & its Yarm Branch & the meeting in Yarm to launch the project. Apart from a woeful shortage of interpretative signs, SBC lacks a policy on the course of the original lines, leaving them in places with little protection from redevelopment & the need for a hurried consultation with Tees Archaeology whenever there is an application.

**What type of housing will be needed over the coming years?**

Housing to enable extended families to live close to where they can get support from relatives; also to permit older people to move to suitable accommodation without moving away from the area in which they have lived. In other words, social housing & OAP accommodation of various types.

**Where should new residential development be situated?**

There is very little land left in Eaglescliffe within the Limits to Development. The current consultation by the owners of the Allen's W site (former RN Depot) for a mixed development including housing needs careful consideration for its effects on the area, e.g., traffic, schools.

**How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

SBC needs to make progress on the Local List (a process currently "on ice" & in reviewing the possible need to revise the Article 4 Direction on Eaglescliffe Conservation Area & to make one on Eaglescliffe-with-Preston Conservation Area.

**What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

Tailbacks on both sides of Yarm Town Centre at busy periods, especially weekday afternoons from approx 1500 to the end of rush hour.

**What changes should be made to car parking in Yarm and Eaglescliffe?**

Car parking in the vicinity of Eaglescliffe Station works for most of the time, owing to mutual tolerance & the blind eye turned by the railway co. to illegal use of the station yard by non-rail-users. This could change if the through trains to London attract a lot of parking &/or the railway co. starts charging for parking. If the new service is successful, I support having a park-&-ride on the W side of the railway, allowing cars from W Stockton etc. to access it from Durham La. Without coming through the Eaglescliffe / Yarm built-up area. This would need an expensive footbridge over the down line & sidings. Any extra parking for Yarm town centre on the north bank of the river would be a problem because of the narrow, winding Aislaby Road, without footways.

Better integration of buses and trains at Yarm Station (timetabling) & Eaglescliffe Station (distance to bus stops).

**How can public transport be improved?**

Pedestrian issues include the lack of direct accesses to: Eaglescliffe Station from the Kingsmead estate this could be cured by the above-mentioned footbridge at the Station; Allen's West Station from the Grassholme Way Estate. A cycle route from Muirfield Road to Butts Lane (avoiding a further stretch of Yarm Road) could be introduced with very little construction work, via St Margaret's Play Area. The footway/cycle track along the E side of Durham Lane from Chaldron Way to the Industrial Park entrance is awaiting agreement for the acquisition of a small strip of land. Durham Lane N of the Park entrance is unsuitable for cyclists or pedestrians, although in some demand from the former.

**What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

Encourage more social & OAP housing. Discourage blocks of flats – if this is not possible, encourage standards of design to be more in keeping with local standards.

**Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Apart from filling up designated employment land and improvements to Preston Park, it is difficult to see where there could be further development in Eaglescliffe.

**Are there any other key issues you feel should be considered in preparing the YEAAP?**

Cumulative effect on traffic of small developments which individually do not need a Traffic Impact Assessment. Lack of planning policies for properties with long, narrow gardens (Highfield between Yarm Road & the railway), leading to piecemeal development without a clear settlement pattern. Also, the current guidelines on rear extensions to houses can be difficult to apply here where Victorian large semis were built with a long, projecting rear wing.

**Cllr W Feldon, Ingleby Barwick Town Council**

**How do you see Yarm and Eaglescliffe in 2021?**

As much as they are now, quiet leafy areas where people can live peacefully in a nice area. Expansion of housing needs to be carefully controlled.

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

I believe this should be decided by residents and Councillors of the area and not by a resident of Ingleby Barwick.

**How could Yarm and Eaglescliffe be developed as tourist destinations?**

Tourism can be increased by advertising its nice hotels and shops and its river connections.

**What other tourism facilities should be promoted and where?**

The railway viaduct is a wonderful piece of engineering and worthy of great publicity.

**What type of housing will be needed over the coming years?**

Three and four bedroom houses with modest gardens but plenty of storage facilities should be encouraged.

**Where should new residential development be situated?**

To the northern end of Eaglescliffe and perhaps around Conyers School

**How can Yarm's role as a commercial centre be strengthened?**

It is very good now except for car parking and the number of pedestrian crossings. We could do with a subway perhaps.

**How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

In Yarm we have a good balance of commercial properties and domestic dwellings. This mix should be encouraged, promote the river area, and prevent back garden development.

**What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

The slow movement of traffic through Yarm and Eaglescliffe is a real problem. The solutions are very costly - a bypass to run alongside the railway viaduct for example.

**What changes should be made to car parking in Yarm and Eaglescliffe?**

Could the Campbell's Garage area and underneath the viaduct be made available for parking?

**What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

The number of vehicles at peak times but this is very difficult to deal with. A tunnel for cyclists and pedestrians under Yarm High Street would help.

**What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

The types of development that should be encouraged are light industry and office accommodation. Small medium sized shops should also be encouraged. Flats should be discouraged.

## **CPRE Stockton**

**How do you see Yarm and Eaglescliffe in 2021?**

The three Conservation Areas must be protected and all given Article 4 Directions. Traditional Eaglescliffe (Yarm Road and its off-shoots from Preston Park to Egglecliffe) must be preserved. Most Tee-siders are unaware of two of the Conservation Areas - Egglecliffe and Eaglescliffe with Preston as they are not on through roads. What they are aware of and do admire is this section of Yarm Road, its meandering, wide, open Avenue with Victorian, Edwardian and Thirties houses and mature trees set in large family sized gardens. These are in various price ranges are ideal family houses. Traditional Eaglescliffe is a unique "land-locked" situation given that is bounded on one side by the Railway, sides two and three by the River and the fourth by the A66. Inevitably this means that any development usually means demolition and/or building on back gardens. This would change the character forever and spoil a much-loved area.

The one development area that can expand is the land adjacent to the A67 and Durham Lane locality and any new build and improved leisure facilities, especially for young people, should be placed there. Leven Road in Yarm is also a much valued and appreciated area in the town and should be protected from inappropriate development.

**How could Yarm and Eaglescliffe be developed as tourist destinations?**

Preston Park is the obvious Eaglescliffe tourist destination. The Roman settlement immediately across the River, the Stockton to Darlington Railway and most importantly, the Visitor Centre for the proposed Heritage Park between Stockton and Yarm all present a tremendous opportunity for the future. Yarm Centre and Egglecliffe Village, each with their historic churches and buildings, and Yarm with its vibrant night life will continue to be big draws in the future but only if the chronic parking problems can be solved. Obviously proper Toilet facilities have to be provided and Visitor Information improved.

**What other tourism facilities should be promoted and where?**

The River Tees has had tremendous commercial and leisure development in recent years. What it now requires is the Heritage Park to be created, from the Banks development to Yarm, to protect and enhance the wildlife and tranquillity of its idyllic natural setting and to make residents and visitors alike aware of its significant attractions. I cannot think of any possible project that Stockton could take on that would do more to change the unfortunate and misguided image that Teesside has in the Country at large.

**What type of housing will be needed over the coming years?**

The concentration on apartment building in recent years has got out of hand. It will always be more profitable for developers to build apartments rather than family houses. In addition they are often priced at levels that key workers cannot afford. What also are required are family homes with reasonable sized gardens - so important for children! Traditional Eaglescliffe and Yarm together with the areas built in the 60's and 70's offer this already and these properties must therefore be protected. High standards of design, energy efficiency and insulation must be insisted upon. The building industry will oppose this claiming that it will make them unaffordable. This is not the case. Energy is now so expensive that the annual ongoing savings can outweigh the interest on the higher capital sum. It is always significantly cheaper to install these systems at the building stage rather than as an "add on" at a later date.

**Where should new residential development be situated?**

New residential development should take place at the Allen's West area of Eaglescliffe. Care must be taken over the amount of new build permitted

within Yarm and Eaglescliffe. The enormous housing projects in Ingleby Barwick, the proposed projects at the Tall Trees together with other large developments must be rapidly exhausting the permitted numbers of houses to be built within Stockton.

#### **How can Yarm's role as a commercial centre be strengthened?**

With the Supermarket now enforcing limited parking on what was the unofficial overflow Car Park in the town the parking situation is now getting critical. The ridiculous thing is that many of the visitors, business people and residents are affluent enough to afford to pay for convenient, secure parking but they are not even given this option. Provision for long term parking must be made! It is now reaching the point that given the choice of travelling even such a short distance as Eaglescliffe to Yarm even residents will not choose Yarm because of the parking! Park and ride is an option but to work it must be very regular, at least every 10 minutes at peak periods. Also 3 routes would be required. One at Preston Park calling at Eaglescliffe Station and Yarm High Street One at Yarm Station to Yarm High Street. One at Oakwood Centre to Yarm High Street. The Conservation Area must be protected full stop! The commercial/retail area must not stray into the residential area e.g. Bentley Wynd.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Inappropriate development is the biggest threat. The residents of both areas really care about their towns as is shown by the existence of civic societies and residents' groups. In Eaglescliffe it is the "whole" that counts - the space, the interaction between the buildings and the gardens and the street scene. Modern buildings are constructed very quickly. Established areas with buildings and trees that have stood the test of time for over 100 years can be demolished in a trice! We depend on you the Planners to protect our towns! This is not "pickling in time" but preserving the best of a period where the standard of building, craftsmanship and materials was generally far higher than today. Once it is gone it can never be brought back. What the nation demands is individuality not identikit type towns that are clones of each other.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

Through route large vehicles are already discouraged but should be banned. Unfortunately the larger shops and the Supermarket will require deliveries by large vehicles. See response to Q7

#### **What changes should be made to car parking in Yarm and Eaglescliffe?**

See response to Q7

#### **How can public transport be improved?**

See response to Q7.

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

A balance has to be struck between improving the above and delaying the traffic still further e.g. Yarm High Street

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

As all open spaces are at a premium they must be protected. There is a lack of sports and leisure facilities especially for young people in Eaglescliffe. There is no point in providing new facilities unless they can be maintained and protected from vandalism.

#### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

See response to Q13

#### **What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

See response to Q8

#### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Eaglescliffe has only two local centres - Sunningdale and Durham Lane. Station Road is not a local centre. It has no Post Office now, which was the heart of the centre, and only one convenience store. The rest could be based anywhere e.g. motor cycle shop, dentist and frock exchange!

#### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

This plan appears to be the only method by which the local residents will have some control over their locality in which they live. I sincerely hope it is not just "ticking the boxes and going through the motions". I am concerned that when local residents wishes conflict in any way with national policies, often designed to rectify the problems of the South East, the locals lose out. Government Inspector's reports in planning appeal situations appear to bear this out! The South East suffers from overpopulation, the North East suffers from under population.

### **Eaglescliffe Preservation Action Group**

#### **How do you see Yarm and Eaglescliffe in 2021?**

EPAG are completing this response for Eaglescliffe only. Our opposite group in Yarm will address issues there.

EPAG firmly believe that the character of Eaglescliffe must be preserved and celebrated. By 2021 Eaglescliffe will have grown and developed. It will be a busy area with a thriving transport network linking it to London as well as locally with improved bus services, cycle paths and walking routes. Its retail infrastructure will have developed with a strategic view rather than a piecemeal approach resulting in useful ventures and there will be leisure facilities which benefit one of the best Victorian suburbs in the borough. We foresee that in housing terms the lungs of Eaglescliffe (i.e. The Avenue, Ashville Ave, Teesbank Ave, Station Road, Dunottar Ave, Swinburne Rd, Albert Road and Yarm Road inter alia for example) and the conservation areas will be protected but also enhanced. In these areas there will be preservation of the Victorian housing stock and, control of demolition enforced by making the local list a mandatory planning document and by expanding the Permitted Development documents. There will be a balance of large homes in substantial gardens, affordable housing on the periphery. Limits will be set on what types of developments can occur and where and these will be rigorously enforced. Windfall sites will be forbidden since this could over-write the vision to be developed by this YEAAP

#### **The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

EPAG provided such a map in 2005 for Neil Cole and Jane Elliott. If these cannot be found that EPAG will replot them.

#### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

Definitely. EPAG believe that the links with Stephenson and the railway should be exploited. Darlington celebrates their part in this venture, Eaglescliffe does not and this is a great loss. The Museum and Butterfly World should be developed so that they are sites of choice for visitors and schools. Catering needs to be improved also. The Teesdale Way should be used and publicised more. The possibilities offered by the Tees Forest

should be explored. Our hotels/B&Bs will be central to tourism and must therefore be retained and enhanced.

#### **What type of housing will be needed over the coming years?**

See Q1. However any planning for housing needs to be viewed in the context of demographics. SBC should be mindful that we have 2 large private schools in the area and the close links with the A19 and A1 means that this area should be the area of choice for those seeking large detached family homes in substantial gardens; this would also bring inward investment and would be a win-win scenario. However Eaglescliffe has now reached saturation point for flats and residential/care homes; further development of these types of housing stock threatens to upset the balance of the population in the area. We suggest that SBC adopt the practice of other councils in the North-West who, we understand, refuse applications for such developments once saturation point (pre-defined) has been reached. To reiterate EPAG believe that the peripheral areas of Eaglescliffe should be developed but the central Victorian highlights and Conservation areas protected

#### **How can Yarm's role as a commercial centre be strengthened?**

Clearly by improving the parking and by linking commercial strategy for Yarm with that for Eaglescliffe so that they support their own areas but they compliment each other. It is difficult to see how parking in Yarm can be improved unless free park & rides can be provided from Preston Park and Yarm Station perhaps for employees primarily and perhaps using an as-required type service.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

See Q1, Q3 and Q5. EPAG believe the key to this is developing the vision for Eaglescliffe – protecting and celebrating the Victorian character of the whole and developing Eaglescliffe as the jewel in the crown of SBC. This means defining housing stock and numbers, refusing developments that do not fit into this vision, retaining the large family homes, controlling demolition and development and enhancing the environs. The conservation areas should be tightly controlled, expanded and linked with the Local List. The onus will be placed on SBC to really make its planning documents work and they should be accountable to the local community for this. Responsibility is also placed on developers to understand the context and see the whole picture rather than eroding the very character of our area with unsuitable development.

#### **How can public transport be improved?**

See Q7. of most importance in the short term is ensuring the new London train service is well supported. This means developing Eaglescliffe station initially. Direct bus services to the main towns should be provided and cycle paths improved. All this must be seen in the wider context of tourist development also. In addition it is vital to link it to the environmental strategy of SBC since our carbon footprint should be reduced.

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

As SBC tries to reduce its carbon footprint the needs of pedestrians and cyclists will increase. Cycle paths should be developed but using a clear plan.

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

The answer to this question depends on how 'sufficient' is defined. Open space is important to all areas. Green wedges should be protected as should our trees and landscaping.

#### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

Preston Park should be enhanced so that the Museum and Butterfly World are sites of choice for visitors. The play areas in the park need updating and policing to prevent vandalism. As already mentioned leisure and recreational facilities need to be improved in Eaglescliffe as a whole

#### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

EPAG believe that the YEAAP provides an opportunity to define the vision for Eaglescliffe and Yarm and this is not articulated specifically in any question. The vision must cover transport, leisure, economic development, environmental considerations and housing stock. It is the "whole" which is important. No longer must our beautiful area be under siege, we i.e. SBC, government bodies and the local community, must take control so that we define how we want these areas to look and feel. In this regard we feel that some of the statements in the Issues & Options document are a bit weak. For example in 1.2 evidence needs to be provided to back up the statement. In 1.3 there should be a reference to the need to provide the vision. In 2.6 it should be made clear what "unduly restricted" and "reasonable" means. In 6.7 it would be useful to provide some hard figures. Finally EPAG are delighted that this document is being produced and we look forward to working closely with SBC to really get it right for Eaglescliffe and Yarm.

### **Egglecliffe and Eaglescliffe Council**

#### **How do you see Yarm and Eaglescliffe in 2021?**

Unless measures are taken to control the levels of growth in housing the area will become totally grid locked especially at peak times. The key to how this area will appear in 2021 is resolving the traffic issue so that it will continue to be a desirable place to live. Eaglescliffe will remain a pleasant dormitory village with the Tees Heritage Park attracting many people to visit for recreation and the Rail Trail bringing in tourists seeking Industrial Heritage sites.

#### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

Eaglescliffe should build on its connections with the Stockton & Darlington Railway, reinvigorate Preston Park and develop the Tees Heritage Park. More should be made of Yarm as a crossing point in Roman times through to its development as a port with a museum.

This could link in with the Stockton & Darlington Railway heritage

#### **What other tourism facilities should be promoted and where?**

Public toilets are needed with baby-changing facilities

#### **What type of housing will be needed over the coming years?**

There are probably enough apartments available; we need mixed developments of houses including "affordable" starter homes for young people. With an ageing population there is a need for smaller homes & bungalows, which are omitted from current developments. Apartment blocks currently being built do not meet either of these needs.

#### **Where should new residential development be situated?**

There does not appear to be a pool of land anywhere in this area and we do not need any more 'back garden' developments along Yarm Road in

Eaglescliffe.

Proposed developments at the "MoD site" at Allen's West, Yarm School & Tall Trees sites should provide sufficient new homes although all of these will cause further traffic problems

#### **How can Yarm's role as a commercial centre be strengthened?**

The barrier to Yarm's development is parking. There is a need for off street parking and the landlocked backlands should be investigated for this purpose.

Northallerton is a good example of off-street parking which is free and close to the centre.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

The key issue is what is described as historic. The large houses on Yarm Road are not historic in the true sense of the word but they form a large part of the character of this area. There should be a block on the demolition of such properties, rather to encourage developers to retain and convert.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

Main problem is a lot of traffic requires to pass through Yarm High Street at peak times starting with school traffic and continues with people returning from work. This has a knock-on effect on Yarm Road, Durham Lane, The Spital etc.

Traffic management such as traffic lights in the High Street working in tandem, restrict loading & unloading, off street parking in the backlands of Yarm and restriction of HGVs.

#### **What changes should be made to car parking in Yarm and Eaglescliffe?**

When the Grand Central train service to London starts later this year, Eaglescliffe station will need additional car parking to avoid overspill onto local roads. Consideration should be given to provision of a car park on Durham lane Industrial Park with a footbridge linking to Eaglescliffe station this could serve those coming from Eaglescliffe West, Yarm, Hartburn etc. without the need for using Yarm Road.

#### **How can public transport be improved?**

Survey needs to be carried out on those travelling to work before planning any new or improved services.

When the new London service starts there is a need for proper bus/train interchange at Eaglescliffe to avoid passengers having to walk to the main road with luggage

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

Cycle paths need to offer a more attractive alternative to roads by being more direct, purpose built rather than being cobbled together from existing footpaths and back roads. They should not be shared with pedestrians as this is dangerous for pedestrians who may not hear bicycles approaching from behind. They should preferably not be shared with vehicles either as this is dangerous for the cyclists.

Additional pedestrian crossings are required on Durham Lane (near Allen's West) and on Urray Nook Road (near Hunter's Green)

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

Plenty of organised open space at Egglecliffe & Conyers schools and in Egglecliffe we are quite well off for equipped play areas for younger children (provided by this Council). No real space for kids wanting to put down coats and have a kick about.

Allen's West playing fields are used only on odd evenings and Saturday mornings so could these be made more accessible for general kick about areas?

#### **Could access to open spaces be improved?**

Access to Preston Park could be improved by the proposed footbridge to Ingleby Barwick. The Teesdale Way could be improved by extending it along the riverbank at Eaglescliffe Golf Course to avoid walkers having to go through the residential built up area and part of Yarm Road. The land at Junction Farm could be much improved.

#### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

School playing fields are underused. In summer months these could be open to children perhaps until 8pm and during the day in holiday periods.

There are no proper recreation facilities in this area and a swimming pool would be ideal. Adults wanting to swim would not need to go to Stockton and schools could utilise a local facility for lessons.

#### **What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

Affordable starter homes for young people and bungalows for older people wishing to downsize, should both be encouraged.

The further development of apartments should be discouraged especially in the £200k + price bracket

#### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Demolition of large houses and their replacement with apartments should be discouraged. Rather that these should be retained and converted if necessary.

Development within mature gardens should also be discouraged (back-garden developments)

#### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

The plan needs to take into account the review of secondary schooling provision and location in Yarm, Eaglescliffe & Ingleby Barwick under the Government's "Building Schools for the Future" initiative as any subsequent changes could have a significant impact on traffic flows in the area.

It is essential that Egglecliffe Parish retain a secondary school in the area

## English Heritage

### General comments/specific comments relating to the Issues and Options Report

Through this AAP heritage protection and enhancement should be at the forefront of the decision-making process and should inform change where intervention is thought necessary or desirable.

In addition to safeguarding the area's conservation areas and many listed buildings, English Heritage would support any initiatives to raise the profile of, and celebrate, the historic Stockton and Darlington Railway.

### Comments relating to the Sustainability Appraisal

With specific reference to the document itself I would opine that in 8.18 it would be helpful for the baseline for the study area to be extracted from the Borough-wide figures. The attached notes provide some guidance on indicator targets but I would draw your attention to discrepancies between the baseline in this document and the baseline in the SA/SEA of the Planning Obligations SPD.

In respect of Reference 9.11, what may be of more relevance would be the number of applications for planning permission and listed building consent-approved contrary to a recommendation that the scheme would have an adverse effect on the historic environment.

## Friends of Tees Heritage Park

### How do you see Yarm and Egglecliffe in 2021?

A comprehensive approach with more emphasis on conservation of the character and the long term integration with a River Tees Heritage Park

### How could Yarm and Egglecliffe be developed as tourist destinations?

As it is we have enough antisocial problems with the hotels in Egglecliffe, we do not want coach parties full of tourists arriving. Egglecliffe and Yarm are predominately residential.

### What type of housing will be needed over the coming years?

I would imagine we will need more self contained flats for the elderly as those people who live in Egglecliffe get older and cannot cope with a house and do not want to move out of Egglecliffe.

### How can Yarm and Egglecliffe's historic buildings, structures and features be preserved and enhanced?

Continue to expand existing conservation controls. More emphasis on enforcement, particularly unapproved temporary advertising.

### What are the main issues regarding vehicles and traffic in Yarm and Egglecliffe?

Over stretched parking facilities in Yarm. High-density apartment developments with inadequate parking have increased the problem. Servicing in High Street should be restricted to outside the working day hours. Should be restrictions on HGV through traffic, other routes now available for most.

### What changes should be made to car parking in Yarm and Egglecliffe?

Ideally long term parking facilities away from congested areas with park and ride or similar. But difficult to identify appropriate sites.

### How can public transport be improved?

More regularity with smaller buses on clearly identified routes

### What are the main issues for pedestrians and cyclists in Yarm and Egglecliffe?

Usual problem of conflict with through traffic, but difficult to see how could be improved. More enforcement to prevent cycling on pavements.

### Is the provision of open space in Yarm and Egglecliffe sufficient?

General lack of incidental open space for local recreation. More use could be made of River Tees and adjoining lands for quiet recreation.

### What type of development should be encouraged in Yarm and Egglecliffe? What should be discouraged?

The type of development that should be encouraged should be sensitively designed infill development. Large scale, green field developments should be discouraged.

### Are there any other key issues you feel should be considered in preparing the YEAAP?

A timetable/programme for implementation of projects should be included in Action Plan.

## Government Office for the North East

### General comments/specific comments relating to the Issues and Options Report

Para 1.2 refers to the ageing local plan this should be amended to provide a more accurate description of the LDF. Para 1.3 is not required.

Requested amendments to section 2 'Scope, Role and Function'. Need to expand upon section 4.13 and link to PPS12

## Highways Agency

### Where should new residential development be situated?

The Agency considers that accessibility is an important factor in determining sustainability and requests that it is reflected in the choice of locations for potential residential development and the policies and strategic approaches within the AAP. The agency considers that the AAP should give recognition to the need for new development to have access to a range of sustainable modes of transport. The Agency would also be supportive of a statement to the effect that "planning applications for developments that may impact on the Strategic Road Network will need to be accompanied by a Transport Assessment and a Travel Plan under the terms of the new Guidance on Transport Assessments document distributed jointly by CLG and DfT." Further, should a proposal for residential development to be put forward that could have potentially impact on the Strategic Road Network, the Agency would need to be consulted at the earliest opportunity to establish the potential impact on the network and discuss any mitigation measures which may be deemed necessary in accordance with the requirement of Circular 02/2007.

### How can Yarm's role as a commercial centre be strengthened?

Depending on the scale of any new development required to strengthen the commercial centre, the potential impacts on the surrounding transport

infrastructure (including the Strategic Road Network) would need careful consideration.

### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

As the Agency identified in the Stockton Core Strategy Issues and Options review, the Agency's key strategic objectives are:

- Reducing congestion and improving reliability
- Safety, improving road safety for users; and
- Sustainability, respecting the environment.

In considering the transport issues relevant to the Agency, the above provides an overview of the key issues, which effectively contribute towards a safe and efficiently operating Strategic Road Network. With regards to Yarm and Eaglescliffe, the Agency believes that a key issue is the need to provide sustainability public transport. Such provisions should be promoted as a viable alternative to the private car and made accessible to all, to ensure that the need to travel by private car is reduced. Another issue is that of commuter journeys and the impact of such on the Strategic Road Network. Given the urban structure in the region, consideration needs to be given to the linkages with surrounding areas (such as Stockton, Middlesbrough and Darlington) and in particular the commuter movements between Yarm/Eaglescliffe and these areas. Tying this together with the first point (sustainable public transport), key commuter movements should be targeted by sustainable transport provisions. In summary, the agency would support improvements to the choice of transport options in the area, so as to allow more opportunity for non-car based modes of transport to be utilised in Yarm and Eaglescliffe. Any improvements which reduce the use of the private car and in particular the reduction of a single occupancy vehicle trips are supported by the Agency.

### **What changes should be made to car parking in Yarm and Eaglescliffe?**

The Agency would like to see the management of parking facilities as a demand management tool, as it has a measurable impact on the level of trips undertaken by the private car. The Agency would wish to see national parking standards (at the least) adopted.

### **How can public transport be improved?**

The Agency would welcome public transport improvements and would wish to see focus being placed on those commuter movements to surrounding urban areas, which without a suitable public transport offer, currently require travel by private car and the use of the Strategic Road Network.

## **Individual**

### **How do you see Yarm and Eaglescliffe in 2021?**

Hopefully Yarm & Eaglescliffe will retain much of their character through to 2021. To achieve this, pressures to over develop this part of the borough should be resisted.

Despite the current talk about a mass influx of Polish migrants into old Eaglescliffe, I do not think the rest of Eaglescliffe or Yarm will change much by 2021

As long as the schools continue to perform well I don't think Yarm and Eaglescliffe will change to much.

Retain historic nature without building too much of high density housing detracting from older charm that is synonymous with Yarm. I want the green belt land around it remaining so that it does not become an increasingly urban sprawl. It would be nice to see that river used for water sports and recreation. More seating/planting along the riverside.

Hopefully it will remain a predominantly pleasant residential area but I am concerned about the amount of late night drinking venues operating. We now have taxis driving along Yarm Road well into the early hours. Also it seems to me that every night we hear police or Ambulance services racing into Yarm.

### **The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

I do think that the boundary should extend so that Yarm meets Ingleby Barwick. Green space between the two area is vital.

The urge to extend the built up areas, not only in Yarm and Eaglescliffe but also across the borough, into open spaces should be resisted. The value of our green wedges and parks to the local community should be fully recognised and these areas given far more protection. Further, with the impending threats of global warming, energy shortages, the spread of instability/conflict and other issues the importance of an inhouse food production capability should be accepted and the farming community and lands, supported and protected. I support the facilities at Preston Park but feel the heritage park should extend along the Tees corridor from the centre of Stockton to the borough boundary.

Yarm and Eaglescliffe Area Action Plan does it refer to Kirklevington a rural settlement or is it about Yarm and Eaglescliffe. If it does not include Kirklevington then why is The Tall Trees mentioned as that is in Kirklevington not Yarm. Yarm should stop at Green Lane as should urban sprawl, farmland should be protected both for the people of Kirklevington and Yarm and future generations. Councillors should treat wildlife corridors as grade 1 plus listed buildings. All protection for strategic policies concerning BAP issues should be strengthened. The needs of local people and their environment should be the over riding issue.

### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

To develop the area as a tourism destination, there is a need to improve the facilities in Preston Park. Potential for major golf competitions at Eaglescliffe.

Access to the River Tees by the public for leisure- the Friarage area is an ideal location. If the School moves, this will be the last chance to give the public a nice river side walk and access to the river. Act now and many facilities could be provided i.e. car parking, toilet facilities, visitor info, health centre provide walking access from Yarm to Levensdale Est via River.

As it is we have enough antisocial problems without the hotels in Eaglescliffe, we do not want coach parties full of tourists driving through. The area is predominately residential.

Activities on the river. More emphasis of its history as the major port on Teesside with information regarding this in tourist office. River trips pointing out areas of local industry that used it as a port. Any relevance to the first railway (develop a mini railway along the original line)

The traditional market town image of Yarm should be protected and enhanced by careful selective and sympathetic development. Preston park is



already a popular tourist attraction across the Region and its successful mix of features should be built upon. The park gives access to the river and Teesside Princess. It is used as a venue for both internal and external organised events. Both of the above and other facilities across the borough are linked by the river and the heritage park. Consider a Park and Ride scheme which could involve a combination of road and river transport between these and other visitor attractions. The proposed foot bridge between Preston Park and Ingleby Barwick will also improve accessibility to the park and extend the footpath network. This would also enable the Roman Villa site, in Ingleby Barwick to be included in the Preston Park Experience.

Do not want the area to develop as a tourist destination. It is primarily residential.

#### **What other tourism facilities should be promoted and where?**

Would like to see the proposed golf club at the south side of Yarm as this will maintain the green wedge there. It would be good to see other major sporting events in the local area.

It could be possible to provide a river side footpath through Eaglescliffe Golf course so to provide a walk from Yarm to Preston Park.

The shuttle bus route between Stockton Centre and Preston should travel over as much of the original Stockton & Darlington Railway track bed as is still possible.

#### **What type of housing will be needed over the coming years?**

Housing should not be built just for the sake of it or to generate a desire to relocate to an area which is temporarily seen as more desirable, often because someone's existing home is in an area which has either been over-developed or allowed to go into decline. The council should investigate the genuine housing needs of the community and only permit new development which substantially meets these requirements. Those seeking new homes should determine the most appropriate house type and the existing local residents should decide the suitability of any proposed location. The Community not the developer should be the driver for new house building.

As technology makes giant strides there is going to be a huge demand for homes with the latest gadgetry. It has also become obvious that apartment living now has a huge appeal.

Would imagine we will need more self-contained flats for the elderly. As those people who live in Eaglescliffe get older and cannot cope with large houses but do not want to move out of Eaglescliffe.

A variety of housing but not to increase the density that is there already. More bungalows for the ageing population perhaps so that people who have lived in the area a long time so do not have to move out to other places.

More of every type of housing is required.

#### **Where should new residential development be situated?**

Stop knocking down houses and building in back gardens in residential areas i.e. Yarm/Leven Road.

Residential development is preferred on brown field sites

The Council should buy the historic buildings, structures and features to be preserved.

Much of the housing development that has taken place within the borough and elsewhere, over the last 12 to 15 years appears to have been driven by the developers desire to make quick short term profit rather than the long term needs to the local community.

Greenfield and back garden development should not be permitted whilst there are genuine Brownfield sites or existing housing areas in need of refurbishment.

The council should not limit its assessment of locations suitable for development just to within the borough boundary, but should also consider the merits of other potential developments in adjoining boroughs as these also form part of the wider community.

#### **How can Yarm's role as a commercial centre be strengthened?**

Bring back the market to Yarm. Parking would be a problem but this needs to be addressed anyway. It would be nice if Yarm's Shops have rents and rates that make it possible for smaller speciality shops to survive rather than fail due to cash flow problems. Increased car parking but not at a charge.

More car parking spaces is needed. Keep it free of charge. Good transport links are important.

Keep residential properties in Yarm High Street. Essential to protect green areas as not many left. Car parking provided on non green land i.e. rear of Yarm High Street/Campbell's Old Garage.

Better car parking facilities required.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Save all listed buildings, don't allow new housing to be built in gardens.

If Eaglescliffe Station is to become a significant holt on the London route it could do with a revamp as it currently looks old and uninviting.

Eaglescliffe Station could defiantly do with a re-vamp. Other than that, cannot think of any historic buildings worthy of consideration.

Planners need to protect the historic buildings. E.g. the house on Leven Road which is going for planning approval for demolition and 5 new houses built. It would be detrimental to the area if the property was demolished. Historic nature of the area must be maintained.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

In Yarm, large lorries park on yellow lines such that only one direction traffic is possible. This ensures the majority of hold-ups.

Finding parking spaces in Yarm High Street can be a nightmare. The delivery vehicles appear to be getting bigger and show no consideration in where they decide to park.

It would be helpful if large vehicles could be diverted around the town via A19 & A66, obviously not feasible if these vehicles are delivering to Yarm. Concern is traffic cutting through Yarm.

Traffic is bad at peak times

Parking at Eaglescliffe also needs improved.

### **What changes should be made to car parking in Yarm and Eaglescliffe?**

The bus lane to Yarm should be removed. If the school did relocate, the area could be used for more parking.

A review of parking (including disabled) is required.

Cannot see car ownership decreasing so we are obviously going to need more car parks.

Parking at Eaglescliffe also needs improvement.

If Yarm school moves could some of this space be used for extra parking. 2 hour parking works well. Parking for people with disabilities is important.

### **How can public transport be improved?**

Public transport could be improved by making it free of charge.

There is a need for a taxi rank at Yarm Station

Public transport needs to be safer, more comfortable and more reliable.

Need to provide better public transport. Bus lanes would slow the traffic down more (unless roads widened). Park and Ride would be useful but may need to be from various areas e.g. north (Durham Lane), east (Layfield/Leven Park, West (Yarm Station), South (Somerfield).

### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

There is a problem with vehicles driving too fast in the area, especially for pedestrians and cyclists.

Cyclists- large lorries, not enough cycle lanes. A cycle path all the way around Yarm would be useful.

Pedestrian- badly maintained footpaths/more crossings needed.

Yarm bridge can be a problem with both residents and cyclists attempting to use the narrow footpaths at the same time. Perhaps there may be scope to build a separate footbridge alongside the road bridge

For Pedestrians, the cobbles in Yarm High Street are a danger. For cyclists I would imagine the fumes from buses and cars are unpleasant.

Cyclists that use the pavement and not the road cause a nuisance to pedestrians.

### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

Yarm could do with a park along the lines of Preston Park. The kids seem to want a skateboard park.

Open space is sufficient with Preston Park and the Golf Course plus the driving range at Yarm.

Yarm has very few green spaces, The Meadowings, the field on the Leven Park Estate and Snaiths Field are the only ones. These must be preserved. Improving the Meadowings is money well spent. Due to the ever-increasing residential building, I feel it is essential that Leven Park and Snaiths field are protected for local people. More sporting facilities (swimming pool). Like to see more open space.

Preston Park could do with a bigger Café/restaurant.

Areas for sport are limited/ not many flat areas. No park with football, cricket, tennis areas. Allotments should be protected.

### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

Good toilet facilities are essential. Could they be attached to Tourist office. Swimming pool would be appreciated.

If Yarm had a park, it should be sports oriented to promote a healthier lifestyle. It could have a running and cycling track and facilities for athletics events.

Facilities for sports/games limited. Use of existing facilities at Friarage to be made available to public. Toilets are a disgrace. Allotments to be retained

There should be more to stimulate children's minds. A roundabout, some swings and a few animals do seem to constitute under use of the facility. Appears to be a need for a skateboard park.

### **What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

The news that a Polish company is trying to buy up large properties in Eaglescliffe to be used as hostels for their workers should be discouraged.

Sportsman's pub (Eaglescliffe) should be demolished to make way for an overflow car park for the station. The pub then relocated within Preston Park, which would be commercially beneficial to both. Tees-side High School needs to be a purpose built site somewhere then we could have an exclusive residential area instead of the school, similar to Egglecliffe Village Green area only with the benefit of a riverside setting

All development should keep in with the historic character of Yarm. Development which gives local people employment would be appreciated and more appropriate shops.

Residential development should be encouraged commercial development should be discouraged. A lot of the commercial ventures do not have enough parking causing congestion on the streets.

### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

No residential, shopping developments outside the boundary outlined on the map. Light industrial employment next to Allen's West Station i.e. new shops, businesses located on the first floors of the high street buildings/other existing buildings. Shops on the site of Cambell's Garage.

Everything should be looked at on its own merit. It does seem though that Yarm high Street has reached saturation point though.

### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

Could Stockton not look to Newcastle as a role model. The planners there seem to have done a great job getting it right in terms of the siting of residential and commercial development.

New homes that are built should be environmentally friendly.

## **JG (Eaglescliffe) Ltd C/O Sanderson Weatherall**

### **How do you see Yarm and Eaglescliffe in 2021?**

Yarm and Eaglescliffe will maintain and improve upon its status as one of the best places to live in Teesside, with its reputation underpinned by improving access to public transport, sustainable residential development on sites where a variety of homes can be made available to all members

of society. The area is as much (if not more) about the people who live there as it is about the physical environment. The community that live in Yarm and Eaglescliffe is exceptionally strong. In order to strengthen and build this community cohesion; affordability of housing is essential to ensure the area does not become a commuter town for the affluent. Much needed affordable housing should be allocated to support the needs of the local area. Furthermore, as the population ages there will also be a requirement to provide for the needs of elderly including sheltered accommodation and care homes.

In addition it will be important to retain the improve employment opportunities. Investment in the existing stock of older industrial accommodation and increasing the potential for development of new offices buildings in sustainable locations around existing transport networks will also make Yarm and Eaglescliffe not only one of the best places to live but also one of the best places to work.

Such mixed-use developments will need to be supported by improved local facilities and access to public transport to ensure that they occur in a sustainable fashion.

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

Attached is a plan showing what we consider is the built up area of Yarm and Eaglescliffe. This has been prepared taking into account existing development and, as far as possible, used physical characteristics to define the boundaries. Any expansion of the boundary is likely to incorporate land that is Greenfield and/or agricultural much of which is within the valley of the River Tees and may be subject to flooding. Expansion of the boundary would also lead to urban sprawl and coalescence of built up areas, which would erode the unique nature of the area.

Priority for new development within the Action Plan should be focused upon previously developed land at sustainable locations with access to sustainable methods of transportation. The opportunity to achieve the Vision set out in Q1; within the built-up area shown on the plan; with sites that fulfil all these criteria is very limited. It will be essential therefore that when such sites do come forward then their redevelopment potential is fully maximised.

Allen's West, is a site located within the built-up area, which seeks to capitalise on its excellent communications, sustainability particulars and can offer mixed use development of Brownfield land.

**How could Yarm and Eaglescliffe be developed as tourist destinations?**

The development of tourist locations is dependent upon a reason to visit and an ability to visit. The attractions exist in the form of historic market town of Yarm, Preston Park and Museum, the River Tees and Stockton-Darlington railway heritage. Accessibility to these attractions would help in the development of the area as a tourist destination. The alleviation of traffic problems in Yarm town centre would be a positive benefit in this regard. Encouraging the use of local railway stations would both assist traffic reduction in Yarm and help promote rail heritage.

**What type of housing will be needed over the coming years?**

Households are becoming smaller and the population is getting older. Consequently, there will be a need to provide more one and two bedroom homes and those suited to the elderly in order to respond effectively to this changing demographic. This will have a detrimental effect on the make-up of the community with young people on low incomes being forced away and elderly people stuck in accommodation unsuitable for their needs as they will be unable to afford to move.

**Where should new residential development be situated?**

The boundary drawn in response to Q2 means that there are few opportunities to deliver the areas housing needs to 2021. Whilst some infill development will occur much of this will be of a size that will not require any affordable provision and therefore will not address the housing needs set out in Q5. Any substantive new development needs to be situated in sustainable urban locations upon brownfield land with good access to the public transport system and close to local facilities.

Allen's West is the only location which can fulfil all of these criteria and provide a full range of homes catering for all the area's needs.

**How can Yarm's role as a commercial centre be strengthened?**

The area needs to support its existing businesses whilst seeking new inward investment. The support of existing businesses is especially important given the competition of new inward investment not only nationally but locally elsewhere within the region. There is a lot of available employment land in the region much of which is better located than that around Yarm and Eaglescliffe. Therefore, it is essential not to undermine those existing companies, as once they have been lost to the area they will be difficult to replace.

It is important that we retain those buildings that form part of our heritage. To ensure this occurs we need to find uses for them that will guarantee their future. Should this be unviable to achieve independently, then enabling development can release funds to achieve this objective.

**What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

A significant amount of consultation and data collection has been undertaken in relation to the Allen's West proposal. This identified the following concerns regarding traffic in the area:-

- Peak hour queuing along Durham Road
- Congestion through Yarm centre
- Limited peak hour queuing off the A66 at Durham Lane junction
- HGV travelling through Yarm centre
- Poor utilisation of public transport

These investigations also showed that the majority of local people worked outside the area. The easiest solution to traffic congestion is to remove the need to travel by car. It is therefore essential to ensure that local commerce is retained as much as possible so as not to exacerbate traffic congestion further and that future development is sustainable by providing facilities locally thereby reducing the need to travel and making the best use of public transport potential.

### **What changes should be made to car parking in Yarm and Eaglescliffe?**

There are no easy solutions to tackling Yarm's parking congestion problems with numerous stakeholders each holding their own views. It is suggested that the best way to bring about a consensus in how to tackle the issues would be to hold a working party of relevant parties to discuss and agree the best way forward.

Issues of parking and congestion in Yarm could also be tackled by improving local public transport, cycle and footpath provision in Yarm could also be tackled by improving public transport, cycle and footpath provision to try and encourage alternative means of travel.

### **How can public transport be improved?**

Public transport should offer a frequent, accessible and reliable service which encompasses the travel needs of potential users. Achieving this objective often requires significant investment in bus shelters, real time information, easy parking at stations, increased frequency of service, etc. This investment may be secured in part from new development in the area; however reducing the need to travel should be the underlying aim through the dispersion of local facilities away from congested centres, and the location of new development close to existing bus and rail links.

### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

The results of the public consultation exercise referred to in Q9 revealed that cyclists and pedestrians are very much in the minority compared to car drivers and car passengers. This would suggest that there may be a current lack of facilities, or that footpath/footway and cycleway continuity is poor.

### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

It is essential that new development is planned and of a size to be able to provide further open space as part of a comprehensive scheme.

### **Could access to open spaces be improved?**

In addition to improving links to existing public open space, new development of a suitable scale can be planned to provide access to both new and existing open space, such as it is proposed as part of the Allen's West Masterplan.

### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

Whilst it is always preferable to have more recreation facilities the existing stock of is considered acceptable however some improvements could be made to ensure that they can be more fully used over a longer period.

### **What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

Additional Housing, including affordable housing in accordance with the national planning policy. Employment development, care home provision, local convenience store, doctors surgery within Eaglescliffe would be appropriate, and could be provided through the Allen's West proposal. Small Scale piecemeal development should be discouraged by comparison, as it will not achieve development led investment in local facilities.

### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Any new development should be located upon previously developed land within the existing boundaries in areas which are highly accessible by public transport.

New development should not be encouraged in less sustainable areas outside of settlement boundaries and be concentrated within locations which positively encourage patronage of public transport. New locations should be outside of areas of flood risk, not impact adversely upon ecology and be able to be assimilated within an existing urban framework. The delivery of key benefits to the communities of Yarm and Eaglescliffe are also a critical factor including the provision of much needed affordable housing, key services such as a doctors surgery and care homes for the elderly. Furthermore key developments should also be supported if the outcome is the improvement of older building stock or securing the future of historic buildings.

### **Are there any other key issues you feel should be considered in preparing the YEAPP?**

The YEAPP should make specific land use allocations to ensure the best use of public transport facilities, the redevelopment of Brownfield land, at a scale to secure the provision of benefits to the local community and support of existing commercial developments.

It is recommended that the land shown on the attached plan be specifically allocated for residential led mixed-use developments in order to secure these and other benefits.

## **Kirkleavington Property Co C/O Peacock & Smith**

### **How do you see Yarm and Eaglescliffe in 2021?**

With particular reference to Yarm, the respondents see the town as a prosperous and sustainable location in which to live and work. New housing has been promoted in sustainable locations close to the town centre, from which new residents have ease of access to a range of shopping, service and leisure facilities. Additional car parking facilities have been provided which have had the effect of reducing congestion and enhancing the pedestrian environment, with the consequence that conditions for business operation and growth have improved. These benefits have been achieved in part by adopting a more balanced and less restrictive approach towards policies which apply to areas around the town centre, i.e. including within the currently defined Green Wedge which extends along the River Tees to the north of the centre.

In this respect,

[a] limited residential development on the previously developed Tannery site has been accommodated without harming the intrinsic functions of the green Wedge,

[b] associated improvements to pedestrian routes and the provision of additional areas of high quality and safe public open space have significantly enhanced the amenity of the area and the enjoyment of those who use it,

[c] the setting of the listed viaduct has been significantly improved, and

[d] related enabling development has included improved, safer pedestrian access and car parking facilities for those wishing to visit the town centre.

### **The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn?**

### **Are there any particular places that should or should not be included?**

All the area on the north side of the river to the west of the road bridge and south of Tanners Bank to the edge of the built up area should be

included within the AAP boundary. See attached plan which shows the general location of the area referred to edged red.

#### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

The development of Yarm as a tourist destination should be addressed through measures that reduce the emphasis placed on the night-time economy, and which concentrate instead on maximising the potential of the town centre and related recreational assets throughout the day. As indicated in the response to Question 1 above, the required package of measures should include the provision of additional car parking together with enhanced pedestrian routes and additional areas of public open space on the north bank of the Tees, possible including toilet facilities and visitor information, funded in part through enabling development in the form of limited residential development on the previously developed Tannery Site.

#### **What other tourism facilities should be promoted and where?**

A package of measures linked to the development of the former Tannery site could include the re-introduction of a slipway to the River Tees, thereby providing a direct means of access to water borne recreation.

#### **What type of housing will be needed over the coming years?**

A mix of housing types, sizes and tenures will be required in order to meet the future needs of all sectors of the community, including well designed family accommodation in highly sustainable locations, well related to the town centre.

#### **Where should new residential development be situated?**

New residential development of an appropriate size, scale, form and design can be successfully introduced onto the former Tannery site in a manner which does not harm the objectives of relevant protection policies, and which [as indicated above] will deliver significant community benefits in terms of facilities for leisure, recreation and tourism; car parking and access to the town centre; the enhancement of the riverside area, and improvements to the setting of the listed viaduct

#### **How can Yarm's role as a commercial centre be strengthened?**

As indicated in the response to Question 1, the provision of additional car parking facilities in the vicinity of the former Tannery site will have the effect of reducing congestion and enhancing the pedestrian environment within the town centre, with the consequence that conditions for business operation and growth can be significantly improved. In addition, by introducing environmental improvements and enhanced leisure and recreational facilities along the north bank of the river, emphasis on the centre as a day time destination will be improved, providing an improved balance, away from that which currently tends to over emphasise the night time economy. As a result, the attractiveness of the centre will be improved, with consequent benefits for the strength of the commercial centre as a whole.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

As indicated in the responses to the previous questions, the fabric of the listed railway viaduct is currently being damaged as a result of direct vandalism, whilst its setting is harmed as a result of the appearance and condition of the former Tannery site and the lack of maintenance and care of other immediately adjacent areas along the river frontage. Those positions can be reversed as a result of the measures that can be implemented as a consequence of the redevelopment of the Tannery site for residential purposes, i.e. through the redevelopment of the site itself in a sensitive manner; the physical improvement of the river frontage; the enhancement of public access and facilities and the resultant 'self policing' that will occur as a result of increased levels of such access.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

The respondents consider that the lack of adequate car parking in and adjacent to Yarm town centre as a key issue, which has implications for the strength of the commercial centre and its attractiveness as a day time tourist and leisure destination. The redevelopment of the former Tannery site for residential purposes could play a pivotal role in facilitating the provision of additional parking facilities in a location immediately adjacent to the central area, i.e. as indicated in the responses to questions 1, 3 and 7 above.

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

Congestion caused in part by inadequate and poorly located car parking facilities means that the pedestrian environment in and around the town centre is unattractive and unacceptable. The provision of additional parking facilities [as outlined in the responses to the previous questions] will have the effect of reducing congestion, thereby improving conditions for pedestrians in and around the town centre.

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

As indicated above, additional areas of high quality public open space in the vicinity of the former Tannery site on the northern bank of the River Tees would enhance the quality and safety of the existing pedestrian route; provide additional facilities along the river frontage, and improve the leisure and recreational offer of the town, in a location close to its central area. Such necessary and valuable provision can be achieved in conjunction with the redevelopment of the former Tannery site with new housing.

#### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

New residential development of an appropriate size, scale, form and design should be encouraged on the former Tannery site, in a manner which does not harm the objectives of relevant protection policies. As indicated above, the Respondents will seek to identify a development package that will deliver significant community benefits in terms of facilities for leisure, recreation and tourism; car parking and access to the town centre; the enhancement of the riverside area, and improvements to the setting of the listed viaduct.

### **Nathaniel Lichfield and Partners**

#### **What other tourism facilities should be promoted and where?**

Paragraph 11.2 of the Issues and Options Report states that "access to rural leisure opportunities is limited, and the river is not used to its full potential". The River Tees is a most important and unique resource and its leisure usage should be maximised. Part of green wedge to the east of Yarm could therefore be used to accommodate community uses to increase access to and enjoyment of the river. We recognise that the green wedge is subject to a set of restrictive policies designed to maintain the open, rural character. However, we consider there could be scope for a sensitive community development within this area.

#### **What type of housing will be needed over the coming years?**

We consider it is important that a range of house types is provided in Yarm and Eaglescliffe area to ensure a sustainable community. We recognise that a number of apartment schemes have been granted planning permission recently. Accordingly we consider it is also important that high quality

houses with gardens are also provided to deliver accommodation for families, ensuring a diverse and balanced housing stock.

#### **Where should new residential development be situated?**

In accordance with PPS3, the focus for new development should be on sites within the urban environment. This area contains many sensitive locations/features including conservation areas and listed buildings. Accordingly, any new residential development must be sensitively located to ensure the character and appearance of the area is respected and that any locations, buildings/ features of historical importance are protected and enhanced as required by PPG15.

Subject to a sensitive design and appropriate location, we consider that infill sites and large garden areas comprise a suitable location for such development. We also support this statement within the Egglecliffe Conservation Area Appraisal that the parcels of land that form part of the farm yard to the east of the conservation area could accommodate some sensitively designed built development.

New residential developments should be suited on sites which are fully accessible to the public transportation network and within walking distance of local facilities. This is to ensure the delivery of a sustainable development in accordance with PPS3 and PPG13. Furthermore, in accordance with PPS25, consideration must be given to the risk of a site flooding and the sequential test, with new development being focused away from the floodplain unless exceptional circumstances exist.

#### **What type of development should be encouraged in Yarm and Egglecliffe? What should be discouraged?**

We consider that residential and community uses should be encouraged within the area. We particularly support paragraph 11.7.2 of the YEAAP which recognises that “some development is inevitable” and that it should be encouraged otherwise places will stagnate, but it should be done sensitively to reduce the impact of change”.

#### **Where should development in Yarm and Egglecliffe be encouraged? Where should it be discouraged?**

As previously stated, we consider that residential development should be encouraged in sustainable locations in the urban environment to infill sites within large back gardens, together with parcels of land that form part of the farm yard to the east of the Egglecliffe Conservation Area and that community development should be encouraged within the green wedge to the east of the River Tees to maximise usage of the River.

### **Natural England**

#### **How do you see Yarm and Egglecliffe in 2021?**

The vision for 2021 needs to consider the environmental issues in the area, and lead onto the development of natural environmental objectives.

#### **How could Yarm and Egglecliffe be developed as tourist destinations?**

Need to encourage sustainable tourism – access by modes other than the car – encourage walking, cycling, riding and use of public transport. Encourage recreation use of the surrounding countryside, the river corridor and the Tees Forest. Create, develop and enhance the green infrastructure network – encourage positive use of the open space areas in and around towns, by creating networks of new and improved parks, woodlands and other green spaces, which are linked to the urban areas and the wider countryside by footpaths, bridleways and cycleways. Consider opportunities for interpretation and understanding of the natural environment.

#### **How can public transport be improved?**

Ensure that any new development dovetails with public transport accessibility and/or ensure provision of new public transport infrastructure within new developments.

#### **What are the main issues for pedestrians and cyclists in Yarm and Egglecliffe?**

Need to safeguard the existing network of public rights of way and encourage the creation/expansion of the network through development proposals.

#### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

The AAP needs to include a section/policies on the natural environment and surrounding countryside, covering such issues as landscape character, biodiversity and geodiversity, protected species, woodlands etc. In particular, the AAP should support the implementation of Tees Forest plan, and conservation and enhancement of BAP priority habitats such as wet woodlands which are present within the map area provided.

### **North East Assembly**

#### **How do you see Yarm and Egglecliffe in 2021?**

With regards to the vision of the area action plan, the NEA would like to see reference to the objectives of policies 5, 7, 8 and 24 of the Regional Spatial Strategy (RSS) proposed changes in the preferred options policy.

In the context of the regional locational strategy, and hierarchy of centres, Yarm and Egglecliffe are not listed, and can therefore be classed as secondary centres. In policy 8 of the RSS proposed changes, local development frameworks are directed to identify an appropriate scale of development that is sufficient to sustain settlements and a vibrant rural economy. The council should ensure that the position of these centres is reflected in the vision and development strategy, in the area action plan. RSS proposed changes policy 8 provides further detailed guidance on some of the key issues facing the rural areas of the region, which should be addressed through local development frameworks, and taken into consideration when formulating the policies for this area action plan. These include providing a positive framework for the development of a range of employment uses; improving the provision of rural service infrastructure; and addressing affordable housing problems.

Policy 5 of the RSS proposed changes, directs strategies to support and incorporate the locational strategy, to maximise the assets and opportunities in the North East and to regenerate areas affected by social, economic and environmental problems. It particularly advocates the importance of supporting the development and redevelopment of the Tees Valley city region by concentrating development within the core areas and the main settlements. It is therefore important that the level of development proposed in Yarm and Egglecliffe is appropriate in the context of the objectives for the Tees Valley city region.

Policy 7 of the RSS proposed changes, directs strategies to support the development of the Tees Valley city region by ensuring that the strategic gaps continue to maintain the separate identity of settlements in the Tees Valley by preventing them from coalescing and by preventing urban sprawl. It further states strategic gaps should be identified between Thornaby/Stockton/Yarm/Billingham and the surrounding towns and villages and

The objectives of policy 24 of the RSS proposed changes, aim to deliver sustainable communities, by providing a mix of type, size, tenure and affordable, high quality decent homes; focusing all types of service development. Stockton-on-Tees Borough Council should therefore incorporate these objectives into their preferred options vision and development strategy as appropriate.

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

Policies in relation to tourism and culture in the preferred options report, will need to be in line with the principles of policy 16 of the RSS proposed changes and policy TOUR1 of RPG1. Policy 16 of the RSS proposed changes, requires strategies and plans to promote culture and tourism by; improving the first impressions gained by visitors arriving and passing through the region; promoting and enhancing culture, sports, leisure and tourist facilities and developments; ensuring tourist and cultural facilities are carried out in a sustainable manner; and are accessible by a range of transport modes. These objectives are also highlighted in policy TOUR1 of RPG1. The NEA would therefore support the inclusion of policies that reflect these regional planning policy objectives.

**What type of housing will be needed over the coming years?**

The NEA would like to see the inclusion of policies that reflect the objectives of policies 30 and 32 of the RSS proposed changes, and policy H1 of RPG1.

Policy 30 of the RSS proposed changes establishes district allocations for each of the local authorities. Any dwelling provision in Yarm and Eaglescliffe should be in accordance with the level of provision proposed for the district of Stockton, and take into account the regional locational strategy, which directs the majority of development to the conurbations and main centres. Therefore, housing development in Yarm and Eaglescliffe should be consistent with the scale and function of these centres.

RSS proposed changes policies 3, 24 and 30 also prioritise the re-use of previously developed land. The objectives of these policies should be reflected in identifying potential sites for housing development.

Policy 32 of the RSS proposed changes advocates a range of dwelling types, sizes and tenures to meet the needs of all sectors of the community. It further states that housing should be well served by public transport and is accessible to jobs and services. The need to address affordable housing where there is an identified need is also reflected in RPG1 policy H7.

Policy H1 of RPG1 directs strategies to support initiatives; mechanisms and resources that improve both public and private sector housing. Furthermore, priority should be given to making best use of existing dwellings and previously developed land and buildings in urban areas in order to minimise the need to develop new housing on Greenfield sites.

**How can Yarm's role as a commercial centre be strengthened?**

Policy 25 of the RSS proposed changes, directs development plans to ensure that the development of retail, commerce, leisure, recreation facilities and public services within rural and urban centres, are consistent with their scale and function in order to maintain and enhance their health and vitality. It further states that development in centres should contribute to the creation of sustainable communities and be in harmony with the built environment. The NEA would therefore like to see the incorporation of these measures in the emerging policies in the area action plan.

**How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

RPG1 policies ENV17, ENV19, and ENV20, and RSS proposed changes policy 34 provide the regional planning policy objectives for the historic environment. The objectives of these policies should be taken into account in developing the policies for the preservation and enhancement of Yarm and Eaglescliffe's historic buildings, structures, and features. A summary of these policies is provided below.

Policy 34 of the RSS proposed changes advocates the protection and the conservation of the historic environment via the refurbishment and re-use of disused or under-used buildings; preserving sites and archaeological sites of national and regional importance. This is also highlighted in policy ENV14 of RPG1. Policy ENV17 of RPG1 directs strategies to protect and enhance the character of historic settlements or individual sites, and provide for necessary development in locations that do not adversely affect their character. Policy ENV19 of RPG1 promotes the protection of listed buildings, their settings and any features of special architectural or historic interest, and to strongly resist the demolition of listed buildings. Policy ENV 20 of RPG1 requires development plans and strategies to take into account the initiatives and priorities of English Heritage and other conservation bodies in the region. Stockton-on-Tees Borough Council should therefore aim to incorporate these objectives into their preferred options report as far as possible.

**What changes should be made to car parking in Yarm and Eaglescliffe?**

In terms of car parking, the NEA would like to see reference to the objectives of policy T12 and T13 of RPG1. Policy T12 requires development plans to promote the use alternative methods of transport to using the car and to be in accordance with maximum standards, as set out in PPG13. Policy T13 of RPG1 seeks to reduce car dependency and states car parking provision should support the retail and commercial functions, and priority should be given to short-stay parking for visitors.

**How can public transport be improved?**

With regards to public transport, policy T5 of RPG1 encourages the use of public transport by ensuring that new developments and redevelopments are located and designed to assist public transport provision; facilitate better integration of public transport; introduce new public transport services; and to make public transport accessible to all. Furthermore, policy T8 of RPG1 seeks to ensure that bus services provide an attractive alternative to the car and are as effective as possible in meeting transport needs, by developing partnerships with transport operators to improve all aspects of bus travel. These objectives are also highlighted in policy 51 of the RSS proposed changes.

**What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

In terms of walking and cycling facilities, policy T14 of RPG1 advocates the implementation of developments that promote walking and cycling by; introducing measures to improve the safety, security of walking and cycling and introducing the use of travel plans by schools and employers. The NEA would therefore like to see RPG1 policies T5, T8, T10, T12, T13 and T14, reflected in the preferred options document.

### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

With regard to the provision of open spaces, the council should take into consideration the objectives of policy ENV10 of RPG1, which requires development plans to protect land that serves as a strategic function from unnecessary development; to ensure that the strategic role of open spaces is maintained and to enhance and identify areas of open land, which are not formally open spaces.

### **Could access to open spaces be improved?**

The RSS proposed changes policies 2 and 6 promote the concept of green infrastructure; a network of multifunctional green spaces in and around the region's towns and cities. This objective should be reflected in the area action plan.

### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

In relation to recreational facilities, the NEA would like to see the inclusion of policies that make reference to policy SR1, SR2, SR3, SR4, SR5 and SR6 of RPG1. These policies require development plans to ensure that recreational and sports facilities are accessible to all sections of the community and are accessible by non-car transport modes. Policy T2 of RPG1 directs development plans to ensure that the design of new developments, facilitate safe and convenient movements by all modes of transport, in particular cycling and walking. This is also highlighted in policy T14.

## **North of England Civic Trust**

### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Area-specific Management Strategies for the 3 CAs (i.e.. more detailed than that in the Conservation & Historic Environment Folder) would provide invaluable focus for protecting detail in the CAs. The boundaries of the CAs should be reviewed at the same time. 2. Implementing a Local List would be very worthwhile but it can only be truly effective if it is backed up by policy as part of the LDF. If resources are tight it could be worth considering the YEAAP area as a pilot for the rest of the borough, or local people and amenity groups could be invited to carry out much of the survey work with appropriate guidance and training. 3. Capitalising on civic pride can help with protecting at-risk features. Ensuring there is sufficient understanding about significance amongst decision-makers, local people and prospective developers can avoid misguided actions which lose vital features. This is more than glossy leaflets, and involves a rooted understanding of the value of conservation in place-making and environmental protection. 4. The Council should be bold about the use of Article 4 Directions where there is evidence of harm from incremental change that control would stem. 5. This is usually more successful if it is coupled with incentives such as grant aid. Consideration should be given to opportunities for grant funding for parts of the YEAAP area where it could deal with the 'conservation deficit' of developing in and around the CAs, or could encourage householders to carry out works in sympathy with local character.

## **Northumbrian Water Ltd C/O England and Lyle**

### **General comments/specific comments relating to the Issues and Options Report**

In para 1.2: support the statement 'The YEAAP can help the area meet the potential it clearly has by ensuring that investment occurs in a comprehensive and coordinated way without harming the appeal of the area'. The Company would request that the phasing of future development in his part of the borough is commensurate to any necessary improvement and reinforcement of existing water and sewage infrastructure in the AAP as a result of the development.

Depending on the scale of future development in the Area Action Plan, NWL would inform that Council may be a requirement for infrastructure reinforcement works to be carried out. For example, all of the pumping stations in this part of Stockton could be a limiting factor, particularly if the Company were not aware of the location of development until the application stage.

NWL would therefore request and encourage early consultation with the Council on the location of these future developments and the relationship of their phasing with water and sewage infrastructure reinforcement. Such development trends as part of its investment planning exercise. For example, the Company would express a potential concern if current patterns of intensification of residential development (medium to high density apartments) along the River Tees was to be a preferred policy approach.

### **Where should new residential development be situated?**

Wherever future development is to be located in the AAP area, NWL would request that explicit reference is made to Sustainable Urban Drainage and the water efficiency and conservation measures. This would include specific reference to BREEAM Standards, including sustainable methods of heating water in homes. Example wording to address this would include "All buildings are to be energy and water efficient." And/or "Sustainable drainage systems will be used."

## **One North East**

### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

Tourism and visitor facilities - the Agency concurs with the issues set out in this section. However, we suggest that the distinctive retail and food/drink offer currently emerging in Yarm should be included as an option. The benefit to the visitor economy from such an offer can be significant.

### **How can public transport be improved?**

It is considered that improvements to Eaglescliffe station to provide better public transport facilities should be included as an issue.

## **Tees Archaeology**

### **How do you see Yarm and Eaglescliffe in 2021?**

As a mature town and suburb which retains as much of its historic character as possible with sympathetic development complementing what exists.

### **The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

I think the limits to development should not extend south of the B1264/A1044. Also the open riverside landscapes to the south of Egglecliffe and east of Eaglescliffe should be maintained.

### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

The historic character of the area should have a high profile, including the 13th century medieval market town of Yarm and the industrial remains such as the line



of the Stockton and Darlington Railway.

**How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Positive stewardship by the Local Authority and community. Possible inclusion on Local List.

**What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

The area is currently under threat from 'garden grabbing' where mature houses in their own grounds are demolished to make way for more intensive developments. This is not appropriate for the area as it will erode the character and social hierarchy of the settlement.

**Are there any other key issues you feel should be considered in preparing the YEAAP?**

Some time ago we developed a statement for the remains of the Stockton and Darlington Railway. I attach a copy of this and wonder if it can worked into the YEAPP.

**The Garden History Society**

**General comments/specific comments relating to the Issues and Options Report**

The Garden History Society believes that the importance of parks, gardens and landscapes should be recognised and support by the inclusion of policies for their protection in local plans. They request the retention of existing policies, or inclusion of new policies, to reflect the importance of sites of both national and local historic interest. Under PPG15 (2.26) local planning authorities have a significant role in the conservation of wider historic landscape and should define planning policies for the countryside taking into account the historic dimensions of the landscape. We would, therefore, argue that the protection of undesignated historic parks, gardens and landscapes is covered by this guidance and the LDF should, therefore, incorporate appropriate policies or guidance.

They would also ask that policies indicate that there is a presumption against enabling development to accord with the English Heritage Policy Statement 'Enabling Development and the Conservation of Historic Assets'.

**Ward Hadaway**

**How do you see Yarm and Eaglescliffe in 2021?**

Principal settlements in this southern part of Stockton which have retained their distinct character.

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

This response is submitted on behalf of my client Barratt Newcastle who are keen to investigate development opportunities in both Yarm and Eaglescliffe in addition to Stockton generally. Barratt Newcastle considers that sufficient land should be made available in Yarm and in turn Eaglescliffe commensurate with their status as principal settlements in this part of the District. At this stage Barratt Newcastle feel it premature to mark a boundary on plan. Rather, all options, including making re- use of underused sites should be considered and evaluated as possibilities without the constraint of having to define a boundary. There could for example be well related sites which would be appropriately re-used for say residential development purposes.

**What type of housing will be needed over the coming years?**

A full range housing across the spectrum is needed and should be facilitated by the Action Plan. In turn it is submitted that Yarm is a sustainable location for residential development acknowledging its location, range of shops, schools, services and public transport opportunities on offer.

**Where should new residential development be situated?**

In the first instance opportunities for the recycling of previously developed land in and well related to the towns should be investigated.

**How can Yarm's role as a commercial centre be strengthened?**

Amongst other things by commensurate levels of housing development and appropriate apportionment of the housing allocation between Yarm and Eaglescliffe. In this respect Barratt Newcastle submit there should be a greater focus on Yarm, the commercial centre.

**What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

Development commensurate with Yarm and Eaglescliffe's status as principal settlements in this part of the Borough should be encouraged as a matter of principle amongst other things to support Yarm's status as a commercial centre in this area.

**Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

In the first instance opportunities for the recycling of previously developed land in and well related to first Yarm and secondly Eaglescliffe should be investigated.

**Yarm & Willie Flatts Residents Group**

**How do you see Yarm and Eaglescliffe in 2021?**

Large established dwellings are being demolished and replaced with apartments or executive housing. This will change the character of the area forever.

**The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

Yarm allotments should remain as open space and be preserved for future use.

**How could Yarm and Eaglescliffe be developed as tourist destinations?**

More activities, car park, landing area for boats and more activities in Preston Park

**What type of housing will be needed over the coming years?**

Affordable and eco friendly

**Where should new residential development be situated?**

We need to preserve open space and stop building

**How can Yarm's role as a commercial centre be strengthened?**

By ensuring Yarm School stays in Yarm. Moving the school out of Yarm would have a negative impact on the High Street

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Securing sufficient funding from lottery.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

No long-term parking

#### **What changes should be made to car parking in Yarm and Eaglescliffe?**

Park and ride schemes at Preston and outskirts of Yarm should be available

#### **How can public transport be improved?**

More trips to areas such as Scarborough and Harrogate

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

Cycle lanes

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

Any available space should be allocated as green space and not built upon

#### **Could access to open spaces be improved?**

Sufficient access already in existence

#### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

Need for more recreational facilities after consultation with residents

#### **What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?**

The demolition of large dwellings should be discouraged. Affordable housing should be encouraged.

#### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Yarm has always been extensively developed and should be discouraged unless a presently untidy area could be improved by development.

### **Yarm Residents Group**

#### **How do you see Yarm and Eaglescliffe in 2021?**

Yarm will inevitably be more populous. The town should be managed to serve residents more, visitors less. At present, most residents shop outside Yarm while the shoppers in Yarm come from outside the area. This is not sustainable. Yarm is currently fashionable for niche shopping and entertainment. Fashion is fickle and its popularity could well decline. The turnover rate of retail businesses is already high and this could indicate difficulties to come. The turnover rate of retail businesses is already high and this could indicate difficulties to come. Local shopping and services need to be protected in a buoyant environment. In particular the community would probably support a reduction in nightlife provision.

What we would like to see retained in Yarm:

- Yarm to be kept as a distinct, primarily residential town with own sense of identity. Not allowed to merge into neighbouring villages.
- Infrastructure to ably serve and support the area and its population. Schools health, emergency services, utilities, transport and shops.
- Areas/features of distinctiveness and value in the town to be protected.
- Density of housing sympathetic to existing areas within Yarm; low-density areas protected.
- The parish of Yarm to be bordered by green space
- The proportion of green space within the town (communal space and private land) valued and protected.

What we would like to see improved in Yarm:

- The development of shared public recreation facilities (e.g.. Multi-purpose sports halls, swimming pools) on existing sites such as school grounds.
- Improved parking facilities in and around the town centre; reduced traffic flow through the centre.
- The protection and enhancement of the river and its banks for public recreation and enjoyment.

#### **The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Where do you think the boundary should be drawn? Are there any particular places that should or should not be included?**

Would like to see the plan cover not only the built up areas, but also the corridors of land between the built-up areas the river banks (Tees and Leven) as these undeveloped corridors may be afforded protection under the plan.

The natural environment is very much part of the quality of life in Yarm. Piecemeal development damages the quality of good habitat and unless we protect it, we will only notice the damage when we've lost the natural diversity. The parish boundary would be appropriate for Yarm.

#### **How could Yarm and Eaglescliffe be developed as tourist destinations?**

We feel that a point of general application would be usefully raised here. Yarm's infrastructure already struggles with the volume of commercial development it has to support, combined with the through traffic. Any expanded role needs to be preceded by substantial improvements to the infrastructure i.e. parking, congestion, delay and public transport. We therefore consider that it is unnecessary to develop either Yarm or Eaglescliffe as a tourist destination.

#### **What other tourism facilities should be promoted and where?**

Heritage Park on the Tees Corridor- would like to see plans extended to include the Leven down to Leven Bridge.

Small scale leisure use of the river Tees - e.g. canoeing, with protection for the rivers ecology.

#### **What type of housing will be needed over the coming years?**

Similar mix of housing as now, - would not like to see Yarm grow significantly larger or road infrastructure expanded as this would destroy the

character of Yarm. Any housing development should provide for significant proportion of genuinely affordable housing.

#### **Where should new residential development be situated?**

The major component of new residential development in the Borough should be situated on true Brownfield land, the former industrial/commercial sites in line with the Core Area. This would mean the bulk of development should be in the urban corridor of the Tees which would ensure that the Sustainability Objectives are met simultaneously for the Borough (SA1-8) and for Yarm (SA9-12,16-17). There is already an approval for considerable development of apartments on the Tall Trees Site, and also initial indications that the Yarm School sites would be used for residential development should the relocation of the schools be permitted. Neither of these significant projects are mentioned in these issues and options.

#### **How can Yarm's role as a commercial centre be strengthened?**

Niche shopping and vibrant nightlife are transient fashions, which should not be considered core to Yarm's survival and economic growth. Would like to see support given to core businesses and traders who provide essential services and products to meet the needs of residents rather than day trippers, reducing residents reliance on transport for out-of town shopping and services.

#### **How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?**

Piecemeal erosion (and the threat thereof) of the historic fabric and other areas/features of local distinctiveness is already slowly robbing the area of its appeal.

Develop a Local List, and speed up its implementation before it is too late, back it up with planning policy e.g. no demolition unless replacement demonstrably equal or better. Reconsider giving some sort of protection status to the Leven Road/River area in Yarm.

#### **What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?**

Restrict large goods vehicles through Yarm to deliveries only within certain limited time periods

Don't lower speed limits further

Purchase unused land behind High Street for Parking. Do not allow further housing development to exacerbate parking problems

#### **What changes should be made to car parking in Yarm and Eaglescliffe?**

Length of stay is generally OK, but there is not enough parking available perhaps could designate one end of High Street for 30 minute-1 hour parking. Purchase some land for longer stay parking from Yarm School, or equally convenient location.

#### **How can public transport be improved?**

Public Transport is not convenient, the bus service isn't comprehensive enough and it's expensive. Poor penetration beyond town centre, so usage is low.

#### **What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?**

Road crossings are adequate. The main road through Yarm does not include a cycle path. All designated footpaths should be regularly checked and maintained/good lighting provided.

#### **Is the provision of open space in Yarm and Eaglescliffe sufficient?**

Open space is not protected enough. Some areas e.g. Spital Flatt should have areas planted up with trees.

#### **Could access to open spaces be improved?**

Private open space such as school playing fields should be opened up to the public

#### **Do some places need increased or better recreation facilities? Are some facilities under-used?**

Yarm does not have a sufficient large public playing field/park for sport and recreation (including perambulation!) or even as an alternative venue for the fair. Snaith's field is inadequate, even as a playground for small children. School facilities such as playing fields and tennis courts, which are largely unused out of school hours, are out of bounds to the general public; people are required to become fee-paying members of recreational clubs to use such facilities.

Yarm Recreation Club has good facilities for members, but access road/parking and building exteriors are in need of considerable maintenance and improvement.

#### **Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?**

Development to be encouraged, where need is truly identified: small-scale development sensitive and complementary and not arising from demolition of Yarm's existing assets.

Development to be discouraged: back garden development and development which detracts from or damages character or history of the area.

Shopping does not need further development already taking place at Ingleby Barwick and Bowesfield, there should be no further need to put under threat the remaining parcels of Greenfield, green wedge and back-garden land that exists in Yarm,

#### **Are there any other key issues you feel should be considered in preparing the YEAAP?**

Relocation of Yarm Grammar School will have major repercussions for Yarm (housing, traffic and destruction of a site of historic environmental interest) and Kirklevington (loss of a Greenfield site, through traffic issues), although it is a business/educational establishment, which supports only a small percentage of local residents.

Similarly the redevelopment of the Tall Trees will have implications for the whole area.

The development of DTV airport will also need to be assessed in respect of its impact on the area.

## **Yorkshire Forward**

No comments to make in this instance but look forward to future opportunities for involvement in the ongoing LDF preparation process.

# Yarm and Eaglescliffe Area Action Plan Stakeholder Event (27 January 2010)

## 1. Background

The council undertook the Issues and Options Stage of the Yarm and Eaglescliffe Area Action Plan (YEAAP) in July 2007. Responses from the community and stakeholders to the Issues and Options consultation identified many issues that the AAP needs to address and the options which are available to deal with those issues. Prior to producing the Preferred Options document the council felt it appropriate to hold a non-statutory stakeholder workshop to establish whether any new issues had emerged since the Issues and Options consultation and allow stakeholders to shape emerging Preferred Options policies

The stakeholder event was held on 27<sup>th</sup> January 2010 at Preston Park, Ballroom. With the following stakeholders being invited to attend:

- Respondees to the Issues and Options Report;
- Ward, Parish and Town councillors who are included within or adjoining to the draft Preferred Options boundary; and
- Members of the Western Area Partnership Board

## 2. Event Structure

The event was structure to include an initial presentation to be followed by five focus groups sessions.

The presentation provided attendees with:

- A background into the purpose of the document
- How it fits into the Local Development Framework Process
- A summary of representations received as part of the Issues and Options consultation
- An overview of emerging Preferred Options policies.

Attendees were allocated focus group numbers, with each focus group being chaired by a spatial planning officer. Each focus group considered the following questions:

1. Is the AAP boundary appropriate?
2. Is the vision appropriate?

3. Should the following should be included within the AAP and how should policies for these be drafted:

- (i.) Local list
- (ii.) Townscape Character Areas
- (iii.) Tees Heritage Park
- (iv.) Preservation and interpretation of the Stockton and Darlington Railway

4. Any further policies/actions that should be included within the AAP?

Comments made during the focus group discussions have been collated and made available within Appendix 1 of this report.

## 3. Summary of representations

A summary of representations is provided below;

### Q1) Is the AAP Boundary Appropriate

- Northern boundary- need to consider if the current location relates well to what's on the ground and if there is a more logical boundary. Should it adjoin the Core Area boundary (adjoin/include Bowesfield)? Should the employment sites to the north and west be included within boundary?
- Eastern boundary- consideration as to whether the boundary should include the extent of the Tees Heritage Park or follow the edge of the edge of built development and how the boundary relates to the limits to development policy.
- Southern boundary- consideration to extend to include areas of protection or whether the boundary is appropriate and these areas can be protected in other documents.
- Western Boundary was generally considered as appropriate. Consideration as to whether to extend the boundary to include land south west in order to include areas of protection or whether the boundary is appropriate and these areas can be protected in other documents.

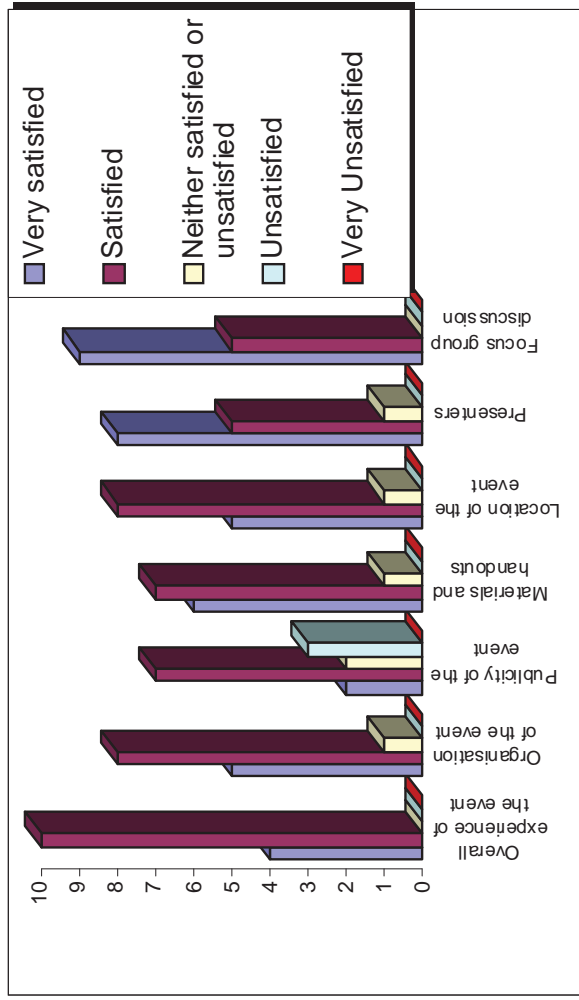
### Q2) Is the Vision Appropriate

Generally support was given for the suggested inclusions within the vision (with minor amendments to wording). However, the following points were raised;

- Clarification about what is meant by minimal development
- Need to support areas of growth identified within the boundary
- The town centre should be focused towards residents as well as its niche role
- More emphasis needs to be placed on the river and the Tees Heritage Park within the vision
- The vision needs to include aspects of sustainability, employment and public transport
- Clarification is needed regarding 'linkages to surrounding communities'

<p>– discussion on whether this means physical linkage or whether in terms of linking communities.</p> <p><b>Q3) Should the following should be included within the AAP and how should policies for these be drafted?</b></p> <p><b>Local List</b></p> <p>There was agreement that a policy relating to the Local List should be included in the YEAAP. With the following comments being made:</p> <ul style="list-style-type: none"> <li>• The policy should be given as much weight as possible</li> <li>• It should preserve properties and protect form demolition where possible</li> <li>• The YEAAP should provide a commitment to review the local list</li> </ul> <p><b>Townscape Character Areas</b></p> <p>There was agreement that a policy relating to the Townscape Character Areas should be included in the YEAAP. With the following comments being made:</p> <ul style="list-style-type: none"> <li>• A clear understanding needs to be made about the purpose of the Character Areas and linked to an appropriate policy.</li> <li>• There is a need to clearly outline what is important about the areas (define characteristics and boundaries)</li> <li>• Policy should ensure that any development preserves or enhances the character.</li> <li>• A number of additional areas were suggested for inclusion as Character Areas.</li> </ul> <p><b>Tees Heritage Park</b></p> <p>There was agreement that a policy relating to the Tees Heritage Park should be included in the YEAAP. With the following comments being made:</p> <ul style="list-style-type: none"> <li>• Policy should emphasise tranquil nature of this section of the Heritage Park.</li> <li>• Recognition of gateways into the Tees Heritage Park.</li> <li>• Need to involve the interested groups in the formulation of policy.</li> <li>• Need to recognise linkages and phasing.</li> </ul> <p><b>Preservation and interpretation of the Stockton and Darlington Railway</b></p> <p>It was noted that much of the railway heritage has been lost within the AAP it was clear that the protection of what remains is welcomed within the document and that there is great potential for the interpretation of the railway heritage (especially within Preston Park).</p> <p><b>Q4) Any further policies/actions that should be included within the AAP?</b></p> <p>Points were noted regarding the appropriateness of sites considered as part of the Building Schools for the Future programme. Whilst this is an issue for the YEAAP it is currently being progressed by the BSF team, which the Spatial Planning Team is a consultee for.</p> <p>Other issues raised related to:</p> <ul style="list-style-type: none"> <li>• Clarification regarding S106 contributions. Specifically what can be requested and what it can be spent on.</li> <li>• Inclusion of something about the affordable and social housing needs of Yarm and Eaglescliffe in order to maintain a mixed and thriving area.</li> <li>• Traffic and parking concerns in the High Street</li> </ul>
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#### 4. Event Feedback



Attendees were invited to complete feedback forms so that officers could monitor the success of the event. Overall it would suggest a satisfaction with the event with negative points being expressed at the publicity of the event.

Representatives invited to the event included, respondents to the Issues and Options Report; Ward, Parish and Town councillors and members of the Western Area Partnership Board. Publicity was not made available to the general public as it would not have been possible to gauge the number of attendees and therefore run the event with focus groups.

## APPENDIX 1 Focus Group feedback

The five focus groups were chaired by a spatial planning officer and included the following participants.

Name	Organisation
<b>Focus Group 1</b>	
Linda Sandbach	Long Newton Parish Council
Mrs Lesley Lewis	Local resident
Chris Harrison	Nathaniel Lichfield and Partners
Cllr Sherris	Yarm Ward Councillor
<b>Focus Group 2</b>	
Chris Burnell	Long Newton Parish Council
Mrs Karen Baker	Yarm Residents Group
Geoff Colling	Eglescliffe Parish Council
Cllr Beaumont	Yarm Ward Councillor
<b>Focus Group 3</b>	
Cllr Maureen Rigg	Eglescliffe Council
Cllr Miss M Galloway	Preston-on-Tees Parish Council
Norman Douglas	CPRE
Ken Dixon	Ingleby Barwick West Ward Councillor
Richard Poundford	Local resident
<b>Focus Group 4</b>	
Cllr John Fletcher	Eglescliffe Council
Doug Nicholson	Friends of Tees Heritage Park
Vicky Thompson	Eglescliffe Preservation Action Group
Ross Patterson	Ingleby Barwick West Ward Councillor
<b>Focus Group 5</b>	
Cllr Alan Lewis	Eglescliffe Council
Mike Cherratt	Preston-on-Tees Parish Council
Louise Grant	Yarm Residents Group

## Q1) Is the AAP boundary appropriate?

<b>Group 1</b>	<ul style="list-style-type: none"> <li>The AAP boundary is fairly logical</li> <li>Appropriate to follow the boundary of the river</li> <li>Keen to protect the buffer between Yarm and Kirklevington</li> </ul>
<b>Group 2</b>	<ul style="list-style-type: none"> <li>A main part of the discussion related to the differentiation between the boundary of the AAP and the limits to development. It was discussed that whilst the boundary of the AAP may not necessarily always follow the boundary of development it is essential that protection is given to all open areas which are included within the AAP boundary.</li> <li>Potential do tighten the AAP boundary/limits to development wherever possible</li> <li>Need to consider how the boundary will relate to Elementis Chromium (possible exclude from the boundary)</li> </ul>
<b>Group 3</b>	<ul style="list-style-type: none"> <li>The group are generally happy with the boundary</li> <li>Suggestion that it allows the inclusion of some of the more rural areas around the settlements.</li> <li>The sense of the shape of the boundary in the north was questioned as it was felt that it was over complicated. Suggested that Preston Lane form the northern boundary as it is considered to be more traditional. It was highlighted that the boundary included some areas of growth and development for example Durham Lane industrial Estate and that the development of these areas must be supported through the Action Plan.</li> </ul>
<b>Group 4</b>	<ul style="list-style-type: none"> <li>Extend the boundary to the south west of Yarm to include land up to the River Tees.</li> <li>Include the full extent of the Tees Heritage Park within the boundary</li> <li>Revise the boundary to the north to exclude Preston Farm Industrial Estate.</li> <li>Need to consider how the boundary corresponds with development off Concord Way.</li> </ul>
<b>Group 5</b>	<ul style="list-style-type: none"> <li>The southern boundary should be extended to include land upto Saltergill Beck.</li> <li>To the south west it should meet the Borough boundary.</li> <li>To the west it should include Aislaby, Moorhouse Estate at Eaglescliffe and beyond.</li> <li>To the southeast, it should encompass all the land up to the boundary of Ingleby Barwick.</li> <li>To the north it was felt that Preston Farm Industrial Estate and Bowesfield Park should not be included as they are not part of Yarm Eaglescliffe.</li> <li>The land at Smiths Farm should form the northern boundary, extending</li> </ul>

towards the road to Ingleby Barwick in the east.

- The western boundary close to Elementis Chromium should be extended to include the stables and the loop road from Elementis to the A67.



## Q2) Is the vision appropriate?

Focus group participants were advised upon the purpose of a vision within the document and advised upon some examples of what could be included within the Vision.

- An area rich in character and distinctiveness where minimal development is anticipated.
- Quality and character of the natural and built environment are protected and enhanced.
- A healthy, vibrant town centre which has built upon its specialist niche retail offer
- Taking advantage of the position astride the river and opening it up to the community
- Improved linkages to surrounding communities.

<b>Group 1</b>	<p>1<sup>st</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Agree with the first part of the bullet point but need clarification about what is meant by 'minimal development'.</li> <li>• Development at Allen's West means that there is little land available for development in the area and traffic impact would prohibit further development in the area.</li> <li>• An area rich in character and distinctiveness tends to be a conservation area. This should set the qualitative standard for other areas.</li> </ul> <p>2<sup>nd</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Support given for inclusion within the vision</li> </ul> <p>3<sup>rd</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Needs to include the retention of as many residential properties as possible on Yarm High Street</li> <li>• Concur that the niche retail offer is what attracts people to Yarm town centre and keeps it vibrant</li> </ul> <p>4<sup>th</sup> bullet point</p> <ul style="list-style-type: none"> <li>• The river is a tremendous asset and should be opened up to the community</li> <li>• We need to change people's perception of the river.</li> <li>• Need to ensure that the vision does not go beyond what is actually deliverable (i.e. raise expectations too high)</li> </ul> <p>5<sup>th</sup> bullet point</p> <ul style="list-style-type: none"> <li>• There is a need for linkages to the Tees Heritage work.</li> <li>• Connections to other areas are not always seen as desirable</li> <li>• We would like the bus route back to long Newton – to travel by bus</li> </ul>
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<p>from Long Newton to Yarm you have to get a connection to Hardwick. Improvements can be made to present linkages – for example the footpath on Leven Bank.</p> <p>Other comments</p> <ul style="list-style-type: none"> <li>• The vision needs to discuss employment and the working environment as a whole. Need to enhance working opportunities in the area rather than if being a dormitory settlement. Opportunities for small business start-ups should be encouraged.</li> <li>• The vision needs to include sustainability.</li> <li>• In principle the idea of a Vision is a good thing.</li> </ul> <p><b>Group 2</b></p> <ul style="list-style-type: none"> <li>• General agreement upon the examples provided.</li> <li>• Need to include reference to accessibility and improvements to public transport provision (especially the proposals to improve Eaglescliffe Station)</li> <li>• Concerns were raised regarding the niche role of Yarm. Need to create a mix between offer for residents and the niche offer. Also concern over the rise in the night-time economy.</li> </ul> <p><b>Group 3</b></p> <ul style="list-style-type: none"> <li>• The group were generally supportive of the vision as it identifies the priority of protecting the character of the settlements.</li> <li>• Need to include the areas of development and economic growth in the vision was raised. It was felt important that the protection of the important character areas should not be allowed to hinder these areas of development.</li> <li>• It was suggested that areas that should be protected should be clearly defined, as should the areas for growth.</li> <li>• The group mentioned Park and Ride in the Durham Lane area.</li> <li>• The group feel that the train stations are a major asset to the area.</li> <li>• It was suggested that a historic footbridge to Allen's West train station should be reinstated to improve access.</li> <li>• It was suggested that the final point about improving linkages to surrounding communities should be clarified.</li> </ul> <p><b>Group 4</b></p> <p>1<sup>st</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Expand to read 'minimal but appropriate development'</li> </ul> <p>3<sup>rd</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Revise to read 'A vibrant town centre which builds upon its unique retail and leisure offer'.</li> </ul> <p>4<sup>th</sup> bullet point</p> <ul style="list-style-type: none"> <li>• Revise opening to read 'Recognise the tremendous potential of the ...'</li> </ul> <p>5<sup>th</sup> Bullet point</p> <ul style="list-style-type: none"> <li>• The group did not consider the point as worded to be appropriate</li> </ul> <p>Other comments</p>
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**Q3) Should the following be included within the AAP and how should policies for these be drafted:**

- (i.) Local list
- (ii.) Townscape Character Areas
- (iii.) Tees Heritage Park
- (iv.) Preservation and interpretation of the Stockton and Darlington Railway

**Local List**

<b>Group 1</b>	<ul style="list-style-type: none"> <li>The discussion clarified the role of the local list and the difference between it and listed building status.</li> </ul>
<b>Group 2</b>	<ul style="list-style-type: none"> <li>Agreement that there is a definite need to link the Local List to a policy within the AAP.</li> <li>Local list policy should seek to preserve properties and protect form demolition where possible</li> <li>Local list policy must ensure where demolition and replacement is proposed it is in keeping with the style, scale and massing of the original structure</li> <li>The AAP should make a commitment to review the local list and consider further inclusions.</li> </ul>
<b>Group 3</b>	<ul style="list-style-type: none"> <li>It was felt that the highest level of protection possible should be given to the buildings on the Local List through policy.</li> <li>It was mentioned that the commitment to support this list should be made quickly and effectively as it currently is not supported enough.</li> <li>The group are aware that it cannot have the same strength as listing by English Heritage but mention that English Heritage themselves are advocating the use of local lists.</li> <li>The group would not accept any watering down of the expected protection offered by the local list.</li> <li>It was suggested that Article 4 Directions should be used for properties on the local list.</li> </ul>
<b>Group 4</b>	<ul style="list-style-type: none"> <li>Agreement that the status of the local list needs to be strengthened and ensure it has clear enforceable weight.</li> <li>The policy needs to be clear, concise and simple.</li> <li>The policy should note the nature, history and context of buildings and consider adapting or preserving before seeking demolition.</li> <li>There are other properties that need to be considered for inclusion on the Local List.</li> <li>Potential to put a group together to help draft a policy</li> </ul>
<b>Group 5</b>	

<b>Group 5</b>	<ul style="list-style-type: none"> <li>Add 'Celebrate history and heritage of the area.'</li> <li>Need to engender community spirit between Ingleby Barwick and Yarm/Eaglescliffe</li> </ul>
<b>1<sup>st</sup> bullet point</b>	<ul style="list-style-type: none"> <li>Concur with its inclusion</li> </ul>
<b>2<sup>nd</sup> bullet point</b>	<ul style="list-style-type: none"> <li>Agree with its inclusion, but suggested that a bit more protection is needed.</li> </ul>
<b>3<sup>rd</sup> bullet point</b>	<ul style="list-style-type: none"> <li>Would disagree with this, as the Town should be geared towards the needs of local residents.</li> <li>Development should be to the inclusion of all.</li> <li>Comments that the rents are high and there are numerous hairdressers in Yarm</li> <li>High Street is too geared to tourism and there is a high turnover of shops.</li> </ul>
<b>4<sup>th</sup> bullet point</b>	<ul style="list-style-type: none"> <li>This should be extended to include an active river frontage.</li> <li>Take advantage and make the most of the northern bank of the River (close to the Blue Bell, upgrade the footpath and make it more accessible from obvious footpath links. There should be trees and benches along the route.</li> <li>Improve river frontage to the south, behind the High Street, Yarm. Investigate the footpath, which runs from the end of Goose Pastures. Could include a footbridge over the Tees at this point.</li> </ul>
<b>5<sup>th</sup> bullet point</b>	<ul style="list-style-type: none"> <li>Discussed the various opportunities for crossing the River Tees and footpath and cycle routes around Ingleby/Yarm and Eaglescliffe. Agreed that those linkages are required.</li> <li>It was mentioned that a by-pass should be constructed for those not wishing to visit Yarm, but noted that this would require the construction of two bridges.</li> </ul>

<ul style="list-style-type: none"> <li>No argument in theory.</li> <li>Concern amongst participants about the process of establishing the local list and the weight that is attached to the designation.</li> </ul>
<p><b>Townscape Character Areas</b></p> <p><b>Group 1</b></p> <ul style="list-style-type: none"> <li>Discussion regarding the role, function and purpose of the character areas.</li> <li>The group considered that a policy such as this is too late for some areas which have been compromised by inappropriate development.</li> </ul> <p><b>Group 2</b></p> <ul style="list-style-type: none"> <li>Agreement that the concept is a good idea</li> <li>Potential to include additional areas (Leven Road)</li> <li>Need to ensure that boundaries of the areas only cover what is considered to have a special character in order to ensure the principal of the designation is not undermined</li> <li>Ensure that policy is worded correctly and has enough weight.</li> </ul> <p><b>Group 3</b></p> <ul style="list-style-type: none"> <li>The group are very supportive of the character areas and this feeds into the group's previous discussion on identifying specific areas that should be protected.</li> <li>The group made a number of additions to the townscape character areas on the map provided.</li> <li>The group would like to see all of the frontage onto Yarm Road protected as this wide tree lined road is part of the character they would like to see protected.</li> <li>They would also like Newlands Avenue to be considered.</li> <li>In light of the character of Yarm Road there was discussion around the heavy traffic particularly heavy goods vehicles that use the road and the speeds that they travel.</li> </ul> <p><b>Group 4</b></p> <ul style="list-style-type: none"> <li>Need to ensure the concept of the townscape character areas is fully considered so that an appropriate policy can be formulated.</li> <li>Need to explain what is important about the area (define characteristics and boundaries)</li> <li>Policy should ensure that any development preserves or enhances the character.</li> <li>Potential to include properties on Aislaby Road.</li> </ul> <p><b>Group 5</b></p> <ul style="list-style-type: none"> <li>Agreed but commented that this has not been tested.</li> <li>Should include reference to visual clutter, road signs and SIDS. As these were mentioned as detracting from the character of an area.</li> </ul>

<p><b>Tees Heritage Park</b></p> <p><b>Group 1</b></p> <ul style="list-style-type: none"> <li>There was strong support for Tees Heritage Park</li> </ul> <p><b>Group 2</b></p> <ul style="list-style-type: none"> <li>Participants were in agreement that a policy relating to the Tees Heritage Park should be included.</li> <li>It was considered that this should be discussed with the appropriate officers and groups responsible for the project.</li> <li>Need to ensure that land is safeguarded for the expansion of the Tees Heritage Park</li> </ul> <p><b>Group 3</b></p> <ul style="list-style-type: none"> <li>The group are very supportive of the Tees Heritage Park</li> <li>Policy should emphasise that Yarm and Eaglescliffe is the tranquil section of the Park.</li> <li>Recognition should be included that Preston Park is the gateway to the Tees Heritage Park in this area.</li> </ul> <p><b>Group 4</b></p> <ul style="list-style-type: none"> <li>Need to involve the rivers users group and the Tees partnership group</li> <li>The AAP needs to recognise the importance of the Tees Heritage Park including linkages and phasing</li> <li>Need to protect the particular character that the Tees Heritage Park is trying to create.</li> </ul> <p><b>Group 5</b></p> <ul style="list-style-type: none"> <li>There was strong support for Tees Heritage Park</li> </ul>
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<p><b>Preservation and interpretation of the Stockton and Darlington Railway</b></p> <p><b>Group 1</b></p> <ul style="list-style-type: none"> <li>You have an amazing asset with the railway – there are a lot of assets that need to be promoted and the railway is one of them.</li> <li>Commented that this was extremely important and mentioned that the opportunity to retain parts of it were lost years ago.</li> <li>The railway is in multiple ownerships. You should make the most of the assets that you as an authority control.</li> <li>We need to retain what we have.</li> </ul> <p><b>Group 2</b></p> <ul style="list-style-type: none"> <li>Agreement that a policy regarding this should be included</li> <li>Hopefully the interpretation of the Stockton and Darlington Railway will emerge through the Tourism and Visitor Strategy</li> </ul> <p><b>Group 3</b></p> <ul style="list-style-type: none"> <li>Very supportive of interpretation and protection of railway heritage but feel that much of this is too late as many elements are lost or no longer accessible.</li> <li>Would like to see Preston Park used to add interpretation to the railway with boards along its route in the Park and a visitor centre.</li> </ul> <p><b>Group 4</b></p>
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- Potential link/include this with a policy for the Tees Heritage Park
- Policy should celebrate as a tourist attraction and seek to preserve.
- Potential to link with Darlington's policy
- Demonstrate linkages with the Tourism & Visitor and Heritage strategies

**Group 5**

- Commented that this was extremely important and mentioned that the opportunity to retain parts of it were lost years ago.

**Q4) Any further policies/actions that should be included within the AAP?**

**Group 1**

- The discussion centred on the school proposal for Preston Park. The facilitator explained that this is being considered through the BSF programme. A participant commented, "The YEAAP should be able to cut across the BSF programme, not the other way around – otherwise why have a YEAAP?" The facilitator explained that the Spatial Planning team are leading the YEAAP and are a consultee for the BSF programme and that, therefore, the two processes are not completely sealed from one another but they are separate processes.

**Group 2**

- The AAP could benefit with some clarification regarding S106 contributions. Specifically what can be requested and what it can be spent on.

**Group 3**

- In addition to the earlier discussion about the need to recognise areas of development as well as areas of protection, the group would like to see something about the affordable and social housing needs of Yarm and Eaglescliffe in order to maintain a mixed and thriving area. It was identified that Yarm and Eaglescliffe has very high house prices and thus has specific issues around affordability, which should be addressed with effective affordable and social housing.

**Group 4**

- Traffic and parking concerns in the High Street

**Group 5**

- Need for a policy which specifically mentions the need to prevent development within the grounds of Preston Park

## **Respondents to the Regeneration Development Plan Document Issues and Options Consultation**

Allegro  
Appletons  
Banks Developments  
Barclays Bank  
Blackett Hart and Pratt LLP  
British Waterways  
Claytons of Carlton  
CPRE  
D G Dale and Sons  
David Kitchen Associates  
Egglecliffe and Egglecliffe Parish Council  
English Heritage  
Environment Agency  
FFT Planning  
Friends of Tees Heritage Park  
Government Office for The North East  
Grindon Parish Council  
Highways Agency  
Ingleby Barwick Town Council  
JG Egglecliffe (Holdings) Ltd  
Maltby Northern Edge Residents Group  
Mr H Suddes  
Mrs Wilson  
National Offender Management Service  
Natural England  
Network Rail  
North East Assembly  
North Shore Development Partnership  
Northumbrian Water  
ONE North East  
Persimmon Homes (North East) Ltd  
Peter Wigglesworth Planning  
Preston Farm Developments  
Redcar and Cleveland Borough Council  
Redleaf VI  
Redmarshall Parish Council  
Royal Mail  
RSPB Northern Region  
Signet Planning Ltd  
Simon Bailes Ltd  
Solutions Northern  
Sport England  
Stillington and Whitton Parish Council  
Stockton on Tees Borough Council  
Housing Regeneration  
Taylor Wimpey  
Tees Valley Regeneration  
The Theatres Trust  
Theakston Estates Ltd  
Thorpe Thewles Residents Association  
Wellington 2004 Estate Company  
Wynyard Estates  
Yarm Residents Group  
Yorkshire Forward  
272 Individuals

Office Use Only	
Ref No	
Name	
Organisation	

**Regeneration Development Plan Document  
Issues And Options Report  
Consultation Response Form – Part B**

This form must be submitted with a completed Consultation Response Form – Part A. Part A explains how we will use and store your information. You can also complete this form online at [www.stockton.gov.uk/spatialplanning](http://www.stockton.gov.uk/spatialplanning).

These questions should be completed alongside the Regeneration Development Plan Document Issues and Options Report. This document puts the issues and options in context and provides further background information. Some of the issues included in the report do not have options associated with them, and as such have not been included in this response form. For each question, please tick the box next to your preferred option, and leave comments where you feel are appropriate (use extra sheets of paper if necessary).

**Issue – North Shore** (See Page 11 of the Regeneration Development Plan Document Issues and Options Report)

<b>Which of the following site boundaries should the mixed-use site at North Shore incorporate? (see map 2)</b>	
<b>Option 1.</b> Existing area (edged in red)	8
<b>Option 2.</b> Additional land to the east and west (edged in blue)	6
<b>Option 3.</b> As option 2, but with additional land to the north (edged in green)	10
<b>No Response</b>	89

**Comments: See schedule of responses**

**Issue – Bowesfield Lane** (See Page 17 of the Regeneration Development Plan Document Issues and Options Report)

<b>How should the assets of this site be best utilised in order to achieve its true potential?</b>	
<b>Option 1.</b> Retain any existing businesses and allocations on the site for general industry and distribution	2
<b>Option 2.</b> Identify the allocations at Bowesfield for high quality uses and use this development to screen the existing uses from waterfront	4
<b>Option 3.</b> Identify the wider Bowesfield Lane as being an area for change and allocate the site for a mix of uses that would enhance and maximise the waterfront location allowing market forces to drive change	15
<b>Option 4.</b> Recognise that parts of the site have an increased probability of flooding and allocate this land for water compatible uses	8

<b>No Response</b>	84
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**Comments: See schedule of responses**

**Issue – Allens West and former Eaglescliffe Logistics Site** (See Page 17 of the Regeneration Development Plan Document Issues and Options Report)

<b>What approach should the Council take towards development on the site at Allens West?</b>	
<b>Option 1.</b> Resist any form of development at the site due to it being outside of the core area	4
<b>Option 2.</b> Expand the employment uses on the site	14
<b>Option 3.</b> Accept the principle of residential development but impose phasing restrictions on the site so that development does not undermine the delivery of schemes in the core area	13
<b>No response</b>	82

**Comments: See schedule of responses**

**Issue – Limits to development of the villages** (See Page 19 of the Regeneration Development Plan Document Issues and Options Report)

<b>Should the existing limits to development of the villages be maintained?</b>	
<b>Option 1.</b> Consider modifying the limits to development of villages where doing so may enhance the sustainability of the village	7
<b>Option 2.</b> Consider modifying the limits to development	3
<b>Option 3.</b> Maintain the existing limits to development	88
<b>No response</b>	15

**Comments: See schedule of responses**

**Issue – Green Wedges** (See Page 19 of the Regeneration Development Plan Document Issues and Options Report)

<b>Should Green Wedges be included within the limits to development?</b>	
<b>Option 1.</b> Maintain Green Wedges within the limits to development	9
<b>Option 2.</b> Remove Green Wedges from the limits to development thereby strengthening their protection from development	52
<b>No response</b>	52

**Comments: See schedule of responses**

**Issue – Barrage Bridge** (See Page 24 of the Regeneration Development Plan Document Issues and Options Report)

<b>Should and access to the Barrage be reviewed in light of the significant change about to occur at North Shore and with the Green Blue Heart?</b>	
<b>Option 1.</b> No, leave the layout as it is to serve the Barrage, white water course, hotel, camp site and gym alone.	5
<b>Option 2.</b> Maintain the current vehicle restrictions, but improve the cycle and footpath links with the Barrage and Marston Road (past the campsite)	10
<b>Option 3.</b> Allow only public transport to use the bridge to link north shore and Teesdale Park	3
<b>Option 4.</b> Allow access into North Shore for all traffic	8
<b>No response</b>	87

**Comments: See schedule of responses**

**Issue – Freight Development** (See Page 24 of the Regeneration Development Plan Document Issues and Options Report)

<b>In order to reduce the need to travel on the roads, how should the Regeneration DPD manage freight related development?</b>	
<b>Option 1.</b> Locate all freight related development at sites to make use of the existing railway network and port facilities	10
<b>Option 2.</b> Promote freight related development at sites which can make use of the existing railway network and port facilities whilst recognising that other locations adjacent to the strategic road network may be required to provide a choice of locations	14
<b>Option 3.</b> Protect sites where wharves and rail halts exist for future freight development	1
<b>No response</b>	88



**Comments: See schedule of responses**

**Issue: Employment Land – How much and where?** (See Page 31 of the Regeneration Development Plan Document Issues and Options Report)

**How should the Regeneration DPD address the potential surplus of employment land in the Borough?**

<b>Option 1.</b> Rationalise our existing employment land portfolio, by de-allocating surplus sites in locations that do not maximise opportunities for employees, and channelling particular uses to the most appropriate sites	23
<b>Option 2.</b> Retain all existing employment sites and allocations despite the potential surplus, unless identified for re-allocation to another use within the Regeneration DPD	6
<b>No response</b>	84

**Comments: See schedule of responses**

**Issue – Employment sites strategy** (See Page 31 of the Regeneration Development Plan Document Issues and Options Report)

**How should the Regeneration DPD safeguard existing and proposed employment land within the Borough and maintain a suitable supply of employment land?**

<b>Option 1.</b> Identify a number of employment locations which recognise the broad need for differing types of employment land, from prestige locations down to general industrial estates in order to provide a variety of locations whilst maintaining a vibrant and successful economy	27
<b>Option 2.</b> Identify an employment land portfolio which does not differentiate which uses are acceptable and the quality of development expected in that area	0
<b>No response</b>	86

**Comments: See schedule of responses**

**Issue – Office Development** (See Page 32 of the Regeneration Development Plan Document Issues and Options Report)

<b>How should the Regeneration DPD identify appropriate sites for office development?</b>	
<b>Option 1.</b> Identify sites that are sequentially preferable for office development over locations that were previously considered suitable	3
<b>Option 2.</b> Maintain allocations at industrial estates that are not sequentially preferable but have previously been identified as suitable locations B1 uses (business)	2
<b>Option 3.</b> Allow office development where a site is identified as an existing industrial estate	8
<b>Option 4.</b> As Option 1, but recognising that large-scale office headquarter premises may not feasibly be able to locate in a town centre site, instead selecting the most sustainable location.	12
<b>No response</b>	88

**Comments: See schedule of responses**

**Issue – Heavy Industrial areas** (See Page 32 of the Regeneration Development Plan Document Issues and Options Report)

<b>What should underpin the approach of the Regeneration DPD towards heavy industrial areas such as the southern area of Billingham, Haverton Hill, Port Clarence and Seal Sands?</b>	
<b>Option 1.</b> Recognise the contribution of these areas and maintain support for the various complexes whilst supporting diversification into other sectors e.g. renewable energy/bio-fuels	12
<b>Option 2.</b> Recognise the significant impact that this industry has on the surrounding landscape and the image of the area in both positive (landmark industrial structures unique to the area) and negative aspects (eye sores in the form of derelict areas and exposed machinery) and seek to improve the visual appearance of the area whilst retaining the most important parts of the unique industrial landscape.	14
<b>No response</b>	87

**Comments: See schedule of responses**

**Issue – Existing employment sites in the Core Area** (See Page 33 of the Regeneration Development Plan Document Issues and Options Report)

<b>How should the Regeneration DPD deal with sites that are identified as being of key strategic importance, or are no longer considered to be a viable long-term employment location?</b>	
<b>Option 1.</b> Do nothing and leave the situation to market forces	0
<b>Option 2.</b> Identify areas as business improvement areas and promote renovation of business units and the environment in these areas	2
<b>Option 3.</b> Where a site is considered to be sustainable and suitable for redevelopment, promote relocation of existing businesses from these areas to purpose built units on other industrial estates. Undertake a comprehensive master-planning exercise to determine the future use of these areas	4
<b>Option 4.</b> Assess which of the above options is the most suitable way to deal with each particular site	18
<b>No response</b>	89

**Comments: See schedule of responses**

**Issue – Linking Stockton Town Centre with the Riverside** (See Page 39 of the Regeneration Development Plan Document Issues and Options Report)

<b>How should the Regeneration realise the potential of the Riverside and link it to the Town Centre?</b>	
<b>Option 1.</b> Leave the Riverside as it is – a major road corridor, and concentrate development in the Town and on other sites	5
<b>Option 2.</b> Improve access and functionality of the High Street	3
<b>Option 3.</b> Develop some of the Riverside’s land with buildings where there is less attractive open space, and invest in the largest part of open space between Finkle Street and the Police Station to create a park	10
<b>Option 4.</b> Acknowledge the difficulties of linking the two sites, and develop more intensive uses to make the best economic use of the land	15
<b>No response</b>	90

**Comments: See schedule of responses**

**Issue – Stockton Town Centre Nightlife** (See Page 39 of the Regeneration Development Plan Document Issues and Options Report)

<b>In order to create a more balanced range of uses and prevent blight, what should be done about the poor spread of uses around Yarm Lane and the southern end of the High Street?</b>	
<b>Option 1.</b> Maintain the concentration of these uses so that it is all in one place and can all be controlled	6
<b>Option 2.</b> Permit no further food and drink uses in Stockton Town Centre so that the problem does not grow	2
<b>Option 3.</b> Allow more food and drink uses, but not in that area	1
<b>Option 4.</b> Comprehensively redevelop the area between Yarm Lane, the High Street, West Row and Ramsgate to provide a more varied range of land uses	17
<b>No response</b>	87

**Comments: See schedule of responses**

**Issue – Stockton Town Centre layout** (See Page 39 of the Regeneration Development Plan Document Issues and Options Report)

<b>How should the Regeneration DPD aim to improve the layout of Stockton Town Centre?</b>	
<b>Option 1.</b> Maintain the existing layout and provide more information about buses	5
<b>Option 2.</b> Remove all buses and taxis from the High Street and make it totally pedestrianised	5
<b>Option 3.</b> Reorganise the High Street layout so that the buses and taxis are less confusing	11
<b>Option 4.</b> Allow from traffic (cars) into the High Street again	6
<b>No response</b>	87

**Comments: See schedule of responses**

**Issue – Identifying a suitable location for a civic amenity centre** (See Page 40 of the Regeneration Development Plan Document Issues and Options Report)

**Question. Can you identify a suitable location for a new civil amenity centre to serve the Southern and Western parts of the Borough?**

**See schedule of responses**

## 1/1 Allegro

### Issue: Spatial Strategy - Submitted for Housing Allocation

With reference to the your letter in the Gazette, I would like to bring to your attention to my property in Yarm Back Lane. Situated just off the A66 it offers easy access to all nearby Towns and Retail Parks with the A1 approximately 10 miles away. It has a large entrance off Yarm back Lane so no congestion would be caused as far as the traffic is concerned. Sitting on the outskirts of Stockton it would keep its rural feel and be a very pleasant area to live in. I would therefore be pleased if you would consider my property for future development.

## 2/1 Individual

### Issue: Spatial Strategy - North Shore

The incorporation of the additional land would make the development more coherent. The eastern area would detract from the overall regeneration. The western area is quite restricted for activities which take place there and a reorganisation of those establishments with, if possible more open aspects would be beneficial visually and in its amenity.

### Issue: Spatial Strategy - Bowesfield Lane

This site being close to the A66 has a visual impact that affects the approach to the town. The river frontage also affects the view from the Thornaby Bank and could affect values and viability of property in that area. The issue of flooding needs also to be taken into account when considering screening or use of the lower part of the estate.

### Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site

The access and egress to and from this site is adversely affected by the restrictions of Darlington Back Lane. At the moment there are very long traffic queues during peak times as the vehicles merge with traffic from Darlington and then run down into Yarm. Further development at Allens West would make this problem worse and would have adverse effects on the quality of life of local residents.

### Issue: Spatial Strategy - Limits to Development Villages

Without careful control there is a real risk of development increasing over time.

### Issue: Spatial Strategy - Green Wedges

There is often pressure to develop those green wedges because of their convenience but this needs to be resisted because once the land is lost it cannot be easily retrieved.

### Issue: Transport - Barrage Bridge

Slowing unfettered access to all traffic would be detrimental to the leisure activities that now take place around the Barrage. As there are plans to possibly extend the water activities it is important to enhance this area.

### Issue: Transport - Freight Development

I think that there may be a need to be some form of flexibility in this area providing that it does not conflict with other objectives in the development plan.

### Issue: Economic Regeneration - Heavy Industry Areas

Industries evolve over time and this should be encouraged as it will keep the area at the forefront of new development improving job security and new opportunities.

### Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside

A means must be made to attract people to use the Riverside area. Any new property built or modified along the riverside should be encouraged to take this aspect into account.

### Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife

The Yarm Lane area is very shabby and very unattractive to visitors to the town.

### Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout

The old layout of the High Street with North and South bound lanes worked better. The High Street is too big to be pedestrianised, especially taking into account elderly or disabled people. Having bus stops at both ends of the High Street makes it easier to manage the distance, another benefit of two lanes would be that the market would return to the centre of the street and would be more manageable and visually more attractive.

### Issue: Community Facilities - Civic Amenity Site

Possibly around the site of the brickworks at Coatham Stob. There is relatively good access from the A66 etc and from Eaglescliffe/Yarm

## 3/1 Individual

### Issue: Community Facilities - Civic Amenity Site

Portrack Area

## 4/1 Individual

### **Issue: Housing Allocations - Hartburn Grange**

Would consider selling site to developer. Although land was taken by the Ministry of Highways - access is from Yarm Back Lane. The land is a lovely areas and we would be very pleased if it was one of the options for housing development. The site is close to schools, churches local shops and other amenities within walking distances.

## **5/ FFT Planning**

### **Issue: Provisions for Gypsies and Travellers - Gypsy and Traveller Sites**

There is a need for additional transit pitches. The existing regional GTAA identifies a need for sites within the Tees Valley amounting to some 39 pitches. However this study clearly limits and does not take into account a number of factors that the Government guidance intended as a bare minimum. There is no reason to delay until the GTAA for the area is complete and the Borough should be informing their position using a range of sources of evidence which should include:

1. Information on all existing private and RSL sites, details of site uses and the types of planning permissions and any conditions appertaining.
2. Information on all unauthorised developments and encampments which would include but not rely on solely, the caravan count data. This would include police information.
3. Information from Gypsy liaison officers, health service providers, from supporting people, school rolls and the Traveller Education Service.
4. Any information from homelessness and housing strategies
5. The interim regional information on Gypsies and Travellers.

There will be an additional need of 10 pitches on top of the 39 indicated above (regional spatial strategy reviews of G & T, CLG, March 2007. However this does not include private pitches. The government lays out transitional arrangements in the circular (para 41 et seq) which could be applied to this situation. Both the RTP1 (Good practice Note No 4 and the Planning Advisory Service (Spaces for Places, Dec 2006) highlight the development of separate topic based DPDs as a means of secure and transparent delivery within a reasonable timeframe and we would urge the council to consider this approach in order to make timely provision. Travelling show people need to be considered as well.

### **Issue: Provisions for Gypsies and Travellers - Gypsy and Traveller Sites**

The Council should make allocations in DPDs where there is identified need and develop criteria to aid the identification of sites in allocations documents and also to meet unexpected demand. Sites in rural areas are acceptable. Landscape and local nature conservation designations should not be used in themselves to refuse planning permission. Hence this criteria should be suitably amended or removed.

## **6/1 Network Rail**

### **Issue: Transport - Light Rail Transport Proposal**

The Regeneration Development Plan Document outlines proposed light rail transport improvements which Network Rail is in support of. However, funding for these should ideally come from the planning process with new developments contributing financially to any required public transport infrastructure improvements and enhancements.

## **7/1 Individual**

### **Issue: Spatial Strategy - North Shore**

Enlarging the existing area would involve displacing existing industries, disrupting an important area of the town.

### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

This site, alongside the railway and the Airport, with close links to the A66 and A19 has great business potential and should not be sacrificed for housing. Also more housing would add to peak time traffic congestion in the Yarm area.

### **Issue: Economic Regeneration - Freight Development**

Option 2 provides a flexible policy to maximise port growth.

### **Issue: Economic Regeneration - Office Development**

Option 4 enables the Borough to accommodate a company headquarters which may have special needs.

### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

This could regenerate an untidy run down area, adding to an improved High Street.

### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Having buses in the High Street enables better access to shops for people living in the suburbs and villages.

### **Issue: Community Facilities - Civic Amenity Site**

Bowesfield Lane alongside the Travellers site or near the Drum and Monkey Pub [Charlie's Bar Bowesfield Lane] might be suitable especially if the travellers site is transferred.

## 8/1 Peter Wigglesworth Planning

### Issue: Transport - Freight Development

It is important to make provision for a range of distribution sites close to strategic roads.

### Issue: Economic Regeneration - Employment Land

Brownfield sites may take many years to be developed and other sites may have infrastructure problems. Therefore it is important to have a wide range of employment sites across the Borough, also the Global economy and the export of manufacturing may lead to large scale job losses in the future, diversity is critical.

### Issue: Economic Regeneration - Employment Sites Strategy

Support Option 1. Object to the identification of the Urlay Nook site as a site recommended for de-allocation. The site is available, sustainable and developable. An application for planning permission for B2 and B8 uses has been submitted.

## 10/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Maltby.

The land is greenfield and there is already sufficient brownfield land in the Stockton Borough for its present and future building; as well as a full range of housing and facilities already available and planned in Ingleby Barwick. Further previous applications for this land in 1989 and 1996 have been rejected on appeal. Nothing has changed in this area to warrant changing those decisions.

## 11/1 Individual

### Issue: Housing Allocations - Thorpe Thewles

Four years ago there were proposals to build in Thorpe Thewles but there were many objections, and nothing has changed. Traffic has increased unbelievably due to the building allowed at Redmarshall, Carlton and traffic which now cuts through all the villages probably to avoid speed restrictions and congestion. Any further development will exacerbate this situation particularly at peak times and weekends. Community is opposed 100% to future development around the village. Traffic blackspot at the junction of the village with the A177 and a traffic build up at peak periods resulting in drivers taking a chance. Any further development south of the Hamilton Russell will create without doubt another black spot, as well as created by allowing housing development at the north end of the village. Further congestion would be caused at either Wynyard Road or at the junction with Junction Road, which will cause another black spot because of the development allowed at Harpers Garden centre. Amenities would be lost. Danger to those walking (including the Castle Eden Walkway) and cycling, particularly children and those using the livery at High Middlefield Farm. The charm and character of the village would be lost.

## 12/1 Egglecliffe and Eaglescliffe Parish Council

### Issue: Spatial Strategy - North Shore

Poor site needs to be regenerated.

### Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site

We recognise the need for some income generator for the site to be developed.

### Issue: Spatial Strategy - Limits to Development Villages

Development should be directed to proper brownfield site i.e. no garden or demolition of established housing.

### Issue: Transport - Barrage Bridge

If unrestricted traffic access would destroy the character of the area, would go for Option 2.

### Issue: Transport - Freight Development

We think it would be wise to protect wharfs and railway lines for future freight development as well as our preferred Option 2.

### Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside

None of the options are satisfactory. However improve access from the High Street and improved frontage from the riverside. Any buildings other than that was there is now would be detrimental.

### Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife

The whole eating and drinking culture on the high street is directed at younger people and is not conducive to the older generation.

### Issue: Community Facilities - Civic Amenity Site

Cattle market or Preston Farm

## 13/1 Individual



**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Village has very few facilities and could not support more people or sustain more houses. Public transport to and from the village is poor it would be more than likely that any new additional residents would need their own transport, which would increase the traffic through the village, which at present is intolerable. The roads leading to the land are narrow and additional traffic would add to an existing safety problem of the junction of High Lane.

**14/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Four years ago there were proposals to build in Thorpe Thewle but there were many objections. Traffic has increased unbelievably due to the building allowed at Redmarshall, Carlton and traffic which now cuts through all the villages probably to avoid speed restrictions and congestion. Any further development will exacerbate this situation particularly at peak times and weekends. Community is opposed to future development around the village. Traffic blackspot at the junction of the village with the A177 and a traffic build up at peak periods resulting in drivers taking a chance. The local schools and doctors are under pressure. The regeneration of existing properties within Stockton centre would be a much more feasible idea and if a new Ingleby Barwick type estate is deemed necessary I am sure the green field sites around Wynyard could accommodate such a scheme.

Amenities would be lost. Danger to those walking (including the Castle Eden Walkway) and cycling, particularly children. This a lovely village which would be blighted by further development.

**15/1 Individual**

**Issue: Housing Allocations - Bishopsgarth School**

With reference to the land next to Bishopsgarth School.

There has been too much land supply in recent years at Ingleby Barwick. The land at the Barn et al. is immediately available for development and its release would help to redress the current market imbalance by providing significant development opportunities within the Stockton area.

**Issue: Housing Allocations - Bishopsgarth School**

Harrowgate Lane is a principle distributor around the western edge of the town thus being connected to other primary routes giving ready access to a wide range of destinations, facilities and services. The site is also on a Core Bus Route, crossed by the Castle Eden Walkway, a footpath and cycleway.

**Issue: Housing Allocations - Bishopsgarth School**

Quality housing is needed of a type that will attract key players in developing information and environmental technology industries to occupy homes within the urban area rather than commute in from more distant rural locations.

The proposed housing site would bring more people into the centre of Stockton and help to stem moves to outer areas of the district or even out of Cleveland.

The Barn and Coalgarth land should complement the other developments at North Shore and, Hardwick, Parkfield and Mandale. This site will provide quality housing such as that at Wynyard. The site offers the opportunity to develop the site from scratch to ensure that the best practice is followed in terms of construction methods and materials.

**Issue: Housing Allocations - Bishopsgarth School**

One of the arguments for the poorer performance of the Tees Valley economically is the dominance of extensive areas of unattractive, small terraced houses and large, monotonous estates of local authority housing. There is a need for new development that offers modern, contemporary homes of distinction and character, meeting present day aspirations and addressing the whole climate change agenda.

**16/ Individual**

**Issue: Housing Allocations - Bishopsgarth School**

Quality housing is needed of a type that will attract key players in developing information and environmental technology industries to occupy homes within the urban area rather than commute in from more distant rural locations.

The proposed housing site would bring more people into the centre of Stockton and help to stem moves to outer areas of the district or even out of Cleveland.

Tithe Barn and Coalgarth land should complement the other developments at North Shore and, Hardwick, Parkfield and Mandale. This site will provide quality housing such as that at Wynyard. The site offers the opportunity to develop the site from scratch to ensure that the best practice is followed in terms of construction methods and materials.

Harrowgate Lane is a principle distributor around the western edge of the town thus being connected to other primary routes giving ready access to a wide range of destinations, facilities and services. The site is also on a Core Bus Route, crossed by the Castle Eden Walkway, a footpath and cycleway.

With reference to the land next to Bishopsgarth School.

There has been too much land supply in recent years at Ingleby Barwick. The land at Tithe Barn et al. is immediately available for development and its release would help to redress the current market imbalance by providing significant development opportunities within the Stockton area.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

This site is not compatible for sustainable residential use or with the RSS vision of a vibrant poly city. It is not a location that new life on the high street identifies.

**17/1 Tees Valley Regeneration**

**Issue: Spatial Strategy - North Shore**

Option 1 requires the core North Shore site. Option 3 reflects the Greater North Shore Area.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Links from the Town Centre to the riverside are key in ensuring connectivity with the North Shore site. Needs to consider more proposals for Eastern Gateway and the Greater North Shore study.

**18/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Can existing roads cope south of the village. Access to old Durham Road and Wynyard Road. Access to A177 already an accident black spot. Access to Blakeston Lane – very narrow road. North of village. Access to proposed site is onto a busy and narrow lane.

Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **Issue: Housing Allocations - Thorpe Thewles**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young

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## **19/1 Individual**

### **Issue: Spatial Strategy - North Shore**

The development of the North Shore would best be served by Option 2 incorporating the existing area to the east and west. This would enable continuity of regeneration plus concentrated into one larger area maximising access of all facilities by means of public transport.

### **Issue: Spatial Strategy - Bowesfield Lane**

Option 3 would maximise the usage of this area, must be given a wide range of planning options as required thereby maximising the usage of the area.

### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Accept development but with firm restrictions. This is a brownfield site and should be considered for residential development before any proposed development on greenfield sites.

### **Issue: Spatial Strategy - Limits to Development Villages**

The pressure on villages in the area is extremely high from property developers, which if allowed would ruin the identities of the villages, result in the loss of precious green land and lead eventually to urban sprawl. Therefore it is vital that the existing limits to development be maintained.

### **Issue: Spatial Strategy - Green Wedges**

With ever increasing encroachment of population development into green wedges, wildlife are in danger of extinction. This would be a great loss of our area. Therefore we must protect green wedges.

### **Issue: Transport - Barrage Bridge**

We need at least one area where traffic restrictions exist. The Barrage area is one where people can go and enjoy the relaxed area. A cycle path would improve the area.

### **Issue: Transport - Freight Development**

The greater the options for road, bus, freight and rail networks the better the services that can be offered to both public and industries alike.

### **Issue: Economic Regeneration - Employment Land**

Option 2 would provide a greater ability to attract other diverse employment to our area.

### **Issue: Economic Regeneration - Employment Sites Strategy**

Maintaining our ability to provide a wide range of land designated employment land gives us a better chance of encouraging employers to the area.

**Issue: Economic Regeneration - Office Development**

Access needs to be taken into consideration, as well as its suitability for new office sites.

**Issue: Economic Regeneration - Heavy Industry Areas**

There are several areas that are considered an eye sore around the derelict areas left by heavy industry. These derelict structures should be removed and the land possibly put to other uses such as light industrial premises, or even to landscaping it as suggested while supporting existing heavy industry in existing areas where they are thriving.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Vital that Stockton town centre is given a face lift and further development if it is to become a thriving centre that can compensate with the other out of town shopping and entertainment areas.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

When comprehensively redeveloping this area, emphasis must be made on ensuring that the area does not become an area of bars and clubs but a diverse mix of uses.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

A totally pedestrianised high street would improve not just the look of this area but increase the amount of business it generates for the shop owners. Taxis and buses can be accessed on roads which run behind the high street.

**20/1 Individual**

**Issue: Community Facilities - Civic Amenity Site**

Portrack Area

**21/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maintaining the limits to development of the villages. 2.14. 2.15.

Option 3 is preferred. Comment is mainly in relation to Kirklevington. The village was consulted in 1988, when the village envelope was created. Since that time many applications have been turned down.

The objections to enlarging the village remain the same, and are even more important now because so much development has occurred both within the Kirklevington envelope and to the south of Yarm. Roads cannot be improved and cannot sustain any more traffic. The rural character should be maintained. The strategic gap between Kirklevington and Yarm should be maintained.

2.14. The purpose of limiting the development is to contain urban sprawl and maintain the openness of the countryside. The development requirements of the Borough can be met within the existing limits.

2.15. There are sites on brownfield land and within existing limits. Development here would endanger its unique character as an independent village.

**Issue: Spatial Strategy - Green Wedges**

2.16. Green Wedges. Green wedges should be removed from the limits of development in order to protect them from development. There is no mention here of the strategic gap which exists to separate Yarm from the village of Kirklevington. The most attractive feature of this area is the discrete nature of the towns and villages each having defined boundaries separated by open country. Retention of the agricultural land is considered important in defining the boundary between settlements and preventing Kirklevington being engulfed by the conurbation, thus maintaining the balance between urban and rural areas in the Borough.

Wildlife movement gets a mention here, but there is no mention of the strategic wildlife corridor in Kirklevington and Castleavington between the Tees and the Leven, which the Cleveland Wildlife Strategy said, should be improved. This is doubly important now that so much building has taken place to the north of it. Green wedges are essentially manicured and managed, like golf courses and playing fields for example. Wildlife corridors have to be left much less disturbed and also need to be of considerable width and length to ensure that biodiversity. This is important for future generations: once developed there is no going back..

**Issue: Spatial Strategy - Limits to Development Villages**

The document is very urban-oriented: the rural villages do not get a mention. Kirklevington and Castleavington wish very much to preserve their present status as separate village communities. Agricultural land is important as a well defined boundary between settlements. If the strategic gap is not maintained the urban sprawl will inexorably erode it.

**22/1 Individual**

**Issue: Spatial Strategy - North Shore**

Use the opportunity to make developments attractive for people who live and work in the area.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Ensure light industry use

**Issue: Spatial Strategy - Limits to Development Villages**

Ensure strategic gaps are not replaced by green wedges. Rural economy farming, tenant farms not addressed - loss of land - loss of livelihood. Ensure that the Tees Valley Wildlife Trust and Tees Valley Structure Plan work together to protect wildlife corridors. Do not allow developers to drive through their own agenda against the Tees Valley Structure Plan in rural areas.

With regards to Kirklevington, maintain the existing limits to development with reference to housing applications see HA24, map 23. This proposed development is outside the development limits as defined in the Tees Valley Structure Plan. No requirement for housing to be built on Greenfield sites. There is sufficient land available within the Stockton Core Areas for housing requirements up to 2021. There is no need for additional land for luxury housing, such land is available within the Stockton Core Area, Wynyard and Ingleby Barwick. The land is closely associated with the Tees/Leven Strategic Wildlife corridor.

**Issue: Spatial Strategy - Limits to Development Villages**

Planning permission has been granted for the development of housing at location HS48 Map 17 Tall Trees. It acknowledged that the site occupied by the Tall Trees Hotel is a brown field site, but it appears that the area in question also crosses the Saltergill Beck and will obstruct a sensitive part of the Tees/Leven Strategic Wildlife Corridor. Is this correct and if so have the planning department incorporated any planning restrictions on the proposed development.

(Further comments are made in respect of the planning decision made at Tall Trees)

**Issue: Spatial Strategy - Green Wedges**

Green wedges must be defined as in the Tees Valley Structure Plan 2004. Green Wedges as opposed to Strategic gaps are of little use to controlling development and protecting villages from urban sprawl. Green wedges should only exist within urban areas not rural areas. Need to enhance area for tourism and walking.

**Issue: Transport - Barrage Bridge**

Barrage needs to have better access to all, but engineering could slow down or restrict use as a rat run.

**Issue: Economic Regeneration - Employment Land**

Wynyard cost the rate payers and structure plan policy was overturned to provide this international world class site for employment. The area was developed as a large housing estate and further housing should not be allowed - allocated for prestige employment.

**Issue: Economic Regeneration - Employment Sites Strategy**

Danger developers being able to pick and choose. Planning department and councillors and residents should choose according to sustainability.

**Issue: Economic Regeneration - Office Development**

Ensure developers are not allowed to make their own plans but stick to existing plans.

**Issue: Economic Regeneration - Heavy Industry Areas**

All areas should be good to live and work in Category D as in the old Teesside Plan was poor for the residents of the area and reflected badly on tourism. Option 1&2 should go together.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Problems if small business relocated to a site which will increase costs for them. Many small businesses provide valuable service.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Parking for the elderly and disabled problem but a greener area is more attractive for all.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

Development along the High Street is poor, missed opportunities, including the house of John Walker, Match Man and adjoining houses, one belonging W Wordsworths brother in law is now a bookmakers. The High Street should be regulated in signs and designs of shop fronts.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Finding a bus or helping tourists is impossible. A bus station with link buses to the High Street is the answer.

**Issue: Community Facilities - Civic Amenity Site**

A site behind the chrome and chemicals for a small yard for skips or Eaglescliffe Industrial Estate also. Better facilities for recycling plastic/cardboard. Bowesfield adjacent to scrap yard close to town centre.

### 23/1 Individual

#### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Option 2 to provide additional employment for local residents on loss of admiralty jobs.

#### **Issue: Spatial Strategy - Limits to Development Villages**

Maintain villages as they are to prevent urban sprawl.

#### **Issue: Transport - Barrage Bridge**

To allow access into North Shore for all traffic (Option 4) would lead to safer route from south to North Shore rather than via A66-A19 Portrack Roundabout.

#### **Issue: Community Facilities - Civic Amenity Site**

Old Crossley Brickyard Site or Eaglescliffe Industrial Estate.

#### **Issue: Housing Allocations - Tall Trees**

HS48 Site shown much larger than agreed area and intrudes into wildlife corridor. Please check site boundary and Map.

### 25/1 Individual

#### **Issue: Spatial Strategy - Limits to Development Villages**

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 26/1 ONE North East

### Issue: Spatial Strategy - Green Blue Heart

One Northeast supports the inclusion of the GBH as a key regeneration project. One Northeast advises that the matter needs to be revisited to update it in line with recent changes to the Strategic Master plan for GBH. Although it is recognised that GHB represents a vision for this area spanning 30-50 years, we agree that the project should be identified in the DPD as there will be some early wins deliverable in the short term.

### Issue: Spatial Strategy - North Shore

One North East supports option 2 as this accords with the ongoing work in North Shore and the proposal for Greater North Shore. Consultants have been commissioned to reconsider the study area at North Shore and minor alterations to its boundary.

### Issue: Spatial Strategy - Southern Gateway and Riverside Sites

Agrees with the issues highlighted

**Issue: Spatial Strategy - Eastern Gateway**

Agrees with the issues highlighted

**Issue: Spatial Strategy - Northern Gateway**

Agrees with the issues highlighted

**Issue: Spatial Strategy - Bovesfield Lane**

One NorthEast supports option 3 since this option will maximise the site whilst ensuring that it complements ongoing efforts to change the Southern Gateway. This site is one of the first, which visitors see of Stockton when exiting the A66. Consequently it is of key importance that any development on this site achieves a high quality of design and use to create a sense of place and arrival for Stockton generally

**Issue: Transport - Light Rail Transport Proposal**

Agrees with the issues highlighted

**Issue: Transport - Major Bus Route Scheme Proposal**

Agrees with the issues highlighted

**Issue: Transport - Rail Transport Links and New Stations**

Agrees with the issues highlighted

**Issue: Spatial Strategy - Barrage Bridge**

To enable the best option to be selected, it is considered that a feasibility study should be undertaken to fully explore the issues around the Bridge in the context of the GBH Plan and North Shore Masterplan.

**Issue: Economic Regeneration - Employment Land**

Supports Option 1 since this will provide the most sensible and sustainable form of action.

**Issue: Economic Regeneration - Employment Sites Strategy**

Supports option 1 as since it helps identify priorities.

**Issue: Economic Regeneration - Office Development**

Support option 4 since it helps to recognise that there may be exceptional cases which merit the qualification of Option 1.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Supports Option 4 since it will enable each case to be considered in the appropriate context of the other options.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

One NorthEast does not consider any of these options to offer a best option. As you are aware the masterplan for the southern Gateway and the ongoing Greater North Shore work is exploring ways to link both areas together. Options need to reflect this.

**27/1 Sport England**

**Issue: Sustainable Living - Building Schools for the Future**

Building Schools for the Future – Sport England considers that this issue should also recognise the degree of new investment into sports facilities that the BSF will involve. Stockton needs to consider what facility provision is required to balance curriculum needs (across the schools) with the Borough's facility requirements.

**Issue: Spatial Strategy - Northern Gateway**

Sport England is committed to the spirit and purpose of spatial planning. The integration of policies for the development and use of land with other policies and programmes chimes with the potential of sport and active recreation to make a contribution across a range of policy areas. Through partnership working, Sport England seeks to engage with planners at regional and local levels to help ensure that the interests of sport and active recreation are well represented.

See the emergence of the spatial planning system as an opportunity to deliver both its own aspirations for sport and active recreation whilst contributing to the aspirations of its partners in public, private and voluntary sectors.

In ensuring that Spatial Planning is successfully undertaken it is imperative to ensure that a Local Authority fully understands all of the issues that have a spatial dimension within its area.

## Northern Gateway

Sport England acknowledges the need to review the use of the Tilery Sports Centre but considers that any decision on this site (and sports facility provision within Stockton as a whole), should be made in the context of quantitative, qualitative and accessibility standards for the facility provision established by a PPG 17 compliant Local Needs Assessment.

### 28/1 Royal Mail

#### Issue: Spatial Strategy - Southern Gateway and Riverside Sites

With reference to the townscape heritage improvement area and in particular the post office building. The DPD should be amended to add a degree of certainty for developers and landowners in this area as to what exactly can be developed or how restrictive land use policies will hinder development or proposed change of use applications.

We also would like to seek clarification from the Council with Specific reference to 90 High Street, Stockton.

### 29/1 Solutions Northern

#### Issue: Spatial Strategy - Limits to Development Villages

With reference to Morley Carr Farm. We are aware of the difficulty in planning terms of the current use etc of the Farm. Tried to progress the concept with the best interests of Yarm and have made some progress in understanding the needs of the Town Council and residents and to this end have also attempted to give the Doctors at Yarm Medical Centre a further option in their quest for a new centre. This land has been offered as a swap transaction with the new Centre being built at our cost. The existing medical centre land would be offered back to the Council for Car Parking use. The additional relocation of 1 acre of allotments designed by a landscape gardener would provide a further area of parking at the entrance to Worsall Road and extend traffic further out of Yarm. Morley Farm should be included within an extended boundary for consideration of future development. The first phase of this development would represent the Care Village, any additional phases would be considered some time in the future.

### 30/1 North Shore Development Partnership

#### Issue: Spatial Strategy - All Regeneration Initiatives

Support the key driver for the spatial strategy be the Stockton Middlesbrough Initiative and the key regeneration projects including North Shore, the Eastern Gateway and the Green Blue Heart.

#### Issue: Spatial Strategy - Green Blue Heart

Support the identification of the Green Blue Heart as key regeneration project within Stockton. However, we do not consider this section of the DPD to be sound – it is out of date information, contrary to PPS12, para 4.24 vii. Recent changes have been made to the Strategic Masterplan for the Green Blue Heart, which should be included within the DPD. Furthermore, although the Strategy is based on a 50-year vision, there are some quick wins, which should be supported.

#### Issue: Spatial Strategy - North Shore

Para 2.7 of the Issues and Options report recognises that the North Shore regeneration scheme is identified as a brownfield mixed use development of regional importance within the emerging RSS and that the Council's Regeneration Strategy identifies It as a flagship site. This paragraph continues by advising that North Shore should be featured prominently within the LDF – support this statement and the importance given to North Shore.

The development quantum should be changed to the following figures:

- Residential = 510 units – 1,200 units
- Office = 60,390 sqm – 90,300 sqm
- Leisure = 2,320 sqm – 4,210 sqm
- Hotel = 100 – 300 bed

The emerging DPD asks what area the boundary of the site should encompass and whether it should comprise the boundaries for the two North Shore planning applications or whether it should include additional land to the east, north and west. We support options 2 and 3 which reflect the ongoing work at North Shore and the proposals for the Greater North Shore area.

#### Issue: Spatial Strategy - Eastern Gateway

Paragraph 2.9 of the Issues and Options report advises that the Eastern Gateway is a long-term aspiration project. This paragraph is unsound because they have not considered all the alternatives as required by PPS12 (para. 4.24vii). We consider that the suggested proposals would be sound by identifying that the car park to the rear of Splash is a suitable location for a multi storey car park, together with providing opportunities for expansion of the existing leisure centre.

#### Issue: Economic Regeneration - Employment Land

Fully support Option 1 whereby surplus sites should be de-allocated and particular uses should be channelled to the most appropriate sites for example Research and Development in clusters within the SMI area including North Shore.

**Issue: Economic Regeneration - Employment Sites Strategy**

We fully support Option 1 which seeks to establish a hierarchy of employment locations for differing types of employment land. As you will be aware, Policy 13 of the emerging RSS identifies North Shore as one of eight Regional Brownfield Mixed Use Developments. Accordingly, given its regional importance, we consider that North Shore should be identified for a major mixed use development including prestige employment uses.

**31/1 Wynyard Estates**

**Issue: Spatial Strategy - Limits to Development Villages**

We note that the Council is currently undertaking a review of villages which may identify opportunities for additional development and could result in a review of limits to development. This a review we look forward to being involved with but note Wynyard's hybrid status.

Currently Wynyard is located outwith the limits to development, the adopted June 1997 Local Plan and proposals map identifies Wynyard as a series of housing allocations (HO 1r). Moving forward, cognisant of the sustainability benefits of more development at Wynyard, and the content of the submitted masterplan, Wynyard should be identified as a location for further development.

We support Option 1 and 2, additional development enhancing the sustainability of Wynyard and there being exceptional circumstances to do so, cognisant of the wider masterplan. Finally, to provide the Council with control over that development, at this stage, rather than defining a village envelope it is considered appropriate that the additional development cells are allocated on the proposals map.

**Issue: Economic Regeneration - Employment Sites Strategy**

As part of the masterplan a commercial site of 5.25 ha has been identified south of the A689, to be accessed from the eastern roundabout. Wynyard Estates consider the Council should identify a hierarchy of employment locations cognisant of the Regional Spatial Strategy and the designation of Wynyard as a prestige employment location. Thereafter, the Regeneration DPD should identify specific opportunities for development channelling development to the most appropriate sites together with de-allocation where appropriate and when sites are not in accordance with the spatial strategy for the Borough.

**32/1 Banks Developments**

**Issue: Spatial Strategy - Bowesfield Lane**

The area now benefits from superb road access. There needs to be a Masterplan approach within the Bowesfield Lane area. This should be done in partnership with the Council lead developers and stakeholders. The area has benefitted from being a mixed community including business, residential and commercial activity. This mix of uses should be consolidated within the study area. One approach would be to focus residential uses on the river frontage with office/commercial uses located behind as a buffer to the heavier industrial uses which are bound to be retained for some time. Area should on include community facilities - shop.

The area has been identified as vulnerable to flooding, and from experience it is believed that the site can be developed in such a way that buildings will not flood and there will be no knock on flooding effects elsewhere.

Some of the study area is currently designated Green Wedge. This should be reviewed as part of the masterplanning process to form a new continuous and effective green corridor from the Surtees Bridge to the Bowesfield Wildlife Conservation Area.

**Issue: Spatial Strategy - Green Wedges**

Some of Bowesfield Lane Study area is currently designated Green Wedge. This should be reviewed as part of the masterplanning process to form a new continuous and effective green corridor from the Surtees Bridge to the Bowesfield Wildlife Conservation Area.

There is a danger of considering the Green Wedges the same as Green Belt. They are not intended to fulfil the same role. By re-drawing limits to development to exclude Green Wedges there would be more protection but in many cases that would give an illogical limit to development.

**Issue: Economic Regeneration - Employment Land**

In practice much of the employment land is in abeyance until there is a dramatic upturn in the fortunes of the chemical industry. Perhaps the DPD should recognise this reality in relation to certain areas.

**Issue: Economic Regeneration - Employment Sites Strategy**

The employment land portfolio should be built up carefully to ensure that differing types of employment activities are likely to be catered for. Where a high quality environment is the aspiration it would be inappropriate to allow unsightly industries.

### **Issue: Economic Regeneration - Office Development**

There is a great emphasis on a single reference in para 1.8 of PPS6 directing office development to town centres. We believe this approach is mistaken and it likely to be formally overturned in the near future in PPS4 (based on comments included in the Governments planning green paper). The logic behind the sequential test for offices is that they have a role to play in supporting town centre shops and cultural facilities. Offices in this location are more difficult to access, more expensive to rent and less attractive. Greenfield out of town office parks should not be approved regardless of other planning issues. Traditionally offices have been allowed on industrial sites - Preston Farm. Although Option 4 recognises that large office may be more appropriate outside town centres it would be very unfair to prevent smaller firms from enjoying the benefits of this type of location. Small firms are the bedrock of the local economy. They cumulatively employ the majority of workers, and in some cases they grow into large firms. Stockton should provide small businesses with the opportunity to find suitable accommodation where they need it.

### **33/1 Government Office for The North East**

#### **Issue: General - Relation to Core Strategy**

PPS12 para 2.9 states that the Core Strategy must be kept up to date and once adopted all other development plan documents must be in conformity with it. Consider that currently the Issues and Options Regeneration DPD fails to clearly identify this vital relationship and is in danger of reopening debate on issues that are in the process of being decided through the development of the Core Strategy through to submission and adoption. There is scant reference to the Core Strategy throughout the draft DPD and the explanation of the need for this DPD to be in conformity with the Core Strategy in a central position within the local development framework, above all subsequent DPD's.

In addition proper recognition of the emerging strategic policy framework within the Core Strategy should result in the Regeneration DPDs options focusing on how the DPD will implement the wider strategy, and the tactical, timing, locational or delivery options available. It is only through this process that an integrated policy framework for Stockton will be achieved and enable DPDs such as Regeneration to meet the requirements of Test of Soundness.

The introduction of this document should make clear the role of the Regeneration DPD with the LDF. No need to repeat the description and definition of the LDF as in paras 1.2 to 1.6.

#### **Issue: Spatial Strategy - Green Blue Heart**

Para 2.7: I understand that the Green Blue Heart project is well advanced and therefore the options are limited but as the masterplan is still being drawn up, this issue and options consultation stage of the Regeneration DPD could be part of the process to determine priorities etc.

#### **Issue: Economic Regeneration - Employment Land**

The strategic question should be answered in the Core Strategy with the Regeneration DPD identifying sites and providing more detailed guidance on the implementation of Core Strategy Policy CS4. If the Council has strong evidence that there is still a surplus of employment land then the issues in relation to which sites to de-allocate are currently identified but this approach is not evident in the CS4 rather the reasoned justification refers to an Employment Land Review which was due to be completed in October 2007.

#### **Issue: Housing - Affordable Housing**

This section does not fully cover the issues and options in relation to the detailed distribution of housing allocations as identified in the core strategy nor the role that housing development should be playing in regeneration projects. Paragraph 6.60 of the Core Strategy describes the role of the Regeneration DPD as 'to identify sites for residential development and to provide more detailed guidance on the implementation of this policy' (CS7). I realise that housing development is mentioned in many of the options throughout the document but as expressed in the Core Strategy preferred options document, paragraph 6.58 'It is clearly essential that site allocations for housing support the regeneration priorities of the Borough'. This housing section could have discussed options for housing, particularly in later phases, in relation to the regeneration priorities instead of merely discussing the affordable housing need which has already been established in the Core Strategy. Further work required.

### **34/1 Redleaf VI**

#### **Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

We support the broad aim of developing land in proximity to the riverside, and acknowledge the recently prepared Riverside Site Masterplan, which highlights the important role that this area could perform in the regeneration of the southern gateway to the town centre. However, we also support reference, within the Preferred Option for the Riverside and the Southern Gateway, of the benefits of the approved new food store in the Castlegate Centre, in terms of both significantly enhancing existing retail provision, and also regenerating this part of the town centre. The 2004 Stockton Retail Study identifies the need for improved food retailing within existing centres, and it is important that the Regeneration DPD recognises this, in order to pass Test of Soundness 4, and ensure consistency with national policy in the form of PPS 6: Planning for Town Centres. This would also ensure consistency with Core Strategy policy CS 5, and the changes proposed in relation to this separate DPD (see attached form), therefore helping to pass Test of Soundness 6 set out in PPG12.

### **35/1 Blakett Hart and Pratt LLP**

#### **Issue: Spatial Strategy - North Shore**

It is not certain that there is a clear highway capacity to allow a larger area to be fully redeveloped. If a larger area is selected, it seems likely that the Council would compensate by restricting development in other areas, regardless of the overall sustainability of other development. Concerns would also be raised about the capacity to properly masterplan over the area, as economic factors have not been taken into

account historically, leading to flawed aspirations which cannot be implemented. The requirement for an unaffordable marina in the Boathouse Lane SPD is cited to support this contention.

**Issue: Spatial Strategy - Bowesfield Lane**

Without a positive intervention strategy involving CPO processes, any change to the area would only occur over an extremely slow timescale. The cost of land assembly, site clearance etc would be likely to mitigate against exemplar developments.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

The scheme needs to be expanded to recognise the area between the site and the A66 as a growth point/eco town, having the potential to accommodate significant new growth in a sustainable manner. The existing site has only the benefit of Allens West railway station but if expanded could encompass new metro stations, Park and Ride Facilities and achieve a critical mass capable of delivering a proper eco town.

**Issue: Spatial Strategy - Limits to Development Villages**

This issue is premature in view of ongoing review of village sustainability. Development within village limits is currently embargoed because of this policy. Not allowing development within villages needs to be carefully considered. There are still villages in Co Durham that bear the scars of this approach (known as category D villages). Development within villages is not inherently unsustainable and should be permitted. This does not appear to be an option allowed for in the above.

**Issue: Spatial Strategy - Green Wedges**

Not all development within a Green Wedge is inappropriate, an evinced by new schools at Ingleby Barwick. Consideration needs to be given to permitting appropriate development and given consideration to an access strategy which allows for greater public access into Green Wedges. Certain forms of development such as formal recreation and large format sports facilities require green wedge locations.

**Issue: Transport - Barrage Bridge**

The more fundamental issue is what can be done to reduce the amount of vehicular traffic in this area. Proper consideration needs to be given to effective Park and Ride and LRT provision.

**Issue: Economic Regeneration - Freight Development**

Experience from Wynyard (Stockton) and Faverdale (Darlington) recognises that the Tees Valley is well placed to play a regional role in large format B8 distribution parks. They can be significant employment generators in their own right. It would be inappropriate to constrain their development in a rigid manner. Greater consideration should be given to the concept of cluster development involving synergies between businesses and transport modes.

**Issue: Economic Regeneration - Employment Land**

There is no merit in seeking retain employment sites which are unattractive to the market place. The result is simply no development. However strategies should be cautious about seeking to be overly prescriptive. Any strategy which would allow only a restrictive range of sites will lead to localised high level values. Foot loose industry will then move to an area with lower values - not necessarily within the Stockton or the Tees Valley. Wider choice of sites are needed. Integration with key transport links is essential if we are to achieve truly sustainable development.

**Issue: Economic Regeneration - Employment Sites Strategy**

Officers are not really inviting a debate on this issue and option 2 is not being put forward as a credible alternative to Option 1.

**Issue: Spatial Strategy - Office Development**

There is a limited range of small to medium offices for owner occupation in the Stockton area. We need to encourage a wider choice. None of the options seem to address the issue of how can we attract office based inward investment into Stockton Borough?

**Issue: Economic Regeneration - Heavy Industry Areas**

The image of the areas is a key factor in inward investment. However the ability of the Council, on its own to tackle decay, contamination and dereliction is very limited. There needs to be stronger recognition in the next version of the document to encourage the private sector to bring forward ideas to tackle eyesore sites. The focus on the Core Area does little to encourage the private sector to take a positive attitude to site remediation. Billingham Bottoms for example is heavily contaminated but has been excluded from core area definitions, despite being an integral link between the 8 bridge cycleway and an existing country park.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Any possible public sector intervention needs to be based upon a proper understanding of the local market place as well as through understanding of site conditions/constraints. There are areas which have had several master plans but no development. The Council will need to convince the development world of capacity and ability before it can command confidence in Option 3.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Option 5: seek to link the Riverside with the Town Centre. Promote Riverside development which links with the Town Centre. Explore ways of reducing the size and volume of traffic on Riverside Way. Support the redevelopment of the Castlegate centre to secure its frontage onto the Riverside. Modified version of Option 3.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

This option could be considered alongside more radical options for linking the High Street with the Riverside as part of a longer term strategy.

#### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

The use of Riverside Way as a bus/taxi only area should be explored. The road closure during SIFR does not appear to result in gridlock in the town centre. New interchange facilities would be provided under this option.

#### **Issue: Community Facilities - Civic Amenity Site**

Is a single facility the best option given the separation of the Leven Valley? Consultation should be given to sites in the vicinity of Allens West and Teesdale [Teesside] Industrial Estate.

#### **Issue: Spatial Strategy - Core Area Priority**

Whilst there is recognition that the Green Blue Heart is an area of development potential and it is recognised that development will inevitably take place in this area, there are concerns that the concept as a whole is expected to last some 30-50 years according to your documentation. Such concerns are manifest when read in conjunction with your core strategy which effectively seeks to limit development outside the core area until such times as the development required to re-invigorate the Green Blue Heart is completed. If the majority of development will be concentrated within the core area, there will be a slow down in build activity within the Borough. The impact on the area outside the core area needs assessed.

#### **Issue: Transport - Light Rail Transport Proposal**

In relation to transport, the proposed light rail transport improvements indicated on map 6 appears to miss out the possibility of providing a new station to the west of Stockton at the intersection with the A66. As this location could be readily linked with the new Park and Ride facilities and would serve the existing Preston Farm Industrial Estate as well as being a short distance away from the transport interchange at Allens West, this seems to be a missed opportunity. This suggestion is made regardless of any decision made by the Government in relation to the possibility of an eco town in this location.

#### **Issue: Transport - Park and Ride**

The lack of park and ride facility for the Tees Valley is considered to a major omission from the strategy. It is accepted that P&R needs to be considered over a large Tees Valley wide area but given the simple highway geometry of the A19, A66 and A174, it is not seen how the basic location of such a facility should require more detailed investigation and study. The location of parking facilities should be a relatively easy task to resolve. Routeing of buses thereafter is considerably more complex but the basic land use issues seem capable of being resolved now. Consideration should be given in the Regeneration document to providing transport interchanges where there is a synergy between P & R facilities, bus corridors and LRT stations where appropriate. To ignore the potential Park and Ride as a means of displacing car journeys is considered to be a significant flaw in demand management and highway thinking.

#### **Issue: Transport - Park and Ride**

It is not clear how the sites in map 8 can possibly contribute to a PR facility given that these facilities are effectively already within the Stockton Town Centre. Effective PR as evinced by York/Durham requires the cars to be intercepted outside of the congested areas. On the A66, this would need to be somewhere around the Elton Interchange. This does not appear to be recognised in the document.

### **36/1 Barclays Bank**

#### **Issue: Retail and Other Town Centre Uses - Retail Evidence**

The Borough's last retail study was undertaken more than 3 years ago and the Bank notes that it is currently in the process of being updated (see paras 6.37 of the Core Strategy Preferred Options). The Bank does not believe that it can be possible to select any preferred policy options for the retail strategy until the evidence base is properly in place.

### **38/2 English Heritage**

#### **Issue: General - Stockton Borough Past and Present**

The urban area is described as being surrounded by a rural hinterland containing a number of villages. This is so, but Stockton is also characterised by having subsumed a number of villages which were formerly rural in nature. Hartburn is an obvious example.

#### **Issue: Spatial Strategy - North Shore**

This text concerns the North Shore. Three options are identified, described as being edged, variously, in red, blue and in green. These Options and their colour coding are not shown on the accompanying Map 2, nor does Map 2 show the relationship of North Shore to the Eastern Gateway Improvement Area centred on Church Road.

#### **Issue: Spatial Strategy - North Shore**

This text concerns the North Shore. Three options are identified, described as being edged, variously, in red, blue and in green. These Options and their colour coding are not shown on the accompanying Map 2, nor does Map 2 show the relationship of North Shore to the Eastern Gateway Improvement Area centered on Church Road.

#### **Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

The text concerns the matter of the Southern Gateway and Riverside Sites. We are advised that a site Masterplan has been prepared and approved by the Council. English Heritage was not consulted on the masterplan despite its critical relationship to Stockton Town Centre and its Conservation Area.

#### **Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

This map identifies a number of regeneration areas in addition to the Eastern and Southern Gateway improvements. The document, however remains silent with regard to the cultural quarter, the THI area, the

Yarm Lane-Bridge Road corner, and Boathouse Lane. Having identified these areas I am puzzled as to why the document provides no commentary. Are there no issues or options to consider in respect of them?

**Issue: Spatial Strategy - Northern Gateway**

This map, in conjunction with Map 3, demonstrates the spatial extent to which efforts are to be spread. We are advised that Norton Road should be improved as the transport corridor. This is a statement, which does little to shed light on the possible range of issues and options for what is in fact quite a large area. In the same way, what are the issues and options in respect of the Tilery Sports Centre. Is it not the purpose of this document to open up discussion on the matter.

Similarly, is residential the only option for Queens Park North and, within that, is there not a discussion to be had regarding the various means by which this might be brought about?

**Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

This text concerns the matter of the Southern Gateway and Riverside sites. We are advised that a site Masterplan has been prepared and approved by the Council. English Heritage was not consulted on this Masterplan despite its critical relationship.

The map identifies a number of regeneration areas in addition to the Eastern and Southern Gateway Improvements. The document, however remains silent with regard to the Culture Quarter, the THI area, the Yarm Lane-Bridge Corner, and the Boathouse Lane. Having identified these areas I am puzzled as to why the document provides no commentary. Are there no issues or options to consider in respect of them.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Paras 2.12

This text concerns that Allens West former Eaglescliffe Logistics site. I note that the site is considered to have good transport links to both Yarm and Stockton centres. I would question this. Access to the north is rather indirect, the access to the south often meets with congestion from Yarm bridge. There is a need for good rail links.

This site is a significant distance from the Core Area (does not conform with the Core Strategy).

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This text concerns that Allens West former Eaglescliffe Logistics site. I note that the site is considered to have good transport links to both Yarm and Stockton centres. I would question this. Access to the north is rather indirect, the access to the south often meets with congestion from Yarm bridge. There is a need for good rail links.

This site is a significant distance from the Core Area (does not conform with the Core Strategy).

**Issue: Spatial Strategy - Limits to Development Villages**

Paras 2.14

Option 1 is to consider modifying the limits to development of villages. A settlement is either sustainable or unsustainable. Where it is already sustainable, there can be no case for allowing additional development which on its face conflicts with the desirability of focussing development within the Core Area of the Borough.

**Issue: Spatial Strategy - Limits to Development Villages**

Option 1 is to consider modifying the limits to development of villages. A settlement is either sustainable or unsustainable. Where it is already sustainable, there can be no case for allowing additional development which on its face conflicts with the desirability of focussing development within the Core Area of the Borough.

**Issue: Transport - Rail Transport Links and New Stations**

This issue, like many others, presents a statement of fact rather than presenting the reader with a clear explanation of the pros and cons of various options, including doing nothing. For example, we are advising that the Tees Valley rail Strategy has identified that a direct passenger rail link between the Tees Valley and Tyne and Wear City regions could be provided by upgrading the existing Stockton to Ferry Hill line. There is, however no commentary to explain the associated benefits or disbenefits, the difficulties such a project might encounter, whether one new station is more important than another and should therefore be prioritised.

Also, what would be the inter-relationship between the residential development at Allens West and the transport interchanges at Eaglescliffe?

Nowhere in this document are the linkages between the various regeneration propositions properly explored.



Para 3.10

This text identifies four redevelopment proposals which may have implications for town centre parking. They are poorly cross referenced on Map 8 on page 26, and poorly cross referenced on Maps 2 and 3.

Pars 3.11

It is not clear from Map 8 which sites are being investigated as possible park and ride car parks. In any event, I would express some concern that those sites, such as they are, may be too close to justify the ride.

Para 3.15

Support the creation of new cycle and pedestrian routes linking the various communities of the Borough. Unclear whether there is a hierarchy of importance between these possible links. Is there a funding issue? Would phasing be necessary?

**Issue: Transport - Freight Development**

English Heritage supports options which encourage rail connections and which safeguard the possible future means of doing this.

**Issue: Transport - Freight Development**

English Heritage supports options which encourage rail connections and which safeguard the future possible means of doing this.

**Issue: Transport - Stockton Town Centre Parking**

This text identifies four development proposals which may have implications for town centre parking. They are poorly cross referenced on Map 8 on page 26, and poorly cross referenced to Maps 2 and 3.

**Issue: Transport - Stockton Town Centre Parking**

Poorly cross referenced to paragraph 3.10

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**Issue: Transport - Stockton Town Centre Parking**

Poorly cross referenced to paragraph 3.10.

**Issue: Transport - Park and Ride**

It is not clear from Map 8 which sites are being investigated as possible park and ride car parks. In any event, I would express some concern that those sites, such as they are, may be too close to justify the ride, doing little to reduce congestion around the town centre.

**Issue: Transport - New River Crossing**

English Heritage supports the creation of a new cycle and pedestrian routes linking the various communities of the Borough. I am unclear from the commentary, however, whether there is a hierarchy of importance between these possible links. Is there funding issue? Would phasing be necessary?

**Issue: Sustainable Living - Health Provision**

I am unclear, from the hierarchy set out in the North Tees PCT's vision, what this strategy will mean for the spatial and geographic future of the existing facilities and provision of new.

**Issue: Economic Regeneration - Employment Land**

Option 1 is best as the Council needs to be more proactive in planning the distribution of employment opportunities and ensuring an appropriate mix.

**Issue: Economic Regeneration - Heavy Industry Areas**

The two options put forward in respect of heavy industrial areas appear not to be options. They are complementary.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

This paragraph sets out four possible options for dealing with existing employment sites in the core area. Question in respect Option 3 whether the redevelopment of an existing town centre site, which has unsustainable relocation consequences for uses that have a vital roles in the local economy, can of itself be sustainable.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

There needs to be further explanation and assessment of more meaningful options. The redevelopment of one site alone, as propounded by option 4 is too specific. It is necessary to deal with overarching principles first. There is a large vacant site within this block but this is not apparent from the text. If the intention is to completely redevelop the whole area then English Heritage would strongly object. The wording of the option is too ambiguous. In seeking to provide a more varied range of land uses, residential should be one of the options.

### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

English Heritage questions whether the historic layout of the main town is really the issue. The text contains insufficient assessment of the issues, and in consequence gives rise to meaningless options, none of which appear to present a holistic or comprehensive approach to the regeneration of the town centre.

### **Issue: Housing - Affordable Housing**

Maps 15 to 17 identify housing sites with planning permission for ten or more dwellings. I am unclear as to whether these sites have been identified as those which will be required to meet affordable housing needs. If they are, it appears that a number of them are not in sustainable locations: Nor is it easy to see how they relate to public transport provision or job opportunities.

### **Issue: Housing - Affordable Housing**

Map 16 identifies housing sites with planning permission for 10 or more dwellings. It is unclear as to whether these sites have been identified as those which will be required to meet affordable housing needs. If they are, it would appear that a number of them are not in sustainable locations: nor is it easy to see how they relate to public transport provision or job opportunities.

### **Issue: Housing - Affordable Housing**

Map 17 identifies housing sites with planning permission for 10 or more dwellings. It is unclear as to whether these sites have been identified as those which will be required to meet affordable housing needs. If they are, it would appear that a number of them are not in sustainable locations: nor is it easy to see how they relate to public transport provision or job opportunities.

### **Issue: Housing - Affordable Housing**

Map 15 identifies housing sites with planning permission for 10 or more dwellings. It is unclear as to whether these sites have been identified as those which will be required to meet affordable housing needs. If they are, it would appear that a number of them are not in sustainable locations: nor is it easy to see how they relate to public transport provision or job opportunities.

### **Issue: Spatial Strategy - Limits to Development Villages**

The inference from this appendix is that the built up areas of the borough have defined limits. Because maps 19 and 20 do not define or show the existing limits to development it is difficult to assess the merits or otherwise of the extensions being put forward.

### **Issue: Spatial Strategy - Limits to Development Villages**

This map contains several notations but no key.

### **Issue: Sustainability Appraisal - Key Issue 6 : Protection of the Built Environment**

I note that Key Issue 6 of the Sustainability Appraisal highlights the need for future development to safeguard the Borough's historic environment. This is welcomed, but I am somewhat concerned that, notwithstanding the historic environment is not identified in the document as a driver for change and more importantly (putting aside a passing reference to the Ramsgate THI and the Green Dragon Yard), it does not emerge again in respect of issues and options.

### **Issue: General - Stockton Borough Past and Present**

There is a very real danger that given the number of regeneration initiatives identified, efforts may be too thinly spread geographically to be truly effective and properly resourced. This will mean there is not enough effort to maintain the town centres. There is also a need to provide information on the timing of regeneration projects.

Comments in relation to Introduction para 1.16:

Settlement of the Boroughs predates, (by some considerable way), the Anglo-Saxon period. Indeed paragraph 67.18 of the Core Strategy SA makes reference to Iron Age Bronze Age Activity.

Comments in relation to Paragraph 1.17:

The urban area is described as being surrounded by a rural hinterland containing a number of villages. This is so, but Stockton is also characterized by having subsumed a number of villages which were formerly rural in nature. Hartburn is an obvious example.

### **Issue: Economic Regeneration - Freight Development**

English Heritage supports options which encourage rail connections and which safeguard the future possible means of doing this.

## **39/1 Northumbrian Water**

### **Issue: Retail and Other Town Centre Uses - Town Centres**

There is no mention of Thornaby District centre or of any retail development. Notwithstanding the comments about no need for retail allocations in the short term, the document is looking towards 2021 and with the planned for housing provision throughout Stockton, additional capacity will be required. We suggest that in the preferred options document, this matter is addressed.

**Issue: Retail and Other Town Centre Uses - District Centre Boundary**

In respect of Thornaby we suggest the inclusion of the NWL site within the district centre.

**40/1 RSPB Northern Region**

**Issue: Spatial Strategy - All**

The RSPB is concerned that the close proximity of the SPA and Ramsar site to some of the areas being considered for allocation in the Regeneration DPD may have significant implications for potential developments in these areas. We are also concerned that the scale of chemical, industrial and port related development proposed at Billingham and Seal Sands would result in adverse effects on the integrity of the SPA and Ramsar site. All of the proposed sites will be subject to the Appropriate Assessment Process – as will the combined impact of all the allocations being brought forward. It is therefore recommended that the Council undertake an urgent initial assessment of the sites close to the SPA and Ramsar site to ensure that the development options being proposed are viable.

**Issue: Spatial Strategy - Bowesfield Lane**

If as stated in Option 4 parts of the site are prone to flooding, this site should not be considered for development. This would be consistent with national planning policy as set out in PPS25: Development and Flood Risk which aims to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.

Water compatible uses for the site are likely to include opportunities to restore natural riverside habitats, strengthening the wildlife corridor along the River Tees, augmenting the Bowesfield Marsh Nature Reserve and contributing to the objectives of the Tees Valley Green Infrastructure Strategy, whilst also creating a more attractive surroundings for the existing industrial estate. Pursuing habitat creation would also provide additional floodwater storage capacity and /or the opportunity to create Sustainable Urban Drainage Systems (SUDS) and reduce the potential environmental impacts of surface water runoff from these sites, and would also provide additional wildlife habitat. Option 4 should be preferred option and allocates specific areas on this site for habitat restoration.

**Issue: Spatial Strategy - Green Wedges**

Green wedges provide a valuable ecological function as wildlife corridors, allowing migration and dispersal of species, and also link undeveloped areas to support Option 2, which would make a strong contribution to sustainable development. This approach would also accord with para 12 of PPS9: Biodiversity and Geological Conservation, which states that local authorities should avoid the fragmentation of natural habitat networks, and protect these from development.

**Issue: Transport - Freight Development**

RSPB supports planning policy that shifts freight from roads to the railway and ports network. However irrespective of the Option chosen, the Council will need to ensure that freight related development utilises sustainable locations what will avoid harming the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar site. The effects of freight related developments arising from the Regeneration DPD is each proposed location will need careful consideration within the Appropriate Assessment of the Regeneration DPD, and relevant DPD policies will need to ensure that no adverse effect on SPA integrity arises. If particular allocations are likely to result in adverse effects on the SPA, these should be removed from the DPD. The RSPB is keen to discuss the potential impacts of extant port related and heavy industry allocations with the Council as a matter of some urgency.

The key risks from such developments are:

- Loss of habitat outside the SPA used by SPA species for foraging or roosting during high tide.
- The construction and operation of developments causing disturbance to or displacement of SPA birds using adjacent areas either within or outside the SPA.
- Loss of SPA inter tidal habitat through coastal squeeze against the flood defences of new developments now or in the future. Coastal squeeze can involve direct loss or a reduced exposure or intertidal habitat due to the combination of fixed coastal defences and sea level rise.

A number of port related activities on Map 10 have the potential to result in adverse effects on the integrity of the SPA and Ramsar site, either on their own, as part of the overall effects caused by the whole DPD or in combination with other plans and programmes.

Developments on all the A178 have the potential to adversely affect the SPA and will require AA at the project level.

Two sites adjacent to the River Tees to the east of Port Clarence lie directly behind the North Tees Mudflats, part of the SPA, and therefore have the potential to lead to the loss of SPA intertidal habitat through coastal squeeze. These issues are likely to have significant implications for the deliverability of existing and proposed allocation, which in turn could prevent the successful delivery of the Regeneration DPD and the Core Strategy.

The Council will need to rigorously apply the sequential tests set out in PPS 25 when appraising sites for their suitability for freight-related development, and be able to demonstrate that its allocations accurately reflect the Strategic Flood Risk Assessment commissioned for the Core Strategy, as a key part of the DPD's evidence base.

Sites next to the river Tees need assessed.

#### **Issue: Economic Regeneration - Employment Land**

Support Option 1. Particular uses should be channelled to the most appropriate sites, and recommend that the potential impacts of development on the SPA is a crucial issue to consider when assessing the appropriateness of particular uses on a site. We recommend a criteria led approach to assessing the sites within the employment land portfolio.

Note that the description of the use of the North Tees Seal sands area offered Option 1 does not explicitly refer to nature conservation. This should be changed. Likely impacts on the interest features of the SPA, SSSI's and regionally and locally important wildlife sites will be key criteria by which the suitability of the proposed use will be determined. As stated the sites likely to cause adverse effects to the SPA should be de-allocated to ensure that the Regeneration DPD does not effect the SPA's integrity.

The evaluation of the employment land portfolio should also consider the opportunities these sites offer to strengthen the integrity of the SPA and or contribute to Stockton's green infrastructure. Sites that are de-allocated because employment use may result in adverse effects on the SPA should be evaluated for the opportunities they offer for enhancement or restoration of wildlife rich habitats. This approach would make a strong contribution to national and local BAP targets and also accord with the requirement in paragraph 5 (ii) in PPS 9 for LDF's to identify sites for the restoration and creation of Priority Habitats.

Sites that will be promoted for nature conservation purposes should be identified within the LDF, preferably within the Regeneration DPD. This would allow the council to fulfil its duty, contained with Section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the purpose of conserving biodiversity when exercising its functions.

Furthermore several areas within the employment land offers a significant opportunity to contribute to the maintenance and strengthening of these Network Components.

We note from Map 14 that the Council is recommended the de-allocation of the Belasis Avenue North and South site. This lies adjacent to the SPA and the Saltholme International Nature Reserve. Support this recommendation provided that any proposed alternative use of this land is compatible with the protection and enhancement of the SPA.

#### **Issue: Economic Regeneration - Heavy Industry Areas**

Neither option identifies the requirements to protect the integrity of Teesmouth and Cleveland Coast SPA as a key issue that underpins how the DPD approaches heavy industry allocations. The RSPB is concerned that several allocations within the current local plan adversely affect the SPA. The key risks to the integrity of the SPA are:

Loss of habitat; the construction and operation of developments causing disturbance to or displacement of SPA birds using adjacent areas either within or outside the SPA; Loss of SPA intertidal habitat through coastal squeeze.

A number of areas identified as being available for port related activities on Map 10 have the potential to result in adverse effects on the integrity of the SPA and Ramsar site, either on their own, as part of the overall affects caused by the whole DPD, or in combination with other plans and programmes. Developments on all the sites east of the A178 have the potential to adversely affect the SPA and will require AA at the project level.

The three allocations in the current local plan immediately to the south of the intertidal area at Seal Sands are known to be used by curlew as a high tide roost site and potentially also as a feeding area throughout the tidal cycle. Heavy industrial development at these locations would lead to the loss of habitats that have functional significance for SPA species, and potentially lead to an adverse effect on the SPA. We are concerned that the Council will have difficulty in concluding that the Regeneration DPD will have no adverse effect on the SPA if these allocations are retained in their present form.

Allocating two of the allocations fall within Unit 2 of the Seal Sands SSSI. This conflicts with national planning policy as set out in paragraph 8 of PPS9. Whilst Unit 2 of the SSSI has been assessed by Natural England as Destroyed this Unit is still afforded the protection given to SSSIs particularly as it continues to support roosting curlew, a species mentioned in the SSSI citation, which states that areas of reclaimed land adjacent to the estuary are significant for roosting birds.

It is likely that a comprehensive database will need to be gathered regarding the use of the allocations in the vicinity of Seal Sands by both roosting and feeding curlew to adequately assess the areas functional importance for the SPA. Given the large amounts of land available for port related industry, we question whether a developer that wishes to bring forward a development within an allocated area whether adverse effects on the SPA were likely, as required by the habitats Regulations.

Need to include a more thorough approach than including policies within the DPD stating that no adverse effect on the SPA integrity will be allowed: the AA need to provide clear evidence that the proposed allocations can be delivered without an adverse effect. If particular allocations are likely to result on adverse effects on the SPA, we strongly recommend that these are removed from the DPD, given the large amount of undeveloped employment land available to the Council within Stockton.

Renewable energy: Supportive of the this type of development however concerned that wind energy developments in the Billingham/Haverton Hill/Port Clarence/Seal Sands areas have the potential to adversely affect the SPA. The key risks to the integrity of the SPA arising from inappropriate to adversely affect the SPA. The key risks to the integrity of the SPA arising from inappropriate sited windfarms in this area are:

- Mortality of SPA species
- Turbines causing disturbance of displacement of SPA species from feeding or roosting areas.
- Turbines disrupting flight paths e.g. between intertidal feeding areas and high tide roosts or different parts of the SPA.

Given the fragmented nature of the SPA and the high levels of movement of birds between its component SSSI's, we seriously question whether this part of Stockton on Tees is suitable for wind energy development. This matter should be fully investigated in the AA of the Regeneration DPD. We note that the AA for the RSS has recommended that the Tees Estuary should be removed from Policy 42 [of the submission draft of the RSS] as being an area of least constraint for development. This is in line with DEFRA's policy of avoiding areas within concentrations of species of conservation importance and key migratory pathways. This recommendation has been supported by Natural England as a key amendment in order to demonstrate that the RSS will not have an adverse effect on the SPA. If this recommendation is accepted, identifying this area as suitable for wind energy development would contradict both national and regional planning policy.

Concerned that biomass cultivation on undesignated land in the vicinity of the SPA could lead to the loss of feeding and roosting sites used by SPA species. Policy safeguards are required to ensure that biomass cultivation is not encouraged in locations that would adversely affect the SPA. Previously development land in this area is capable of supporting regionally significant biodiversity and states that local planning authorities together with developers, should aim to retain this interest or incorporate it into any development of the site. Paragraph 13 of PPS 9 identifies the potential importance of brownfield biodiversity and states that Local Planning Authorities together with developers, should aim to retain this interest or incorporate it into any development of the site. Recommend that the regeneration DPD contains policy ensuring that only land with low biodiversity value is used for growing biomass crops.

Other comments made repeat those made in representation 40.5

#### **Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

We support the emphasis on environmental improvement in Option 2, and believe that such improvements should be focused on providing high-quality green space that benefits both people and wildlife. With this in mind, the policies of the Regeneration DPD should fully reflect paragraph 14 of PPS 9 by ensuring that developers maximise the opportunity to incorporate wildlife friendly features within the design of developments.

#### **Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Consider that none of the options fully realise the potential of the Riverside: the RSPB would support an Option that would use the regeneration of the Riverside as an opportunity to create areas of high quality green space for the benefit of both people and wildlife. This green space could incorporate cycleways, footpaths and green trails. It would also improve the biodiversity value of the wildlife corridor along the River Tees, and by using SUDS could also contribute to minimising flood risk and addressing the environment effects of surface water runoff.

We believe the Council should adopt policy within the Regeneration DPD that protects and enhances the biodiversity value of open spaces in the built environment, in order to reflect paragraph 14 of PPS9. Given the high population densities in some parts, the need to provide high quality open space can contribute to improved health and well being in such communities. Developers should therefore be expected to demonstrate how the additional requirements for open and green space generated by their development will be addressed.

#### **41/1 Simon Bailes Ltd**

##### **Issue: Spatial Strategy - North Shore**

The boundary of the North Shore development needs careful consideration. It is only necessary to identify the area where it is essential to plan for the comprehensive and coordinated planning for the area. It is not necessary to include land and or premises, which would otherwise be, appropriate for individual developments (albeit contributing to the plans general policy aims and aspirations) on their own. The land and premises of Simon Bailes Ltd and the land generally falling within the new road gyratory roundabout at the end of Church Road (either side of Commercial Street) is one such site, which should be excluded from the North Shore Area. Site does not need to be included within the North Shore area as it effectively an island site.

The existing area should be used for the North Shore area but excluding the island site that includes Simon Bailes Ltd

**Issue: Spatial Strategy - Allocate as Mixed Use Development**

The site extends to include the Simon Bailes premises and adjoining land which with the recent highway works now forms an island site contained by Church Road on this prominent arterial approach to Stockton Town Centre.

The site contains an existing motor dealership as well as display areas, garage and general access infrastructure.

The [Simon Bailes Ltd] site should be included as a site for mixed use development for either a single landmark development or mixed use scheme of offices, retail housing or leisure uses.

**42/1 Mr H Suddes**

**Issue: Housing Allocations - Limits to Development Villages**

The numbering of sites differs between appendix 2 and map 23 and 24. Our clients land at Maltby is identified as site HA19 on the list but the site identified as site HA19 on Map 23 is in Ingleby Barwick. The sites shown at Maltby in Map 23 are not numbered. The land referred to as part of this submission is shown to the north of Maltby village in Map 24 of appendix 2.

**Issue: Spatial Strategy - Limits to Development Villages**

Support Option 1. The Council should consider modifications to the development Limits of villages where doing so would enhance the sustainability of the villages. The core area should be important for housing development but what is currently proposed is excessive. It would lead to the stagnation of decline of important role in the rural economy and need additional development to help maintain and enhance services and their ongoing sustainability as a place to live. If the LDF does not properly deal with this issue it would fail Soundness Test 4. Should allocate the Site HA19 (Land at Maltby) as identified on the site list and Map 24.

Maltby has a large amount of public services and facilities and employment opportunities to support further housing development. See Village study for details. The site allocation for housing would be essential to ensuring the long term viability of local services and other facilities on Maltby, a village well connected to the main urban area and accessible by public transport.

It is considered that the settlement of Maltby is large enough to accommodate further housing at a sympathetic scale in order to maintain the vitality and viability of the village in the long term, but not detract from the character of the village. The development of site on the edge of existing settlements will achieve both these aims in a sustainable fashion and increase the choice of sites available within the Borough.

Given the need to identify the council's position on future development to sustain the long-term vitality and viability of service villages in the core strategy, Site HA19, 25, 26 and 27 would provide the most deliverable site to accommodate future development in Maltby.

**43/2 D G Dale and Sons**

**Issue: Spatial Strategy - Limits to Development Villages**

Option 1 is the appropriate option in this case. The Borough Council should consider modifications to the Development Limits of Villages. Whilst recognising that the Core Area should be an important focus for future housing development the level of development currently proposed in the Core Strategy is excessive and the LDF fails to have proper regard to the needs of other settlements.

Villages such as Kirklevington would for example benefit from a review of current development limits and are capable of accommodating some modest growth without harm. Growth is essential to support local services and infrastructure. It is not just a case of evaluating how sustainable rural settlements are in order to consider their suitability to accommodate some development. Modest growth to village locations as it will be this growth which will be the catalyst to their future. Without such modest growth many villages will see no development, support to local services will diminish, they will miss out on new affordable housing and the planning gains of social infrastructure that some developments can bring.

This is inline with PPS7. It is also an approach supported by the emerging RSS Proposed Mods which supports strengthening the role of rural service centres with an appropriate scale of development and protecting and improving rural service infrastructure. It is also an approach in line with Stockton's own Community Strategy and the vision set out within the Core Strategy DPD for rural areas.

Propose the inclusion of land to the south of Kirklevington within the village limits of Kirklevington.

**44/1 Wellington 2004 Estate Company**

**Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

Attached to this letter is a map extract, which should be treated as an addition to the council's map 3 Southern and Eastern Gateway & Riverside. The red cross hatching indicates opportunities for regeneration within the town centre. There is ongoing investment requirement in the town centre, most probably by the provision of further retail floorspace and car parking, which could occur within the area

that we have identified.

#### **46/1 Preston Farm Developments**

##### **Issue: Spatial Strategy - Green Wedges**

Option 1 green wedges should remain within limits to development, but their main purpose of maintaining separation between distinct settlements should be reconsidered where it can be shown that the individual character of settlements would not be compromised by limited housing development in a green wedge, which would have the additional benefit of creating within the green wedge some public amenity such as a park or playing fields that would contribute a purposeful functional element without changing the balance of openness of the wedge.

##### **Issue: Housing - Proposed Housing Allocation**

Site proposed for housing at Preston Farm in the Green Wedge.

#### **47/1 Individual**

##### **Issue: Spatial Strategy - Village Limits**

Village limits should be modified to enable sites to be included where they would allow the provision of executive style housing. There are limited sites in the Borough that can provide the sort of setting to attract wealthier migrants into the area, particularly those who may have influence over investment decisions and who may be footloose in terms of where they live. There should be scope for additional development within the villages to cater for this sector of the community.

##### **Issue: Housing Allocations - Submitted for Housing Allocation**

###### **Aislaby**

Not opposed to the development of the wider area of Aislaby, however concerned that the merits of our particular location (Meadowcroft) for housing development may not be fully considered should the reaction to the prospect of development on the larger site be negative. The dwelling itself has been sold separately but the remaining land to the east of the house remains in our ownership. (See map). The site is sustainable, brownfield land and located within the settlement limits of Aislaby. The village is a short distance to Yarm, is served by a school bus, the road access is a preferred cycle route. The village is not therefore in a situation so much more inaccessible to services than one would find in parts of the built up area of Tees Valley. Other means of transport than the motor car are available to residents of Aislaby. The site would lend itself to high quality, high specification in terms of the sustainable homes agenda. High quality contemporary housing is in short supply in the Tees Valley and could bring with it benefits for local economic growth.

#### **48/2 Highways Agency**

##### **Issue: Spatial Strategy - North Shore**

The North Shore site is located close to SRN with the A66 to the south and A19 to the north. Site will require a detailed assessment in terms of its impact. As the site is developed, measures to improve the sustainability should be brought forward, and whilst the Agency supports measures such as pedestrian and cycle bridges, depending on the level of impact on the SRN, the magnitude of further sustainable measures may need to be greater.

##### **Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

This site is located in close proximity to the SRN with the A66 immediately to the south. Such a level of development will require detailed assessment in terms of its impacts on the SRN, in line with the provisions of the GTA and Circular 02/2007. As the site is developed, measures to improve the sustainability should be brought forward, and whilst the Agency supports measures such as pedestrian and cycle bridges, depending on the level of impact on the SRN, the magnitude of further sustainable measures may need to be greater.

The Agency would expect that as the site is brought forward, measures to improve its sustainability are also brought forward. Further assessment of the site can be found in the attached TIR.

##### **Issue: Spatial Strategy - Eastern Gateway**

Due to the level of detail currently provided, the agency can not make any particular comment, but at this stage, would wish to be consulted at the earliest opportunity should any significant development be proposed in the area.

##### **Issue: Spatial Strategy - Northern Gateway**

Due to the level of detail currently provided, the Agency cannot make any particular comment, but at this stage, would wish to be consulted at the earliest opportunity should any significant development be proposed in the area.

##### **Issue: Spatial Strategy - Bowesfield Lane**

The impact of the site on the SRN needs to be assessed, particularly as this part of the network is likely to become stressed during the lifetime of the LDF.

##### **Issue: Spatial Strategy - Allens West**

Due to the level of detail currently provided, the Agency can not make any particular comment, but at this stage, would wish to be consulted at the earliest opportunity should any significant development be

proposed in the area.

**Issue: Transport - Light Rail Transport Proposal**

Supportive of all sustainable transport proposals, including that for light rail given that they would assist in meeting sustainable transport objectives and reduce the need to travel by private car, particularly on the SRN.

**Issue: Transport - Major Bus Route Scheme Proposal**

Supportive of the bus scheme that would assist in meeting sustainable transport objectives and in particular where it would help to reduce the need to travel by the private car on the SRN.

**Issue: Transport - Rail Transport Links and New Stations**

Supportive of this strategic rail link as it would assist in meeting sustainable transport objectives and help to reduce the need to travel by private car and particularly help to reduce the need to travel on the SRN.

**Issue: Transport - Barrage Bridge**

The Agency has no particular option preference.

**Issue: Transport - Freight Development**

Consider that a combination of Options 1 and 3 would optimise the use of existing port and railway facilities and protect potential sites that could be utilised to transport freight by rail and water in the future, which would provide a more sustainable approach for the transportation of freight and help reduce the need to utilise the SRN.

The Agency would be concerned if Option 2 was to be implemented due to the potential detrimental impact of locating freight facilities adjacent to the SRN. Should such an approach be promoted the Agency would wish to be consulted at the earliest opportunity, to assess the potential impact of such development on the SRN in accordance with Circular 2/2007. Further, such development proposals would need to be supported by a Transport Assessment utilising the guidance on Transport Assessments.

**Issue: Transport - Stockton Town Centre Parking**

Wish to be consulted on this in the future.

**Issue: Transport - Park and Ride**

The Agency will consider the specific merits (or impacts) of such provisions as part of the development study and will look to the conclusions of this study to make a more informed judgment.

**Issue: Transport - Eaglescliffe Rail Station**

The Agency would be supportive of this rail link which would enhance the Boroughs sustainable transport provision.

**Issue: Transport - New River Crossing**

The Agency has no particular comment but is generally supportive of initiatives which encourage the use of more sustainable modes of transport, such as walking and cycling as well as providing better access to such facilities.

**Issue: Sustainable Living - Building Schools for the Future**

At this stage the Agency has no particular comment to make.

**Issue: Economic Regeneration - Employment Land**

More supportive of Option 1, particularly with regards to the de-allocating sites in locations where there are no opportunities to travel to work other than by the private car. Only the most sustainable sites should be developed and these should be accessible by a variety of transport modes including cycling walking and public transport and is therefore supportive of criteria 3 and 4 of the second bullet point.

**Issue: Economic Regeneration - Employment Sites Strategy**

Agency has no particular comment regarding the hierarchy of employment locations provided that employment development is located on previously developed land where it will not have detrimental impact upon the SRN and where it can be accessed by a variety of sustainable modes of transport. The Agency also considers that where there is an oversupply of employment land and sites allocated for employment could provide a sustainable location for alternative uses then these should be considered for re-allocation to fully utilise the provision of the most sustainable sites in the Borough.

**Issue: Economic Regeneration - Office Development**

Agency generally prefers Option 1 which requires sites for office development to be identified that are sequentially preferable to those previously considered to be suitable, as this is likely to result in the most sustainable sites being brought forward. Notwithstanding this should a sequentially preferable site be located where its development could lead to a detrimental impact on the SRN then the Agency would wish to be consulted at the earliest opportunity to discuss any potential mitigation measures which may be deemed necessary in accordance with the provisions of Circular 02/2007..

**Issue: Economic Regeneration - Heavy Industry Areas**

The Agency has no particular Option preference but would wish to be consulted at the earliest opportunity regarding any potential development in the heavy industrial areas which could have a detrimental



impact on the safe and efficient operation of the SRN particularly regarding the A19 and A66.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

No particular option preference provided that any redevelopment of sustainable core sites does not lead to a detrimental impact upon the safe and efficient operation of the SRN. Further if existing businesses are located to the industrial estates, these should also not lead to a detrimental impact on the network. Where relocation of businesses could impact on the network the Agency would wish to be consulted at the earliest opportunity.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

The Agency has no particular option preference but considers that priority should be given to the most sustainable sites particular those within existing centres on previously developed land which have good access to a wider variety of services facilities and public modes of transport.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

The Agency has no particular comment but is generally supportive of initiatives which aim to improve the provision and access to more sustainable modes of transport.

**Issue: Housing - Affordable Housing**

The Agency has no particular comment but considered that the provision of a mix of housing types sizes and tenures can help reduce the need for travel by giving everyone the opportunity to live in their desired location where they can access employment opportunities via sustainable transport modes.

**49/2 Environment Agency**

**Issue: Spatial Strategy - All**

Any schemes to develop or alter sites which incorporate, or are adjacent to, the River Tees, River Leven or other watercourse should aim to protect and enhance the wildlife corridor value of the river or watercourse. This comment applies to sites identified in the Spatial Strategy, Transport, Economic Regeneration, Retail, Housing and Appendices sections.

**Issue: Retail and Other Town Centre Uses - All**

Any schemes to develop or alter sites which incorporate, or are adjacent to, the River Tees, River Leven or other watercourse should aim to protect and enhance the wildlife corridor value of the river or watercourse. This comment applies to sites identified in the Spatial Strategy, Transport, Economic Regeneration, Retail, Housing and Appendices sections.

**Issue: Spatial Strategy - Flood Risk**

A significant number of the listed key regeneration projects are located within flood zones 2 and 3. As a result, flood risk will be a key issue. This is acknowledged in the SA under Key Issue 4 but omitted from the main text of the Regen DPD. Serious consideration should be given to incorporating appropriate reference to flood risk and the requirements of both the Council's SFRA and PPS 25.

**Issue: General - Land Contamination**

The Agency would like to reiterate the expectations that land which is obviously brownfield will need to be investigated, assessed and remediated to protect human health and environment. This approach is in accordance with PPS 23 - Planning and Pollution Control. Annex 2 Land affected by land contamination.

**Issue: General - Northern Gateway and Land Contamination**

Use of part of this site as a gas works has resulted in significant land contamination issues which need to be addressed through the regeneration options available for the site and surrounding area.

**Issue: General - Land Contamination and Allens West**

Significant land contamination needs to be remediated.

**Issue: Community Facilities - Civic Amenity Site**

Supports the provision of a new civic amenity site in the Borough, as this will promote recycling rates. Careful consideration must be given to the location of this site in order to maximise its use.

**Issue: General - Utilities**

Sewerage Undertakers should be consulted by the Local Planning Authority and be requested to demonstrate that the sewerage and sewage disposal systems serving the development have sufficient capacity to accommodate the additional flows generated as a result of development without causing pollution.

**50/1 Individual**

**Issue: Spatial Strategy - Bowesfield Lane**

There is no point in building a non water compatible usage in an area that has the probability to flood. This would only cause problems for the future.

**Issue: Spatial Strategy - Allens West**

Use this site for the new Yarm School. It is a large enough site which has previously been developed. This should be considered before building on Greenfield Areas.

**Issue: Spatial Strategy - Limits to Development Villages**

Stockton has very few villages left and these should be maintained. 2.15 page 19 states that Stockton has enough brownfield land to meet its housing needs. It also states that there does not appear to be a viable case for a strategic review of the limits of development. Most villages are not sustainable e.g. Maltby - We have no schools, playing fields and only one small shop and a limited bus service. It would be very difficult almost impossible for anyone to travel to work and back using this service. In fact there is no direct service to Stockton to increase housing here would go against all Government legislation on sustainability and the environment.

**Issue: Spatial Strategy - Green Wedges**

Green wedges should be given more protection and should only be considered for leisure/sporting development for all.

**Issue: Transport - Barrage Bridge**

It would spoil the area if all Traffic has access. This is a lonely quiet area close to the centre of Stockton. I do think however that footpaths and cycle paths should be improved as this would add value to the area whilst maintaining its attractiveness. I don't have a problem with public transport using the bridge.

**Issue: Transport - Freight Development**

Much more freight should travel by rail if we care for our environment.

**Issue: Economic Regeneration - Employment Land**

It is important that sufficient employment land is maintained to provide jobs.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

The riverside is an attractive area. The road should never have been built there in the first place as it spoils the attractiveness but it was. Therefore unless the road is to be taken out altogether the riverside should be left. Improvements should be carried out at Chandlers Wharf.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

The High Street has been much more attractive since cars were stopped from using it.

**51/1 Individual****Issue: Spatial Strategy - North Shore**

Office accommodation should not be built with river frontage. This should be kept for access for all with footpaths, hotels, restaurants, leisure facilities to keep the area alive. Offices are occupied only part of the day/week, this can encourage vandalism.

**Issue: Spatial Strategy - Bowesfield Lane**

No offices on the river frontage. Too many offices already on riverside. Keep open access along river bank.

**Issue: Spatial Strategy - Limits to Development Villages**

No extensions to limits to development. No good agricultural land should be allocated for housing. Agricultural land is needed to grow our own food and fuel and help prevent global warming and the catastrophic climate change. Once it is built on it is gone forever. We need to protect the countryside and environment for all. By building over the countryside with concrete will increase the risk of flooding.

**Issue: Economic Regeneration - Office Development**

Too often we see offices occupying prime riverside locations which are closed evenings and weekends. This can encourage vandals. There are new offices on riverside built sometime ago and are still vacant.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Close the major road corridor. It cuts the town off from the river. This is a prime site and should be made attractive.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

Areas above shops should be used for affordable homes. Agree with option 4.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

For too long Stockton has turned its back on the river. John Walker Square should be opened up to the river and road closed. The Castle car park moved and specialist shops, cafes, restaurants, hotels etc in its place. This would make it a place to go and enjoy.

**Issue: Community Facilities - Civic Amenity Site**

Allens West has easy access to road and rail.

**52/1 Individual**

**Issue: Spatial Strategy - North Shore**

Option 3 would also be appropriate as well as option 1 if the caravan and camping site on the eastern edge of land to the east of the North Shore were excluded; thus retaining that area for Green Blue Heart.

**53/1 Individual****Issue: Spatial Strategy - North Shore**

Adequate road, rail and cycle access is crucial. At present the systems are piecemeal.

**Issue: Spatial Strategy - Bowesfield Lane**

The site is presently developing into a satisfactory light industry office use with improved access. The low ground river should be carefully developed for wildlife enjoyment as part of the present wildlife corridor and recycling facilities.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Yarm/Eaglescliffe traffic is a big enough problem at present.

**Issue: Spatial Strategy - Limits to Development Villages**

Present strategic gaps are crucial to prevent urban sprawl. A cynical developer could offer to enhance the sustainability of the village (e.g. build a shop which is unviable in the long term) to enable a plan for private housing to be made more acceptable when viewed on the basis of sustainability. The shop later fades away.

**Issue: Spatial Strategy - Green Wedges**

There will be enough erosion of green space without green wedges being on the agenda.

**Issue: Transport - Barrage Bridge**

This area is attractive. To include it as a thoroughfare/rat run for motorists is wrong, using the Barrage for a convenient cross over would be a mistake.

**Issue: Transport - Light Rail Transport Proposal**

Light rail transport is attractive but at present it is still bearable for motorists to drive and they will continue to do so - sadly. To build such a link would be a waste of money.

**Issue: Economic Regeneration - Employment Land**

Stockton needs to lose its heavy industry image and attract SE sunrise businesses, who are becoming disillusioned with their present location and wish to relocate. There must be as much flexibility as possible to allow them to settle, but no more Samsungs.

**Issue: Economic Regeneration - Employment Sites Strategy**

Stockton needs to lose its heavy industry image and attract SE sunrise businesses, who are becoming disillusioned with their present location and wish to relocate. There must be as much flexibility as possible to allow them to settle, but no more Samsungs.

**Issue: Economic Regeneration - Office Development**

Offices need not be situated in the town centres. Quality office buildings on selected estates enhance the site and attract others.

**Issue: Economic Regeneration - Heavy Industry Areas**

The Borough and the North East should be trying to lose this image and attract more intellectual businesses. Also heavy industry is not an employer of large numbers of permanent staff - see the shrinking ICI saga and the general down sizing of the companies which purchased the various ICI buildings.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Review developments on a when and as basis.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

The people of Stockton deserve a central riverside park. Too much money has been wasted on trying to improve the High Street. There is not the local affluence to make it a place people want to visit and shop. Make Riverside more attractive for locals and visitors when this starts to happen and more wealthy people are attracted only then will the retail outlets in the High Street improve to cater for the demand.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

The high street was wrecked in the 60's. The place is full of cheap retail outlets and undesirable youth. There is little local wealth to make it an attractive venue for modern shopping and little left to give a feeling of uniqueness.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

The high street was wrecked in the 60's. The place is full of cheap retail outlets and undesirable youth. There is little local wealth to make it an attractive venue for modern shopping and little left to give a

feeling of uniqueness.

#### **54/1 Stillington and Whitton Parish Council**

##### **Issue: Spatial Strategy - Limits to Development Villages**

There are inaccuracies in appendix 2 of the document. With regards to Ref HA2 - Land allotments adjacent to Stillington - the summary of comments from persons submitting the proposal to the council states that the land previously had planning permission. The site was given PP in the 1970's but the most recent planning application for residential development on this land (92/1051/P) was refused. The area in question was never designated for development - the allotments were referred to as a valuable village facility.

##### **Issue: Spatial Strategy - Limits to Development Villages**

While the Parish Council generally support the existing limits to development it is felt that if there was some degree of flexibility this could be beneficial to the villages of Stillington and Whitton in certain circumstances.

#### **56/ Ingleby Barwick Town Council**

##### **Issue: Economic Regeneration - Existing employment sites**

Each area has its own needs so must be assessed individually to ascertain what the development and improvement needs are.

##### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre layout**

Buses and taxi's are necessary but the layout and attractiveness of Stockton High Street merits attention.

##### **Issue: Spatial Strategy - North Shore**

This development will be of great benefit to Stockton as a whole. The whole area could do with regeneration.

##### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

It is in the interest of the area to expand the site for employment uses. We have new homes being built at Preston Farm and Ingleby Barwick it is in the interests of the occupants of these new properties that we start expanding employment opportunities in the area. The road that runs from Allens West to the A66 needs to be re-evaluated to relieve traffic congestion at the junctions and roundabouts.

##### **Issue: Spatial Strategy - Green Wedges**

This is very important as there is a push by Government to build more houses.

##### **Issue: Transport - Barrage Bridge**

If North Shore is to be developed access would have to be allowed for all traffic.

##### **Issue: Transport - Freight Development**

It is a good policy to try and incorporate option 3 as far as possible.

##### **Issue: Economic Regeneration - Employment Land**

We must always allow adequate industrial land surplus in preparation for the unexpected demand.

##### **Issue: Economic Regeneration - Employment Sites Strategy**

With due care and attention option one would be correct approach.

##### **Issue: Economic Regeneration - Office Development**

Office buildings should be kept to land identified as industrial estates. We do not want town centres to be all office blocks. We need retail outlets which the office workers will help support. We need to think about green routes to work both in town centres and outside.

##### **Issue: Economic Regeneration - Heavy Industry Areas**

It is important to ensure that areas are clean, tidy and desirable. They should be made as pleasing to the eye as possible.

##### **Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Each area has its own needs so must be assessed individually to ascertain what the development and improvement needs are.

##### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Buses and Taxis are necessary but the layout and attractiveness of Stockton High Street merits attention.

##### **Issue: Community Facilities - Civic Amenity Site**

Portrack Area, Bowesfield Industrial Estate near Urray Nook area, a site near Teesside Durham airport, back where it used to be near Newport Bridge. The Council depot on Yarm Road near the A66 but it

would have to be kept very tidy. Darlington Back Lane near to Egglecliffe Industrial Estate.

#### **57/1 Individual**

##### **Issue: Spatial Strategy - North Shore**

This whole area would benefit from a facelift

##### **Issue: Spatial Strategy - Bowesfield Lane**

Option 2 would seem to make the ideal compromise.

##### **Issue: Spatial Strategy - Allens West Former Egglecliffe Logistics Site**

Certainly more housing is required in the area with its good road and rail links this site would be suitable for domestic dwellings.

##### **Issue: Spatial Strategy - Limits to Development Villages**

The Local Parish Council would need to be consulted closely on these matters.

##### **Issue: Spatial Strategy - Green Wedges**

This is now very important as there is a push by Government to build more houses.

##### **Issue: Transport - Barrage Bridge**

Option 4 may be needed if we are going to develop that area.

##### **Issue: Transport - Freight Development**

It is a good policy to try and incorporate option 3 as far as possible.

##### **Issue: Economic Regeneration - Employment Land**

We must always allow ourselves adequate industrial land surplus in preparation for the unexpected demand.

##### **Issue: Economic Regeneration - Employment Sites Strategy**

With due care and attention option 1 would be the correct approach.

##### **Issue: Economic Regeneration - Office Development**

We do not want town centres to be all office blocks. We need retail outlets which the office workers will help support. A mixture is required.

##### **Issue: Economic Regeneration - Heavy Industry Areas**

Use option 1 but it is important that these areas are made as pleasing to the eye as possible.

##### **Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Each particular area should be assessed individually.

##### **Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

I am surprised how the outdoor market has declined - a working class area. Compare this to Northallerton - an upper class area which has a very good market. Perhaps it is due to the lack of business people on the Borough Council.

##### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

Many of the problems we have on the High Street are due to the extended opening hours for pubs and clubs.

##### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

If we are going regenerate the shopping in the High Street, we must make things easier for car parking. Northallerton is a good example.

##### **Issue: Community Facilities - Civic Amenity Site**

Use the Council depot in Yarm Road near the A66 but it would have to be kept very tidy or Darlington Back Lane near to the Egglecliffe Industrial Estate but not to include an incinerator.

#### **58/1 Individual**

##### **Issue: Spatial Strategy - Allens West Former Egglecliffe Logistics Site**

It is in the interest of the area to expand the site for employment uses. We have new homes being built at Preston Farm and Ingleby Barwick it is in the interests of the occupants of these new properties that we start expanding employment opportunities in the area. The road that runs from Allens West to the A66 needs to be re-evaluated to relieve traffic congestion at the junctions and roundabouts.

**Issue: Transport - Barrage Bridge**

If North Shore were developed access would have to be allowed for all traffic.

**Issue: Economic Regeneration - Office Development**

Office buildings should be kept to land identified as industrial estates and leave town centres as just that, as retail places.

**Issue: Economic Regeneration - Heavy Industry Areas**

It is important to make sure these areas are clean and tidy and desirable for other businesses to start using and expand on.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Each area has its own needs so must be assessed individually to ascertain what the development and improvement needs are.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Even though we should develop some of the riverside land with buildings and invest in leisure facilities and housing, I do not think another park is needed but housing and good leisure facilities is. Or maybe a permanent market site as the market has declined as not up to the standard with other market sites.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

To put all the clubs, pubs and nightlife in one area would reduce the amount of litter waste and be easier to police.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Taxis need to be removed from the High Street and put into a designated area out of the town centre.

**Issue: Community Facilities - Civic Amenity Site**

Back where it used to be near Newport Bridge.

**59/1 Individual**

**Issue: Spatial Strategy - North Shore**

This development will be of great benefit to Stockton as a whole. The whole area could do with regeneration.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

I have concerns about building new homes re travel/congestion around the local area and implications for schools.

**Issue: Transport - Barrage Bridge**

Options 2 and 3 give a variety of easy access

**Issue: Economic Regeneration - Office Development**

We need to think about green routes to work both in town centres and outside.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

The High Street in Stockton needs a lot of refurbishment and updating.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Buses and taxis are necessary but the layout and attractiveness of Stockton High Street merits attention.

**Issue: Community Facilities - Civic Amenity Site**

Portrack or Bowesfield Industrial Estate.

**60/1 Individual**

**Issue: Community Facilities - Civic Amenity Site**

One option could be near the Urray Nook site, or at a site towards Teesside Durham airport.

**61/1 Persimmon Homes (North East) Ltd**

**Issue: Spatial Strategy - All Housing**

In relation to the sites identified as part of the Regeneration DPD would welcome the opportunity to discuss these further with the Authority prior to making any comments regarding their suitability, as well as assessing them in conjunction with the Councils 5 year land supply.

### 63/1 Grindon Parish Council

#### **Issue: Spatial Strategy - Limits to Development Villages**

Residents of Thorpe Thewles have made it clear via 144 responses to the document that they would strongly resist development on the sites HA4 - The Parish Council supports them in this.

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#### **Issue: Spatial Strategy - Limits to Development Villages**

Grindon Parish Council wishes to place on record that it would object to development on the site MU1 in Wynyard.

#### **Issue: Spatial Strategy - Limits to Development Villages**

Support residents of the ward in any attempt to extend the planning envelopes of both Thorpe Thewles and Wynyard.

#### **Issue: Spatial Strategy - Wynyard**

Grindon Parish Council wishes to draw attention to the fact that on page 54 there is no mention amongst the villages of Wynyard. This should be rectified.

### 64/1 Redmarshall Parish Council

#### **Issue: Spatial Strategy - North Shore**

Tend to disagree with all the options and feel that the North Shore should include only the land to the East. (where the Malleable Steel Plant was).

#### **Issue: Spatial Strategy - Limits to Development Villages**

Green spaces between villages are already being built on at an alarming rate with applications using all the usual loopholes in the planning guidelines (I.e. stables, horse businesses, affordable housing, as the current application for The Stables confirms)

#### **Issue: Spatial Strategy - Green Wedges**

Urban areas need green spaces and these areas should be totally protected.

#### **Issue: Transport - Barrage Bridge**

North Shore is served by A19 trunk road already.

#### **Issue: Economic Regeneration - Employment Land**

We feel that there is not enough information to make an informed decision. Where are these sites? And what does de-allocation to the other uses mean.

#### **Issue: Economic Regeneration - Heavy Industry Areas**

These industries are renown for creating a negative image of the area.

#### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

Problem is just about controllable now, any further development may exacerbate these problems.

### 65/1 Friends of Tees Heritage Park

#### **Issue: Spatial Strategy - Bowesfield Lane**

An ideal opportunity to provide substantial waterfront access, in conjunction with the Tees Heritage Park objectives.

#### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Amount and content of residential to be determined by traffic generation studies and environmental/wildlife protection and enhancement.

#### **Issue: Spatial Strategy - Green Wedges**

Essential to protect what open space is left. Further protection could be offered by implementing open space/green proposals such as Tees Heritage Park.

#### **Issue: Transport - Barrage Bridge**

Necessary to open up area for leisure use. But through traffic should be limited to such use.

#### **Issue: Economic Regeneration - Employment Land**

Consider potential for further brown field residential development

#### **Issue: Economic Regeneration - Heavy Industry Areas**

Extremely important to soften/disguise eyesores if green/blue heart etc to be successful.

**Issue: Economic Regeneration - Existing Employment Sites in the Core Area**

Potential for brownfield residential sites.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Essential to create better links between town and river and develop leisure use on river frontage - maybe landscape decking over parts of the highways.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Still too barren on non market days and more features/buildings in middle of high street.

**Issue: Community Facilities - Civic Amenity Site**

A site - possibly decked - between town centre and river.

**66/ Individual**

**Issue: Spatial Strategy - Village Limits**

Meadowcroft, Aislaby.

This site is on previously developed land within the village limits and is in a location no less sustainable than others which have recently benefited from the grant of planning permission for housing development despite being in rural locations and no less distant from services and amenities.

**Issue: Spatial Strategy - Limits to Development Villages**

Want to register the land south of Knowles Close, Kirklevington as indicated on the enclosed map for consideration.

**Issue: Spatial Strategy - Limits to Development Villages**

Option 1 should be amended to read:

"Consider modifying the limits to development of villages where doing so may enhance the sustainability of the village or, in the interests of fostering economic growth in Tees Valley, offer the opportunity of providing for the development of high quality, low density housing."

The sustainability of villages is important, but so also is the need to provide sites away from the urban area capable of meeting specific executive needs.

**67/1 Preston Farm Developments**

**Issue: Spatial Strategy - Green Wedges**

Preston Farm development would finance the creation of public goods such as a park or playing field.

Value of green wedges specifically Preston Farm Green Wedge for limited housing development that provides challenging and innovative contemporary housing coupled with the creation of a public good such as a park or playing fields. The housing development would finance the creation of public good which would be dedicated for public use, thereby protecting the green wedge in active public use for the future without damaging the main purpose of the green wedge in maintaining separation between settlements to protect their individual identity.

There is potential to widen the remit of this Spatial Strategy to recognise that in an increasingly sophisticated market place there is a need to provide for a wider range of opportunities for housing than is pre-supposed by the focus of the Strategy on regeneration areas to create the diversity of offer. Much of the green wedge land and other open space is visually sterile, but the opportunity, under specific criteria, they have the potential to create elements of townscape that will enhance the overall image of the area.

**68/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Meadowcroft, Aislaby

This site is previously developed land within the village limits and it in a location no less sustainable than others which have recently benefited from the grant of planning permission for housing development despite being in rural locations and no less distant from services and amenities.

**69/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road,



Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating it its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5<sup>82</sup> does not constitute a natural boundary as has been asserted, being a recently established plantation

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Can existing roads cope south of the village. Access to old Durham Road and Wynyard Road. Access to A177 already an accident black spot. Access to Blakeston Lane – very narrow road. North of village. Access to proposed site is onto a busy and narrow lane.

Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## **70/1 Individual**

### **Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

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Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 71/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating it its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 72/1 Thorpe Thewles Residents Association

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

### 73/1 Individual

#### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **74/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A174 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 75/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Can existing roads cope south of the village. Access to old Durham Road and Wynyard Road. Access to <sup>91</sup>A177 already an accident black spot. Access to Blakeston Lane – very narrow road. North of village.

Access to proposed site is onto a busy and narrow lane.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## **76/1 Individual**

### **Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

Can existing roads cope south of the village. Access to old Durham Road and Wynyard Road. Access to A177 already an accident black spot. Access to Blakeston Lane – very narrow road. North of village. Access to proposed site is onto a busy and narrow lane.

Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **Issue: Spatial Strategy - Limits to Development Villages**

Any further development in our village would really only benefit the land owner who is selling up and the property developer. It would be to the detriment of the village to build on green fields. This village does not need to be sustained by any more development. People like living here because it is peaceful and a small community - we want it stay that way thank you. Thorpe Thewles does not need sustaining by building any more houses, it is sustainable as it is. Please concentrate on redeveloping Stockton itself or continue to develop the modern housing estates at Wynyard/Ingleby Barwick instead of spoiling the village atmosphere of the established villages in this area.

#### **77/1 Individual**

#### **Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for <sup>93</sup>Option 3 as it relates to limits to development. Development of the site would require major road

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Issue: Should the existing limits to development of the villages be maintained

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **78/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 79/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## **80/1 Individual**

### **Issue: Spatial Strategy - Limits to Development Villages**

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## 81/1 Individual

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating it its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 82/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

### **83/1 Thorpe Thewles Residents Association**

#### **Issue: Spatial Strategy - Limits to Development Villages**

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Supports Option 3 which maintains the existing limits to development.

#### **84/1 Individual**

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## 85/1 Individual

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## **86/1 Individual**

### **Issue: Spatial Strategy - Limits to Development Villages**

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 87/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of biological significance through its use as a nature corridor of Wynyard Woodland Park and area. The

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 88/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Supports Option 3 which maintains the existing limits to development.

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 92/1 Individual

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Supports Option 3 which maintains the existing limits to development.

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and thereby maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 97/1 Individual

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## 101/1 Individual

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to



HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Council's decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 102/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to Old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 103/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Supports Option 3 which maintains the existing limits to development.

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## 106/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough.



There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

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We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 107/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## 108/1 Individual

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## 112/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

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We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.



Supports Option 3 which maintains the existing limits to development.

## 113/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 118/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 119/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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## 122/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 123/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

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Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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then it may be argued that there is scope reviewing its limits to development.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **Issue: Spatial Strategy - Limits to Development Villages**

I would like to say no to any developments in Thorpe Thewles which would be detrimental to the conservation of the character of the village or any that would encroach upon areas of natural woodland or areas of archaeological significance. I would also say no to any development of housing which would extend on the existing village boundary. I agree that safety of roads into the village is an issue already.

#### **124/1 Individual**

#### **Issue: Spatial Strategy - Limits to Development Villages**

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## 125/1 Individual

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Supports Option 3 which maintains the existing limits to development.

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## 127/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. The very nature of the village is under threat. Its intimacy and character would be destroyed, never to be regained. Thorpe Thewles must be protected from further development. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 128/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.



Supports Option 3 which maintains the existing limits to development.

## 129/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Supports Option 3 which maintains the existing limits to development.

### **130/1 Thorpe Thewles Residents Association**

#### **Issue: Spatial Strategy - Limits to Development Villages**

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Supports Option 3 which maintains the existing limits to development.

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## 132/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

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In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable

then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

### 138/1 Individual

#### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## 139/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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#### 140/1 Individual

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 143/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### 144/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

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## 147/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### 148/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 149/1 Individual

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## 152/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 163/1 Individual

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **168/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road†!! bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane†!! very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Councils decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

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## 177/ Individual

### Issue: Spatial Strategy - Limits to Development Villages

If more amenities wouldn't council tax increase because of extra developments, then why should people of Thorpe have to pay more. We do not need urbanisation we have our village. Thorpe Thewles. With more urbanisation, would crime increase as it is manageable at the moment?

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Issue: Should the existing limits to development of the villages be maintained

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 178/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

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## 182/1 Individual

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The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.



Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 183/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **184/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

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Supports Option 3 which maintains the existing limits to development.

## 185/ Individual

### Issue: Spatial Strategy - Limits to Development Villages

Construction of major development would be extremely disruptive to village, plus it would be a serious health and safety risk due to narrow roads and poor access on the approach road, also village roads.

I chose to live in a quiet rural village. I do not want to live in a developing housing estate. The village is close to Hardwick, Roseworth, Norton and Ingleby Barwick, i.e. with significant residential developments nearby.

The current relatively tranquil village lifestyle would be threatened by the building of 50 plus four bedroomed houses. Construction phase would be disastrous followed by significant increases in traffic children with limited amenities and associated social problems.

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Supports Option 3 which maintains the existing limits to development.

#### **186/ Individual**

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##### **Issue: Spatial Strategy - Limits to Development Villages**

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Thorpe Thewles. The current relatively tranquil village lifestyle would be threatened by the building of 50 plus four bedroomed houses. Construction phase would be disastrous followed by significant increases in traffic children with limited amenities and associated social problems.

Thorpe Thewles. I chose to live in a quiet rural village. I do not want to live in a developing housing estate. The village is close to Hardwick, Roseworth, Norton and Ingleby Barwick, I.e. with significant residential developments nearby.

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

188/1 Individual

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### 193/1 Individual

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Supports Option 3 which maintains the existing limits to development.

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#### **195/1 Thorpe Thewles Residents Association**

##### **Issue: Spatial Strategy - Limits to Development Villages**

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## 197/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger. The area surrounding the village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area. The area surrounding both the proposed areas are close to sites of Archaeological Interest which could be devalued with the enlarging village envelope. Both sites are near sites where vented methane gas areas and close to gravel pit development. Both areas are near the edge of the village envelope are prone to flooding in fields and on the roads usually caused by the inadequate drainage/flood prevention of Billingham Beck. Poor drainage in area of the village envelope shown by examples of unstable properties requiring remedial work in areas close to sites. Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last 18 months. Public transport is inadequate for present population of village regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport. Can the schools cope with the proposed development? Lack of recreational facilities for children/young people in the area at present. The site is outside the village envelope and is considered that an expansion of the village will create precedents which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type to destroy the nature and character of the village creating in its stead urbanisation. The wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted to be an extension, being a recently established plantation capable of coppicing. Desirable to protect the rural environment adjacent to Wynyard Woodland Park. Endorse the Borough Council's decision to consider brown land for development so as to protect the prime green land as in this proposal. Thewles. HA4 and HA5

Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Sewerage: There would be major investment required to enhance the present pumping station due to the extra loading that has been put on it as a result of infill development in the village.

Community facilities: The nearby walkway has a designated community use as a European & National Cycleway and walkway which will be blighted by any development in this area.

Ecological: The area surrounding the present village envelope is an area of ecological significance through its use as a nature corridor of Wynyard Woodland Park and area.

Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.

Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

Can existing roads cope south of the village. Access to old Durham Road and Wynyard Road. Access to A177 already an accident black spot. Access to Blakeston Lane – very narrow road. North of village. Access to proposed site is onto a busy and narrow lane.

Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### 198/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

The comments set out paragraphs 2.14 and 2.15 - the supporting text to the issue, expressing support for Option 3 as it relates to limits to development. Development of the site would require major road investment and there is already a problem with traffic in the village. Makes comments in respect of the capacity of the access to old Durham Road – bad junction at Old Durham Road and Wynyard Road, Access to A177 already an accident blackspot, Access to Blakeston Lane – very narrow road. HA4 - Access to the site to the north of the village is onto a very busy narrow road/lane. Water facilities have been reduced as a result of recent relining of the water pipes. Major investment required to enhance the present pumping station. Nearby walkway designated community use and as European & National Cycleway and walkway will be blighted by any development in the area. The development areas are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement.



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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

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Drainage: Poor drainage in area of village envelope shown by examples unstable property requiring remedial work in area of sites.

Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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Access to proposed site is onto a busy and narrow lane.

Public transport is inadequate for present population of villages regardless of age. Additional housing would put more pressure on this already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

#### **199/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

Water: Water facilities have been reduced as a result of recent relining of the water pumping station due to the extra loading that has been put on it as a result of infill development in the village.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 200/1 Individual

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 201/1 Individual

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Lack of recreational facilities for children/young people in the area at present

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Supports Option 3 which maintains the existing limits to development.

## 202/1 Individual

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Energy: Electricity is presently overloaded indicated by the numerous cuts to power supply that has occurred over the last eighteen months. This is still occurring.

Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

In the case of Stockton on Tees, the overall housing requirement to 2021 has already been substantially committed through planning permissions and there are still sites coming forward that are on brownfield land and within the existing limits to development. There does not appear therefore, to be a viable case for a strategic review of the limits to development with a view to meeting the boroughs housing requirements viewed numerically. However, the council is currently undertaking a review of the sustainability (i.e. access to shops, schools etc) of the villages. If a village is found to be highly unsustainable then it may be argued that there is scope reviewing its limits to development.

Land in question contained on page 49 DL1 and Page 53 HA4 and HA5 goes outside existing village planning envelope. It is considered that an expansion of the village envelope will create precedents, which could result in development proposals difficult for the local authority to deny. The development would be of sufficient size and type as to destroy the nature and character of the village creating in its stead an urbanisation. Note should be taken that the wooded area to the north of the land subject to HA4 and HA5 does not constitute a natural boundary as has been asserted, being a recently established plantation capable of coppicing.

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We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 203/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Archaeological: The area surrounding both proposed areas are close to sites of archaeological interest which could be devalued with the enlarging of village envelope.

Incompatible Neighbouring Use: Both areas are near sites where there are vented methane gas areas and close to gravel pit development.

Flood Risk: Both areas near the edge of village envelope are prone to flooding in fields and on the roads usually caused by inadequate drainage/flood prevention of Billingham Beck.



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Issue: Should the existing limits to development of the villages be maintained

The purpose of limits to development is to contain urban sprawl and there by maintaining an openness of the countryside. Consideration is normally only given to extending the limits to development if the development requirements of a district or borough cannot be met within the existing limits to development and the key driver, for this is usually meeting the housing requirement for the district or borough. There may also be exceptional circumstances that justify a revision to the limits to development.

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We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 205/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Supports Option 3 which maintains the existing limits to development.

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Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 207/1 Individual

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Supports Option 3 which maintains the existing limits to development.

## **208/1 Individual**

### **Issue: Spatial Strategy - Limits to Development Villages**

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Roads: The development of both sites in Thorpe Thewles would require major investment in roads. Already there is a problem with traffic in the village.

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Public transport is inadequate for present population of villages regardless of age. Already inadequate service. Residents are unable to access doctors of choice by public transport.

We question if the schools - primary/secondary can cope with additional school population?

For every ones benefit it is felt to be desirable that the rural environment adjacent to the Wynyard Woodland Park is protected.

We would endorse the Councils decision to consider brown land for development so as to protect the prime green land as in this proposal.

Lack of recreational facilities for children/young people in the area at present

Areas concerned are primarily used by pedestrians, dog walkers, horse riders and cyclists where there is no pavement. Additional development will put these in danger.

Supports Option 3 which maintains the existing limits to development.

## 209/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

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Lack of recreational facilities for children/young people in the area at present

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#### **Issue: Spatial Strategy - Limits to Development Villages**

The very small inadequate telephony switch that serves the village based in Stillington. Will that support all these extra houses. Yet another accident at A177 junction on Sunday 4/11/07 luckily no one hurt this time.

#### **211/1 Individual**

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Supports Option 3 which maintains the existing limits to development.

**Issue: Spatial Strategy - Limits to Development Villages**

Water pressure is already very low at peak usage times. Increasing the burden could mean some households with no water during these periods. It is not felt to be a good idea to allow Wimpy to provide a play area as the complete field behind North Close adjacent to the A174 was sold to Wimpeys many years ago with the aim of building on it eventually.

**239/1 CPRE**

**Issue: Spatial Strategy - North Shore**

If option 3 is selected then this flagship project will transform the opportunity to regenerate a significant area and transform central Stockton. Presumably safeguards will be built in to protect the interests of any local businesses within the designated area.

**Issue: Spatial Strategy - Bowesfield Lane**

Option 4 should be integrated into option 3 and option 3 amended accordingly.

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Option 3 should only be offered on the basis that the developer makes a substantial contribution towards the building of facilities for leisure and recreation for young people.

**Issue: Spatial Strategy - Limits to Development Villages**

Must be really exceptional circumstances. This should not be used as a carte blanche to build outside the limits.

**Issue: Spatial Strategy - Green Wedges**

Option 2. This is essential. It is not an anomaly that green wedges are currently included within the limits of development - it is astonishing.

**Issue: Transport - Barrage Bridge**

This is the missing link of the redevelopment of Stockton centre. This proposal if implemented would at a stroke tie together Stockton High Street, the North Shore development, Teesside Park, and the Green Blue Heart. In our view it is probably the single most essential decision for Stockton Centre - it would most certainly be the most cost effective. We are aware there will be objections on environmental considerations but on this occasion we feel the benefits significantly outweigh the disadvantages.

**Issue: Economic Regeneration - Office Development**

If a large scale office headquarters cannot be located in the town centre it will probably be because of the access and parking problems. If an edge of centre locations is agree, sufficient parking must be provided. We know of two instances where companies are moving out of Teesdale because of parking problems.

**Issue: Transport - Freight Development**

Option 2 and 3 is preferred. Recognise that some flexibility must be included but the sites adjacent to where the rail halts must be protected.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

There is not enough information provided for these options for anyone to make an informed choice. It is a tragedy that the Riverside Road was constructed in its present position thus ensuring that Stockton turned its back on the River. However, Riverside Road is crucial to the development of central Stockton. Any decisions should protect and further enhance the riverside area and must not detract from it.

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

The best option would be a combination of options 3 and 4. Stockton is blessed with one of the finest high streets in England. Continental style bistros and cafes should be encouraged, which means there has to be flexibility. Lessons should be learned from Yarm High Street, and should be recreated on a larger scale with improved shopping and general ambience.

**Issue: Community Facilities - Civic Amenity Site**

If a suitable location could be established on farmland, well screened from Durham Lane, near to Elton/Eaglescliffe/Hartburn interchange on the A66 with dedicated traffic encouraged to use the A66, it might be a possibility. However, if it involves any form of processing that is more industrial in nature and creates noise/ and / or unsightly waste, than it should be confined to an industrial site even if this involves placing it in the north east of the Borough.

#### **240/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Oppose further development around Maltby for the following reasons:

The number of proposed dwelling would put a considerable amount of pressure on the limited resources within the village. Lack of facilities schools post office shops etc would put a considerable amount of pressure on the villa and surrounding environment. Severely impact on the current village community and its limited facilities. Increased traffic would have a significant impact on the safety of the villagers, children and equine activities. Increased traffic and housing would have a significant impact on the villages carbon footprint. No recreational facilities, schools or shops would necessitate a considerable amount of through traffic from the surrounding area - a short cut and becoming a rat run - from Hemlington to Coulby Newham and Ingleby Barwick residents. The typical North Yorkshire/Cleveland village would not lose this much sort after character and uniqueness by this proposed new development. Land is currently used by the local community and brings a lot of charm to the area for the community and visitors alike. SBC should protect the above uniqueness and not allow this merging effect with other surrounding developments.

#### **241/1 Individual**

##### **Issue: Spatial Strategy - Village Limits**

Maltby

The village has insufficient facilities to sustain more houses. The drainage system is already inadequate and could not cope with additional housing. The increase in traffic would be intolerable and possibly dangerous. Additional development would detract from character of the village.

#### **242/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Object to any further development for the following reasons: No facilities and would eradicate the village which has a long farming history. There is no school nearby, and the existing bussing of children from the village is unreliable, and costly.

The public transport through the village is non-existing for people in employment, it is not a transport option.

There is no entertainment or access to local towns because there is no transport after 5.00pm.

Any development would result in a huge increase in the number of cars in the number of cars travelling through the village. The increase would be intolerable where parking problems with parking and road safety are already of great concern to residents. There is a history of traffic accidents at the A1044 junction to Maltby, and approach roads already cause the very busy Thornaby road and Barwick Way to cause delay. Stockton have already declared an effort to reduce traffic not increase it many fold.

There have been refusals in 1989, 1999, 2000 and 2004 which set a precedent.

Any building would increase the risk of crime, with accessibility to Low Lane and A19.

There is no scope within the one street village to deal with hundreds more vehicles passing through.

Already provision for Brownfield land in Stockton Borough and at Ingleby Barwick where facilities already exist.

Development would seriously imperil the quality of life.

#### **243/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

The land at Maltby is greenfield and there is already one of the largest housing estates in Europe at Ingleby Barwick less than two miles away. This land is inhabited by wildlife and we should maintain their environment and natural habitat. There are plenty of areas within the Stockton Borough that would benefit from new housing without spoiling natural habitat.

#### 244/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Against the use of land to the north of Maltby village for development because any new residents would have to use cars as the public transport is very limited. Traffic would increase through the village and this would be intolerable that already has traffic and parking problems. Housing adjacent to the A19 will make it appear to be an estate on the edge of Teesside Industrial Estate separated only by the A19 rather than a village.

#### 245/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby is a village with very few facilities mainly bungalows for older people, building more family homes here would mean we would have to have more facilities to cater for children.

#### 246/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

There is plenty of scope for a variety of housing in already identified areas i.e. Ingleby Barwick. Maltby would not be able to support any further housing i.e. drains, electrics etc. Traffic volumes would increase as there are no substantial facilities in the village.

##### Issue: Spatial Strategy - Green Wedges

These merit protection from development as they are informal recreation areas, wildlife corridors and buffer space for urban development.

#### 247/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

With reference to Maltby. Buildings would destroy the wildlife in the local area. The introduction of new housing would create more traffic problems in the village, High Lane corner and the access to the A1044 junction. Also excess noise and pollution.

#### 248/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

With reference to Maltby.

Problems with sewerage disposal makes additional housing a cause for concern. Before any development a complete re-think of sewers and drainage systems would need to be addressed. Concern with any new build would be are the Willows Avenue

Sewage problems. Surface water drainage needs improved.

#### 249/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby.

In the opinion of the members of the Maltby Northern Edge Residents Group the area shown in the attached map is unsustainable for local residential development by virtue of the limited services. Developing this area would be against local and national policy. It is an unsustainable location as it has limited services, travel by private car for employment, schools, retail and recreational purposes. The village could not meet the demand placed upon it from such a development and contrary to the aims of Government guidance with respect to locating residential development in sustainable locations as detailed in PPS 1 PPG3 PPS7 and Structure Plan policies SUS 1 and SUS 2. The area named should not be included should not be included in any list or on any map compiled to show possible future development in Stockton Borough.

#### 250/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby

I am against the use of land to the north of Maltby for development because any new residents would have to use cars for entering and leaving the village.

#### 251/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

I am concerned that any changes to the village will not make it any more sustainable but will cause further congestion to the main road which already suffers from over parking on the road and pavements. With no useful public transport links any new housing will increase the number of cars, and add to the 8am and 530pm rally that occurs each weekday. Please add your houses to Ingleby Barwick which will not be adversely affected by additional housing and which has amenities to support it.

**Issue: Spatial Strategy - Green Wedges**

Maltby

The green wedges should be protected from development to ensure that these are not to erode the open spaces by stealthy development.

**Issue: Economic Regeneration - Heavy Industry Areas**

Do not drive industry out by forcing them to "pretty up", these are valued jobs in the area.

**252/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Land to the north and east of the village.

Opposed to development due to lack of public bus service, the increase in traffic levels and associated danger, access to the village to the east involves a traffic blind spot, the land is greenfield and lack of facilities. Development would wipe out a range of wildlife. There is sufficient brownfield land in other areas - including Ingleby Barwick to service Stockton.

**253/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north of Maltby Village for development for the following reasons:

Traffic problems, parking problems, loss of public bridle ways over fields, natural visual impact, wildlife loss, loss of greenfield, archeology site within the area. There is sufficient brown field land elsewhere in the Borough - Ingleby Barwick must fulfil the point in question.

**254/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

The village of Maltby has few facilities and cannot sustainably support an increase in development. Will also alter the character of the area.

**Issue: Spatial Strategy - Green Wedges**

Maltby

Green wedges provide valuable corridors for wildlife and green areas for recreation within built up areas and therefore should be protected.

**Issue: Economic Regeneration - Heavy Industry Areas**

This area supports employment for a large number of people in the area and the continued modernisation and development should be supported.

**255/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development of land to the north of Maltby village would be unable to sustain a larger community of residents. Doubts still continue from previous developments that went ahead in the village and nearby villages which many still feel have changed the community. Extra development will increase traffic making it unsafe and lead to an increase in air pollution. There are unsafe junctions around the village. The village and the utilities could not support the pressure of extra housing.

**256/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development. Village has very few facilities and cannot support any more people. Public transport is intermittent and not reliable. Traffic issues with busy junctions to Thornaby Road and Barwick Way. Access into and out of any development would cause further traffic problems as well as noise from A19. There is plenty of Brownfield land elsewhere.

**257/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

Any new residents would have to use cars for everything, there are already large traffic problems. History of failed planning applications and appeals. Development would change character of this linear village. Roads are narrow and access to fields is poor - extra accessed points will not alter the existing safety problem at the High Lane corner.

**258/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Is a small village with few amenities. We have a limited bus service and High Lane and Low Lane could not cope with an increase in car usage.

**259/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

Against the use of land to the north of Maltby village for development, the country village lifestyle would be taken away by building more houses. This would add to more traffic. Village cannot sustain any more.

**260/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north. Village has few facilities and could not sustain more houses and the traffic that would go with them. A two hourly bus service which is not sufficient. There are no school facilities and the nearest one in Ingleby Barwick is over subscribed. Maltby is a small village, with more houses it would not be.

**261/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Object to any more development as few facilities, increase traffic in the village (dangerous). The increase in families and traffic would be unacceptable. The existing roads on the Willows Avenue and Beech grove could not cater in any way for an increase in motor vehicles. Emerging traffic from Willows Avenue to High Lane is highly dangerous. Parked cars High Lane create a hazard to the emerging onto High Lane. Traffic calming is essential. The proposed development area adjoin a wooded area which abounds in wildlife where deer, foxes, partridge, grouse are to be found. Any development would destroy the natural habitat of this wildlife.

**262/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

The infrastructure of the village would not support any extra building development. This is greenfield land which adjoins a wooded area where you see birds all wildlife: deer, pheasants, partridge, grouse. It would be disastrous for wildlife and the environment if there was any more building developments allowed. There is a traffic safety issue in the village without adding more traffic to it. It is horrendous trying to get out of Willows Avenue onto High Lane, road alignments and parked cars add to the danger - restricting views. Houses should not be considered as the existing buildings are bungalows.

**263/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Development to the north of the village will ruin the environment of the village allowing more houses. The access to the field from Willows Avenue would be diabolical as the road turns when you approach the last five houses where there are often cars parked on either side. Access is a problem.

**264/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

I am against the use of land to the north of Maltby Village for development because of the impact on the environment and the noise this would cause to residents and the impact on wildlife on the village. The current facilities cannot support more people and cars without major impact or danger to current villagers.

**Issue: Spatial Strategy - Green Wedges**

Think of our children and yours before its too late.



## 265/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Maltby has no amenities apart from a pub and very limited public transport and the last bus to town is at 5.00pm. The mixed housing proposed would mean that families would come into an area with a lack of public transport no schools, parks, play areas or other leisure facilities. The resultant social problems could be enormous.

Maltby village has grown up alongside High Lane which is little more than what the name suggests. It has a notoriously dangerous junction with the road to Yarm. Extra traffic would only help to exacerbate the existing problems. I think it would be an awful mistake for the Council to consider development on this scale in any village without the necessary infrastructure to cope with the increased demands.

### Issue: Spatial Strategy - Limits to Development Villages

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## 267/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Maltby

A Stockton report around 1990 stated that future development would not allow further access at the top of Maltby bank on safety grounds. Hence development north of the village would only be at the western end of Maltby not through Willows Avenue. Development south of Maltby would be in Roger Lane.

## 268/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Traffic is already a problem in the village and access to the main road from Beech Grove and Willows Avenue is quite dangerous. There are no schools in the village and children have to be taken to school and places of entertainment by car or coach - so adding to traffic on village roads and other roads through Ingleby Barwick and to Thornaby. Extra traffic means more noise pollution and we already have enough noise from A19.

Sewage and drainage system is already stretched to cope with existing properties and roads.

### Issue: Spatial Strategy - Green Wedges

Green areas are essential to the well being of the area and the one north of Maltby creates a barrier between us and the encroaching built up area.

## 269/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Maltby.

Would be concerned about the use of land to the north of Maltby village for development due to several factor. The site is green field and brownfield land should be used where possible. Ingleby Barwick has a full range of housing available form luxury homes to affordable family and single homes. Access to this area may have to be from very narrow existing village roads which were not designated or constructed for large volumes of traffic. When existing willows Avenue onto High Lane visibility is very poor due to parked cars and from the other direction due to the brow of Maltby Bank. When driving into the bottom of Willows Avenue it is very difficult to see oncoming traffic from Beech Grove due to the bend in the road leading to the current field. Infrastructure of the village could not sustain more residents or houses. Building on this land would destroy or significantly alter part of an important wildlife corridor.

## 270/1 Individual

### Issue: Spatial Strategy - Limits to Development Villages

Maltby.

There would be a significant increase in the volume of traffic both in the village itself and surrounding spine roads. When existing Willows Avenue onto High Lane visibility is already very poor due to parked cars and from the other direction due to the brow of Maltby bank. When driving into the bottom of Willows Ave it is very difficult to see oncoming traffic from Beech grovev due to the bend in the road leading to the current field entrance. I understand that there is already a long history of traffic accidents at the A1044 junction to Maltby.

Stockton Borough has one of the largest housing developments at Ingleby Barwick here there is a wide range of housing needs can be catered for already. There has also been a number of new housing

developments in Thornaby recently. Although there is a national and government issue to build more homes this must be looked at in context of local issues and facilities. The land at Maltby is a green field site and there must already be enough brown field land for development in Stockton Borough. Building on our green areas would also of course be detrimental to wildlife in the area.

Extra housing and residents would alter the character of the village.

#### **271/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby

New residents would require cars as Maltby has a limited bus service and High Lane and Low Lane would be unbearable. The land is greenfield and there are enough houses being built and unsold at Ingleby Barwick.

#### **272/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby

I am against the use of land to the north of Maltby village for development. The village has few facilities and will not support more people. Site is unsustainable. More people will mean more car travel, and the junctions with Thornaby Road and Barwick Way are already very busy and dangerous. The last bus is at 1700 - no use to people either going to or coming from work.

The land proposed is green field and there is already plenty of brown field land in Stockton Borough. This land is also important wildlife corridor, deer, foxes, badgers, grouse partridge all seen in the area. Access to the land will be poor with limited visibility.

The land proposed is greenfield and there is already plenty of brownfield land in Stockton. Access to the site is also poor with limited visibility and increase in danger to traffic on High Lane.

#### **273/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

The village has very few facilities, a minimum bus service and High Lane could not cope with an increase in car usage.

#### **274/1 Individual**

##### **Issue: Spatial Strategy - Village Limits**

Maltby.

We are against any development in Maltby village because this village has no facilities to support any increase in population. There is very little public transport, with none after 5.00pm. There would inevitably be a huge increase in the number of cars on an already stretched road through the village. There is not a church, one tiny newsagent only, and the doctors require journey to Teesside or Coulby. Children have to use an unreliable school bus already to be bussed to schools outside the area. Extra traffic would be intolerable in such a small hamlet, where traffic already ignores speed limits. There are no formal crossings and horses use the only road through the village. There is no parking facility, as there are no shops to require it. Planning applications were refused in 1989, 1996, 2000 and 2004. Nothing has changed since then. Building next to the A19 would open the opportunity for crime to increase, and houses built that would suffer from noise and pollution.

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

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##### **Issue: Spatial Strategy - Green Wedges**

There should be no consideration about green wedges because there should be no development in them.

#### **275/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Strongly object for the following reasons: There are not enough schools for Ingleby Barwick Children let alone Maltby Village. Transport for our children to schools from Maltby are unreliable. Maltby has few facilities and cannot support any more people. Building new houses would alter our village tremendously.

#### 276/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby.

More housing on this site would increase the traffic from the A19 and low lane. An increase in development would increase crime levels.

#### 277/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby

Strongly objects to development in maltby for the following reasons: resulting traffic problems/congestion, overcrowding, lack of facilities for children and the change in the nature of the village.

##### Issue: Spatial Strategy - Green Wedges

Maltby

Surely there is enough land to build homes on without destroying green belt sites as village residents we are banned from going on Tarrant Trust fields. How is it possible to change rules to allow 100's of people to live there. Greed for money maybe.

#### 278/ Individual

##### Issue: Spatial Strategy - Village Limits

Maltby

Strongly objects to development in Maltby for the following reasons:

Far more suitable potential building plots in the Borough many of them brown field than the area to the north of Maltby, unsuitable site due to traffic noise that would arise from the A19 dual carriageway.

Developing the area to the north of Maltby would generate a feeling of insecurity. Bordering the A19 as it would, opportunities for crime would be increased with alternative means of speedy escape.

Approach roads to the area are sufficient only for the current volume of traffic. These roads were not designed for higher volumes. Also each route would depend on turning left, and more importantly right, into oncoming traffic at their respective junctions into High Lane. This proves difficult already with at least one of these junctions.

Maltby has existed for many years as a small village with minimal facilities (as with other similar villages in and around the area) The building of additional houses would bring about an imbalance that would prove impossible to restore.

Increases in traffic levels brought about by additional houses would increase the likelihood of accidents at the already hazardous junctions onto the A1044 which have always been considered accident black spots.

#### 279/1 Individual

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby

No school facilities and the limited school bus has to be heavily subsidised and is unreliable.

Extra housing would alter the character of the village. This is a linear village. Land is greenfield - build on brown field land e.g. Ingleby Barwick. Roads are narrow and access to fields is poor. Safety would be a problem.

#### 280/1 Maltby Northern Edge Residents Group

##### Issue: Spatial Strategy - Green Wedges

Essential for protection of open space.

##### Issue: Spatial Strategy - Limits to Development Villages

Maltby

Against development in Maltby formed group to oppose this.

Comments relate to land submitted for consideration as housing allocations -HA19, HA25, HA26, HA27, ~~300~~ some references to HA20.

Policy background provided

Stockton-on-Tees Local Plan 1997

GP1 General Principles

EN13 Limits to Development

EN14 Green Wedges

TR9 Public Transport

Tees Valley Structure Plan 2004

Policy SUS1

Policy SUS2

Policy STRAT1

Policy STRAT2

Policy H2

Policy T1

Submission draft Regional Spatial Strategy for the North East (June 05)

Policy 1 - Renaissance

Policy 2 - Sustainable Development

Policy 3 - Sequential Development

Policy 5 - Locational Strategy

Policy 11 - Connectivity and Accessibility

Policy 24 - Delivering Sustainable Development

Against development for the following reasons:

Design and Access

The nature of the village is valued by local residents and should be maintained, the linear form of the village means it is unsuitable for further development. Access roads to the village are unsuitable for increased traffic, traffic problems on Thornaby Road and Barwick Way would be increased, access to the proposed sites are bad and there is a history of traffic problems at the A1044 junction to Maltby.

Noise Problems

The fields to the north of Maltby currently provide an only just accessible separation of the village from the A19 trunk road and the and the trading estate both of which are well documented in parish council minutes as providing unacceptable noise on regular occasions. The 1989 village report states that the building on the northern fields is sterilised by the noise problems from the A19 and traffic has increased greatly since then.

Public Safety and Crime

Wildlife Protection

School and Health Provision

Entertainment and Shopping

Recent Planning Decisions

**Issue: Spatial Strategy - Green Wedges**

Land at Little Maltby Farm

The land is entirely green wedge land removed from the Ingleby Barwick Masterplan to create open space.

**281/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby is a small rural village with public amenities which barely cater for the present population.

Additional building even on a small scale would significantly alter the appearance and biodiversity of the village. Habitats would be lost, noise and congestion would be increased.

Access into the village from Low Lane is already dangerous. There are frequent accidents due to the speed of traffic and poor visibility at the turning by the Yorkshire Dragoon. Traffic attempting to join High Lane has then to negotiate a tight bend, with traffic travelling at least 50 mph towards them.

Livery stables are situated immediately at the entrance to the village. It is already commonplace to have to wait for vehicles to enter/exit the restricted entrance to the farm, and have to travel slowly in single lane traffic around horses. Any additional residents will add to the congestion on a stretch of road already identified as a potential danger.

There are no schools in the village. The nearest school is a primary school and it would not be suitable or safe for pupils to walk to school. The arrival of the school bus already causes restrictions in traffic flow as cars park in the road side to await the school bus. An increase in housing will not only necessitate an improved and reliable school bus service, but will also mean pupils driven to the various schools in the family car. This will inevitably increase congestion at peak times onto roads already heavily congested.

#### **282/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Against development north of Maltby village due to lack of public transport and we have to travel everywhere by car. 2 hourly bus service. Narrow roads access onto High Lane is dangerous and busy. There is a long history of accidents onto Low Lane.

Known history of noise problem from A19 - northern facing houses already affected. Any further northern houses would be nearer the A19.

We would lose our identity as a village and just become part of Thornaby Trading Estate and Ingleby Barwick.

Crime would rise - access from Low Lane and A19 would not be defensible.

Applications for this land has been refused 4 times. - nothing has changed that would make this village more sustainable.

#### **283/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Building on the land to the north of Beech Grove would alter the character of the village. The increase in traffic would upset existing villagers and there are already traffic and parking problems in the village.

There would be more complaints from residents about the noise from the A19. The land is green field and there is already enough brown field land in Stockton Borough particularly in Ingleby Barwick.

#### **284/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Very much against the use of land to the north of Maltby Village for development. The village has limited facilities and could not support any more residents and their families. Additional housing implies additional need for schooling - there are no school facilities in the village. The limited school bus has to be heavily subsidised and it would appear unreliable. There is a public bus, two hourly, and doesn't support people in employment either early in the morning or evening. There is little entertainment in the village, and no access to anything outside the village. Additional residents would need to use cars - many households have 2 or more vehicles. The increase in traffic would be both dangerous and intolerable. The village already has many traffic problems and parking problems, especially in the High Lane.

All of the extra cars would add to the traffic problem on the spine roads - Thornaby Road and Barwick Way. To mention only two. There is a long history of road traffic accidents at the junction of the A1044 to Maltby and Thornaby Road Buildings on this land would destroy part of a wildlife corridor where deer, partridge, hedgehogs, grouse and a wide range of birds and other small mammals are regular visitors.

Maltby is a linear village - extra housing would alter the character of the village. The land is also greenfield. I understand that there is a history of applications for this land which have been refused development many times before to include 1989, 1996 (when it was rejected by the Secretary of State) 2000 and 2004. Nothing has altered to warrant a change in these decisions.

The fields provide a separation from the A19 - a very noisy road. Putting buildings between the A19 and Maltby will mean that the present villagers lose much of that separation and become a village on the edge of the A19. There will be noise complaints arising from new residents. The site is green field and there is already enough brownfield land in Stockton Borough for its needs. The full range of housing and facilities are available in Ingleby Barwick.

#### **285/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north and north east of Maltby village. There is no reason to override the refusal of previous development applications in 1989, 1096, 2000 and 2004.

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north and north east of Maltby village. There is no reason to override the refusal of previous development applications in 1989, 1096, 2000 and 2004.

**Issue: Spatial Strategy - Green Wedges**

Stockton on Tees as an overall community benefits from housing options it can offer. Its surrounding villages are a quality option which enhance the attractions of this part of the country. Maintaining the natural character is essential if Stockton intended to retain its diversity of living options.

#### **286/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

The increase in traffic near my house would be unacceptable. There are already parking problems and the T junction outside my house is already very congested as it is used as a turning circle (roundabout). How about a traffic survey? I do not agree with farmland being used for new housing when there are plenty of derelict industrial sites in Stockton. The removing of wildlife habitats in this area is not necessary. More houses and people in Maltby will change the character of the village. There will be more noise near my house.

**Issue: Spatial Strategy - Green Wedges**

Do not agree with building on farmland there are plenty of brownfield sites in Stockton Borough.

#### **287/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development as it will harm the village. The impact of people speeding through this village and the damage that can be done also the cost to all forms of life here.

#### **288/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Village life is special and should not be disrupted. The land is greenfield and there is already more than enough brown field land around us - Ingleby Barwick. Narrow roads are a safety issue. A19 is already noisy and increase in crime has already been noticed. Cars are even now a problem - parking at roadside making accidents inevitable. More traffic more tragic episodes. (Representation included details of an accident in which a car crashed through the hedge of a property)

#### **289/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

I am against the use of land to the north of Maltby village for development because the facilities would not support more people or sustain more houses.

Because of the lack of public transport, new residents would have to use cars - possibly 2 or 3 per household. The increase in traffic would be intolerable in the village where traffic and parking are already problems. Extra cars would add traffic to the already congested Thornaby Road and Barwick Way. No school in the village - the limited school bus is unreliable. Public transport is only 2 hourly and non-existent early morning and evenings. It can take a long time to go anywhere and does not help people in employment.

Any new building would be near the A19 and Low Lane meaning even more people would be complaining of the noise.

Building on this land would affect the wildlife that has taken up residence and visit these fields. More housing would put added strain on the already limited drainage system.

#### **290/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

In the opinion of the members of Maltby Northern Edge Residents Group, the area is an unsustainable location for residential development by virtue of the limited services within Maltby village which would require occupants to travel by car for employment, schools, retail and recreational purposes. The settlement could not meet the demand placed on it from such a development in respect to these uses and as such would be contrary to the aims of Government guidance with respect to locating residential development in sustainable locations as defined in PPS1 PPS 3 and PPS 7 and also Structure Plan Policies SUS1 and SUS2. Because of this, the group believes that the area named should not be included in any list or on any map compiled to show possible future development in Stockton Borough.

#### 291/1 Individual

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

I am opposed to the extension of development of villages, land wise, and subscribe to the improved development of villages on existing boundaries for the benefit of the inhabitants. Concerned about Maltby. Traffic - existing hazards have not been resolved that is the exit from Willows Avenue to High Lane, the exit from Roger Lane onto High Lane to Maltby Bank. Any increase in traffic as a result of housing developments in the village would exacerbate these particular hazards. The additional traffic would inevitable with additional development due to the inadequate and inconvenient provision of a bus service - leading to a much increased car use into her village (carbon footprint). The increased flow of traffic from Maltby onto and across the A1044 would make a hazardous junction - blind to the traffic from the right - more so.

There are no play areas although the junction of willows Avenue and Beech grove is so used to the hazard of passing traffic. Any promises tied to residential development would have to be taken with the proverbial pinch of salt.

One small shop and no school or adequate bus service sums it up.

Sewage disposal via the existing system directed to the small disposal plant in the Teesside Industrial Estate would need to have serious and costly attention.

The electricity supply seems to have its own eccentric fits of bad behaviour which do not seem to affect other nearby areas.

I have suffered considerable inconvenience from development work carried out on two bungalows opposite and the large property at the end of Willows Avenue over several years, mainly because of the narrowness of the road here. I think the considerable disruption and mess over a long period that would be caused by housing developments at the end of Willows Avenue and Beech Grove are a burden the inhabitants should be spared. This is particularly so when set against the very doubtful benefits that might be expected.

##### **Issue: Spatial Strategy - Green Wedges**

Any effort to restrict or eliminate development of green wedges is to be commended.

#### 292/1 Individual

##### **Issue: Spatial Strategy - Limits to Development Villages**

I am against the use of land to the North of Maltby village for development because new houses would mean lots more cars (bus service suitable for working people). The roads are narrow and exits onto High Lane are dangerous even now. We wish to maintain Maltby as a village. Crime rate is low at the moment and more houses especially on the Northern fields would means access from A19 and Low Lane and I am frightened for any safety and security.

##### **Issue: Spatial Strategy - Limits to Development Villages**

I am against the use of land to the North of Maltby village for development because new houses would mean lots more cars (bus service suitable for working people). The roads are narrow and exits onto High Lane are dangerous even now. We wish to maintain Maltby as a village. Crime rate is low at the moment and more houses especially on the Northern fields would means access from A19 and Low Lane and I am frightened for any safety and security.

#### 293/1 Individual

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Maltby is a small village any extra building will spoil the character. Would cause traffic problems. Village would need new drainage to cope with extra housing. Land should remain greenbelt and separate the village from the A19.

#### 294/1 Individual

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

I am against the use of land to the north of Maltby for development because the village has very few facilities and could not support more people. It cannot sustain more houses. The roads are narrow and access to these fields is very poor.

#### 295/1 Individual

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development north of Maltby due to lack of facilities, traffic, noise from A19, amount of brownfield land available, wildlife in area.

There are no school facilities and pupils have to be taken by car or school bus away from the village. There is only one religious place of worship. There is only one small village shop containing essentials only. The subsidised bus service is only 2 hourly and does not provide a convenient service for the working person. Any increase in housing would generate more traffic which would be intolerable in a village which already has big traffic and parking problems. There is a long history of traffic accidents at the A1044 junction to Maltby. Previous applications to develop this land (1989, 1996, 2000 and 2004) have all been refused. Noise from the A19 has increased markedly in the last 10 years and is a nuisance to persons living nearby. There is enough brown field land in Stockton for its housing needs. The land is valuable wildlife area. Any building in this area would increase accessibility for undesirables from A19 and Low Lane. I would suggest that because of the above reasons the village of Maltby cannot sustain additional housing.

#### **296/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development. The village is not sustainable for any further development to the north and west. A private car is needed for most journeys and a private coach is needed to get children to school. There are no footpaths leading away from the village and of course no cycle paths and Maltby Bank and the T junctions on the A174 have to be negotiated at peak times. Any increase in development to the village would undoubtedly increase the number of cars leaving. We already have problems with road safety in Maltby and this would increase. There is also of course, the protection of green wedges.

#### **297/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby

If the development goes ahead the traffic coming out on High Lane is going to make it dangerous. There will be an increase in traffic, drains, electricity and water. It wont be a village anymore. Greenfield's are disappearing very fast. We understand that the land at the top of the bank had a clause that no building is to take place there, beyond the last bungalow.

#### **298/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

There are enough houses in this village. It looks like we are about to become another part of Ingleby Barwick and that's when we will lose our village identity. There is enough building land in Ingleby Barwick we have not got the road infrastructure to cope with the influx of vehicles more houses would bring.

#### **299/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north of Maltby village for development because the village cannot support any more development. Access from Beech grove to high lane is now very difficult - with more cars using it would be dangerous. There are very few facilities in the village. We have no Post Office, no school, no library - no bus service for people going to work from the village. The first bus is 8.15 am and the last bus from Middlesbrough is 5.00pm. We have a very small shop and a very tiny Methodist chapel. We have no entertainment apart from the Pub; in fact our village could not cope with any more development.

#### **300/1 Individual**

##### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land for development around Maltby (i.e. outside the village envelope) because the infrastructure of the village including the utilities - water supply, sewerage, electricity is barely adequate for the present population there are few facilities. The new residents would be obliged to use cars for transport. Apart from the traffic problems in the village itself, this would add extra vehicles to those already using Thornaby Road, A1045, Barwick Way and Low Lane, A1044. Greenfield land around Maltby should not be used when enough brownfield sites are available in Stockton Borough. A full range of house types and other facilities are already available in Ingleby Barwick.

Any housing just to the north of Maltby or indeed south west would be adversely affected by traffic noise, which is continuous even in the early hours in the morning. The acoustic barrier is very old and grossly inadequate for the volumes of traffic currently experienced.

##### **Issue: Spatial Strategy - Green Wedges**

I want see Green Wedges kept free from building development as far as possible to prevent large settlements like Ingleby Barwick from sprawling out to envelop smaller pockets of housing like High Leven, Maltby and other semi-rural communities.

#### **301/1 Individual**



**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

There is an existing problem with traffic in the village and surrounding Thornaby/Ingleby area. Each new house would bring an average of 2 cars.

Applications in 1989, 1996, 2000 and 2004 were all refused (some by the Secretary of State). I am unaware of any changes warranting a change in decisions. The land is greenfield land, and there are sufficient brownfield sites coming forward to more than meet the commitment to housing requirement to 2021.

**302/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

All previous applications have been successful nothing has since changed in the village. Traffic in the village and district is already very heavy, increased housing would only add to the problem. Few facilities in the village that would be needed to review limits of development

**303/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north of Maltby. Land is greenfield. The overall housing requirement has already been committed through planning permissions and there are still sites coming forward that are on brownfield land and within existing limits to development. There is a history of failed applications. Whilst exceptional changes of circumstances can justify a revision to limits of development I am not aware of any changes exceptional or significant enough to warrant reversing those decisions. Maltby village has access to only a very limited range of social facilities - only one shop, pub church and no school- and therefore would fail to satisfy any review of sustainability which is one of the requirements necessary to review the limits of development.

**304/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Applications for development of this land have been refused several times on the past. Nothing has altered to warrant changing those decisions. Why build on greenfield when there is enough Brownfield land in SBC for its needs. Access to these fields is poor. There is an existing safety problem at the High Lane corner and extra access will not change this.

**305/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Any new residents would need to use a car, bringing increased traffic to a very small village, with small roads. This would also increase extra traffic to the spine roads. Village has few facilities and these could not support more people. It cannot sustain more houses. Maltby is described as a linear village. Extra housing would alter the character to the detriment of people already living there. The land is greenfield, and there seems to be enough brown field land in Stockton Borough for the needs and full range of housing facilities is already available in Ingleby Barwick. There is a history of failed applications for this land. It has been refused many times when it was rejected on appeal by the Secretary of State in 200 and 2001. Nothing has altered to change those decisions.

**306/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

More houses would mean more cars per household. Cars are used for everything as there is little facilities in Maltby itself. E.g. No school, supermarkets, shopping facilities, entertainment etc. The limited school bus is heavily subsidised and unreliable. The land is greenfield, there is already enough brownfield land in Stockton. Building on the land should alter the character of Maltby as described as a linear village. Houses in Maltby already suffer from noise from the A19, building nearer the A19 would mean more complaints. The fields provide separation from the A19. Building closer would increase crime.

**307/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development to the north of Maltby for development because

Noise problems from A19, this is well known to the Parish Council. Building nearer would mean even more people complaining, plus more traffic on the road in the village, which are narrow. Extra houses would alter the character of the village. This land is green field land and there is already enough brown field land in Stockton Borough for its needs. Village has very few facilities and could not support more people. It cannot sustain more houses.

**308/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

I would like to state that I'm against the use of land to the north of Maltby village for development because the land supports wildlife and separation from the road network. Access and increase traffic would cause major problems on the junction of Willows Avenue.

**Issue: Spatial Strategy - Green Wedges**

Green wedges should be maintained in its current state for children to use.

**309/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against the use of land to the north of Maltby village for development as previous reasons for rejections on planning applications in 1989, 96, 2000 and 2004 still have grounds for refusal today as nothing has changed to warrant those decisions being amended.

**310/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against Development to the north of the village for development because the village has very few facilities and could not support more people or more houses. There are no school facilities and the limited school bus has to be heavily subsidised and is unreliable. The bus service runs only 2 hourly and going anywhere takes many hours. As there is only 1 small shop and a chapel, new residents would have to use cars for almost everything. The increase in traffic would be intolerable in a village that already has big traffic problem causing safety issues. As we already house the largest housing estate in Europe on the opposite side of the village why spoil a pretty village. There are already major policing issues and more houses would add to the risk of break ins - High Lane is a narrow road and cannot sustain the traffic - we want to keep our small village and not turn it into a village on the side of the A19.

**311/1 Individual**

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Existing brownfield sites should be used to its full potential.

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby

Against development as any new houses would 2-3 cars per household. The roads are narrow and exits dangerous. These are known existing traffic problems. The exits onto Low Lane are impossible at peak times and is an accident black spot. Any development to the north of the village would increase access onto Low Lane directly onto the backs of existing houses and substantially increase crime to an already known policing problem. The noise and smell that already exists from the A19 would be even worse for new residents on the north fields. Those fields are in full time agricultural use and are also a wildlife corridor. Maltby village has few facilities and an irregular subsidised bus service. It could not sustain more residents and we would lose our village identity.

**Issue: Spatial Strategy - Employment Land**

Retain existing sites but building new speculative sites undermine previously built underused sites.

**Issue: Spatial Strategy - Green Wedges**

There are sufficient Brownfield areas which should be developed to regenerate run down areas.

**Issue: Spatial Strategy - North Shore**

Colors shown on Map not clear - unable to answer.

**312/1 Individual**

**Issue: Spatial Strategy - North Shore**

None

**Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Stockton has plenty of Brownfield land at the moment but will need more in future to ensure preservation on greenfield between now and 2021.

**Issue: Spatial Strategy - Limits to Development Villages**

Maltby.

Against development. The limits of Maltby must be maintained because the village has very few facilities and is unsustainable. All new residents would use cars (2-3 per household) for almost everything. On

top of the well documented traffic problems, this would be intolerable causing increases not only within the village, but on the spine roads and in Ingleby Barwick. There is a history of applications for land to the north of Maltby, always rejected (once on appeal in 1996) nothing has changed to warrant any changes to those decisions. There is a known problem in Maltby Parish Council Minutes of noise problems and foul smell problems from the A19 and trading estate, building nearer would be foolish. Roads are narrow access is poor (see 1989 Village Survey) The land is greenfield and in full agricultural use. It is already fulfilling its best potential as a separation of this linear village from the A19, any development at all would alter the character of the village spoiling it for existing residents.

**Issue: Spatial Strategy - Green Wedges**

Maltby.

Building on greenfield land, particularly at Little Maltby Farm, is completely against modern thinking and would create ridiculous traffic increases. Build in core area only please on brownfield land.

**Issue: Transport - Barrage Bridge**

None

**Issue: Economic Regeneration - Employment Land**

Without retaining sites, SBC may not be able to offer potential employers actually what they want.

**Issue: Economic Regeneration - Employment Sites Strategy**

This gives more options for grouping existing usage and opens areas for new (perhaps as yet unenvisioned) uses.

**Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

If you want to be a city you will need city centre parks

**Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

Preferably before there is a death or injury

**313/1 National Offender Management Service**

**Issue: Community Facilities - Prisons**

The LDF should set out the broad locations for delivering the housing and other strategic development needs such as essential public services. Circular 3/98 Planning for Future Prison Development highlights the continuing overcrowding within the prison estate and the need to identify more sites for new prisons. New prisons bring economic benefits to an area.

While there are no specific proposals for new prison development in your area, in line with Government guidance, NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward. There should be a presumption against the loss of a prison, unless it is surplus to requirements.

**314/ North East Assembly**

**Issue: Retail and Other Town Centre Uses - All**

The NEA supports all of retail objectives.

**Issue: Spatial Strategy - Green Blue Heart**

The inclusion of reference to the Green Blue Heart in the document is supported. This is one of the key initiatives of the Stockton Middlesbrough Initiative, and is recognised in paragraph 2.159 of the RSS proposed changes. Reference to the GBH is therefore consistent with RSS proposed changes 7 which gives priority to the regeneration of the core regeneration areas of the Stockton Middlesbrough Initiative.

**Issue: Spatial Strategy - North Shore**

The alternative options for North Shore are to either maintain the existing boundary for the area, or expand the area to the north, east and west. As recognised in the discussion paper, the site is a regional Brownfield mixed-use development site. The appropriate boundary for the site is a matter for local authority to determine. However, RSS proposed changes policy 13 establishes a number of criteria, which must be taken into account in planning for the development of each sites. These include the preparation of a Masterplan; the application of appropriate phasing, ensuring that adjacent town centres are not adversely affected; and ensuring that the appropriate infrastructure mechanisms are in place. In determining the most appropriate site boundary for the North Shore, these criteria should be taken into account in accordance with regional planning policy.

**Issue: Spatial Strategy - Southern Gateway and Riverside Sites**

Also relevant to Eastern and Northern Gateways. These sites will enable links between the North Shore and the town centres and providing locations for commercial development. In accordance with RSS proposed changes policies 5 and 7, the regeneration of the core areas (and in particular the areas of the Stockton Middlesbrough Initiative) is identified as a priority. The council should ensure that in selecting sites for development in the Regeneration DPD, a sequential approach to the identification of land and buildings is adopted. This approach would be consistent with RPG1 policy DP1 and RSS proposed changes to policy 3.

### **Issue: Spatial Strategy - Northern Gateway**

These sites will enable links between the North Shore and the town centres and providing locations for commercial development. In accordance with RSS proposed changes policies 5 and 7, the regeneration of the core areas (and in particular the areas of the Stockton Middlesbrough Initiative) is identified as a priority. The council should ensure that in selecting sites for development in the regeneration DPD, a sequential approach to the identification of land and buildings is adopted. This approach would be consistent with RPG1 policy DP1 and RSS proposed changes to policy 3.

### **Issue: Spatial Strategy - Eastern Gateway**

These sites will enable links between the North Shore and the town centres and providing locations for commercial development. In accordance with RSS proposed changes policies 5 and 7, the regeneration of the core areas (and in particular the areas of the Stockton Middlesbrough Initiative) is identified as a priority. The council should ensure that in selecting sites for development in the regeneration DPD, a sequential approach to the identification of land and buildings is adopted. This approach would be consistent with RPG1 policy DP1 and RSS proposed changes to policy 3.

### **Issue: Spatial Strategy - Bowesfield Lane**

The council proposes a series of options for the future of the existing Bowesfield Lane industrial estate. Taking these proposed options into account in the context of regional planning policy, there are two key issues that the council needs to consider selecting a preferred option for this site. As with all local development frameworks, it is necessary to adopt a sequential, risk based approach to development and flooding. In accordance with RSS proposed changes policy 37 this approach should be informed by a strategic flood risk assessment prepared in liaison with the Environment Agency. In accordance with RSS proposed changes policies 2 and 3 sites for development should be in locations that avoid the highest risk of flooding.

The second factor to take into account is the extent to which the employment land is needed to form part of the long term employment land and premises portfolio in Stockton. The general thrust of RPG 1 policies EL2 and EL3, and RSS proposed changes policy 18 is that existing employment allocations should be reviewed based on employment land assessments, and protected as necessary and reallocated if no longer required. It should be noted that regional planning policy particularly supports the renewal and modernisation of existing employment areas.

### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

As with all the sites, the Council should adopt a sequential approach to the identification of land and buildings in accordance with RPG1 policy DP1 and RSS proposed changes policy 3. Given that this site is described as being located outside the core area, it is likely that there will be sites which perform better against the sequential test than this site. The council should be satisfied that the release of this site is necessary in accordance with these principles.

RSS proposed changes policy 7 prioritises the regeneration of the core areas and requires that housing development should not undermine existing housing markets, particularly housing market restructuring areas. In accordance with this policy housing should be developed in sustainable locations to support economic growth strategies. RSS proposed changes policy 12 directs economic development and investments to conurbations and in particular core areas. The Council should consider carefully these objectives in relation to the suitability of this site for housing employment uses, as this may present some conflict with regional planning policy.

### **Issue: Spatial Strategy - Limits to Development Villages**

In accordance with the regional location strategy and the objectives for rural areas (RSS proposed changes policies 5 and 6) ; local development frameworks should identify an appropriate scale of development that is sufficient to sustain settlements and a vibrant rural economy. In reviewing the limits to development of the villages, these objectives should be taken into account. It will be necessary to take into consideration the strategic gaps in Tees Valley (RSS proposed changes policy 7/7.5) which separate the conurbation from the surrounding villages. The purpose of these gaps is to maintain the separate identity of settlements in the Tees Valley.

### **Issue: Spatial Strategy - Green Wedges**

The protection of green wedges is supported and consistent with the objectives of RSS proposed changes policies 2, 5B and 7. These recognise the importance of green infrastructure in enhancing recreational experiences and supporting biodiversity.

### **Issue: Transport - All**

The issues paper supports light rail transport improvements; and improved bus scheme in Tees Valley; and an upgrade to the Stockton to Ferryhill railway line to improve the connections between the city regions. The schemes are identified in the transport and investment priorities, and therefore their inclusion in the Regeneration DPD is to be supported. These projects seek to make the best use of existing infrastructure which is consistent with RSS proposed changes policy 5A.

Freight: Regional planning guidance on freight is provided through these policies should be considered carefully in these options. These policies direct local authorities to protect sites adjacent to railways and ports to maximise movement of goods by rail and sea. Freight movement should be prioritised alongside strategic corridors and where this is using roads, freight movement should be directed away from congested central areas and residential areas, where there is a good access to the trunk road network.

The investigation of park and ride facilities is supported.

### **Issue: Transport - Freight Development**

Regional planning guidance on freight is provided in RPG1 policy T15 and RSS proposed changes policy 57, and the criteria in these policies should be considered carefully in developing the preferred options. These policies direct local authorities to protect sites adjacent to railways and ports to maximise movement of goods by rail and sea. Freight movement should be prioritised alongside strategic corridors and where this is using roads, freight movement should be directed away from congested central areas and residential areas, where there is a good access to the trunk road network. The reallocation of road space to freight uses should be considered where appropriate.

### **Issue: Transport - Barrage Bridge**

The Council has proposed a series of options for the future of the Barrage bridge. The options involve retaining its current usage; improve cycling and footpath links across the bridge; allowing public access across the bridge to the North Shore; or allowing full access over the bridge to the North Shore. The council should be satisfied that any changes to the bridge should take into account the capacity of the surrounding infrastructure. Allowing public transport and footpath/cycle routes across the bridge to improve access to the North Shore, by these means would be supported.

### **Issue: Transport - Park and Ride**

The investigation of appropriate sites for park and ride measures as a means of reducing congestion is supported. This is consistent with RSS proposed changes policy 53, which directs local authorities to establish demand management measures as a means of addressing congestion; environmental and safety issues. In planning for future car parking in the town centre, the Council should ensure that the objectives of the RSS proposed changes policies 53 and 54 are taken into account. These policies identify parking standards as a demand management measure, and direct strategies to minimise parking provision for non residential uses.

### **Issue: Sustainable Living - Building Schools for the Future**

The NEA notes the Building Schools for the Future Programme and the Primary Care Trust's vision, which will be reflected in the Regeneration DPD in land use planning terms. The improvement of services in these areas will contribute to the achievement of regional planning policy objectives to raise educational achievement and improve health. The sequential approach and sustainability criteria established in Regional Planning Policy should be used. This approach would be consistent with RPG1 policies DP1 and DP2 and RSS proposed changes policies 2 and 3.

### **Issue: Economic Regeneration - Employment Land**

The paper proposes two options for planning for employment land. NEA supports the first option (rationalise the existing employment land portfolio) as this would be consistent with regional planning policy. RPG1 policy EL2 directs local authorities to re-examine all current employment land allocations. Where employment land allocations have no prospect of being developed in the foreseeable future and do not satisfy the sustainability criteria or the sequential approach, they should be deallocated. This approach is carried forward into RSS proposed changes policy 18. These policies prioritise the regeneration and upgrading of exiting employment areas in advance of allocating new sites on greenfield land. The Council should take into consideration these objections when selecting the preferred sites for employment development.

As regards to future office accommodation sites, a combination of options 1 and 4 is supported. Town centres are the preferred locations and then edge of centre and regional Brownfield mixed use sites should be developed.

Recognising the importance of the heavy industrial area at Billingham and Seal Sands is supported and consistent with the objectives of RSS proposed changes policy 7. Improving the visual appearance of this area would be supported, alongside the measures to diversity into the renewable energy sector.

It is noted that the council considers that there may be sites in the core area, which are allocated for employment purposes, but no longer a viable long-term employment land location. In these circumstances, advice contained in RPG1 policies direct councils to facilitate the renewable and modernisation of existing employment areas where they are an important part of the employment land portfolio. Policy EL2 explains that, where this is not the case, in reallocating sites, acceptable uses should be identified which meet the principles of sustainable development, and does not compromise the local strategy for development and regeneration. The council should be satisfied that the site does not contribute to choice and variety of employment land and the prospect of development for employment purposes is unrealistic. There fore a combination of options 2 and 3 is supported.

### **Issue: Economic Regeneration - Employment Sites Strategy**

The council proposes two options for the employment sites strategy. The first option proposes to identify a hierarchy of employment locations, including prestige and general industrial. The second option proposes to identify an employment land portfolio which does not differentiate which types of employment use are acceptable. The NEA supports the first option, which provides a hierarchy of employment locations. This is consistent with RPG1 policy EMP2, which directs local authorities to make provision for good quality land for employment uses, which is sufficient to provide flexibility and choice to investors. RSS proposed changes policy 18 directs local development framework to make appropriate provision of general employment land; Brownfield mixed use developments; and prestige employment sites.

### **Issue: Economic Regeneration - Office Development**

Local planning authorities are expected to undertake employment land assessments in determining the employment land portfolio. If in completing this work, suitable, more sequentially preferable sites are identified for office accommodation, then these sites should be the location for office development during the plan period. RSS proposed changes policy 18A clearly states that city and town centres are the preferred location for office development. Where sites cannot be accommodated in these locations, sites on the edge of centre and regional Brownfield mixed use development sites should be selected. Therefore a combination of options 1 and 4 is supported.

#### **Issue: Economic Regeneration - Heavy Industry Areas**

Recognising the importance of the heavy industrial area at Billingham and Seal Sands is supported and consistent with the objectives of RSS proposed changes policy 7. Improving the visual appearance of this area would be supported, alongside measures to diversify into the renewable energy sector.

It is noted that the Council considers that there may be sites in the core area which are allocated for employment purposes, but no longer a viable long term employment land location. In these circumstances, advice contained in RPG1 policies EL2 and EL3, and RSS proposed changes policy 18 should be followed. These policies direct councils to facilitate the renewable and modernisation of existing employment areas where they are an important part of the employment land portfolio. Policy EL2 explains that where this is not the case, in reallocating sites acceptable uses should be identified which meet the principles of sustainable development and regeneration. The Council should be satisfied that the site does not contribute to choice and variety of employment land and the prospect of development for employment purposes is unrealistic. Therefore a combination of options 2 and 3 is supported.

#### **Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Supports the objective to improve the links between the town centre and riverside. This could be achieved through improving the walking and cycling routes between these two areas, alongside a wider regeneration scheme which initiates appropriate land uses to encourage movement between these two areas.

#### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

The objective to improve the evening economy in the town centre is consistent with RPG1 policy TC1 and RSS proposed changes policy 25, which seek to improve the vitality and viability of the town centre. The detailed strategy for the distribution of restaurants and bars is a detailed matter for the Council to consider.

#### **Issue: Community Facilities - Civic Amenity Site**

The location of a new civic amenity facility is a matter for the council to determine. However, in the context of regional planning policy, in selecting a suitable site for development, the council should take account the sequential approach to development and sustainability criteria in RPG1 policies DP1 and DP2, and RSS proposed changes policies 2 and 3. The emphasis on regenerating the core areas as outlined in RSS proposed changes policy 7 should be taken into consideration in selecting a site for development.

#### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Layout**

The council has raised concerns about the town centre layout, and a series of options are presented to address this issue. These include providing more information about buses, pedestrianisation reorganisation of the High Street. Deciding the most appropriate measure to address the layout is a matter for the council to determine. However, the use of bus lanes and travel awareness raising would contribute to developing an integrated programme of demand management measures in accordance with RSS proposed changes policy 53.

#### **Issue: Housing - Affordable Housing**

The regeneration DPD proposes to identify the amount of affordable housing which will need to be provided on sites allocated for housing. This will be based on the Stockton on Tees Local Housing Assessment 2006. This approach will be consistent with RPG1 policy H7 and RSS proposed changes policy 32, which direct local authorities to ensure that affordable housing is provided where it is needed, based on robust assessments of need. Local authorities are directed to establish provision targets on this basis.

#### **Issue: Provisions for Gypsies and Travellers - Gypsy and Traveller Sites**

The issues paper explains that a sub regional Gypsy and Traveller Accommodation Assessment (GTAA) is being completed, which will establish if existing provision is meeting current needs in the Borough. If it is not meeting need then sites will be identified as necessary. In accordance with RSS proposed changes policy 32, the local development framework should provide criteria following the plan monitor manage and sequential approach for development for the provision and release of sites for gypsy and travelling communities. Whilst it is likely that this policy should be included in the core strategy, the council should ensure that any sites released for this use through the regeneration DPD meet these criteria.

### **315/1 Mrs Wilson**

#### **Issue: Spatial Strategy - Limits to Development Villages**

Support Option 1 i.e. the council should consider modifications to the development limits of villages where doing so would enhance the sustainability of the village. The expansion of the core area fails to have proper regard to the needs of other settlements in the Borough. The approach suggested in the core strategy would lead ultimately to the stagnation and decline of important services villages such as Longnewton. It is recognised in PPS7 and in Draft RSS that service villages such as Long Newton provide an important role in the rural economy and need additional development to help maintain existing services and their on-going sustainability as a place to live. If the LDF does not properly deal with this issue it would fail Soundness Test 4.

Support the identification of the sites shown as HA16 (as shown on Map 22 of the Regeneration Issues and Options DPD) as a housing site. This site could accommodate up to 25 dwellings based on a conventional density multiplier, and we consider that developments of this scale would help to support the existing shops and services.

### **316/1 JG Eaglescliffe (Holdings) Ltd**

#### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

Allens West forms part of a larger mixed use proposal at the former Eaglescliffe Logistics Centre, Durham Lane, Eaglescliffe. It is anticipated that the site could yield 500 residential units as part of a larger mixed use proposal on a sustainable brownfield site, within the defined urban area of Eaglescliffe adjacent to Allens West train station. A public exhibition was undertaken in January 2007 for this site and the details can be viewed on the website.

The site has been promoted through the Yarm and Eaglescliffe Area Action Plan during a recent consultation exercise. The site is identified within the Regeneration DPD - Issues and Options Consultation September 2007.

The site should be recognised for a residential led mixed use development. Phasing should be considered in light of deliverability of the 5 year supply. The site will not undermine the deliverability of sites within the core area as it falls within a different housing market altogether.

### **317/1 British Waterways**

#### **Issue: Spatial Strategy - North Shore**

Option 3. The site boundary should not be confined to the existing area. The inclusion of land to the north, east and west will enable a greater holistic approach to the redevelopment of the North Shore. As a prerequisite, we strongly advise that the council and developers undertake early consultation with all landowners within the area before work commences on the Masterplan.

#### **Issue: Spatial Strategy - Bowesfield Lane**

Encourage an integrated design philosophy for the area, with the River Tees as the focus for new development.

#### **Issue: Transport - Barrage Bridge**

The prime function of the Tees Barrage is to regulate and maintain river levels. The Barrage bridge which is not an adopted road provides access for maintenance and emergency vehicles associated with the safe operation of the Barrage. British Waterways need to guarantee that any changes in the current access arrangements of the barrage bridge does not impinge on the ability to maintain the safe operation of the barrage. As owners of the bridge, we suggest that further evaluation of the options be undertaken, involving further detailed discussions with British Waterways.

#### **Issue: Retail and Other Town Centre Uses - Linking Stockton Town Centre with the Riverside**

Option 3

### **318/1 The Theatres Trust**

#### **Issue: Spatial Strategy - Green Blue Heart**

Pleased that the GBH area is to be redeveloped to provide a wide range of opportunities for leisure, recreation and sporting activities and would like to be consulted on the implementation of the project through public consultation exercises.

#### **Issue: Retail and Other Town Centre Uses - Stockton Town Centre Nightlife**

Support Option 4. Town centres are the heart of communities and an expression of their culture and identity. As well as shops they should provide a range of functions such as leisure recreation and culture centred on restaurants, pubs, clubs theatres concert halls and museums. As such all these elements should be inter-dependent and play an active role in creating vibrant town centres and stimulating night time economy.

#### **Issue: Transport - Stockton Town Centre Parking**

Note that evening cultural and entertainment venues are reliant on audiences being able to get to the venue by public transport and car, being able to park their cars and bikes and being able to get home safely. Controlled parking zones in central locations can have serious implications on the economic viability of such venues. We would strongly urge any planning policies concerned with parking provision to consider the presence of cinemas and evening leisure facilities in the locality. These attract families, young people and disabled patrons and older people who can be discouraged to attend if the costs of travelling and parking make the price tag of an evening too high. Supermarket car parks are a useful source of evening parking in town centres.

### **319/1 Northumbrian Water Ltd**

#### **Issue: Spatial Strategy - Queens Park North and Tilery Sports Centre**

A strategic 34" diameter steel water main which passes through both sites which are shown on Map 4 of the DPD. This water main infrastructure can carry up to 100% of all the drinking water into Stockton and Billingham areas.

#### **Issue: Spatial Strategy - Allens West Former Eaglescliffe Logistics Site**

A 30" cast iron water main passes through the site.

**Issue: Housing Allocations - Maltby**

A 1200mm pre-stressed concrete water main passes through the site.  
(Check allocations HA25, HA26,HA27?)

**Issue: Housing Allocations - Hollybush Farm**

900mm, 1000mm and 36" water mains passing through the site.

**Issue: Housing Allocations - Hartburn Grange**

9", 12", 27" and 36" water mains which passes through the site.

**Issue: Housing Allocations - Hill House Farm and Bishopsgarth**

2 strategic water mains a 36" steel and a 42" steel water main pass through the site carrying up to 140 million litres of water.

**Issue: Housing Allocations - Land West of Back Lane**

Two strategic water mains a 36" steel water main passing through the site.

**Issue: Housing Allocations - Bowesfield Lane**

33" and 36" and 1016 mains pass through the site.

**Issue: Housing Allocations - Bowesfield Lane**

33" and 36" and 1016 mains pass through the site.

**Issue: Spatial Strategy - Mixed Use Allocation**

Potential water supply capacity issue

**Issue: Spatial Strategy - Mixed Use Allocation**

Potential water supply capacity issue

**Issue: Spatial Strategy - Village Limits**

Page 49 shows land that has been submitted to the council for consideration as extensions to the limits to developments around towns villages - specifically Thorpe Thewles, Whitton, Carlton and Aislaby.  
There are a number of issues or potential issues:

The foul sewage flows from these villages are pumped by a series of pumping stations and depending on the size of any additional development the stations may have to be enlarged.

The sewage treatment works serving Thorpe Thewles, Whitton and Carlton is at capacity and may have to be enlarged depending on the size of the developments.

**Issue: Employment Allocations - Employment Land**

NWL have no comment on the options other than to ask that when considering any de-allocated sites for alternative uses the capacity of the water and sewerage infrastructure is taken into account.

**Issue: Economic Regeneration - Employment sites strategy**

NWL have no comment on the options other than to ask that when considering sites for alternative uses the capacity of the water and sewerage infrastructure is taken into account.

NWL acknowledges that this is the first stage. The company would therefore request close liaison with the Council and potential development partners at the earliest use and scale and density of development, so that they can carry out a more detailed assessment on capacity issues relating to individual sites and therefore the implications for strategic water and sewer investment in the borough over the plan period. Failure to do so will result in the Company objecting to the potential allocation of the above sites at the later stages of the DPD production.

**320/1 Individual**

**Issue: Spatial Strategy - Limits to Development Villages**

Object to the alteration of village development limits as unsustainable and contrary to objectives in Core Strategy Policy 2

**Issue: Housing Allocations - Chesham Road Norton**

Support the inclusion of land indicated as HA8 in Appendix 2 for the reasons appearing the summary and the full submission previously submitted.



## 321/1 Theakston Estates Ltd

### **Issue: Spatial Strategy - Green Wedges**

Support option 1 that the green wedge should be included within the limits to development. This would enable the potential of the River Tees and the Green Wedges to be released as a recreational resource, which will assist in the delivery of sustainable, healthy, and active communities as now discussed. Green infrastructure is recognised in the Tees Valley Green Infrastructure Plan (Jan 07).

A key message running through the emerging Core Strategy is the role of the River Tees as a key driver for change, and in particular the potential to increase the use of the river and its environs for leisure etc. This is supported.

A substantial proportion of the southern course of the River Tees lies within the Green Wedges. If the Green Wedge was to be taken out of the limits to development, thereby introducing a strong presumption against any development, this could severely limit the potential of increasing use of the river. Accordingly, in order to help deliver a key message of the emerging CS we consider maintaining and reviewing the Green Wedges within the limits to development to ensure that leisure, sports and recreation development could take place alongside the River Tees. This would enable the Borough to capitalise on this key natural asset and improve the leisure, sport and recreation offer of the area.

Sensitive leisure and recreational development could result in the Green Wedges becoming not only an important area of land to separate built areas, but a valuable community resource that is used and enjoyed by all. The Green Wedge has the potential to represent a resource that local communities can take ownership of, take pride in and share responsibilities. There is a risk that taking green wedges out of the limits to development and restricting development of any sort could leave a valuable community resource underused.

It is fundamental to recognise the multifunctionality of Green Wedges as part of the Boroughs green infrastructure, and in doing so consider the integration and interaction of different functions and activities in the same area. This will ensure efficient and sustainable use of land. We consider that new development can make a positive contribution to the local area, protecting and enhancing the Green Wedge environmental asset by responding positively to features of natural and local character. There is the potential to address environmental, social and economic objectives and to create an attractive place with a good quality of life that better matches people's aspirations. Green Wedges should remain within the limits to development and through the Local Development Framework process a review of their boundaries should also take place.

### **Issue: Transport - New River Crossing**

Welcome and support the Councils investigating and feasibility of introducing new cycle and pedestrian routes linking Ingleby Barwick with Eaglescliffe, Preston Park, Thornaby and Yarm. This will improve connectivity between communities as well as improving the openness of the Green Wedge.

### **Issue: Housing Allocations - Appendices**

Use the SHLAA to identify housing sites, rather than on an ad hoc basis.

## 322/2 Natural England

### **Issue: Spatial Strategy - Green Blue Heart**

Pg 9. The proposals need to recognise the biodiversity resources present in the area and the Tees Forest Plan. The projects identified in paragraph 2.6 need to be clearly defined in a policy for the area.

### **Issue: Spatial Strategy - North Shore**

The eastern part of the site is within the Tees Forest Area.

### **Issue: Spatial Strategy - Northern Gateway**

Part of the site is within the Tees Forest area

### **Issue: Transport - Freight Development**

In all options there is a need to ensure no adverse impact on the Teesmouth and Cleveland Coast SPA/Ramsar site, Teesmouth National Nature Reserve, SSSIs and on the RSPB Saltholme reserve.

### **Issue: Transport - New River Crossing**

Links should also be considered with the proposed circular bridleway route in Tees Valley, and any opportunities to link to Environmental Stewardship access opportunities.

### **Issue: Economic Regeneration - Employment Land**

Option 1. This option needs to ensure there is no adverse impact on the Teesmouth and Cleveland Coast SPA/Ramsar site, Teesmouth National Nature Reserve, SSSIs and on the RSPB Saltholme reserve.

### **Issue: Economic Regeneration - Heavy Industry Areas**

This section needs to recognise that these areas are important habitat for internationally important numbers of breeding and over wintering bird populations.

**Issue: Economic Regeneration - Employment Land**

Part of the land shown as allocated for employment land on this map is within the boundaries of the Seal Sands SSSI.

**Issue: Economic Regeneration - Employment Land**

Part of the land shown as allocated for employment land on this map is in an Environmental Stewardship agreement.

**Issue: Housing Allocations - Land at Hall Farm Carlton**

Site HA6 is adjacent to the Whitton Bridge Pasture SSSI.

**Issue: Housing Allocations - Land at Bishopsgarth Cottages Darlington Back Lane**

HA10/11/12/13/14 suggested currently within Environmental Stewardship agreement.

**Issue: Housing Allocations - Land at Two Mile House**

Land suggested currently within Environmental Stewardship agreement.

**Issue: Housing Allocations - The Tannery Tannery Bank Yarm**

Land suggested currently within Environmental Stewardship agreement.

**Issue: Housing Allocations - Hartburn Grange**

Land suggested currently within Environmental Stewardship agreement

**Issue: Housing Allocations - Land west of Yarm Back Lane**

Land suggested currently within Environmental Stewardship agreement

**Issue: Mixed Use Allocations - Land at A19A689 Wolviston**

MU1/MU2 Land suggested currently within Environmental Stewardship agreement.

**Issue: Mixed Use Allocations - Land at Wolviston**

MU1/MU2 Land suggested currently within Environmental Stewardship agreement.

**323/ Taylor Wimpey**

**Issue: Spatial Strategy - Village Limits**

Support Option 1 i.e. the Borough Council should consider modifications to the development Limits of villages where doing so would enhance the sustainability of the village.

Whilst recognise that the core area should be an important focus for future housing development the level of development currently proposed in the Core Strategy Preferred Options DPD is excessive in the Borough. It would lead to stagnation and decline of important service villages such as Thorpe Thewles.

Other details of the site included. Useful for SHLAA process.

**Issue: Housing Allocations - Land at Durham Road Thorpe Thewles**

Support the identification of the site HA5 (Land at Durham Road, Thorpe Thewles) as shown on Map 21. Site is well related to the Thorpe Thewles village envelope with the existing site extending to 1.2 hectares (30-35 dwellings).

It contains a large number of buildings previously used for horsiculture. The site is screened and defined by existing landform, and existing settlement limits. Development would help maintain and enhance the sustainability of the village. Local bus stop within 200 metres, public transport to Stockton, Middlesbrough Durham and Sedgfield, well related to the national cycle network and footpaths. The site meets all the tests of soundness.

**324/1 Signet Planning Ltd**

**Issue: Spatial Strategy - Limits to Development Villages**

Support Option 1. The benefits of an extension to the settlement limits to the village at this particular point (see attached plan) are three fold:

Will enable the village (Wynyard) to become fully sustainable by being able to attract and maintain additional services and facilities within the village which will reduce the need for residents to access such services and facilities out with the village.

Given the existing nature and form of Wynyard Village this particular site is the logical location for the provision of executive housing in the Borough. Current housing stock is acting as a barrier to economic growth and in-migration and the identification of a shortage of mid market and executive housing reinforces this.

Including this site (HA1?) within the settlement limits for Wynyard would enable the introduction of a prestige executive housing development which will help the economy retaining senior management.

### **326/3 David Kitchen Associates**

#### **Issue: Mixed Use Allocations - Lowfield Farm**

Would wish to submit the 23 acres of Lowfield Farm, Wolviston as a mixed use allocation. This site is located to the west of MU1 and the east of A689/A19 Wolviston services.

### **328/1 Maltby Northern Edge Residents Group**

#### **Issue: Spatial Strategy - Limits to Development Villages**

By virtue of the limited services within Maltby Village, which would require occupants to travel by private car for employment, schools retail and recreational purposes, and that the settlement could not meet the demand placed upon it from such a development and as such would be contrary to the aims of government guidance with respect to locating residential development in sustainable locations as detailed in PPS 1, PPS 3 PPS 7 and Structure Plan Policies SUS 1 and SUS 2.

Land to the north of Maltby should not be included on any list or on any map compiled to show possible future development in Stockton Borough.

### **329/1 Individual**

#### **Issue: Spatial Strategy - Limits to Development Villages**

This area has many forms of wildlife and development on this land would destroy their natural habitat. The amount of additional traffic would cause safety issues at junction with A1044 and additional traffic along a small village road with cars already parked on the road would add further dangers to villagers.

### **330/ Individual**

#### **Issue: Spatial Strategy - Green Wedges**

In addition to the issues previously mentioned the development of green wedges would have a negative impact on the quality of village life as it is likely to result in Maltby becoming part of the urban sprawl.

#### **Issue: Spatial Strategy - Limits to Development Villages**

Maltby - The current facilities in the village have difficulty in sustaining the needs of the residents and resources could not support further expansion. For example, there is no doctor/health centre, no school and limited bus service. Any increase in traffic movements would add to the already significant road safety issues.

### **331/1 Individual**

#### **Issue: Spatial Strategy - Limits to Development Villages**

No school facilities. Limited school bus heavily subsidised. One small shop. Small one denomination church. New residents would have to use a car for almost everything. - usually 2/3 per household. Increase traffic congestion. Any building in Maltby would bring increased crime. Maltby is a linear village. New building would fundamentally alter the character of the village. Building on this land would adversely affect wildlife. Roads are narrow and access to these fields is poor. This land is greenfield. There is already plenty of brownfield available for projected use. Noise problems from the A19 is a well recognised problem. Building on these fields would bring more complaints.

### **332/1 Claytons of Carlton**

#### **Issue: Spatial Strategy - Limits to Development Villages**

The current village envelope excludes the business premises from which we operate and is wholly inconsistent with the fact I believe the policy is for there to be a clear break between urban and rural uses and landscapes. It is impossible to argue that the business premises constitute a rural use and I accordingly request they be included within the village envelope.

## **Respondents to the Environment Development Plan Document Issues and Options Consultation**

Yorkshire Forward  
Ministry of Defence  
The Coal Authority  
Highways Agency  
Homes & Communities Agency  
Egglecliffe & Eaglescliffe Parish Council  
Tees Valley Biodiversity Steering Group  
Carlton Parish Council  
British Waterways  
Sport England  
RSPB  
Middlesbrough Council  
One North East  
Natural England  
English Heritage  
Environment Agency

# Environment DPD Questionnaire Responses

## THEME 1- Natural Environment (planning policies on the protection and enhancement of the natural environment)

**How can we best protect and enhance international, national, regional and local sites?**

(Please tick one box)

<b>Option 1:</b> Provide a criteria-based policy to judge proposals for development on or affecting sites of regional and local biodiversity and geodiversity	0
<b>Option 2:</b> Option 1 + include the identification of key sites/locations for the creation of new habitats and tree cover	5

**Q1.** Is a separate criteria-based policy required for each local and regional designation type?

Yes  No

**Q2.** Should a criteria based policy be developed for ancient woodland?

Yes  No

**Q3.** What should the content be of the criteria-based policies?

See summary/full responses

**Q4.** Should policies seek to ensure that development is not detrimental to green infrastructure and where possible enhance it?

Yes  No

**Q5.** Core Strategy Policy CS10 identifies a commitment to improve various aspects of the natural environment. Should the Environment DPD contain detailed policies stating how this commitment will be delivered?

Yes  No

**Q6.** Should these documents (Tees Valley Biodiversity Action Plan (BAP), and the Stockton Green Infrastructure Strategy and Action Plan) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?

Yes  No

See summary/full responses

**Q7.** Should the Environment DPD include a specific policy to protect and support the continued enhancement of the RSPB Saltholme 'nature reserve'?

Yes

3

No

1

**Q8.** Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?

Yes

5

No

0

**Q9.** Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?

Yes

5

No

1

**Q10.** Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?

Yes

5

No

0

**THEME 2- Historic Environment** (policies on the conservation and, where appropriate, enhancement, of the historic environment and heritage assets within the Borough)

**How can we conserve and enhance the historic environment and heritage assets?**

(Please tick one box)

<b>Option 1:</b> Identify designated heritage assets and solely rely upon the development management policies within PPS5 for proposals affecting all aspects of the historic environment.	0
<b>Option 2:</b> Option 1 + identify and provide policy to protect and enhance other heritage assets	0
<b>Option 3:</b> Option 1 & 2 + include a policy relating to the Historic Landscape Characterisation to ensure that development is sympathetic to that in the local area.	2

**Q11.** Are there any other heritage assets which help characterise and define the Borough and which it is important to conserve in order to maintain its unique sense of place?

See summary/full responses

**Q12.** Is there merit in developing a heritage asset at risk register (whether they are designated or otherwise) and produce a local strategy for the historic environment to tackle these matters?

Yes  1  No  0

**How we review Article 4 directions?**

(Please tick one box)

<b>Option 1:</b> Do not alter the current Article 4 directions which are in place	0
<b>Option 2:</b> Consider the need to extend the use of Article 4 directions	2

**Q13.** Does the exercise of permitted development rights undermine the aims of the historic environment? If so in which specific areas?

Yes  0  No  0

See summary/full responses

## THEME 3- Rural Environment (policies on rural character and diversification)

### How can we manage development in the countryside?

(Please tick one box)

<b>Option 1:</b> Provision of topic specific policies for development within the countryside	1
<b>Option 2:</b> Option 1 + develop a policy approach which ensures that development is only allowed which is conducive with the 7 individual character areas outlined within the Landscape Character Assessment and Capacity Study.	2

**Q14.** What should the topic specific policies seek to achieve?

See summary/full responses

**Q15.** Are there any other topic areas that require specific policies?

See summary/full responses

**Q16.** Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?

Yes  No

**Q17.** Is it appropriate for policy to restrict the residential re-use of buildings in the countryside to those associated with tier 1 and 2 villages except in exceptional circumstances?

Yes  No

**Q18.** Should this policy (option 2) seek to steer development away from the most sensitive landscape areas unless unavoidable?

Yes  No

**Q19.** Is there a need to identify and protect specific areas of the best and most versatile agricultural land from piecemeal development?

Yes  No



**THEME 4- Urban Open Space** (policies on the strategic management of green spaces throughout the Borough)

**How do we identify provision to be protected?**

(Please tick one box)

<b>Option 1:</b> Protect all open spaces	1
<b>Option 2:</b> Protect open spaces of higher quality and value to the local community	0
<b>Option 3:</b> Protect spaces that are of a particular conservation, historical or cultural value	0
<b>Option 4:</b> Protect spaces that form part an essential part of the borough's green infrastructure	0
<b>Option 5:</b> A combination of options 2, 3 and 4	5

**How do we identify provision to be enhanced?**

(Please tick one box)

<b>Option 1:</b> Focus to enhance higher value and lower quality spaces that are critical to avoid deficiency in a type of open space in the first instance	0
<b>Option 2:</b> Enhance spaces that are of a particular conservation, historical or cultural value	0
<b>Option 3:</b> Enhance spaces that form part an essential part of the borough's green infrastructure	3
<b>Option 4:</b> A combination of options 1, 2 and 3	4

**How do we identify where new provision is required?**

(Please tick one box)

<b>Option 1:</b> Identify areas where there is a deficiency against quantity and proximity standards	0
<b>Option 2:</b> Option 1 + assess the requirement for new provision associated with planned increases in population	3

**How do we identify opportunities for new, enhanced or relocated provision?**

(Please tick one box)

<b>Option 1:</b> New provision as identified within the preceding section	0
<b>Option 2:</b> Enhanced provision as identified within the preceding section	0
<b>Option 3:</b> Relocated provision where this would make a better use of	0

land, especially if it enhances the quality and accessibility to users	
<b>Option 4:</b> A combination of options 1, 2, and 3	3

Should we identify potential development sites?

(Please tick one box)

<b>Option 1:</b> Do not seek to identify potential development sites	1
<b>Option 2:</b> Seeks as a first priority to ensure that in an area where the provision of a type of open space has met provision standards the presumption should be to use part of that space for a type of provision to remedy deficiency in that area	1
<b>Option 3:</b> Where option 2 has not been able to identify an opportunity for the creation of a valued type of open space, identify sites which are 'surplus to requirements' and deemed suitable for development	0

**Q20.** Should the Environment DPD include policies which protect and support the delivery of the Tees Heritage Park and Portrack Marsh? What should these policies be specifically aiming to achieve?

Yes

No

[See summary/full responses](#)

## British Waterways

### Theme 1: Natural Environment

**Q4 Should policies seek to ensure that development is not detrimental to green infrastructure and where possible enhance it?**

Yes

**Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?**

Yes

**Q10 Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?**

Yes

### Theme 3: Rural Environment

**Q14 What should the topic specific policies seek to achieve?**

Inland waterways are:

- 1) Important tourism visitor destinations and attractions in their own right (attracting day-trippers, overnight stays, domestic and foreign visitors, and weekend and short breaks), as well as providing links to key markets, other visitor destinations and attractions (such as waterside parks, pubs, galleries and museums);
- 2) The essential infrastructure upon which a wide range of leisure marine businesses are dependent and;
- 3) A supporting factor in rural regeneration and diversification through tourism and recreation' (TCPA Policy Advice Note: Inland Waterways: Unlocking the potential and securing the future of inland waterways through the planning system (2009)).

However, as Waterways are non-footloose assets i.e. their location and alignment are fixed, policies need to provide flexibility as 'certain types of development and uses are dependent upon the location of waterway infrastructure itself and the movement of boats along the waterway.

It is important that planning policies acknowledge that it is not always possible to find suitable sites adjacent to the waterways for some waterway-dependent uses, in or around existing settlements, for example:

- 1) provision of facilities to support waterway-related visitor attractions and
- 2) essential facilities to support boating-related tourism and leisure activity, such as marinas, boatyards and boat-hire companies, and moorings, which are informed by reasonable cruising distances.

Policy EC7 'Planning for Tourism in Rural Areas' of PPS4 promotes essential facilities required by Inland Waterways and advises local planning authorities should support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, the character of the countryside, its towns, villages, buildings and other features.

**Q16 Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?**

Yes

### Theme 4: Urban Open Space

**Issue 6 How do we identify provision to be enhanced?**

Option 3

## Carlton Parish Council

### Theme 2: Historic Environment

**Q11 Are there any other heritage assets which help characterise and define the Borough and which it is important to conserve in order to maintain its unique sense of place?**

The network of Salters and Drovers Lanes has been identified as characteristic heritage features in the draft National Character Area document for the Tees Lowlands (Natural England 2011). In the rural areas to the west of Stockton these are also often defined by historic hedgerows that have been in place since the enclosures. These hedgerows often do not receive protection under the Hedgerow Regulations because they are not species-rich or otherwise ecologically important. The lanes and their hedges are however features of local character and are valued by people who live in our parish. We believe these help to define the "character and unique sense of place" of this area and would like to see them protected, where possible, through planning policy.

### Theme 3: Rural Environment

**Issue 4 How can we manage development in the countryside?**

Option 2

**Q14 What should the topic specific policies seek to achieve?**

Policies should seek to protect the rural character of the area. In particular it needs to safeguard the area from piecemeal development where equine enterprises begin with small scale agricultural developments such as stables, followed by caravans and eventually to permanent residences.

**Q16 Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?**

Yes

**Q17 Is it appropriate for policy to restrict the residential re-use of buildings in the countryside to those associated with tier 1 and 2 villages except in exceptional circumstances?**

Yes

Q18 Should this policy (option 2) seek to steer development away from the most sensitive landscape areas unless unavoidable?

Yes

Q19 Is there a need to identify and protect specific areas of the best and most versatile agricultural land from piecemeal development?

Yes

## Eggescliffe & Eggescliffe Parish Council

### Theme 1: Natural Environment

Issue 1 How can we best protect and enhance international, national, regional and local sites?

Option 2

Q1 Is a separate criteria-based policy required for each local and regional designation type?

Yes

Q2 Should a criteria based policy be developed for ancient woodland?

Yes

Q3 What should the content be of the criteria-based policies?

To ensure protection of the sites for use by future generations

Q4 Should policies seek to ensure that development is not detrimental to green infrastructure and where possible enhance it?

Yes

Q5 Core Strategy Policy CS10 identifies a commitment to improve various aspects of the natural environment. Should the Environment DPD contain detailed policies stating how this commitment will be delivered?

Yes

Q6 Should these documents (BAP and Stockton Green Infrastructure Strategy) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?

Yes The area formerly known as the Admiralty Ecology Park, Uraly Nook, Eggescliffe. This area is owned by Elementis and has previously been used and managed by the Forest School organisation who have moved due to the closure of Elementis, leaving the future of this valuable wildlife resource uncertain.

Q7 Should the Environment DPD include a specific policy to protect and support the continued enhancement of the RSPB Saltholme 'nature reserve'?

Yes

Q8 Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?

Yes

Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?

Yes

Q10 Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?

Yes

### Theme 2: Historic Environment

Issue 2 How can we conserve and enhance the historic environment and heritage assets?

Option 3

Q11 Are there any other heritage assets which help characterise and define the Borough and which it is important to conserve in order to maintain its unique sense of place?

Preston Park, gardens and hall. St John's Church, Eggescliffe

Q12 Is there merit in developing a heritage asset at risk register (whether they are designated or otherwise) and produce a local strategy for the historic environment to tackle these matters?

Yes

Issue 3 How we review Article 4 directions?

Option 2

Q13 Does the exercise of permitted development rights undermine the aims of the historic environment? If so in which specific areas?

Yes No specific areas identified, but those where no other protection exists could be adversely affected.

### Theme 3: Rural Environment

Q16 Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?

Yes

Q17 Is it appropriate for policy to restrict the residential re-use of buildings in the countryside to those associated with tier 1 and 2 villages except in exceptional circumstances?

Yes

Q18 Should this policy (option 2) seek to steer development away from the most sensitive landscape areas unless unavoidable?

Yes

**Q19 Is there a need to identify and protect specific areas of the best and most versatile agricultural land from piecemeal development?**

Yes

#### **Theme 4: Urban Open Space**

**Issue 5 How do we identify provision to be protected?**

Option 5

**Issue 6 How do we identify provision to be enhanced?**

Option 4

**Issue 7 How do we identify where new provision is required?**

Option 2

**Issue 8 How do we identify opportunities for new, enhanced or relocated provision?**

Option 4

**Issue 9 Should we identify potential development sites?**

Option 1

**Q20 Should the Environment DPD include policies which protect and support the delivery of the Tees Heritage Park and Portrack Marsh? What should these policies be specifically aiming to achieve?**

Yes Retention of the areas for use by future generations

#### **Your Supplementary Comments**

With regard to the statement on climate change on page 11, there are counterviews that disagree with the Stern review.

The list of Local Wildlife and Geodiversity Sites on page 16 is non-specific, are the former Admiralty Ecology Park at Urray Nook and the new forest park at Marshalls, Durham lane, Eaglescliffe included?

The list of Scheduled Monuments on page 22 includes Yarm Bridge, does this refer to the railway bridge or the road bridge and why not both?

With regard to Q16, would these policies afford protection for the rural areas within Egglecliffe and Eaglescliffe?

Noting that Yarm Rural Fringe is listed separately, does the River Tees Corridor listed as a character area on page 28 include the rural areas within Egglecliffe and Eaglescliffe?

#### **English Heritage**

##### **General Comments**

###### **General comments**

English Heritage notes the strength of the Core Strategy Objectives which directly or indirectly seek to safeguard and/or constructively utilise the historic environment and its heritage assets. Objective 9 is of particular relevance. Whilst Core Strategy policies are less helpful in this regard, this DPD provides an opportunity for the shortcoming to be redressed.

English Heritage welcomes the inclusion of Theme 2 - Historic Environment in particular, and welcomes too the acknowledgement that each theme has resonance with the others.

Since the preparation of the Core Strategy, the Government has published PPS5: Planning for the Historic Environment replacing PPG 15 and PPG 16 in their entirety. It is important that this DPD reflects the terminology, language and vocabulary of the new PPS, and I am pleased to observe in Part I above reference to the 'historic environment' and 'heritage assets', both of which now have specific meaning attached to them.

This DPD should not repeat national policy guidance, but instead supplement it with a locally distinctive overlay that responds to those issues of particular and especial concern to the Borough.

PPS5 Policy HE3. I urges local authorities to set out in their LDF a positive, proactive strategy for the conservation and enjoyment of the historic environment, taking into account the locally specific variations in type and distribution of heritage asset, as well as the contribution made by the historic environment in respect of the following

- i) its influence on the character and appearance of the environment and an area's sense of place
- ii) its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development
- iii) the stimulus it can provide to inspire new development of imaginative and high quality design
- iv) the reuse of existing fabric, minimising waste and
- v) its mixed and flexible patterns of land use that are likely to be, and remain, sustainable.

We are advised that the purpose of this document is to provide 'site specific designations and guidance which adds more detail to the strategic policies set out in the Core Strategy'. In light of the comments in respect of the Introduction, this statement should also refer to the Strategic Objectives in the Core Strategy.

With regard to the historic environment of the Borough I would surmise that it is not the intention to identify all the heritage assets within the area or provide some indication of their extent. Arguably the DPD could not do so, given that in order to the document would need to include all heritage asset types, including those on a local list, all nationally significant non-scheduled archaeology, and all buildings and structures covered by the extent of any listing. What it could not include, additionally, would be any heritage assets yet to be discovered, and it would be wrong for the reader to assume that absence from the DPD was an indication of absence of any heritage interest.

The evidence base for this DPD should include an inventory of all known heritage assets within the Borough and, importantly, information as to the condition of those assets. Consequently the evidence base should include all relevant entries on the Historic Environment Record. The English Heritage Register of Heritage at Risk contains much of the information pertaining to the extent to which a number of asset types are at risk from harm or loss through condition or underuse, but it does not contain information with regard to grade II listed buildings at risk or locally important heritage assets at risk. This is information which the local authority needs to gather in order to be able to pro-actively manage its heritage assets.

English Heritage previously provided a response on the scoping of the Sustainability Appraisal/Strategic Environmental Assessment of the DPD.

## **Theme 2: Historic Environment**

### **Issue 3 How we review Article 4 directions?**

Option 2

## **Theme 4: Urban Open Space**

### **Issue 6 How do we identify provision to be enhanced?**

Option 4

## **Your Supplementary Comments**

### **OVERARCHING APPROACH: GREEN INFRASTRUCTURE AND CLIMATE CHANGE**

The introduction describes the linkages between Climate Change, Green Infrastructure and Core Strategy policies. The linkages with Core Strategy Objectives should also be addressed, and in this regard I am particularly anxious to ensure that their relationship to the historic environment is dealt with in this chapter.

Green Infrastructure- The consultation paper on a new PPS dealing with a 'natural and healthy environment' is not particularly helpful in articulating the historic dimension of green infrastructure. The historic environment and heritage assets can make a valuable contribution to green infrastructure networks and their wider functions, for example in providing opportunities for leisure and recreation, encouraging walking and cycling, and strengthening local character. Places such as historic parks and gardens, archaeological sites, the grounds of historic buildings, and green spaces within conservation areas can form part of a green infrastructure network as well as underpin the character and distinctiveness of an area and its sense of place. Other heritage assets can also offer a range of opportunities such as canal networks, churchyards, and the wider countryside including networks of 'green-lanes', common land and historic parkland.

The Council should therefore, in association with new development proposals, seek to positively identify those heritage assets which constitute part of the area's green infrastructure network and which may warrant investment in their management.

Climate Change- has the potential to cause harm to the historic environment and its heritage assets. English Heritage guidance can be found at [www.helm.org.uk](http://www.helm.org.uk). Our response to the consultation on the Council's Sustainable Design Guide SPD contains further details of the links.

The historic environment is a key component of the sustainability agenda, in the sense that it is a finite resource; once lost it is lost forever.

Both PPS5 and Regional Spatial Strategy (RSS) Policy 2(e) urge local authorities to make better use of existing built fabric in addition to making prudent use of natural resources. By this means both energy consumption and levels of waste can be reduced minimising the environmental cost of demolishing existing buildings, transporting waste to landfill, manufacturing materials afresh, transporting them to site and employing them in new construction. Whatever the future for the RSS, the principle described above holds good and now remains enshrined in Government policy. It also goes to the heart of protecting the significance of heritage assets and the repair and maintenance of assets at risk.

### **THEME 1 - NATURAL ENVIRONMENT**

Many aspects of the historic environment have a direct relationship to the 'natural' environment. Marine heritage, entries on the English Heritage Register of Historic Parks & Gardens, and ancient woodlands and field systems are all such examples.

### **THEME 2 - HISTORIC ENVIRONMENT**

'The historic environment/s defined as All aspects of...'

It would be useful to reference the English Heritage document Conservation principles, which describes the four heritage values (evidential, historical, aesthetic, and communal) to be taken into account in assessing the significance of a heritage asset.

To designated heritage assets should be added non-scheduled archaeological sites which, although not designated as such, may nevertheless be of national significance.

PPS5 Policy HE3.1 sets out the cross-cutting value of the historic environment, and it would be useful for this to be acknowledged in the commentary. English Heritage has not been consulted on the Regeneration DPD since 2007. Has further work been undertaken recently on which we have not been consulted?

The evidence base appears to be suitably comprehensive in terms of the inventory of heritage assets types, but it does not appear to include any evidence as regards the condition of those assets. I note too that the Heritage Strategy has not yet been prepared. Nor am I clear how this DPD ties in with the Heritage Strategy. The need to recognise, value, promote, celebrate and resource the sector and its assets is in many senses a given.

The Historic Landscape Characterisation (HLC) for Tees Valley has now been completed.

The issues - In response to the issues as set out I would contend that they perhaps need to be approached in a different order.

Firstly, the Council has a duty to ensure that development proposals contribute to the protection, conservation (and enhancement) of the historic environment. The Council should ensure that development proposals have due regard to the historic environment and its heritage assets, and that decisions reached avoid or minimise harm to, or loss of, their value and significance.

Secondly, the Council should ensure that non-designated heritage assets are sufficiently protected.

The local list for Stockton need not confine itself to 'buildings'. A local list can include the full range of heritage asset types. Consequently it could include, for example, locally important parks and gardens, the entire route of the Stockton and Darlington Railway, and non-designated archaeology. The preserved area unexcavated and maintained as open space at Quarry Farm, Ingleby Barwick is an example of the latter.

Other issues then flow from these two basic aims. In order to achieve both it is necessary to have a positive, proactive strategy for the conservation and enjoyment of the historic environment of the Borough. Whilst for the purposes of Development Management it may be acceptable to employ the decision-making processes as set out in the PPS, this aspect of heritage protection and enhancement does not in itself provide the locally tailored positive strategy for conservation and enhancement required of PPS5 Policy HE3.1

Having accepted that the PPS cannot, and should not, be relied upon in its entirety, and that a positive and pro-active Strategy is needed, it is then necessary to decide on what it should seek to do, and to decide on what success would look like. In other words it needs actions, targets and indicators, and the means by which to judge performance.

Such a Strategy should begin by having a strong evidence base which contains a full understanding of the extent and condition of the heritage assets within it. In addition it needs to demonstrate a full understanding of the nature and extent of the risks to it, for example as a consequence of avoidance, neglect and/or deterioration, inappropriate repair/reuse, and/or loss of context.

Actions, by no means inclusive, which might flow from this could include:

- A programme of management and enhancement of the Historic Environment Record
- A programme of removing heritage from risk by, for example, direct action or making sure that conservation areas have up to date appraisals and management plans which might identify the need for Article 4 Directions
- A local grant scheme for the repair of historic fabric
- An award scheme for exemplar activity in respect of the management and conservation of the historic environment
- Activities to increase public engagement and interest in the historic environment
- A programme of improvements to public realm — (street/public realm audits, improvements works, de-cluttering works)
- Extended participation in the Heritage Open Days programme
- A programme for the management/transfer/disposal of local authority heritage assets
- Supporting the work of the designated Design and Heritage Champion Member
- A programme of training events for the management of the historic environment

The Strategy would need to include targets and indicators by which to measure success in respect of any actions.

With particular regard to the extent/coverage of Article 4 Directions it would be inappropriate to regard the present situation as immutable. Any such measure adopted should be regularly reviewed to ensure that it is fit for purpose. This may mean making new Directions, or amending the geographic extent and purpose of those existing. Article 4 Directions can apply to areas outwith Conservation Areas.

### THEME 3 - RURAL ENVIRONMENT

This section of the document identifies two components to the evidence base - the Landscape Character Assessment and Capacity Study, and the Historic Landscape Character Assessment. The DPD provides commentary on the first, but not the second. It would, however, be useful for the document to explain how the HLC is to be used to inform the decision-making process.

Whilst the principal purpose of rural planning is normally to exercise restraint, it is important to have regard to design quality where development is allowed. Good decisions are invariably arrived at by firstly understanding the context within which the development would take place, including its historic context, and then adhering to whatever design guidance the Council deems fit for the purpose of securing high

quality responsive development based at least in part on an analysis of landscape (and historic landscape) character.

#### THEME 4 - URBAN OPEN SPACE

In this section of the document we are informed of the intention to create a Tees Heritage Park. The commentary remains silent with regard to the historic component of 'heritage' and references no linkage with historic environment objectives or policies in the Core Strategy.

In respect of the identification of provision to be protected, I would opine that Option 1 brings with it no qualitative assessment of the extent to which the Borough's open spaces are used, cherished or misused. It is incumbent on the Council to satisfy itself that open spaces are in the right places to serve their communities, and that they are used and maintained properly. Where they are not of value it is legitimate for the Council to question their continued presence.

Option 3, which is to protect spaces that are of particular conservation, historical, or cultural value, ought not to be an option, but a given in any scenario.

In respect of existing provision to be enhanced I would argue that the preferred option should be built around all three set out.

In our previous response I drew attention to the issue of public footpaths, arguing that they are an integral part of the open space network within the Borough. It would be helpful for the DPD to address this network as an issue, especially given that for the most part it is of historic value (and a consideration for that theme too).

#### Environment Agency

##### Theme 1: Natural Environment

**Issue 1 How can we best protect and enhance international, national, regional and local sites?**

Option 2

**Q4 Should policies seek to ensure that development is not detrimental to green infrastructure and where possible enhance it?**

Yes

**Q5 Core Strategy Policy CS10 identifies a commitment to improve various aspects of the natural environment. Should the Environment DPD contain detailed policies stating how this commitment will be delivered?**

Yes

**Q6 Should these documents (BAP and Stockton Green Infrastructure Strategy) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?**

Yes The North East Wetland Feasibility Study is an important tool in identifying the location and design of wetland restoration and creation projects. It could form part of the evidence base for Stockton, along with the listed documents and initiatives.

**Q8 Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?**

Yes

**Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?**

Yes

**Q10 Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?**

Yes

##### Theme 3: Rural Environment

**Q16 Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?**

Yes

##### Theme 4: Urban Open Space

**Issue 5 How do we identify provision to be protected?**

Option 5

**Issue 6 How do we identify provision to be enhanced?**

Option 4

**Issue 7 How do we identify where new provision is required?**

Option 2

**Issue 8 How do we identify opportunities for new, enhanced or relocated provision?**

Option 4

**Q20 Should the Environment DPD include policies which protect and support the delivery of the Tees Heritage Park and Portrack Marsh? What should these policies be specifically aiming to achieve?**

Yes Support policies which seek to protect and enhance river and wetland environments in these two areas and provide benefits for wildlife and people.

#### Your Supplementary Comments



## Theme 1 - Natural Environment

Questions 1 to 3 - We suggest that the Tees Valley Biodiversity Partnership, acting as the Local Sites Partnership, is best placed to comment on these questions.

Question 7 - It may be more appropriate to widen such a policy to cover the seven sites, including RSPB Saltholme, in the North Tees Natural Network initiative.

Question 10 - We would support such a policy. Given the challenging requirements of the EU Water Framework Directive (WFD), any opportunity to improve water quality should be capitalised upon, particularly new watercourses which are currently failing WFD targets (this information can be acquired from us on request).

## Theme 4 - Urban Open Space

Identifying potential development sites: We would suggest perhaps a combination of option 2 and 3. Open space is a valuable commodity, difficult to reclaim once lost. Our strong preference would be for open space to be redeveloped as a more appropriate open space use if at all possible (option 2). However we appreciate in some areas there might be a strong case for redevelopment as other uses. We suggest that this should only be considered as a last resort only when the impacts of an open spaces lost (both present and future) are proven negligible (more stringent version of option 3).

## Highways Agency

### General Comments

#### General comments

We support the policies within the Environment DPD, particularly those that relate to the Core Strategy policies CS1 and CS2, which promote development within the conurbation linked to sustainable travel modes. We do not have any concerns at this stage, but would wish to continue to be consulted at future stages of development of the DPD.

## Homes & Communities Agency

### General Comments

#### General comments

Thank you for your letter of 28 January advising the Homes and Communities Agency (HCA) of the above consultations.

We have noted the contents of these documents and have no comments to make at this time. We look forward to continuing to work with Stockton-on-Tees to support the delivery of your LDF.

## Middlesbrough Council

### General Comments

#### General comments

Thank you for consulting Middlesbrough Council on your draft Environment DPD - Issues and Options Report, Sustainable Design Guide SPD and Parking Provisions for Development SPD. As an adjoining Tees Valley local planning authority, the Council has no comments to make at this stage of the LDF process.

The Council would however, wish to be kept informed of the progress of these and other future Stockton Council LDF documents.

## Ministry of Defence

### General Comments

#### General comments

The MOD has no safeguarding objections to the Environment DPD Issues and Options.

## Natural England

### General Comments

#### General comments

Thank you for consulting Natural England on the issues and options report for the Stockton Environment DPD.

Natural England has been charged with the responsibility to ensure that England's unique natural environment including its land, flora and fauna, freshwater and marine environments, geology and soils are protected and improved. We also have the responsibility to help people enjoy, understand and access the natural environment.

We welcome the development of the Environment DPD and its overarching themes of green infrastructure and mitigation and adaptation to climate change. We consider that the natural environment in the Stockton area needs to be at the heart of urban and rural policy and place making. It is integral to policies, and initiatives to deliver better health, sustainable transport, social cohesion and thriving local economies as well as providing an enhanced sense of place, and biodiversity and landscape benefits.

This opinion is based on the information provided by you, and for the avoidance of doubt, does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan or programme which is the subject of this consultation, and which may despite Strategic Environmental Assessment, Habitats Regulations Assessment and Environmental Impact Assessment have adverse effects on the environment.

I trust that this is helpful, but please do not hesitate to contact me at the above address or telephone number should you wish to discuss this matter further.

## Theme 1: Natural Environment

Issue 1 How can we best protect and enhance international, national, regional and local sites?

Option 2

Q1 Is a separate criteria-based policy required for each local and regional designation type?

No

Q2 Should a criteria based policy be developed for ancient woodland?

Yes

Q3 What should the content be of the criteria-based policies?

In the development of all options the local authority should follow the advice in PPS9, and associated good practice guide, and other guidance which may be of use in identification of policy strands:

PPS9 Planning for Biodiversity and Geological Conservation A Guide to Good Practice.

<http://www.communities.gov.uk/publications/planningandbuilding/planningbiodiversity>

Biodiversity by Design A Guide for Sustainable Communities (TCPA)

[http://www.tcpa.org.uk/data/files/bd\\_biodiversity.pdf](http://www.tcpa.org.uk/data/files/bd_biodiversity.pdf)

DEFRA Guidance for Local Authorities on Implementing the Biodiversity Duty

[http://www.naturalengland.org.uk/Images/dutyguidancelocal\\_tcm6-9234.pdf](http://www.naturalengland.org.uk/Images/dutyguidancelocal_tcm6-9234.pdf)

Conserving Biodiversity in a Changing Climate: Guidance on Building Capacity to Adapt DEFRA May 2007

<http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf>

Natural England report - Climate Change and Biodiversity Adaptation – The Role of the Spatial Planning System

<http://naturalengland.etraderstores.com/NaturalEnglandShop/Product.aspx?ProductID=1b0e18e5-cf75-4068-a644-05bd294e2cfb>

Accessible woodlands from Space for people (woodland trust 2010) <http://www.woodlandtrust.org.uk/en/about-us/publications/key-publications/space-for-people/Pages/space-for-people.aspx>

Q6 Should these documents (BAP and Stockton Green Infrastructure Strategy) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?

Yes Along with the Tees Valley BAP, the Stockton Green Infrastructure Strategy, the Tees Valley Green Infrastructure Strategy and any proposed Integrated Biodiversity Delivery areas, the Landscape Character Assessment may also provide evidence/guidelines of where habitat restoration and creation would be appropriate, along with any emerging work from the Tees Valley landscape scale partnership.

Q7 Should the Environment DPD include a specific policy to protect and support the continued enhancement of the RSPB Saltholme 'nature reserve'?

Yes

Q8 Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?

Yes

Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?

Yes

Q10 Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?

Yes

## Theme 2: Historic Environment

Issue 2 How can we conserve and enhance the historic environment and heritage assets?

Option 3

## Theme 3: Rural Environment

Issue 4 How can we manage development in the countryside?

Option 2

Q14 What should the topic specific policies seek to achieve?

The document should have separate policy concerning landscape character. This should provide clear policy objectives for the landscape character areas (lca) identified within the plan area, based on the guidelines produced as part of the landscape character assessment, and taking into account their sensitivity to change– for example which lca and their characteristics need to be protected or conserved, enhanced, managed, restored or created ?

All new development should contribute to the protection and enhancement, or creation of new landscape character of the landscape character areas identified, supporting the creation of high quality, locally distinctive places.

The policy and/ or infrastructure delivery plan could also include reference to supporting landscape scale partnerships which could deliver the objectives in particular landscape character areas within Stockton and for the Tees Lowlands NCA.

We have produced guidance on implementation of the European Landscape Convention including how ELC can be incorporated into plans, policies and strategies which may be of help in developing the policy  
[http://www.naturalengland.org.uk/Images/ELC-GUIDANCE-PART-2\\_tcm6-23585.pdf](http://www.naturalengland.org.uk/Images/ELC-GUIDANCE-PART-2_tcm6-23585.pdf)

#### Theme 4: Urban Open Space

**Q20 Should the Environment DPD include policies which protect and support the delivery of the Tees Heritage Park and Portrack Marsh? What should these policies be specifically aiming to achieve?**

The Environment DPD should include a policy for the protection and enhancement of river corridors - Promoting the protection, restoration and enhancement of river corridors so as to conserve and enhance their natural and historic heritage, their amenity and their value for fisheries, recreation and tourism, with links also to the particular local project objectives and their delivery.

#### Your Supplementary Comments

Page 8 - We welcome the development of the Environment DPD and its overarching themes of green infrastructure and mitigation and adaptation to climate change. It is however not clear if the Environment DPD is proposing to have two overarching strategic policies covering green infrastructure and climate change.

Green Infrastructure is an essential infrastructure and should be planned, delivered and managed as other essential infrastructure (in line with PPS 12 paragraphs 4.6 - 4.8). We are pleased to note that Stockton BC has moved on from PPG 17 style green space/ open space approach to developing and implementing a Green infrastructure strategy, however this should also be reflected throughout document, for example by replacing the term open space with greenspace or with Green Infrastructure asset wherever possible.

Natural England considers that climate change is the most serious long term threat to the existing natural environment, and the impacts of climate change should be fundamental to decision making within spatial planning. The spatial planning system has a key role in delivering the measures needed to both mitigate and develop resilience to adapt to the impacts of climate change for both development and the natural environment. There are clearly implications from climate change for agriculture, woodland, biodiversity networks, green infrastructure and potentially for recreation and tourism patterns.

The implementation of a multi functional green infrastructure network can minimise the urban heat island effect, soak up excessive water runoff and reduce flood risk. The delivery of habitat restoration and creation measures, and habitat networks enables the natural environment to adapt. Other mitigation issues that need to be considered include the protection of carbon 'sinks'/storage areas such as woodlands.

Page 9 - Stockton on Tees Green Infrastructure Strategy - this paragraph does not provide details of the definition of green infrastructure adopted by Stockton. It is not clear if the one provided by draft PPS on Planning for a Natural and Healthy Environment is the one adopted.

Page 10 - Appendix 1 could also show priority BAP habitats. The GI Action Plan should also feed into the LDF Infrastructure Delivery Plan.

Page 12 - PPS1 Supplement on Climate Change was published Dec 2007. There is also a need to allow the natural environment to adapt to climate change; PPS1 Supplement refers to the need to conserve and enhance biodiversity.

Page 16 - This section should also describe the priority BAP habitats and species present within Stockton.

Page 19 'Box text' - The supporting text can also describe the protection afforded to European protected species.

HOW CAN WE BEST PROTECT AND ENHANCE INTERNATIONAL, REGIONAL AND LOCAL SITES - Option 2 is more comprehensive in this respect, however in both options, the conservation, and enhancement of priority BAP habitats and species, the need for protection and enhancement and improvements to the connectivity of habitat networks in line with PPS9 and the recent Lawton Review, and encouragement of the provision of better access to and interpretation of biodiversity and geodiversity sites and features in the area should also be included. We recommend including the identification of key sites/locations for habitat creation at a landscape scale such as Integrated Biodiversity Delivery Areas, as these will all support the development and enhancement of the green infrastructure network.

Q2 We recommend a policy covering ancient woodland, woodlands, hedgerows and trees.

Q7 - The Environment DPD could have a policy supporting nature based/educational tourism and access to and involvement in the natural environment including reference to both Saltholme and to the Teesmouth National Nature Reserve, and the role of Local Nature Reserves. Natural England encourages the use of the natural environment by adults and children for outdoor learning, volunteering and environmental education.

Q9 - We consider that sustainable management of flood and erosion risk is best achieved by solutions that work with the physical and hydrological processes that shape coastal and riverine environments. Appropriate spatial planning and more sustainable land management and use can help to reduce flood flows, make space for rivers and enable coasts to evolve naturally, and thereby make a critical contribution to flood and erosion risk management.

A strategic, integrated management approach to flood and coastal erosion risk is required which needs to anticipate climate change, contribute to its mitigation and help provide for innovative adaptation of the natural environment. We encourage flood risk management to contribute to a range of public benefits including natural resource protection, improved water quality, climate change mitigation and adaptation, biodiversity gain, green infrastructure, access to the natural environment and recreational opportunities.

We consider Stockton BC is one of the lead authorities in the North East in terms of their approach to linking flood risk mitigation with Green Infrastructure, and this approach should be reflected in the policy.

Q10 - Natural resources such as land, air, water and soils are either finite, or require careful stewardship to ensure their continued quality or availability, and in order for them to deliver the ecosystem services such as food, clean water, flood protection that communities need.

Page 23/25 - Historic Landscape Characterisation work We welcome the work carried out on the historic landscape, and the recognition of its wider contribution to understanding landscape character in the area.

Page 26 3rd paragraph - This is not particularly clear suggest rewrite to 'development in the countryside is a cross cutting issue with potential impacts on landscape quality and character, biodiversity and geodiversity, to countryside management.'

Page 28 - Please note that the Regional Character of England map was produced by Countryside Agency (CA) and English Nature (not SNH). These areas are now known as National Character Areas. We are currently developing a series of integrated objectives for each NCA. The landscape character policy suggested below could seek to support the delivery of NCA integrated objectives for the Tees Lowlands.

Page 28 - Issues Please note that the landscape character assessment looks at the landscape as a whole, not just those features which are valued or unique.

Page 30 - Theme 4 should be entitled Urban Green Space

Page 31 - Please note any proposals at Portrack Marsh need to take into account that this area is BAP habitat – coastal floodplain and grazing marsh.

Page 32/33 - The policy options should also consider how to embed green infrastructure in new and existing housing using CIL, section 106 and other tariffs as delivery vehicles, and through the use of concept statements and master planning to facilitate and enable this. Further guidance can be found :

Concept statements - Delivering sustainable development in the Sustainable Communities Growth Areas (Natural England and Planning Co-operative Feb 2007); hands-on guide and update to the below.

More detail and experience from the North East on [http://www.naturalengland.org.uk/regions/north\\_east/ourwork/green\\_infrastructure.aspx](http://www.naturalengland.org.uk/regions/north_east/ourwork/green_infrastructure.aspx) St Edmundsbury GI strategy 'info pack' of guidelines for developers and planners (p8) explains how concept statements and master plans complement each other.

Green Infrastructure by design; adding value to development.

Page 32 - Identification of provision (the principles apply to all questions in this section) Option 5, in particular:

- 1) There is a need to analyse which green space currently does provide which benefit or function (what do they do?)
- 2) There is a need to invest in adding new functions (to existing green spaces or by creating new greenspaces) where they are most needed
- 3) Evidence for need can be found in community survey, LSP objectives, Accessible Natural Greenspace Standards, Spaces for people woodland standard, other catchment based standards. For further details please see :
- 4) Nature Nearby - Accessible Natural Greenspace Guidance
- 5) Accessible Natural Greenspace Standard
- 6) Where evidence suggests a greenspace (and the functions/ benefits it provides/ has the potential to provide ) are not required/ essential in that specific place, sale of green space assets to generate capital funds for where investment is required should be considered.
- 7) Green Infrastructure assets should not be preserved, enhanced or created on the basis of their type, but on the basis of what they do (function).

## One North East

### General Comments

#### General comments

Clearly the Environment DPD will form an important component of Stockton's LDF, supporting and supplementing many of the key policies and objectives of the Core Strategy. One North East has previously provided supportive comments in regard to each of the Core Strategy policies to which the document relates.

I can confirm that at this stage in the development of the DPD, One North East does not wish to make any specific comments in respect of the issues and options identified. We would however request that the Agency is consulted again at the subsequent stages of consultation.

## RSPB

### Theme 1: Natural Environment

Issue 1 How can we best protect and enhance international, national, regional and local sites?

Option 2

Q1 Is a separate criteria-based policy required for each local and regional designation type?

Yes

Q2 Should a criteria based policy be developed for ancient woodland?

No

**Q3 What should the content be of the criteria-based policies?**

The recent Lawton Review of wildlife sites makes it clear that local wildlife sites need greater protection and management than is currently provided. The Council should review the Local Plan policies regarding local wildlife sites and determine whether they provide appropriate protection, and revise these policies so the role of local wildlife sites (as set out in PPS9 and the Lawton Review) in supporting the Borough's biodiversity is properly reflected.

Regarding Q2, ancient woodland is a biodiversity resource that cannot be created once it is lost. We recommend that the Council commit to avoiding the loss of ancient woodland through the development control process.

**Q4 Should policies seek to ensure that development is not detrimental to green infrastructure and where possible enhance it?**

Yes

**Q5 Core Strategy Policy CS10 identifies a commitment to improve various aspects of the natural environment. Should the Environment DPD contain detailed policies stating how this commitment will be delivered?**

Yes

**Q6 Should these documents (BAP and Stockton Green Infrastructure Strategy) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?**

Yes

**Q7 Should the Environment DPD include a specific policy to protect and support the continued enhancement of the RSPB Saltholme 'nature reserve'?**

Yes

**Q8 Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?**

Yes

**Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?**

Yes

**Q10 Should the Environment DPD include a policy to ensure that new development does not adversely impact air and water quality?**

Yes

**Theme 3: Rural Environment**

**Issue 4 How can we manage development in the countryside?**

Option 1

**Q14 What should the topic specific policies seek to achieve?**

Among other things, the policies should seek to ensure that biodiversity within farm buildings is retained and enhanced when conversion, re-use and replacement of buildings. In particular, provision should be made for bats, barn owls and birds of conservation concern such as house sparrow, starling, house martin and swallow.

**Q16 Should policies seek to ensure that development in the countryside is not detrimental to green infrastructure and where possible enhance it?**

Yes

**Theme 4: Urban Open Space**

**Issue 5 How do we identify provision to be protected?**

Option 1

**Issue 6 How do we identify provision to be enhanced?**

Option 4

**Issue 7 How do we identify where new provision is required?**

Option 2

**Issue 8 How do we identify opportunities for new, enhanced or relocated provision?**

Option 4

**Issue 9 Should we identify potential development sites?**

Option 2

**Q20 Should the Environment DPD include policies which protect and support the delivery of the Tees Heritage Park and Portrack Marsh? What should these policies be specifically aiming to achieve?**

Yes Supportive policies that facilitate the creation and restoration of high-quality habitats with integrated access for people to enjoy them. Identifying these areas as strategic open spaces for enhancement, to deal with increasing demands on green infrastructure and also to deliver improved floodwater storage within the Tees Corridor.

**Your Supplementary Comments**

Regarding Q6 and Q7, we would like to see a policy that supports the North Tees Natural Network initiative, and confirms the important role that the Teesmouth National Nature Reserve and the RSPB Saltholme reserve have as visitor hubs for the Network. RSPB Saltholme should be seen as an important part of the Network rather than in isolation. The North Tees Natural Network area should be identified as a priority for

habitat creation and restoration, and also a priority area for the provision of improved access in to allow a range of users to enjoy the wildlife and open space of the North Tees area. The initiative should be seen as also delivering a high-quality 'gateway' to the Seal Sands Industrial Estate, which in turn will improve perceptions of the area and encourage investment in the area.

Regarding Map 1, SNCIs within the North Tees Natural Network area appear to have been omitted, this should be rectified.

## Sport England

### Your Supplementary Comments

I refer to your e-mail dated 28th January 2011 concerning the above. Thank you seeking Sport England's views on this matter.

Generally speaking development plan policies are permissive in respect of new development with the development limits of urban areas. As such, if finite undeveloped resources such as greenspace are to be protected from development they need to be the subject of a restrictive policy. Playing fields are currently afforded protection by the policy set out in para. 15 of PPG17 and this sets a good framework for establishing a policy which might seek to protect urban greenspace as a whole. It establishes a presumption against the loss of playing field in all but exceptional circumstances. In the case of playing fields those exceptional circumstances are;

- there's a proven surplus
- the development is ancillary to the primary use and does not adversely affect that primary use
- the development involves odd corners or unusable parts of playing field
- the playing field will be replaced by one at least as good
- the development is for much needed sports facility.

Applying this type of approach to all open space would mean that there would have to be blanket protection along the lines of Option 1. It might be possible to add a specific criteria in respect of open space which looks at quality.

Caution needs to be exercised in seeking to address all urban open issues in one type of policy. Some types of open space will be important for their openness and contribution to the urban fabric while others may be of value for their sporting role. Policies which protect the openness of a site may be problematic for a sports site when additional investment in facilities is made.

With regard to the issue of identifying potential sites being 'surplus to requirements' and therefore potential development sites, Sport England has some concerns. The studies that would inform whether a playing pitch or built sports facility were surplus would be a playing pitch strategy or PPG17 built facilities strategy (respectively). There is a danger however that the timescales for keeping these strategies up to date and those of the lifespan of the Environment DPD will be out of step. This could mean that the Environment DPD identifies sites as surplus, and then a review of the strategies that underpin that reveals a change in circumstances that mean that the facility in question is no longer surplus. Sport England's preference would be for the policy to establish a presumption against the loss of urban open and sports sites unless there was a surplus identified in the appropriate up to date strategy.

I trust you will give due consideration to the points made in this response, and look forward to being consulted on the Preferred Options stage of this DPD in due course.

## Tees Valley Biodiversity Steering Group

### General Comments

#### General comments

The Tees Valley Biodiversity Partnership brings together organisations and individuals who are working to conserve, enhance and promote biodiversity throughout the Tees Valley. The Partnership Steering Group includes representatives from the following organisations:

Darlington Borough Council  
Hartlepool Borough Council  
Middlesbrough Council  
Redcar & Cleveland Borough Council  
Stockton-on-Tees Borough Council  
Tees Valley Wildlife Trust  
Environment Agency  
Natural England  
Teemouth Bird Club  
Industry Nature Conservation Association  
Wildflower Ark  
Royal Society for the Protection of Birds  
Northumbrian Water  
Environmental Records Information Centre North East  
Tees Valley Unlimited

#### General Comment

The Partnership Steering Group welcomes the opportunity to comment on the Environment DPD Issues and Options report. In particular it welcomes the decision of the Borough Council to produce an Environment DPD as part of the Local Development Framework and supports

the overarching approach which puts climate change and green infrastructure as key issues which will inform both the specific policies in the DPD and in other Local Development Documents.

Several of the comments made below follow guidance given in Planning Policy Statement 9 'Biodiversity and Geological Conservation'. There is an opportunity through policies in the Environment DPD to show how PPS9 can be applied and implemented in Stockton-on-Tees.

## Theme 1: Natural Environment

**Issue 1 How can we best protect and enhance international, national, regional and local sites?**

Option 2

**Q1 Is a separate criteria-based policy required for each local and regional designation type?**

No

**Q2 Should a criteria based policy be developed for ancient woodland?**

No

**Q3 What should the content be of the criteria-based policies?**

The following is suggested as the basis for a criteria-based policy on local sites:

"Proposals for development which could destroy or adversely affect, directly or indirectly, a local site will not be permitted unless:

- 1) It can be clearly demonstrated that the need for the proposal outweighs the need to safeguard the site
- 2) There is no satisfactory alternative location for the proposal

If development is permitted then mitigation or compensatory provision for the lost habitat will be sought. All options should be explored for retaining the most valuable parts of the nature conservation interest as part of the development proposal. Particular consideration should be given to conserving habitats that cannot readily be recreated within a reasonably short timescale, for example ancient woodland and ancient meadows."

**Q5 Core Strategy Policy CS10 identifies a commitment to improve various aspects of the natural environment. Should the Environment DPD contain detailed policies stating how this commitment will be delivered?**

Yes

**Q6 Should these documents (BAP and Stockton Green Infrastructure Strategy) provide the evidence base for areas of habitat restoration and creation? Are there additional areas which should be considered?**

Yes The documents referred to should provide the evidence base for habitat restoration and creation. The Tees Valley Biodiversity Action Plan concentrates on habitats and species for which actions are likely to be achievable with current resources and partnerships. There are other habitats and species that equally require conservation and enhancement, including national priority habitats and species and there is an opportunity in the Environment DPD to achieve protection and enhancement of existing habitat. This is in line with sections 11 and 16 of PPS9.

**Q7 Should the Environment DPD include a specific policy to protect and support the continued enhancement of the RSPB Saltholme 'nature reserve'?**

No

**Q8 Should the Environment DPD seek to include a specific policy which seeks to retain/incorporate significant locally important biodiversity or geological interest within the redevelopment of previously-developed sites?**

Yes

**Q9 Should the Environment DPD include a policy relating to the restoration of floodplains and natural watercourses in appropriate locations?**

No

## Your Supplementary Comments

### Theme 1 - Natural Environment

As part of the introduction to this theme, within the 'Stockton's Natural Environment' section, some reference could usefully be made to the wider functions of the natural environment and the eco-system benefits the natural environment provides. The core components of ecosystems - water, soil, nutrients, organisms - provide the following services:

- 1) Provisioning - products obtained from ecosystems including food, fuel, bio-chemicals, pharmaceuticals and fresh water
- 2) Regulating - benefits from the regulation of ecosystem processes including air quality, climate regulation, water purification
- 3) Cultural - non-material benefits people obtain from ecosystems such as recreation and aesthetic experiences

Although the eco-systems approach can seem very academic or research based it is possible to relate it to the benefits provided by green infrastructure. For example the cultural services relate to recreation and leisure, tourism and quality of place benefits which in turn influence health and well-being, labour productivity and land/property values which in turn can help to deliver sustainable economic growth and investment.

In the 'Tees Valley Biodiversity Action Plan' section a useful summary of the current position of the Plan is:

"The Tees Valley Local Biodiversity Action Plan is endorsed by the Council as providing the future basis for decisions on nature conservation in the Borough. The Plan highlights where action is necessary and enables the targeting of resources to conserve and enhance biodiversity through local partnerships."

## Options

The Partnership Steering Group supports option 2 subject to consideration of its response to the questions.

Q1. It is not considered necessary to have a separate policy for each of the 3 types of site proposed in option 1 - local nature reserves, local wildlife sites, and regionally important geological sites. Local nature reserves are designated by local authorities on land within their ownership and control. Local wildlife sites and regionally important geological sites should be considered as 'local sites' in line with DEFRA's local site guidance. There should therefore just be a single criteria-based policy for local sites which allow the criteria to be generic.

Q2. Ancient woodland is captured by the criteria for local sites agreed by the Biodiversity Partnership in its role as the Local Sites Partnership and a separate criteria-based policy is not considered necessary.

Q4 - the role of green infrastructure is considered further in the response to Q5.

Q5 - there are a number of aspects to Core Strategy Policy CS10 that do warrant separate policies within the Environment DPD:

1) Creation of new habitat as part of new development proposals. Possible wording could be along the lines of "Opportunities will be sought to create new habitat as part of new development and redevelopment schemes. Proposals should seek to complement and enhance existing habitat, in particular seek opportunities to improve connectivity with any existing habitat and landscape features." This is in line with section 14 of PPS9.

2) There is also an opportunity in the DPD to identify areas with potential for habitat creation, particularly as part of the development of a green infrastructure network. For example "Delivery of new and improved habitats should be an integral part of the implementation of the Stockton Green Infrastructure Strategy. The green infrastructure network identified in the Strategy offers significant opportunities for habitat creation and enhancement across the Borough, including areas such as the Green Blue Heart, the North Tees Natural Network, and the River Tees Heritage Park. This will also enhance the role of the green infrastructure network for improving the connectivity of fragmented habitats." This is in line with section 4ii of PPS9.

3) Consideration could also be given to an overarching policy on green infrastructure. This could set out a number of principles for the development of GI such as accessibility of local people, enhancing locally distinct character, physical and functional connectivity between sites, delivering multiple benefits, including biodiversity etc. The Tees Valley Green Infrastructure Strategy (section 7.9) includes a series of guidelines and principles on the promotion and development of green infrastructure and this should, where appropriate, be referred to or cross-referenced within the Environment DPD. This policy could also refer to the relationship between GI and eco-system services (see earlier comment above) and how developing a GI network can contribute to climate change adaptation and mitigation e.g. trees provide benefits for local climate control, including cooling and sheltering, green space in urban areas is effective in reducing surface temperatures, and investment in green roofs offers potential for urban cooling.

Q7 - if other policies on biodiversity protection and enhancement are appropriately worded and implemented then a specific policy on Saltholme (or any other individually named site) should not be necessary. Planning policy on nature conservation and biodiversity should be about creating and protecting an inter-connected network of habitats and features, not just about individual sites.

Q8 - the Environment DPD should include a policy on the biodiversity/geological interest of previously developed land. There are likely to be a number of previously developed sites in the Borough that have developed a biodiversity value over the years. The overall intention should not be to prevent any redevelopment or regeneration proposals but to ensure that, where possible, the most important habitats are retained as part of any overall redevelopment scheme. Possibly something along the lines of: "Previously developed land can often be rich in biodiversity and form an important refuge for wildlife in an otherwise heavily urbanised landscape. Prior to any development being permitted areas of significant biodiversity interest should be identified and such areas should be retained and enhanced where possible as part of any development proposal." The supporting statement to the policy could refer to the LBAP, and in particular the Brownfield Habitat Action Plan which provides further detail. This is in line with section 13 of PPS9.

Q9 - it may be more appropriate to include the water environment (grazing marsh, wetlands, sustainable urban drainage etc) and the opportunities presented for biodiversity as part of the overarching policy on green infrastructure (see Q5).

## Theme 4 - Urban Open Space

Identifying existing provision to be enhanced/Identifying opportunities for new, enhanced or relocated provision

In identifying areas for enhancement or new provision reference could be made to Natural England's green space standard (Accessible Natural Greenspace Standard plus/ANGST+). Although it is recognised that there are likely to be variations to reflect particular local circumstances, ANGST+ provides a useful starting point for assessing natural green space provision, and emphasises the need to try to ensure that adjacent green spaces are interconnected. Some urban open space will have existing or potential ecological value and such areas should be identified and protected.

## The Coal Authority

### General Comments

#### General comments

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make at this stage.



## Yorkshire Forward

### General Comments

#### General comments

We welcome the opportunity to comment on emerging planning policy within neighbouring local authorities, however, in this instance we do not have any comments to make in relation to these documents.

## Respondents to the Core Strategy Review Issues and Options Consultation

### Letters and Emails

Appletons  
Billingham Town Council  
Cameron Hall Developments  
Campaign to Protect Rural England  
Carlton Parish Council  
CE Electric UK  
Church Commissioners  
Cllrs Mr & Mrs M Womphrey  
Commercial Farmers within your District  
Co-operative Group  
Councillor Kevin Faulks  
Darlington Borough Council  
Egglescliffe and Eaglescliffe Parish Council  
Elizabeth Wright and Alexandra Farrington  
England and Lyle  
English Heritage  
Environment Agency  
Friends of Tees Heritage Park  
Hartlepool Borough Council  
High and Low Worsall Parish Council  
Highways Agency  
Homes and Communities Agency  
Howson Developments Ltd  
Ingleby Barwick Town Council  
Kirklevington and Castle Leavington Parish Council  
Long Newton Parish Council  
Maltby Northern Edge Residents Group  
Middlesbrough Council  
Mr A Steele, Ms J Steele and Mr T Steele  
Mr John Mason, 18A Braeside, Kirklevington  
Mr Matthew Hall  
Mr N I Snowdon  
Mr Paul Barker, Hall Farm Carlton  
Mr Rod Bickenson  
Mr S Singh  
Mr Vinay Bedi  
National Grid  
Natural England  
North Tees and Hartlepool NHS Foundation Trust  
Norton Heritage Group  
One North East  
Partner Construction  
Preston Farm Developments  
Redmarshall Parish Council  
Roland Firby on behalf of Tithebarn Land  
Satnam Planning Ltd  
Scott Bros Environmental Services Ltd  
Sport England  
Stillington & Whitton Parish Council  
Sven Developments  
Taylor Wimpey  
Taylor Wimpey Strategic Land  
Tees Archaeology  
Tees Valley Local Access Forum  
Tees Valley Rural Community Council  
The Coal Authority  
The Crathorne Estate  
The Garden Centre Group  
The Theatres Trust  
Theakston Estates (North East) Limited and Yarm School  
Thorpe Thewles Residents Association  
Tithebarn Land  
Tithebarn Land  
UK Association of Gypsy Women  
West Raynham Developments  
WT Elstob & Son  
Wynyard Park Ltd  
Yarm Civic Society  
Yarm Residents Group  
Yuill Homes and Persimmon Homes  
22 Individuals

**Questionnaire responses were also received from a number of individuals using an online questionnaire and the Council's resident's panel, Viewpoint. Responses to the open questions in these questionnaires are also reproduced in the following pages.**

### **1/1 English Heritage**

The need to safeguard the historic environment of the Borough is acknowledged throughout the document as a key sustainability issue. This is welcomed. In respect of some urban extensions (as well as other sites in the conurbation, in the villages, and at Wynyard) we are informed through commentary on the sustainability issues, of historic environment factors that should be taken into account. This is helpful, but it is not clear, where commentary remains silent on such matters, whether this is because there are thought to be no heritage issues involved or because they have simply not been addressed. To remove this ambiguity and clarify matters it would be helpful for positive statements to be made in respect of each site.

### **1/2 English Heritage**

Figure 19 shows Land to the South of Preston Farm Industrial Estate. I note reference to the possible impacts upon the site of Preston medieval village. This area lies to the north of Preston Hall and its extensive grounds and also has the potential to affect its setting.

### **1/3 English Heritage**

All potential housing sites (all development for that matter) whether in the town centre, the wider conurbation, the villages, or Wynyard should have regard to context if good quality place making is to be achieved. Decision-making should be informed by an understanding of what is distinctive about the locality in question, as well as an understanding of what is historically significant about it and worthy of safeguarding. Development, whether it be beyond the boundaries of a settlement, or within it, has the potential to harm character and significance if not informed in this way.

The presumption should be in favour of sustainable development – development which is located such that services and facilities are not within easy access should be resisted. I am aware of, and direct your thoughts to, the DCLG's latest working definition of 'sustainable development' which has emerged in advance of the National Planning Policy Framework.

### **1/4 English Heritage**

Acknowledges in Figure 27 that part of the first three sites in question impacts upon the Wynyard entry on the English Heritage Register of Historic Parks & Gardens. I note, and concur with, the findings of the Sustainability Appraisal in paragraph 3.118.

The scale and nature of development in the Wynyard area is such that it appears fragmented and disjointed. If further development is found, notwithstanding the Sustainability Appraisal, to be justified it is important for any existing master plan to be refreshed. It would be helpful for this to be undertaken together with Hartlepool Council, which also has an interest in developing the wider Wynyard area.

## **2/0 Individual**

I would also like to see incorporated in the housing developments schemes for public transport, both bus and train, and also cycleways and good footpath access to schools, shops and parks.

### **2/1 Individual**

I have no comments to make about the areas selected and can offer no additional sites, although I consider that if village churches, village halls, schools and shops are to survive then more houses will need to be built in these communities.

One of my main concerns is that housing must be supported by employment in the local area. I do not wish to see new estates being developed where many residents are unemployed and the majority of households on low incomes, unable to afford the cost of travelling to employment miles from home.

### **2/2 Individual**

traffic congestion will be a serious problem if all these housing sites are developed and residents rely on car usage for all their travel requirements.

### **3/1 Satnam Planning Ltd**

We write further to your recent consultation (8 July 2011) with regard to the Partial Review of the Core Strategy. The letter sets out the comments and representations on behalf of Tiviot Way Investments Limited, who own land at Little Maltby Farm, Ingleby Barwick, as shown on the enclosed documentation.

The basis for the Partial Review of the Adopted Core Strategy

As set out in the report to Cabinet of 16 July 2011, a review of the housing element of the Adopted Core Strategy is necessary as a result of the current economic situation, the malaise in the development industry and uncertainties in high level Planning and central Government funding policy. The report sets out the detailed reasoning on these matters and we do not intend to repeat that within these representations; suffice to say that paragraph 7 sets out 'It is for those reasons that a review of the Council's locational strategy for housing is taking place and subsequent work to identify deliverable sites to accommodate new housing development in the Borough has commenced. The DPD review document is the first stage in this process. It identifies a number of potential housing sites across the Borough and will be the subject of an extensive consultation exercise to determine which should be allocated for housing.

### **3/2 Satnam Planning Ltd**

The currently Adopted Core Strategy

The Core Strategy was adopted in March 2010 and as such is a recent and up to date document. In our view any Partial Review should seek to maintain the overall vision and objectives of the Core Strategy and to avoid a wholesale revision which will give rise to matters that need to be reopened at this stage.

The Core Strategy is based on a policy of priority to the core area and elsewhere within the conurbation and we note it specifically seeks to improve the provision of facilities that contribute and satisfy the growing population of Ingleby Barwick (CS6). We note that paragraph 12.10 states that

'If there are not sufficient sites to be brought forward to maintain a five year supply of deliverable housing land then the annual up date of the Strategic Housing Land Availability Assessment will seek to identify additional site allocation opportunities and a Partial Review of the housing allocations in the regeneration DPD will be undertaken.'

We note that CS8 - Housing Mix and Affordable Housing Provision, states that higher density development will not be appropriate in Ingleby Barwick and that affordable housing within the range of 15 to 20% will be required on schemes to meet housing needs. Furthermore, we note that paragraph 12.25 states that the specific needs of older people need to be addressed through; and in paragraph 12.26, where it is noted that the SHMA has highlighted a continuing need for executive housing and that Ingleby Barwick is a suitable location for such development.

It will also be noted that the Core Strategy Strategic Diagram shows the extent of the Green Wedge around Ingleby Barwick (CS10) and this excludes much of the Little Maltby Farm site, which is shown as White Land not affected by the extent of the Green Wedge. It should also be noted that it is not affected by the Tees Heritage Park which lies to the South-West, West and North of Ingleby Barwick.

### **3/3 Satnam Planning Ltd**

The proposed Partial Review

The purpose of the proposed Partial Review is to select new housing sites which will remedy a shortfall which will occur in the supply of housing in the Borough over the life of the DPD. It is essential, therefore, that the sites selected can and will be brought forward for housing and do provide the necessary homes within the requisite time period. The estimated shortfall; some 2,800 homes, must be brought forward in order to accommodate housing needs and the local (and indeed regional) housing market requirements.

In light of the reliance which will have to be placed on the sites to be allocated for new housing within the lifetime of the DPD, we are firmly of the view that a number of sites should be allocated for residential development rather than reliance placed on one single site where the risks of non or delayed implementation, and thus non achievement of strategic housing requirements is much greater.

### **3/4 Satnam Planning Ltd**

In addition to the above, we are firmly of the view that the strategic aims of the existing Core Strategy should be followed as far as possible in the current circumstances and in that regard sites within the conurbation should be allocated rather than those further afield. This will reduce the need to review fundamental elements of the Core Strategy's locational objectives and requirements and maintain the development focus on the core conurbation area Brownfield sites in the longer term.

### **3/5 Satnam Planning Ltd**

Clearly there are many reasons why sites within the conurbation should be allocated for residential development rather than sites in more outlying areas. These are able to be set out in full with reference to national and local planning policy but in short, they include,

- 1.Sustainability issues - such as the need to reduce the extent of travel.
- 2.To provide homes in close proximity to existing facilities and employment opportunities.
- 3.To consolidate the existing urban area and not to expand it beyond its present physical or perceived limits.
- 4.To safeguard, as far as possible, environmental and sensitive areas.
- 5.To maintain the planning focus of the Core Strategy on the central area and the allocated Brownfield sites which, whilst uncertain at present, will undoubtedly be brought forward at some stage, either in this DPD or in future DPDs; and,
- 6.To provide additional facilities and infrastructure improvements within the conurbation, which will benefit both future residents and existing communities and neighbourhoods.

### **3/6 Satnam Planning Ltd**

Question 1 – For the reasons set out in the Officer's Report your authority are not able to rely on the sites set out in the core area for the development of homes in the period up to 2028. For these reasons fresh sites should be allocated (as proposed by your Officers) and thus the fulfilment of strategic and local housing requirements will be met.

### **3/7 Satnam Planning Ltd**

Question 2 – Yes we agree with this approach.

### **3/8 Satnam Planning Ltd**

Question 3 – For the reasons set out above the new housing sites should be a combination of sites, so that if implementation problems are encountered the risk to the fulfilment of strategic housing requirements is able to be managed. If one single site is allocated to make up the envisaged shortfall then the risks of non-implementation/delayed implementation is unacceptable.

### **3/9 Satnam Planning Ltd**

Question 4 – There should be no village extensions as growth should be directed towards the conurbation and the opportunities for sustainable development within those areas.

### **3/10 Satnam Planning Ltd**

Question 5 – Limited infill development should only be allowed within the most sustainable villages and in small scale.

### **3/11 Satnam Planning Ltd**

Question 6 – Wynyard should still be strategically envisaged as an office location for inward investment. An element of logistics and manufacturing would be appropriate as high profile employers and relocations could be achieved.

Further housing at Wynyard in our view is unsustainable and would lead to further use of the private car. There are no local facilities and there is no certainty that further facilities will be provided if there is growth at Wynyard. It is much more sustainable to concentrate future growth within the spread of the existing conurbation so that the benefits which flow from further development are able to be enjoyed by the wider residents of Stockton rather than the few who currently reside at Wynyard.

### **3/12 Satnam Planning Ltd**

Question 7 – Not applicable as we are of the view that no further housing allocations should be made at Wynyard.

### **3/13 Satnam Planning Ltd**

Question 8 – Not applicable as we are of the view that no further housing allocations should be made at Wynyard.

### **3/14 Satnam Planning Ltd**

Question 9 Not applicable as we are of the view that no further housing allocations should be made at Wynyard.

### **3/15 Satnam Planning Ltd**

Question 10 – Not applicable as we are of the view that no further housing allocations should be made at Wynyard.

### **3/16 Satnam Planning Ltd**

Ingleby Barwick

We enclose, in support of these representations, a document showing how the land at Little Maltby Farm is able to be brought forward for residential and ancillary development in a phased manner. The enclosed information demonstrates the principle of residential development is acceptable on the site, and there are no over-riding environmental, transportation, archaeological or similar factors which would prevent this scheme.

The enclosed document demonstrates how circa 1, 350 homes are able to be provided on this site within the Plan period, together with a new Secondary School for 600 pupils (plus 150 Sixth Form) which is at present the subject of an application for a Free School by the Ingleby Barwick residents group, BO2 SS.

The important factors which should be born in mind with further residential development at Ingleby Barwick are as follows,

1. This is a proven housing market which is attractive to families and home-buyers. This is important as the provision of homes rather than allocated land or empty units is the basis for the SHMA housing requirements.
2. Ingleby Barwick is a thriving community with a strong sense of identity. Further residential development in this location will assist in furthering this sense of identity and will strengthen the existing community, especially with the development of a new secondary school on the site in the early phase of the site.
3. At present there is limited affordable housing within Ingleby Barwick and a new allocated site will provide the opportunity to bring forward further affordable housing. The location of Little Maltby Farm in the south of Ingleby Barwick will assist in the spread of affordable housing accommodation to the southern part of Ingleby Barwick which has very little such accommodation at present. This will strengthen the depth of the existing neighbourhood structures and build a cohesive community.
4. Ingleby Barwick is well served by the existing road network and public transport system. It has existing community and recreational/shopping facilities and is very close to existing employment areas. As such it is a sustainable location for further residential development.

### **3/17 Satnam Planning Ltd**

With regard to the site specific nature of Little Maltby Farm we would note the following

1. The proposed development area is not affected by the Green Wedge notation as shown in the Diagram of the Core Strategy and the housing would be wholly contained within the existing extent of the Green Wedge (see Diagram and CS10).

### **3/18 Satnam Planning Ltd**

With regard to the site specific nature of Little Maltby Farm we would note the following

2. The site is physically suited to residential development and long distance views into and out of Ingleby Barwick would not be adversely affected by the proposal. Indeed, there is the opportunity to create landscaped edges to the area where none exist at present, thereby improving the locality.

### **3/19 Satnam Planning Ltd**

With regard to the site specific nature of Little Maltby Farm we would note the following

3. There is a need for a new Secondary School in the southern part of Ingleby Barwick and this is proposed in a sustainable and accessible location as shown on the enclosed document.

### **3/20 Satnam Planning Ltd**

With regard to the site specific nature of Little Maltby Farm we would note the following

4. The provision of further affordable housing in this part of Ingleby Barwick can provide for housing needs and those seeking homes within the area who are not able to compete in the general housing market.

### **3/21 Satnam Planning Ltd**

With regard to the site specific nature of Little Maltby Farm we would note the following

5. Specifically with regard to the points raised on page 47 of the Core Strategy Review Issues and Options (land at Ingleby Barwick) we would note the following:
  - I. 3.90 – the majority of the site is not shown as included within the Green Wedge within the Core Strategy and is shown as White Land inside that notation.
  - II. 3.93 – the attached presentation shows how the site is located in close proximity to the public transport network, with a good number of services and bus stops within easy walking distance of the site. Clearly with a development of this size extensions and improvements to the existing bus services are able to be envisaged and penetration into the site will be sought.
  - III. 3.94 – the retail centre of Ingleby Barwick at Myton Way is approximately 1/1.2 km from the centre of the site. This is well within acceptable walking distances as measured both locally and nationally. Clearly with a development of this size certain local facilities will be provided within the site (as shown in the final phases of this scheme) and improvements to existing pedestrian linkages between Ingleby Barwick and the site will be implemented early in the development phases.
  - IV. 3.95 – as part of the proposals a site for a new Secondary School is provided for within the site which would enable many of the Secondary School pupils within Ingleby Barwick to have a local Secondary School rather than face a bus journey to schools outside the settlement. This is a major positive factor to support the early development of this site.
  - V. None of the points raised at 3.90-3.95 are in anyway against the development of the site for residential and ancillary development and indeed point to areas where development is able to improve both the existing situation and expanded community over time.

### **3/22 Satnam Planning Ltd**

#### Implementation

The land at Little Maltby Farm is held by Tiviot Way Investments Limited and is able to be brought forward for residential development in the short term. There are no economic or similar barriers to the land being brought forward for housing as set out in the attached document. Furthermore the amount of advance infrastructure required is moderate and is able to be accommodated within the first phase.

The site is able to be relied upon to provide homes throughout the Plan period.

The early release of the first phase of this site also brings forward the Free School proposal and there are separate negotiations occurring with regard to the ability of this development site to provide financial and other support to enable the Free School proposals to be achieved in the short term.

We look forward to working with your Officers over the forthcoming months to explain our proposals further and bring forward this development to the benefit of the current and future residents of Ingleby Barwick.



#### 4/1 Individual

Please find my response to the above consultation exercise, enclosed.

Please provide your head of planning, Mrs Straughan, with a copy of this response, as additional information to my letter to her, of 3rd August 2011.

You will be aware of the recent publication of the Draft NPPF by the department for Communities, and of the definition of sustainability contained within it.

As a consequence of that draft, which is now a material consideration for both plan making and planning applications, many of the assumptions and conclusions within the Core Development Plan Document are no longer fit for purpose.

The draft NPPF makes it abundantly clear that, although planning will be plan led, the following principles must apply for the plan to conform to the NPPF:

1. Plans must be based on 'objectively assessed proposals'
2. All plans should be based on an contain an assumption in favour of sustainable development- using the definition supplied within the draft NPPF.
3. Decision takers at every level should assume that the default answer to development proposals is 'yes' except where this would compromise the key sustainable development principles set out in the draft NPPF
4. Planning policies and decisions should always seek to deliver a good standard of amenity for existing occupants of land and building.
5. The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development
6. Approach development management decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so.
7. In the absence of an op-to-date and consistent plan, planning applications should be determined in accord with this Framework, including its presumption in favour of sustainable development.
8. The relationship between development management and plan-making should be seamless and both should recognise the presumption in favour of sustainable development and the positive approach to planning set out in the draft NPPF.

This means that plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so will significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

I raise all of the above points because, in refusing the small scale proposal to extend The Stables at Redmarshall, (previously submitted as part of the Development Plan process) the LPA is clearly in breach of the positive sentiment expressed in the draft NPPF. Points 1 to 6, above, are directly related here, and I cannot see how a certificate of conformity could be obtained if such proposals are resisted.

138 of the draft NPPF states, 'the appropriateness of existing Green Belt boundaries should only be considered when a Local Plan is being prepared or reviewed. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period.'

The existing boundary between domestic and agricultural cannot endure once the dwelling is permanently occupied. The main access, installed at the insistence of the LPA, will obviously domesticate that land over time, as its consistent use will negate any possibility of it being used for its current agricultural designation. Any impartial observer would draw the conclusion that this small piece of land, orientated as it is immediately adjacent to the dwelling, will never be used as agricultural, and as such the LPA have a duty to change its designation to a realistic usage.

Section 140 of the draft makes a relevant point: that when defining boundaries, local authorities should not include land it is unnecessary to keep permanently open.

Section 144 is even more explicit to the circumstances at The Stables, noting that an acceptable exception to development in the green belt is the extension or

alteration of a building provided that it does not lead to a disproportionate addition over and above the size of the original dwelling.

If ever there was a piece of land, and a circumstance which meets those sentiments, it is the small piece of land to the side of the existing dwelling, through which access to the main entrance is obtained.

Should the LPA continue to resist the common sense and obvious logic of my proposal I will challenge the conformity of the local plan at the Inspectors public examination phase, using this case as the basis for doing so. (See attached letter to Carol Straughan for further information).

#### **4/2 Individual**

The Planning for Housing consultation exercise asks for proposals for alternative sites, and, given the positive nature of the NPPF, I now wish to formally propose that the entirety of my land at The Stables is designated as development land within the local plan.

This proposal could take a number of forms:

1. As the LPA is aware, I seek to extend the existing dwelling to the side, and add a garage to improve the amenity of my family and of future residents. In my view that is appropriate, and supported by the sentiment clearly expressed in the draft NPPF.

2. My preferred option is to:

- a) Extend the existing dwelling and build a garage, and then gift the remaining land to the rear to a housing association, or similar, as long as the land is used for affordable housing for local people in perpetuity, or,
- b) Extend the existing dwelling, as above, and build one detached dwelling on the land to the rear, constructed of an oak frame, with brick and glass walling, under a thatched roof. This would meet the requirements of Section 113 of the draft NPPF, which states that LPA's should consider homes in the countryside which are truly outstanding or innovative, reflecting the highest standards of architecture, and significantly enhancing its immediate setting.

Redmarshall could never be described as a centre of good design. By building a home as described above, new techniques, materials, and design standards will be introduced to the area, boosting the local economy, and raising standards generally in the area.

With regard to affordable housing, an application would be underpinned by an appropriate Section 106 agreement, and evidence of need from the recent Rural Housing Assessment Survey.

The draft NPPF also comes to the aid of this particular aspect of my proposal, at 112 'In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing.'

I have only chosen the most obvious points in relation to The Stables, to demonstrate how the proposed Core Strategy conflicts with the draft NPPF.

#### **4/3 Individual**

On a wider scale, I have concerns about the council's strategy, in identifying a series of large sites at the exclusions of many other locations across the borough.

Paragraph 102 of the draft NPPF states, 'LPA's should ensure that large land banks bound up in a very few sites do not stifle competition.'

If the council is to press ahead with either one or two large sites, or a half dozen smaller sites, to meet the demands of the market, precisely how will the council ensure that competition is not stifled? Small developers must do a first class job of work and design to compete against the economies of scale enjoyed by the larger national developers. Their involvement in the marketplace is essential for the livelihoods of many small traders and individual craftsmen in the area. We cannot afford to lose those skills, nor would Stockton benefit from the loss of small high quality developments in and around our villages and on the edge of urban areas.

It is essential that the aspirations of people are met. Where will self build schemes fit in to the core strategy? Where will we see innovative design, and unique bespoke properties which, in the past, have largely defined villages to the south of Middlesbrough, like Great Ayton, and Great Broughton. Places like that are continually developing, with one of bespoke homes built to enhance the area.

The same cannot be said of the villages to the north and west of Stockton.

#### **4/4 Individual**

Planning is an essential part of our future. Those in the planning system can see the draft NPPF as a direct criticism of their past endeavours, or embrace it as an opportunity to really make a difference by applying common sense to proposals such as mine, which will only improve the area.

#### **5/1 Individual**

I have today received in the post a letter from Grindon Parish Council informing me of the "Planning for Housing: Core Strategy Review" currently underway by Stockton Borough Council. I am requesting a response from SBC on the following points:

1. Can someone explain to me why, when I pay Council Tax to SBC, that I was not formally contacted by SBC in relation to this public consultation?

#### **5/2 Individual**

2. Why does the planning survey focus so heavily on "all types of development at Wynyard" when this review is badged as a borough-wide review? As I can see you appear to be holding Wynyard up as a special case for comment and critique by everyone in the borough, without similar fair analysis or comment being given to other areas.

#### **5/3 Individual**

3. Related to point 3, has the Council already made its mind up that 1,580 of the required new 2,800 houses will be sited at Wynyard? We are of the understanding that outline planning permission for development at Wynyard Park East has already been granted.

#### **5/4 Individual**

4. How does the planning consultation take into account the recent announcement of developments around Wynyard by Hartlepool Borough Council? How has the council satisfied itself that we do not face the risk of massive overdevelopment at Wynyard?

7. What considerations as part of any planning strategy review has the Council given to the local services available to residents at Wynyard. In particular, schooling, local transport, shops, leisure facilities. Have these costs (for the Council and the developer) been factored into any proposed developments from landowners?

## **5/5 Individual**

5. What considerations and costs has SBC factored into the upgrades to road infrastructure required now in and around Wynyard, even before any additional development takes place - particularly with reference to the A689 connections to the A19 which cause severe congestion for residents and workers?
6. The argument that new housing development will result in lower traffic congestion than business development is completely flawed. What real life research and assumptions has the Council made in developing this outrageous statement?

## **5/6 Individual**

8. Who on the Council is representing the views of Wynyard residents? I would like the name and contact details of the responsible councillor.
9. I would request that this letter is shared and discussed at the next Council meeting to satisfy yourselves that due process has been carried out.

In summary, I am appalled at the shambolic way this consultation process has been dreamt up and executed. I will also be writing to my local MP to voice my concerns on the process being followed, and to ensure a full and inclusive public consultation takes place, before any planning decisions are made.

## **6/1 Mr Paul Barker, Hall Farm Carlton**

This response is submitted on behalf of Mr Paul Baker of Hall Farm, Carlton in relation to the above mentioned consultation. It is to be taken into account and afforded positive weight in the Council's consideration of this matter.  
The respondent's comments are set out below.

## **6/2 Mr Paul Barker, Hall Farm Carlton**

### Question 1

Agree that the Council can no longer rely solely on sites in the Core Area for new housing development between 2013 and 2028. It was a concern raised during the course of the preparation of the Core Strategy whether this approach was sufficiently flexible, it placing significant and perhaps an over reliance on the Core Area for delivery of the Borough's Housing requirements. In the circumstances, in accordance with PPS3, PPS12 and the emerging NPPF, it is appropriate to undertake a review of the Plan and to allocate additional land for development. Subsequently, through the application process, the bringing forward of newly allocated land can be managed through the Plan Monitor Manage approach.

In accordance with the guidance in the emerging NPPF which carries positive weight as a material consideration, the objective should be to significantly increase the supply of housing. Amongst other things, in accordance with that guidance, the five year supply should include an additional allowance of at least 20 percent to ensure choice and competition in the market for land. This principle should be written into the Core Strategy Review.

## **6/3 Mr Paul Barker, Hall Farm Carlton**

### Question 2

Following on from question 1, support the principle of allocating additional land including in specified villages including Carlton. Indeed detailed evidence was submitted on behalf of Mr Baker to the Examination in Public in support of his representation that some housing development in the larger villages should be allowed to contribute towards range and choice, support rural services and facilitate affordable housing. Indeed at the time of the preparation of the evidence to the EIP it appeared that seemingly all the affordable houses completed / in the pipeline were within the conurbation (Table 14 of the AMR 2007 – 2008). In the AMR December 2010 it is recorded that whilst there was some affordable housing delivery, the focus was in the urban areas with little if any apparent delivery in the rural area. This is something which should be addressed in moving forward. In this respect the advice in para 112 of the Draft NPPF states that in rural areas LPAs should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing. The guidance continues that LPAs should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. As detailed in Mr Baker's evidence to the EIP, he would be happy to make an affordable housing contribution as part of a development proposal on his land.

#### **6/4 Mr Paul Barker, Hall Farm Carlton**

##### Question 3

Alternative b preferred, namely allocating new housing on a combination of sites. Reasons include that as detailed in SHLAA para 3.42, sites of varying sizes / number of builders have different build rates and are limited by demand. This suggests that a greater number of sites in the right locations are likely to deliver a greater number of homes than a single large allocation. Additionally, following on from Question 2, this approach would facilitate some housing in the rural area and potentially facilitate the provision of affordable housing to meet local needs.

##### Land At Ingleby Barwick

As a general point there has been a significant amount of the development in and around Ingleby Barwick for many years and there are a significant number of plots in the pipeline. In the circumstances a positive decision should be taken to steer development elsewhere in the Borough amongst other things to improve the range and choice of new housing options and locations.

#### **6/5 Mr Paul Barker, Hall Farm Carlton**

##### Question 4

Village extensions of an appropriate scale and character should be considered in only the most sustainable villages, option 2. By 'the most sustainable villages' Tier 1 and Tier 2 villages are meant.

Support Carlton being listed as a Tier 2 village. An objection would be lodged if it were otherwise the case.

Support as a minimum a 15 percent expansion of Tier 1 and Tier 2 villages. Based on a 15 percent expansion these six villages would deliver 274 dwellings (60+45+35+17+60+57). This figure is less than 10 percent of the 2,800 sought and would not undermine the overall Core Strategy approach of focusing development towards the urban area. Indeed the Plan for Carlisle, a reasonably sized town surrounded by an extensive rural area, adopted an 80 : 20 split between housing to the urban area and to the rural area. Mr Baker would support such a split for Stockton with numbers adjusted accordingly, an approach which would still respect the overall Core Strategy whilst providing sufficient flexibility and supporting deliverability.

Following on from the above, Carlton could accommodate such a level of housing development. Mr Baker's interest is in SHLAA site 25, Land at Hall Farm to the North and West of the Village of Carlton. Notwithstanding the findings of the latest SHLAA we would comment as follows;

Suitable- The whole parcel of land was submitted to the SHLAA for use in whole or part. The part which we consider most suitable is that area in close proximity to Carlton is shown on the attached plan. This area measures 2.6 hectares and again is available for use in whole or part. It is well related to the existing village, indeed the adjoining development immediately to the east appears to be reasonably recent demonstrating that the principle of a westerly expansion is part of the evolution of the settlement.

Available- The site is available. This reflects the findings of the latest SHLAA.

Achievable- The site is achievable. This reflects the findings of the latest SHLAA.

#### **6/6 Mr Paul Barker, Hall Farm Carlton**

##### Question 5

Infill development should only be allowed in Tier 1 and Tier 2 villages. These are villages where there are a greater range of services and facilities and as such are the more sustainable locations where development should be focused.

Insofar as the comment in para 3.99 that increasing the number of residents in villages with fewer services and facilities can assist in attracting more services and facilities to these villages, the respondent considers any additional services and facilities attracted are at best likely to be limited in number and not of sufficient benefit to justify development outside Tier 1 and 2 villages.

**6/7 Mr Paul Barker, Hall Farm Carlton**

Question 6b

Wynyard should be maintained as an attractive executive housing location and should only accommodate limited if any additional housing development. Wynyard was brought forward originally to contribute towards the demand for executive housing in Tees Valley and to respond to unsustainable commuting patterns. In the circumstances Wynyard should be maintained as an attractive executive housing location and it should not be a focus for new housing development.

**6/8 Mr Paul Barker, Hall Farm Carlton**

Question 8

If housing were permitted in Wynyard, it should be limited to executive housing.

**6/9 Mr Paul Barker, Hall Farm Carlton**

Conclusion

The above should be taken into account and afforded positive weight in the Council's consideration of alternatives.

The respondent would appreciate an early discussion with officers on the contribution that his site can make towards the development needs of the Borough and its rural area and in particular the larger villages. Please can you the relevant officer contact me at this Office where I am generally available in order that a mutually convenient appointment can be made.

**7/1 Individual**

My husband has filled in your questionnaire online but again the questions do not allow for actual dissent as there are not options to say no or fully disagree on all of the questions asked. As you will know how a questionnaire is constructed can determine the outcome one wants to achieve. As a taxpayer in Stockton, I am not pleased with how my money is being used.

**7/2 Individual**

We have just been advised about your plans for development. It would be interesting to understand how these numbers for increased housing were determined especially as there are other studies which show that the North East will actually show a fall in population of upto 35% with a similar % in Yorkshire. This would suggest that there is not such a need for additional housing as you indicate. The source for this is J.Bellini Connected Britain - the face of working Britain in the digital age referenced in the Institute of Directors 2011 Q2 Big Picture.

**8/1 Individual**

I do most strongly object to yet further development in this area on the grounds that enough green belt has been sacrificed already in this region and as a resident of Ingleby Barwick I do not wish to live in a concrete jungle that is far removed from the original plan of a series of tastefully developed villages. For heavens sake, we cant handle the population and the traffic that we have now, the infrastructure and services wont support it, you will be making a mockery of the whole scheme at the expense of the the long suffering residents, who in my opinion have lost enough already!

## 9/1 Elizabeth Wright and Alexandra Farrington

This response is submitted on behalf of Elizabeth Wright & Alexandra Farrington in relation to the above mentioned consultation. It is to be taken into account and afforded positive weight in the Council's consideration of this matter.

Responses are set out below.

### Question 1

Agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028. It was a concern raised during the course of the preparation of the Core Strategy whether it was sufficiently flexible, it placing significant and perhaps an over reliance on the Core Area for delivery of the Borough's Housing requirements. In the circumstances, in accordance with PPS3, PPS12 and the emerging NPPF, it is appropriate to undertake a review of the Plan and to allocate additional land for development. Subsequently, through the application process, the bringing forward of newly allocated land can be managed through the Plan Monitor Manage approach.

### Question 2

Following on from question 1, support the principle of allocating additional land. In turn if the Core Area delivers as originally projected, there would be no need to translate allocations into permissions. Equally, if there was under delivery in the Core Area, there is strategically planned land available to bring forward to assist in meeting the Borough's housing requirements. In a plan led system it is appropriate that this be undertaken by way of a partial review of the Plan to enable the issue to be addressed in a planned and coordinated manner rather than through a piecemeal approach.

### Question 3

Alternative b preferred, namely allocating new housing on a combination of sites. Reasons include that as detailed in SHLAA para 3.42, sites of varying sizes / number of builders have different build rates and are limited by demand. This suggests that a greater number of sites in the right locations are likely to deliver a greater number of homes than a single allocation.

### Yarm Back Lane, West Stockton

Following on from the response to question 3, support the principle of land at Yarm Back Lane, West Stockton making a positive contribution towards the development needs of the Borough. In turn support the area of search identified on Figure 12 of the Consultation Document. This area is amongst other things well related to the A66, public transport links and other services and facilities as outlined in paras 3.37 and 3.38.

It is envisaged that the development would likely start from the existing urban edge of Stockton on SHLAA site 23 'Hartburn Grange land between Yarm Back Lane and West Stockton built up area' and then progress west. The respondents' site, SHLAA site 80 which is enveloped by existing development, a dwelling to the south, an equestrian facility and caravan storage facility to the north and a beck to the west should be included in the initial phases of the development.

It is noted that according to para 3.35 of the Consultation, the deliverability of the site would require that Yarm Back Lane become redundant and a new estate road be taken though the site to the west of the existing Yarm Back Lane. The respondents would appreciate a discussion with officers about any work that has been undertaken in relation to possible routes for the Estate Road.

### Issue 4 : The Conurbation

#### Billingham Bottoms

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area.

Additionally, as detailed in para 3.68 a strategic scale housing development has significant potential to impact negatively upon the landscape and biodiversity of surrounding areas. Furthermore, on the SHLAA Map, the site is recorded as a Country Park suggesting extensive public access and leisure use. For all these reasons the site should be discounted as a possible new housing site.

#### Land South of Preston Farm Industrial Estate

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Following on from the above there are issues with the site as detailed in paras 3.72 and 3.73. These factors contributed to the SHLAA findings;

- that the site was not suitable because it is not well related to the existing built up area;
- that the site is not achievable there being incompatible neighbouring land uses that would be difficult to design out.

For all these reasons the site should be discounted as a possible new housing site.

#### Land at Durham Lane Industrial Estate

The site is designated as one of the main locations for employment land and the Council's Employment land Review recommends that the site be retained for employment use. The site should be retained for employment purposes, a good supply of employment land being essential to the future of the Borough and beyond. In turn, as detailed in para 3.79 and 3.80 the site is not well related to schools or other facilities of acknowledged importance. For all these reasons the

site should be discounted as a possible new housing site.

Land at Urray Nook – Sites 1 and 2

The parts of the sites currently designated as one of the main locations for employment land and recognised in the Employment Land Review, should be retained for employment purposes.

The HSE issue is a further constraint on residential development as experience tells in another site in Tees Valley.

Land At Ingleby Barwick

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area.

Following on from the above part of the site was considered in the November 2010 SHLAA (site 70). Its findings were that the site was not suitable, a conclusion that the respondents agree with.

In addition, there has been a significant amount of the development in and around Ingleby Barwick for many years and there are a significant number of plots in the pipeline. In the circumstances a positive decision should be taken to steer development elsewhere in the Borough amongst other things to improve the range and choice of new housing options and locations.

Summary

For the reasons detailed above the urban extensions are to be preferred over strategic sites within the conurbation.

Question 6b

Wynyard should be maintained as an attractive executive housing location and should only accommodate limited if any additional housing development.

Wynyard was brought forward originally to contribute towards the demand for executive housing in Tees Valley and to respond to unsustainable commuting patterns. In the circumstances Wynyard should be maintained as an attractive executive housing location and it should not be a focus for new housing development.

Question 8

If housing were permitted in Wynyard, it should be limited to executive housing.

Conclusion

The above should be taken into account and afforded positive weight in the Council's consideration of alternatives. As detailed earlier in the submission the respondents would appreciate an early discussion with officers.

## **9/2 Elizabeth Wright and Alexandra Farrington**

Question 1

Agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028. It was a concern raised during the course of the preparation of the Core Strategy whether it was sufficiently flexible, it placing significant and perhaps an over reliance on the Core Area for delivery of the Borough's Housing requirements. In the circumstances, in accordance with PPS3, PPS12 and the emerging NPPF, it is appropriate to undertake a review of the Plan and to allocate additional land for development. Subsequently, through the application process, the bringing forward of newly allocated land can be managed through the Plan Monitor Manage approach.

## **9/3 Elizabeth Wright and Alexandra Farrington**

Question 2

Following on from question 1, support the principle of allocating additional land. In turn if the Core Area delivers as originally projected, there would be no need to translate allocations into permissions. Equally, if there was under delivery in the Core Area, there is strategically planned land available to bring forward to assist in meeting the Borough's housing requirements. In a plan led system it is appropriate that this be undertaken by way of a partial review of the Plan to enable the issue to be addressed in a planned and coordinated manner rather than through a piecemeal approach.

## **9/4 Elizabeth Wright and Alexandra Farrington**

Question 3

Alternative b preferred, namely allocating new housing on a combination of sites. Reasons include that as detailed in SHLAA para 3.42, sites of varying sizes / number of builders have different build rates and are limited by demand. This suggests that a greater number of sites in the right locations are likely to deliver a greater number of homes than a single allocation.



#### **9/5 Elizabeth Wright and Alexandra Farrington**

Following on from the response to question 3, support the principle of land at Yarm Back Lane, West Stockton making a positive contribution towards the development needs of the Borough. In turn support the area of search identified on Figure 12 of the Consultation Document. This area is amongst other things well related to the A66, public transport links and other services and facilities as outlined in paras 3.37 and 3.38.

It is envisaged that the development would likely start from the existing urban edge of Stockton on SHLAA site 23 'Hartburn Grange land between Yarm Back Lane and West Stockton built up area' and then progress west. The respondents' site, SHLAA site 80 which is enveloped by existing development, a dwelling to the south, an equestrian facility and caravan storage facility to the north and a beck to the west should be included in the initial phases of the development.

It is noted that according to para 3.35 of the Consultation, the deliverability of the site would require that Yarm Back Lane become redundant and a new estate road be taken though the site to the west of the existing Yarm Back Lane. The respondents would appreciate a discussion with officers about any work that has been undertaken in relation to possible routes for the Estate Road.

#### **9/6 Elizabeth Wright and Alexandra Farrington**

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Additionally, as detailed in para 3.68 a strategic scale housing development has significant potential to impact negatively upon the landscape and biodiversity of surrounding areas. Furthermore, on the SHLAA Map, the site is recorded as a Country Park suggesting extensive public access and leisure use. For all these reasons the site should be discounted as a possible new housing site.

#### **9/7 Elizabeth Wright and Alexandra Farrington**

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Following on from the above there are issues with the site as detailed in paras 3.72 and 3.73. These factors contributed to the SHLAA findings;

- that the site was not suitable because it is not well related to the existing built up area;
- that the site is not achievable there being incompatible neighbouring land uses that would be difficult to design out.

For all these reasons the site should be discounted as a possible new housing site.

#### **9/8 Elizabeth Wright and Alexandra Farrington**

The site is designated as one of the main locations for employment land and the Council's Employment Land Review recommends that the site be retained for employment use. The site should be retained for employment purposes, a good supply of employment land being essential to the future of the Borough and beyond. In turn, as detailed in para 3.79 and 3.80 the site is not well related to schools or other facilities of acknowledged importance. For all these reasons the site should be discounted as a possible new housing site.

#### **9/9 Elizabeth Wright and Alexandra Farrington**

The parts of the sites currently designated as one of the main locations for employment land and recognised in the Employment Land Review, should be retained for employment purposes.

The HSE issue is a further constraint on residential development as experience tells in another site in Tees Valley.

#### **9/10 Elizabeth Wright and Alexandra Farrington**

#### **9/11 Elizabeth Wright and Alexandra Farrington**

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Following on from the above part of the site was considered in the November 2010 SHLAA (site 70). Its findings were that the site was not suitable, a conclusion that the respondents agree with.

In addition, there has been a significant amount of the development in and around Ingleby Barwick for many years and there are a significant number of plots in the pipeline. In the circumstances a positive decision should be taken to steer development elsewhere in the Borough amongst other things to improve the range and choice of new housing options and locations.

### **9/12 Elizabeth Wright and Alexandra Farrington**

Wynyard should be maintained as an attractive executive housing location and should only accommodate limited if any additional housing development. Wynyard was brought forward originally to contribute towards the demand for executive housing in Tees Valley and to respond to unsustainable commuting patterns. In the circumstances Wynyard should be maintained as an attractive executive housing location and it should not be a focus for new housing development.

### **9/13 Elizabeth Wright and Alexandra Farrington**

If housing were permitted in Wynyard, it should be limited to executive housing.

### **10/1 Individual**

The construction of housing on green field sites to the south and west sites 8, 7, 6, 10 encroach into the countryside whilst we have many derelict sites within the built up areas.

### **10/2 Individual**

There is no mention of North Shore where significant infrastructure at great expense has been installed in readiness for housing

### **10/3 Individual**

To build homes on and at Billingham bottoms would be expensive and also remove a long term, historic nature reserve that has been there for centuries. I have therefore got to object to this.

### **11/1 The Coal Authority**

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

### **12/1 WT Elstob & Son**

This response is submitted on behalf of WT Elstob & Son in relation to the above mentioned consultation. It is to be taken into account and afforded positive weight in the Council's consideration of this matter.  
The respondents' comments are set out below.

#### **Question 1**

Agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028. It was a concern raised during the course of the preparation of the Core Strategy whether it was sufficiently flexible, it placing significant and perhaps an over reliance on the Core Area for delivery of the Borough's Housing requirements. In the circumstances, in accordance with PPS3, PPS12 and the emerging NPPF, it is appropriate to undertake a review of the Plan and to allocate additional land for development. Subsequently, through the application process, the bringing forward of newly allocated land can be managed through the Plan Monitor Manage approach.

### **12/2 WT Elstob & Son**

#### **Question 2**

Following on from question 1, support the principle of allocating additional land. In turn if the Core Area delivers as originally projected, there would be no need to translate allocations into permissions. Equally, if there was under delivery in the Core Area, there is strategically planned land available to bring forward to assist in meeting the Borough's housing requirements. In a plan led system it is appropriate that this be undertaken by way of a partial review of the plan to enable the issue to be addressed in a planned and coordinated manner rather than through a piecemeal approach. This also reflects the emerging guidance in relation to the new Local Plan system.

## 12/3 WT Elstob & Son

### Question 3

Alternative b preferred, namely allocating new housing on a combination of sites. Reasons include that as detailed in SHLAA para 3.42, sites of varying sizes / number of builders have different build rates and are limited by demand. This suggests that a greater number of sites in the right locations are likely to deliver a greater number of homes than a single allocation over a given period.

#### North West Billingham

This site, SHLAA site 30, is in the respondents' ownership and has been promoted by the respondents for residential development in earlier stages of the LDF and its evidence base.

SHLAA November 2010 findings include;

- the site is available
- the site is achievable

The above conclusions are agreed and supported.

Turning to suitability, the November 2010 SHLAA concluded, "The site is not suitable as the location is considered to be unsustainable".

The respondents do not agree with this conclusion for reasons reflecting those in para 3.25 of the consultation, namely,

"The development site at North West Billingham is located at the edge of an existing residential area and immediately adjacent to Northfield School and Sports College. New residents are expected to have good access to a number of local facilities and the site can, therefore, be considered to be sustainable".

The respondents agree and support the findings of para 3.25 as detailed above and ask that the SHLAA when reviewed in 2011 is amended to find that the site is suitable, available and achievable.

Insofar as mitigation to improve public transport links and to minimise noise issues, suitable measures can be designed into a scheme as appropriate. These issues are therefore addressable especially acknowledging the inherent suitability of the site which is physically well constrained, well related to existing communities and to Northfield School and Sports College.

## 12/4 WT Elstob & Son

### Issue 4 : The Conurbation

#### Billingham Bottoms

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Additionally, as detailed in para 3.68 a strategic scale housing development has significant potential to impact negatively upon the landscape and biodiversity of surrounding areas. Furthermore, on the SHLAA Map, the site is recorded as a Country Park suggesting extensive public access and leisure use. For all these reasons the site should be discounted as a possible new housing site.

#### Land South of Preston Farm Industrial Estate

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Following on from the above there are issues with the site as detailed in paras 3.72 and 3.73. These factors contributed to the SHLAA findings;

- that the site was not suitable because it is not well related to the existing built up area;
- that the site is not achievable there being incompatible neighbouring land uses that would be difficult to design out.

For all these reasons the site should be discounted as a possible new housing site.

#### Land at Durham Lane Industrial Estate

The site is designated as one of the main locations for employment land and the Council's Employment land Review recommends that the site be retained for employment use. The site should be retained for employment purposes, a good supply of employment land being essential to the future of the Borough and beyond. In turn, as detailed in para 3.79 and 3.80, the site is not well related to schools or other facilities of acknowledged importance. For all these reasons the site should be discounted as a possible new housing site.

#### Land at Urray Nook – Sites 1 and 2

The parts of the sites currently designated as one of the main locations for employment land and recognised in the Employment Land Review, should be retained for employment purposes.

The HSE issue is a further constraint on residential development as was demonstrated to be the case on another site in Tees Valley.

#### Land At Ingleby Barwick

The site is designated Green Wedge and should be retained as such, its current openness making a positive contribution to the character of the area. Following on from the above part of the site was considered in the November 2010 SHLAA (site 70). Its findings were that the site was not suitable, a conclusion that the respondents agree with.

In addition, there has been a significant amount of the development in and around Ingleby Barwick for many years and there are a significant number of plots in the pipeline. In the circumstances a positive decision should be taken to steer development elsewhere in the Borough amongst other things to improve the range and choice of new housing options and locations.

## 12/5 WT Elstob & Son

### Question 6b

Wynyard should be maintained as an attractive executive housing location and should only accommodate limited if any additional housing development. Wynyard was brought forward originally to contribute towards the demand for executive housing in Tees Valley and to respond to unsustainable commuting patterns. In the circumstances Wynyard should be maintained as an attractive executive housing location and it should not be a focus for new housing development.

## **12/6 WT Elstob & Son**

### Question 8

If housing were permitted in Wynyard, it should be limited to executive housing.

### Conclusion

The above should be taken into account and afforded positive weight in the Council's consideration of alternatives. As detailed earlier in the submission the respondents would appreciate an early discussion with officers.

## **13/1 One North East**

I refer to your email dated 11 July relating to the above document sent for comment to One North East as a statutory consultee in accordance with the above Regulations. Thank you for consulting the Agency.

Currently One North East is responsible for the development, delivery and review of the Regional Economic Strategy (RES) on behalf of North East England. The RES sets out how greater and sustainable prosperity will be delivered to all of the people in the North East over the period to 2016.

In commenting on plans within an Authority's Local Development Framework (LDF), as required by the legislation relating to its role as a statutory consultee, the Agency will consider the document in the context of the RES. Our comments relating to the document are set out below.

One North East notes the Council's evidence that suggests there are now insufficient housing identified which are compliant with the Stockton-on-Tees Core Strategy DPD (adopted March 2010) and that this is due, in the main, to changing circumstances. Whilst the Council remains committed to its objectives to achieve regeneration and implementation of its plans to provide health and education improvements, it also recognises that such commitment must be based on realistic and achievable plans set in the context of the significant reduction in the availability of public investment.

One North East welcomes and endorses the Council's intention to formally debate a review of the housing element of the adopted Core Strategy in order to ensure the shortfall is addressed in a planned and co-ordinated way rather than through piecemeal and un-co-ordinated development.

Clearly the Council, as Local Planning Authority (LPA), will need to be satisfied that any loss of employment land to housing (for example on sites like Wynyard – the 70ha site identified as a Key Employment Location by Policy CS4, Economic Regeneration in the adopted Core Strategy) can be satisfactorily justified and evidenced by the LPA.

I confirm that One North East has no other specific comments to make regarding this Issues and Options stage of the Review.

As you are aware from our letter to the Council in July 2011 relating to the enactment of the legislation (expected this Autumn) to abolish Regional Development Agencies, with regard to the future consultation with the Agency in its role as 'a specific consultation body' on LDF documents received after 29 July 2011. Therefore, it is intended that, where such documents are sent to the Agency between 29 July and the enactment of the legislation to abolish RDAs, a standard 'no comment' response will be made.

## **13/2 One North East**

Clearly the Council, as Local Planning Authority (LPA), will need to be satisfied that any loss of employment land to housing (for example on sites like Wynyard – the 70ha site identified as a Key Employment Location by Policy CS4, Economic Regeneration in the adopted Core Strategy) can be satisfactorily justified and evidenced by the LPA.

## 14/1 Individual

We note that you invite comments on your document “Core Strategy Review Issues and Options”. We applaud this open approach to planning and are using this letter to raise some aspects of particular concern to us. If there is some tabulation of responses at your end, please note that we wish to be counted as two respondents.

Our special concerns are on the preservation of Kirklevington as a village and Yarm high street as a nationally recognised environmental gem. You will have observed that we live in the village of Kirklevington but this is not just a matter of local interest to us and fellow residents. We note from your documents that “we want Stockton to be economically competitive”. In today’s harsh climate that means not losing employers we already have and attracting new ones into Stockton. An important aspect of that must be a variety of housing situations which will attract employers to make their homes in Stockton.

In this context, we believe any increase in the number dwellings in Kirklevington would do harm to Stockton’s cause out of all proportion to the value of housing gained. The same would be true if there were any development in the sites your document names as “West Yarm”, “South West Yarm” and “South East Yarm”.

In the case of Kirklevington we now have a village environment which attracts residents who value small communities, closeness to the countryside etc. Proposals in your document could threaten this in two ways.

Firstly, recently allowed developments have already increased the population size. Any further increase will mean it is no longer a village, in this sense, at all. Secondly, development on any of the three “Yarm” sites would cut into the green wedge which makes Kirklevington a village and not merely a suburb of Stockton. There is nothing wrong with suburbs but Stockton has plenty of suburban housing already and could easily provide more on sites such as West Preston.

In the case of Yarm High Street the issue is also one of numbers. Not numbers of residents but the number of people who would drive through it to work and see it as their local shopping or leisure area. Developing any of the “West Yarm”, “South West Yarm” and “South East Yarm” sites would increase these numbers dramatically and threaten a nationally recognised asset of Stockton.

## 15/1 UK Association of Gypsy Women

Thanks for the information, especially interesting is that you would like to involve Gypsies and Travellers in the development plan process and in identifying suitable sites.

I would suggest that as you have already identified sites for market housing then one of those sites could be utilised as you have clearly already assessed the impact extra residents in those areas would have on the existing community and services.

As for engaging with the Gypsy and Traveller communities in Stockton the best and easiest way would be for you to simply visit the existing sites and carry out an oral consultation. This can also be done with those people currently forced to live on unauthorised sites as the development plan will affect them more than most. Oral consultation is something that is often overlooked and if done by Local Authorities tends to be done with a view of merely paying lip service in order to 'tick boxes' on consultation. You will find that, like the wider community, some have more interest and opinions than others but to provide them with the opportunity to voice their opinions in a way they understand would be a fantastic thing to see Stockton County Council do.

You also have SPARC (Society for the Promotion and Advancement of Romany Culture) in Stockton, which I believe is run by a resident of one of your authorised sites. They can be contacted on 01642 243453 and I'm sure they would be happy to introduce you to many Romany residents across the borough.

I hope this helps and look forward to hearing about new sites for Gypsies and Travellers in the Stockton area.

## 16/1 Highways Agency

The Highways Agency (the Agency) welcomes the opportunity to make comments on the above consultation draft document. The Agency has undertaken a review of the document and the issues, options and potential strategy identified, in accordance with its responsibilities and aims. This letter provides a general overview of the Strategic Road Network (SRN) in Stockton, as well as providing a response to the draft document. In addition, a broad assessment of the housing options has been undertaken and is appended to this letter.

The Strategic Road Network in Stockton

The Strategic Road Network (SRN) within Stockton comprises of the following routes:

- The A19(T) provides a north-south link through the borough; and
- The A66(T) provides a link between the A66(M) westwards towards Darlington and Eastwards towards Middlesbrough.

The A19(T) and A66(T) in Stockton is part of the Agency's strategic road network, and that future funding proposals, where necessary, will be identified with the help of local stakeholders, including the Local Enterprise Partnership, to develop low cost, innovative solutions.

The Agency is aware of capacity issues on both the A19(T) and A66(T) in the Stockton area. The majority of the A19(T) and the A66(T) within Stockton-on-Tees, is currently operating either above or close to capacity. The Agency would be concerned if, through land use planning policy, the development or intensification of land would increase levels of traffic on the network such to create capacity or safety problems in the future.

Planning for Housing: Core Strategy Review Issues and Options

Issue 1: Deliverability

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

The Agency appreciates that the current economic climate is having a significant impact on the delivery of new housing and particularly on brownfield sites that are more costly to remediate and regenerate, and typically found within the urban core. Existing central urban areas, such as the 'Core Area', are generally recognised to provide the most sustainable location for delivering new housing development, given that they generally have the best access to services, facilities, employment opportunities and easy access to more reliable sustainable means of transport and therefore are likely to have less of an impact on existing infrastructure. However, the Agency appreciates that such sites may now be more difficult to deliver compared to sites which require less remediation and that this has brought a degree of uncertainty to the Core Strategy's adopted housing strategy.

Whilst recognising that the deliverability of the core housing area may have become questionable due to the reduction in funding streams, the shift in emphasis towards the sites being considered within the document is likely to lead to potentially less sustainable development, due to their particular locations in relation to the existing urban area and the transport network / provisions. Subsequently, such sites may need to be supported by additional infrastructure improvements, further mitigation measures and a greater requirement for infrastructure funding, above what has previously been considered. Such requirements will therefore need further consideration as more detailed proposals are developed and the Agency can provide further assistance to ensure that the implications for the SRN are appropriately determined.

Q2: Do you agree with this approach?

The Agency is supportive of an approach that provides as great a degree of certainty as possible, as this will enable the potential impacts of development to be more accurately determined and therefore enable any supporting measures / infrastructure improvements, which may be required to enable the sustainable delivery of development, to be accurately considered and delivered to support the required level of need. The Agency appreciates that the consultation document identifies that the development of any of the identified sites is likely to have significant implications in terms of traffic impacts on the road network, given the likely scale of housing development required to be delivered on each site.

Such sites are strategic in nature and as such are recognised as being critical to the delivery of the strategy. Whilst the Agency has particular concerns regarding the potential impact on the operation of the Strategic Road Network (SRN) from a number of the sites (refer to the supporting assessment), the Agency is keen to continue working with the Council to ensure that only the most appropriate sites are taken forward and that full consideration is given to the impacts on existing infrastructure and the level and type of mitigation which may be required to ensure that new development will be sustainably delivered and will not have a detrimental impact on the safe and efficient operation of the SRN.

Further, the Agency will expect that any new approach taken forward will comply with adopted Policy CS2: Sustainable Transport, which in addition to setting the requirements for the provision of sustainable transport improvements, identifies that all major development proposals that are likely to generate significant additional journeys will need to be accompanied by a Transport Assessment, to demonstrate that the SRN will be no worse off as a result of development and where any measures proposed in a supporting Travel Plan will be insufficient to fully mitigate the impact of increased trip generation on the network, infrastructure improvements will be required.

#### Issue 2: Strategy

Q3: Which of the following options for the distribution of new housing sites do you agree with?

- a. concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. allocate new housing on a combination of sites

It is recognised that the sites identified within the document are potential options and that the council has no intention of allocating all of these sites (para 3.5). In this respect, at this stage, it is not prudent to undertake a cumulative analysis. Instead, consideration has been given to each of the potential site options in order to guide the strategy adopted within the preferred option, particularly in respect of the potential implications at the SRN.

Consideration has therefore been given to the trip generating potential of each of the sites (identified in Figure 1), along with the likely main point of impact at the SRN. This has enabled the intensity of the impacts at the SRN, the associated requirement for further consideration and the potential likelihood for SRN specific measures to be determined.

#### Figure 1 –Site Locations in relation to the SRN

In summary, the analysis uses the following methodology:

- The trip generation calculations have been undertaken with reference to generic TRICS data.
- The trip distribution and assignment patterns have been established through the use of the Agency's PENELOPE software (A GIS based package founded on 2001 census data and typical journey times / distances).
- In considering the implications at the SRN, consideration has been given to the link on the SRN where the greatest two-way impact occurs in the morning or evening peaks, in line with the Department for Transport [DfT] Circular 02/2007 'Planning and the Strategic Road Network', the DfT with Communities and Local Government joint publication 'Guidance on Transport Assessment' [GTA], March 2007 and the 'Highways Agency and the Planning Application Process - A Protocol for Dealing with Planning Applications'.

The results of the site specific analysis are contained in the table appended to this letter, where it can be clearly seen that many of the potential options could have significant implications at the SRN.

At the Preferred Options stage, once further thought has been given to the strategy direction, the Agency would expect a cumulative analysis to be undertaken in order to consider the consequences and impact of the chosen option and for appropriate consideration to be given to the required policy and Infrastructure Delivery Plan measures required to support the option.

As part of all previous LDF responses, and as part of the agreed partnership approach between the Agency and Tees Valley Unlimited and the Tees Valley



Local Authorities, the mechanism for doing so has been established through the Tees Valley Area Action Plan, which provides the assessment platform for considering the requirement for SRN-specific interventions associated with future land-use aspirations. An update to this analysis should therefore be taken forward.

#### Issue 3: Urban Extensions

Refer to the appended table which provides a broad assessment of the potential impact of the sites identified in Figure 9 as potential urban extension sites, including: North West Billingham, Harrowgate Lane, Yarm Back Lane, West Preston, West Yarm, South West Yarm and South East Yarm.

#### Issue 4: The Conurbation

Refer to the appended table which provides a broad assessment of the potential impact of the sites identified in Figure 17 as potential conurbation sites, including: Billingham Bottoms, Land to the south of Preston Farm Industrial Estate, Land at Durham Lane Industrial Estate, Land at Urray Nook – Sites 1 and 2 and Land at Ingleby Barwick.

#### Issue 5: The Villages

Q4: Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- o All villages
- o Only the most sustainable villages
- o No village extensions

The Agency has no particular preference, but generally considers that villages should only be identified for extensions, provided that they offer a sustainable location for new development, i.e. have good access to services, facilities, employment opportunities and a range of reliable sustainable transport options and can be supported by existing transport infrastructure.

Q5: At present, development inside the village boundaries is only allowed within the most sustainable villages. Should development inside the village boundaries be allowed in all villages?

Refer to Q4 response.

#### Issue 6: Wynyard

In relation to the recent Highways Agency study (para 3.105) and its stated conclusion that "...promoting a mix of uses at Wynyard Park that spreads journeys out at peak periods or reduced the number of trips during the morning peak period might allow more of Wynyard Park to be developed", in order to specifically consider the potential implications of residential development on the highway network, further analysis would need to be undertaken.

Any additional housing development, over and above existing provisions, is likely to cause additional implications on the highway network, which would also require further consideration.

Any replacement of employment development with residential development in this location would provide a mix of development that could potentially reduce trip numbers at the SRN. However, given the tidal nature of the alternative land uses (i.e. in the critical morning peak, employment land uses would mainly generate trips arriving to the site, with residential land uses generating departure trips, and visa-versa in the critical evening peak), appropriate consideration would need to be given to these issues of tidality and the implications on the surrounding highway network.

Irrespective of the mix of uses, the area remains to be an unsustainable location in transport terms, and is likely to have a major focus on the use of the private car. Appropriate provision will need to be made as part of the overall strategy, should the Wynyard proposals form part of the preferred option.

During consultation on Hartlepool Borough Council's Core Strategy Preferred Options, the Agency also stated that development proposed at Wynyard could have a detrimental impact on the SRN, given that it was not considered to provide a sustainable location for development and would have the least opportunity

to reduce the need to travel out of the options identified. A broad assessment undertaken on a revised draft of the Preferred Options in November 2010, identified that the sites forming the Wynyard Extension, which consisted of significant quantities of housing and prestige employment development, would likely to have particular implications at the A19/A689 junction and that further evidence would need to be provided in relation to the specific impact of these sites at the SRN and particularly how the strategy's policy would address the identified impacts.

Therefore a coordinated approach with Hartlepool Borough Council and the Agency is essential to ensure that an appropriate and robust strategy for the Wynyard area is developed.

I trust that this response is helpful. If, however, you require any further information, please do not hesitate to contact me. I look forward to receiving confirmation that our comments have been received in due course

## **16/2 Highways Agency**

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

The Agency appreciates that the current economic climate is having a significant impact on the delivery of new housing and particularly on brownfield sites that are more costly to remediate and regenerate, and typically found within the urban core. Existing central urban areas, such as the 'Core Area', are generally recognised to provide the most sustainable location for delivering new housing development, given that they generally have the best access to services, facilities, employment opportunities and easy access to more reliable sustainable means of transport and therefore are likely to have less of an impact on existing infrastructure. However, the Agency appreciates that such sites may now be more difficult to deliver compared to sites which require less remediation and that this has brought a degree of uncertainty to the Core Strategy's adopted housing strategy.

Whilst recognising that the deliverability of the core housing area may have become questionable due to the reduction in funding streams, the shift in emphasis towards the sites being considered within the document is likely to lead to potentially less sustainable development, due to their particular locations in relation to the existing urban area and the transport network / provisions. Subsequently, such sites may need to be supported by additional infrastructure improvements, further mitigation measures and a greater requirement for infrastructure funding, above what has previously been considered. Such requirements will therefore need further consideration as more detailed proposals are developed and the Agency can provide further assistance to ensure that the implications for the SRN are appropriately determined.

## 16/3 Highways Agency

Q2: Do you agree with this approach?

The Agency is supportive of an approach that provides as great a degree of certainty as possible, as this will enable the potential impacts of development to be more accurately determined and therefore enable any supporting measures / infrastructure improvements, which may be required to enable the sustainable delivery of development, to be accurately considered and delivered to support the required level of need. The Agency appreciates that the consultation document identifies that the development of any of the identified sites is likely to have significant implications in terms of traffic impacts on the road network, given the likely scale of housing development required to be delivered on each site.

Such sites are strategic in nature and as such are recognised as being critical to the delivery of the strategy. Whilst the Agency has particular concerns regarding the potential impact on the operation of the Strategic Road Network (SRN) from a number of the sites (refer to the supporting assessment), the Agency is keen to continue working with the Council to ensure that only the most appropriate sites are taken forward and that full consideration is given to the impacts on existing infrastructure and the level and type of mitigation which may be required to ensure that new development will be sustainably delivered and will not have a detrimental impact on the safe and efficient operation of the SRN.

Further, the Agency will expect that any new approach taken forward will comply with adopted Policy CS2: Sustainable Transport, which in addition to setting the requirements for the provision of sustainable transport improvements, identifies that all major development proposals that are likely to generate significant additional journeys will need to be accompanied by a Transport Assessment, to demonstrate that the SRN will be no worse off as a result of development and where any measures proposed in a supporting Travel Plan will be insufficient to fully mitigate the impact of increased trip generation on the network, infrastructure improvements will be required.

## 16/4 Highways Agency

Q3: Which of the following options for the distribution of new housing sites do you agree with?

- a. concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. allocate new housing on a combination of sites

It is recognised that the sites identified within the document are potential options and that the council has no intention of allocating all of these sites (para 3.5). In this respect, at this stage, it is not prudent to undertake a cumulative analysis. Instead, consideration has been given to each of the potential site options in order to guide the strategy adopted within the preferred option, particularly in respect of the potential implications at the SRN.

Consideration has therefore been given to the trip generating potential of each of the sites (identified in Figure 1), along with the likely main point of impact at the SRN. This has enabled the intensity of the impacts at the SRN, the associated requirement for further consideration and the potential likelihood for SRN specific measures to be determined.

Figure 1 –Site Locations in relation to the SRN

In summary, the analysis uses the following methodology:

- The trip generation calculations have been undertaken with reference to generic TRICS data.
- The trip distribution and assignment patterns have been established through the use of the Agency's PENELOPE software (A GIS based package founded on 2001 census data and typical journey times / distances).
- In considering the implications at the SRN, consideration has been given to the link on the SRN where the greatest two-way impact occurs in the morning or evening peaks, in line with the Department for Transport [DfT] Circular 02/2007 'Planning and the Strategic Road Network', the DfT with Communities and Local Government joint publication 'Guidance on Transport Assessment' [GTA], March 2007 and the 'Highways Agency and the Planning Application Process - A Protocol for Dealing with Planning Applications'.

The results of the site specific analysis are contained in the table appended to this letter, where it can be clearly seen that many of the potential options could have significant implications at the SRN.

At the Preferred Options stage, once further thought has been given to the strategy direction, the Agency would expect a cumulative analysis to be undertaken in order to consider the consequences and impact of the chosen option and for appropriate consideration to be given to the required policy and Infrastructure Delivery Plan measures required to support the option.

As part of all previous LDF responses, and as part of the agreed partnership approach between the Agency and Tees Valley Unlimited and the Tees Valley Local Authorities, the mechanism for doing so has been established through the Tees Valley Area Action Plan, which provides the assessment platform for considering the requirement for SRN-specific interventions associated with future land-use aspirations. An update to this analysis should therefore be taken forward.

### Issue 3: Urban Extensions

Refer to the appended table which provides a broad assessment of the potential impact of the sites identified in Figure 9 as potential urban extension sites, including: North West Billingham, Harrowgate Lane, Yarm Back Lane, West Preston, West Yarm, South West Yarm and South East Yarm.

### Issue 4: The Conurbation

Refer to the appended table which provides a broad assessment of the potential impact of the sites identified in Figure 17 as potential conurbation sites, including: Billingham Bottoms, Land to the south of Preston Farm Industrial Estate, Land at Durham Lane Industrial Estate, Land at Urray Nook – Sites 1 and 2 and Land at Ingleby Barwick.

## **16/5 Highways Agency**

The Agency has no particular preference, but generally considers that villages should only be identified for extensions, provided that they offer a sustainable location for new development, i.e. have good access to services, facilities, employment opportunities and a range of reliable sustainable transport options and can be supported by existing transport infrastructure.

## **16/6 Highways Agency**

Issue 6: Wynyard

In relation to the recent Highways Agency study (para 3.105) and its stated conclusion that "...promoting a mix of uses at Wynyard Park that spreads journeys out at peak periods or reduced the number of trips during the morning peak period might allow more of Wynyard Park to be developed", in order to specifically consider the potential implications of residential development on the highway network, further analysis would need to be undertaken.

Any additional housing development, over and above existing provisions, is likely to cause additional implications on the highway network, which would also require further consideration.

Any replacement of employment development with residential development in this location would provide a mix of development that could potentially reduce trip numbers at the SRN. However, given the tidal nature of the alternative land uses (i.e. in the critical morning peak, employment land uses would mainly generate trips arriving to the site, with residential land uses generating departure trips, and visa-versa in the critical evening peak), appropriate consideration would need to be given to these issues of tidality and the implications on the surrounding highway network.

Irrespective of the mix of uses, the area remains to be an unsustainable location in transport terms, and is likely to have a major focus on the use of the private car. Appropriate provision will need to be made as part of the overall strategy, should the Wynyard proposals form part of the preferred option.

During consultation on Hartlepool Borough Council's Core Strategy Preferred Options, the Agency also stated that development proposed at Wynyard could have a detrimental impact on the SRN, given that it was not considered to provide a sustainable location for development and would have the least opportunity to reduce the need to travel out of the options identified. A broad assessment undertaken on a revised draft of the Preferred Options in November 2010, identified that the sites forming the Wynyard Extension, which consisted of significant quantities of housing and prestige employment development, would likely to have particular implications at the A19/A689 junction and that further evidence would need to be provided in relation to the specific impact of these sites at the SRN and particularly how the strategy's policy would address the identified impacts.

Therefore a coordinated approach with Hartlepool Borough Council and the Agency is essential to ensure that an appropriate and robust strategy for the Wynyard area is developed.

## **16/7 Highways Agency**

Location of Greatest Impact: South of A19(T)/A139 junction.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other Comments: Suitable provisions are noted. Specific consideration will need to be given to transport implications as part of the overall strategy.

## **16/8 Highways Agency**

Location of greatest impact: East of A66(T) Elton Interchange.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: A sustainable location, where travel to Stockton on Tees would not need to make use of the SRN. However, given the scale of the development, residual impacts of travel to neighbouring authorities could have implications at the SRN.

### **16/9 Highways Agency**

Location of greatest impact: South of A19(T)/A1027 junction

Impact Summary: Unlikely to have significant individual impacts.

Other comments: Poor sustainable transport links noted. While the scale of development results in limited SRN impacts, consideration to transport sustainability required as part of overall strategy.

### **16/10 Highways Agency**

Location of greatest impact: East of A66(T) Elton Interchange.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Sustainable provisions are noted. Given the specific location of the development in relation to the A66(T), specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/11 Highways Agency**

Location of greatest impact: North of A19(T)/A174 interchange.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Poor sustainable transport links noted. While the scale of development results in limited SRN impacts, consideration to transport sustainability required as part of the overall strategy.

### **16/12 Highways Agency**

Location of greatest impact: East of A66(T) Elton Interchange.

Impact Summary: Further assessment of potential impacts required.

Other comments: Sustainable provisions are noted. Given the specific location of the development in relation to the A66(T), specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/13 Highways Agency**

Location of greatest impact: East of A66 Elton Interchange

Impact Summary: Further assessment of individual impacts required

Other comments: Sustainable provisions are noted. Given the specific location of the development in relation to the A66(T), specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/14 Highways Agency**

Location of greatest impact: South of A19(T)/A689 junction.

Impact Summary: Further assessment of potential impacts required.

Other comments: Unsustainable location that would have specific impacts at the A19 "Wynyard" junction. Specific consideration will need to be given to the transport implications as part of the overall strategy.

### **16/15 Highways Agency**

Location of greatest impact: East of A66(T)/Bowesfield Lane Junction.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Sustainable provisions are noted. Given the specific location of the development in relation to the A66(T), specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/16 Highways Agency**

Location of greatest impact: North of A19(T)/A174 interchange.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Sustainable provisions are noted. Specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/17 Highways Agency**

Location of greatest impact: North of A19(T)/A67 Junction.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Sustainable provisions are noted. Specific considerations will need to be given to transport implications as part of the overall strategy.

### **16/18 Highways Agency**

Location of greatest impact: East of A66(T)/A135.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Poor sustainable transport links noted. Given the specific location of the development in close proximity to the A66(T), there are likely to be significant issues at the SRN.

### **16/19 Highways Agency**

Location of greatest impact: North of A19(T)/A67 junction.

Impact Summary: Further assessment of potential impacts required.

Other comments: Sustainable provisions are noted. Specific consideration will need to be given to transport implications as part of the overall strategy.

### **16/20 Highways Agency**

Location of greatest impact: South of A19(T)/A689 junction.

Impact Summary: Further assessment of potential impacts required.

Other comments: Unsustainable location that would have specific impacts at the A19 "Wynyard" junction. Specific consideration will need to be given to the transport implications as part of the overall strategy.

### **16/21 Highways Agency**

Location of greatest impact: South of A19(T)/A689 junction.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Unsustainable location that would have specific impacts at the A19 "Wynyard" junction. Specific consideration will need to be given to the transport implications as part of the overall strategy.

### **16/22 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange

Impact Summary: Unlikely to have significant individual impacts

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/23 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange.

Impact Summary: Likely impacts may require mitigation (subject to further assessment).

Other comments: Issues in relation to transport sustainability noted. Given the specific location of the development in close proximity to the A66(T), there are likely to be significant issues at the SRN.

#### **16/24 Highways Agency**

Location of greatest impact: East of A66(T) Long Newton Interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

#### **16/25 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

#### **16/26 Highways Agency**

Location of greatest impact: North of A19(T)/A174 interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

#### **16/27 Highways Agency**

Location of greatest impact: North of A19(T)/A67 junction.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

#### **16/28 Highways Agency**

Location of greatest impact: South of A19(T)/A1027 junction.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

#### **16/29 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.



### **16/30 Highways Agency**

Location of greatest impact: North of A19(T)/A174 interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/31 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/32 Highways Agency**

Location of greatest impact: South of A19(T)/A1027 junction.

Impact Summary: Unlikely to have significant individual impacts

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/33 Highways Agency**

Location of greatest impact: South of A19(T)/A689 junction.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/34 Highways Agency**

Location of greatest impact: East of A66(T) Elton interchange.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

### **16/35 Highways Agency**

Location of greatest impact: South of A19(T)/A689 junction.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

## **16/36 Highways Agency**

Location of greatest impact: East of A66(T)/A135 junction.

Impact Summary: Unlikely to have significant individual impacts.

Other comments: The village extensions are generally of a minimal scale which will lead to limited individual impacts at the SRN. However, appropriate consideration will need to be given to the sustainability of the sites and, as they would only contribute to an element of the shortfall, appropriate consideration of their cumulative impacts as part of the overall strategy.

## **17/1 Homes and Communities Agency**

Thank you for invitation to comment on the review of the Stockton Core Strategy. Having considered the consultation documents, the HCA would like to provide the following response.

We welcome the Council's continued commitment to regeneration, as stated in point 2.1, and understand the need for re-evaluation in light of the current economic climate.

Point 3.13 of the review document states that the Council cannot identify sufficient sites within the Core Area with enough certainty that they will be developed for 2013 to 28. Point 3.14 goes on to highlight the inexact nature of housing trajectories and the need for flexibility in delivery; the HCA welcomes the Council's commitment to support delivery of regeneration sites should they "come forward unexpectedly".

However, we encourage the Council to consider the impact of allocating areas outside of the Core Area for housing on the deliverability of sites within the Core Areas. The view of the HCA is that a policy to allocate peripheral sites for housing could seriously lessen the probability of Core Area sites being delivered for two reasons.

Firstly, developers faced with a choice of building on greenfield land or the more complicated brownfield sites are very likely to choose to develop greenfield land due to lower risk and greater expected profits. Secondly, as sites outside of the Core Area are developed this will increase the supply of new housing. This will mean that any potential development on Core Area sites will face increased competition, lower sale values and worsened viability – this could mean that sites within the Core Area that would previously have been viable may well not be if housing is delivered on sites outside of the Core Area.

Failure to deliver development within the Core Area could mean that Stockton does not gain from the wider economic benefits that would accompany regeneration of the town centre. The HCA feels it is important that the current economic situation does not lead to a shift in planning policy that will prevent maximum economic gains being achieved in the longer term.

Given the previous public investment into regeneration of the town centre, any policy that shifts the focus of development away from the Core Area – and makes development within the Core Area less likely as outlined above – should consider how this will impact on achievement of the outcomes that previous investment had sought.

For the above reasons careful analysis is required as to the costs and benefits of the proposed reallocation of land outside of the Core Area, and whether such a change is necessary in the short-term given that cumulative net-completions are forecast to outstrip target completions until 20/21 (as shown in Figure 1 of the consultation document)

## 18/1 Individual

We on Wynyard share a common desire.  
To live on Wynyard in peace and harmony.  
To have our children brought up in an environment conducive to their future plans and hopes.

It is now clear these values and requisites are under serious threat.

Over a seven year period we have seen the development plans for Wynyard escalate to the current level which now threatens to destroy the community which we have invested our hopes and dreams into.

The care home was sanctioned despite warnings from residents that there was no requirement for such a scheme, the council nevertheless gave approval.

When through lack of enquiries and acceptances for "the home" the commercial realisation was clear, the rules were "conveniently changed to allow "all users.

The site is a dreadful monstrosity of poor design and execution which we have to tolerate and live with.

I was in conversation with a Bellway sub-contractor. He commented "Wynyard will become a mini Ingleby Barwick, John Hall is hell bent on ruining the area out of commercial greed"

Apparently the road through Wynyard woods will be extended out to the Castle Eden walkway to accommodate a further 200 houses. It will return to the area behind Plantations or towards the Stables where a further 400(?) houses are planned these will include "affordable housing ".

An application will then be renewed for a Thai restaurant a doctors surgery ,chemist and a new pub,  
possibly in the area opposite or adjacent to the "care home".

Every gap on the estate will be targeted ,Castlereagh has several "gaps" lucrative plots that could be used to create mini developments onto the golf course.

They will not stop till the area and community are ruined, we will have an influx of "visitors" visiting the new facilities .Our roads will barely cope with the traffic levels needed.

We must "help the council" understand that these planning applications are not about providing or meeting a "need", just as it was with the care home, this is about speculative greed and exploitation.

In the process the environment including fauna and wildlife is destroyed.

Even now Wynyard estates neglect our environment, there are no flower beds ,roads are potholed with no prospect of repair, verges are unkempt. Past promises of a childrens play area and sports facilities are merely skilfull misdirection to gain credance while conspiring to ruin the community.

Regretably John Hall has abandoned any idea that Wynyard is a lasting heritage and tribute to himself, a great shame because it could and should have been. Instead he will exploit his relation with the compliant councils who, while pretending to be selective, use this supterfuge to mask the inevitable decision in his favor.

Wynyard woods (north) has been a "building site for 5 years now, builders vehicles, often driving over 30mph, mud on the roads ,often two inches thick, dangerous illegal damaging speed bumps, Signs that make the area like a huge advertising campaign for Bellway

We CAN STOP THIS,or at least apply some control and common sense.

May I point out my home in Manor fields is not threatened by development to the extent especially of those on the south side of Wynyard woods,my interest and possible involvement is because of the thoughtless greed and disregard for the residents who have chosen to live and bring up families here,and the cynical speculators now queueing up to destroy our lives.

This may sound dramatic,but ,in 5 years Wynyard will be building site with works traffic,mud filled roads

### **19/1 Individual**

I have just completed your questionnaire. Thank you for giving us the opportunity to comment. However, I would like more reassurance that the areas you have chosen for housing will be provided with proper facilities to reduce short car journeys. For example, will Ingleby Barwick finally have a proper secondary school?

I am also aware that the houses at the far end of Yarm are very short of facilities. There is, for example, only the one post office in the centre of Yarm but that is 3 miles away from the furthest houses. Houses built at Uray Nook and Durham Lane will have the choice of going to Yarm or Stockton for their post office and bank etc, which is not a way of encouraging sustainability. Tescos does not deliver everything!

As things stand, houses built in off Harrogate Lane would have the shops in Hardwick as their closest shops, so again, most of them would need to get to Tescos or Stockton. I am not sure where the nearest facilities are for West Preston, which is a big development. Nor does Wynard have enough facilities.

I appreciate that many of the people will be commuting and will not use local shops, but the demographics show that there will be many more older people and they do not travel for their shopping. Mums with children also need local facilities, particularly as petrol is not going to reduce in price.

So, I need more convincing that your plan is going to make sustainable communities. I felt that the north shore development is a good step for future planning and ticked all the boxes of being carbon neutral and near shops and a transport hub. I am not sure that this can be said about developing the outskirts, particularly as the housing will be on agricultural land.

Thank you for giving us the opportunity to comment

### **20/0 Individual**

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

This question appears to relate just to the three Brownfield sites identified within the Core Area. If it has been decided that these are suitable for housing then there is no reason why they cannot be developed within the time scale. The full cost of site preparation should lie with the developer, who is the one profiting from development, and not the tax payer. No Greenfield sites should be released for development until the Brownfield sites are all complete. If a developer is insistent on a Greenfield development then they should be required to pay the full cost of returning a Brownfield site of equal area back to a condition where it is suitable for agricultural use – (see comments questionnaire). However, in the case of Tees Marshalling Yards, I consider this has far greater value to the community if it is retained for future re-development as a goods transport hub. I also believe that the identified Core Area could be expanded to incorporate more of the existing developed area within the borough.

### **20/1 Individual**

Q2: Do you agree with this approach?

It is not clear if this question just relates to the Core Area or also the potential housing sites on school and hospital land. If Chandlers Wharf and Bowesfield North did come forward then appropriate development would be supported. However, support for hospital and school sites would be less certain and would depend on the individual situation. The Hospital Trust may consider it satisfactory to re-locate services to Wynyard but for many people, the current hospital at North Tees is already too far away. If Trust managers continue to ignore the views of their clients they may find themselves in charge of a 'white elephant'.

### **20/2 Individual**

Q9: If a new master plan is prepared for the area, how could connectivity between the northern area and the southern area be improved?

If these areas are retained as farm land then connectivity is not an issue.

### **20/3 Individual**

Living in a town, such as Stockton, is for many people a compromise between the competing desires for access to the countryside or to urban land based services. By expanding the limits to development, the rural aspect becomes more remote encouraging some people to relocate for a better sense of a country life.

When a new housing estate is built resulting in a shift in a local centre of population, bus routes tend to be readjusted to take account of this. The original housing then becomes less well served by buses making them less sustainable than they were.

In both of the above cases, it is usually those who are most dependant on buses and least able to move who are left to live the declining urban centre.

### **20/4 Individual**

Further, to use historic information to predict housing numbers is questionable particularly when the practice of urban expansion perpetuates an element of demand. Certainly this practice is not sustainable and if it continues unchecked will eventually lead to a collapse of the democratic social system that we enjoy in this country.

## **21/1 Mr A Steele, Ms J Steele and Mr T Steele**

### Introduction

Our clients, the Steele family, own part of the site off Harrowgate Lane, West Stockton (please see the attached location plan for reference). We wish to take this opportunity to support the Council's decision to review the Core Strategy and fully support the future development of this site.

Although our clients are happy to pursue development on their land individually, they are willing to work in partnership with the adjacent landowners to create and deliver a carefully planned comprehensive urban extension to the west of Stockton. We would be happy to meet with the relevant planning officers to discuss this in further detail.

### Conclusion

As we outline above, we welcome the Council's review of the Core Strategy. In particular, we support the suggestion of an urban extension off Harrowgate Lane, West Stockton, is the most appropriate development site to achieve the shortfall in housing development. This site is the most sustainable parcel of land when compared against the sites identified at Wynyard and the other sites identified to the west of Stockton (please refer to appendix 4 of the Core Strategy Review Sustainability Appraisal for further details).

The site is suitable, achievable and available for future development and provides a sustainable development opportunity which would have a minimal impact on the open countryside and surrounding area.

We strongly favour the "single site" solution and fully support the development of the land off Harrowgate Lane in that context. Should, however, the revised Strategy prefer a different solution to a "single site", our clients would still wish their land on the attached plan to be considered for development, and we would be happy to discuss this further with the relevant planning officers in due course.

## **21/2 Mr A Steele, Ms J Steele and Mr T Steele**

### Core Strategy Review

Our clients support the need to review the adopted Core Strategy at this time. A number of significant changes have recently taken place within the planning system and the wider economy. The Local Development Framework needs to ensure it has the flexibility needed to deliver these changes; particularly with regard to addressing housing need and demand, in suitable and sustainable locations.

Page 1 of the consultation document recognises that there is insufficient identified housing sites that are both compliant with the adopted Core Strategy and can realistically deliver the number of homes necessary within the Plan period.

In addition, following the publication of the Council's consultation document, the Draft National Planning Policy Framework (Draft NPPF, July 2011) has been released. The NPPF states that local planning authorities should:

- prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes;
- approve development proposals that accord with statutory plans without delay; and
- grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.

As set out in the Ministerial Forward, "Development that is sustainable should go ahead, without delay - a presumption in favour of sustainable development that is the basis for every plan, and every decision". We support this assertion.

It is therefore essential that the Council ensures an adequate supply of deliverable housing sites to meet the long term housing needs of the District. To bring the DPD in line with the Draft NPPF, paragraph 109 states that:

"To boost the supply of housing, local planning authorities should: identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land".

According to the Planning Inspectorate, the NPPF is capable of being a material consideration and gives a clear indication of the Government's 'direction of travel' in planning policy.

In accordance with the above guidance, the Core Strategy Review needs to ensure the availability of sufficient, deliverable sites - which are attractive to the market - to meet the housing needs of the District.

We therefore support the Council's decision to review the Core Strategy.

## **21/3 Mr A Steele, Ms J Steele and Mr T Steele**

### Current Housing Supply

The current housing trajectory illustrates a shortfall of 2760 new dwellings to the end of the plan period. We agree that it is vital for the Council to address this shortfall to ensure that housing need is met in appropriate and deliverable locations.

As stated above, not only do the Council need to address this circa 2800 shortfall, it should include an additional allowance of at least 20 per cent within the 5 year housing land supply to ensure choice and competition in the market for land, in line with the Draft NPPF

## **21/4 Mr A Steele, Ms J Steele and Mr T Steele**

### Addressing Housing Need

We welcome the Council's acknowledgement that there are delivery challenges associated with bringing forward housing sites in the Core Area; public funding to facilitate costly regeneration schemes has been severely restricted and end values are low. This is typically resulting in unviable development schemes within regeneration areas.

As an alternative, the Council are taking a more proactive development stance with the suggestion of a future urban extension to create a sustainable pattern of housing growth and well-planned infrastructure, including access to a range of local services and facilities.

We consider that the development of a sustainable urban extension will go some way towards addressing the current housing shortfall and facilitate the provision of new affordable housing. The alternative is to fail to deliver the necessary shortfall of 2800 dwellings which may elevate current house prices, fail to deliver affordable housing at the required rate, encourage out migration from the Borough and open the Local Planning Authority up to challenges from sporadic and poorly planned new development.

In this respect, we support the Council's approach to address housing need

## **21/5 Mr A Steele, Ms J Steele and Mr T Steele**

### Issue 1: Deliverability

#### Question 1 & 2

As stated in the consultation document, the Council cannot identify sufficient 'deliverable' development sites in the Core Area. This is particularly due to reduction in public investment required for the delivery of such sites. We agree with this assertion.

If development within the Core Area is ultimately undeliverable, the Council are required to allocate different sites for residential development in accordance with Planning Policy Statement 3 (PPS3). "The supply of land should be managed in a way that ensures that a continuous five year supply of deliverable sites is maintained".

For the Core Strategy to remain sound, it is important that the Council build flexibility in to the development plan document, in particular the phasing of new and realistically deliverable housing sites.



## **21/6 Mr A Steele, Ms J Steele and Mr T Steele**

### Issue 2: Strategy

The Core Strategy has suggested a new approach; to concentrate on a single, large site with capacity for a level of new homes substantial enough to close the gap in the future supply of new homes. We welcome this approach. In particular, we support the future allocation and development of an urban extension on the land off Harrowgate Lane, West Stockton. The site is understood to be able to accommodate approximately 2470 dwellings (based on a density of 30 dwellings per hectare).

With this 'single site' approach, it would mean that the traffic impact of development would be relatively concentrated and any mitigation measures easily managed and contained (as stated in the Council's documents).

The development of the site would provide an area for comprehensive, sensitive new development, well related to existing homes, shops and community facilities of the existing settlement. In addition, the consultation document states (at paragraph 3.31) that the site is one of the most sustainable locations for development within the issues and option report.

We particularly support the development of the site identified on the attached location plan.

### Question 3

We therefore support the concentration of new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently. We specifically support the future allocation and the development of the site at Harrowgate Lane, West Stockton. Further justification for supporting the future development of this site is set out further below.

## **21/7 Mr A Steele, Ms J Steele and Mr T Steele**

### Issue 3: Urban Extensions

As stated in the publication 'Best Practice in Urban Extensions and New Settlements' (CLG 2007), "urban extensions provide opportunities for concentrated rather than sprawling development. By virtue of their scale, and if carefully designed and developed to produce integrated, 'holistic' settlements, they can encourage and accommodate highly sustainable patterns of living".

Although the adopted Core Strategy does not currently allow for urban extensions (due to its focus within the Core Area), the acute shortfall of housing sites and the current difficulties in securing funding for the regeneration of the Core Area has led to this Review and a much needed change in strategy to accommodate the housing need of the Borough. It is unlikely that the Council will achieve the housing demand if an urban extension is not allocated for future development.

It is therefore considered that the development of an urban extension on the site off Harrowgate Lane, West Stockton is a suitable option for housing development, concentrated around a wide range of existing local services and facilities. In accordance with the 2010 SHLAA, the site is available, achievable and suitable for future residential development.

We consider that the land at Harrowgate Lane, West Stockton is wholly suitable for a sustainable urban extension and should be identified as such within the Core Strategy for a number of reasons, as defined below.

## **21/8 Mr A Steele, Ms J Steele and Mr T Steele**

Harrowgate Lane, West Stockton

The delivery of the Borough's shortfall of housing (circa 2800 dwellings) could be accommodated by the development of a single site, identified as one of the most sustainable locations for growth. We support the future development of the site 'off Harrowgate Lane, west of Stockton'.

The site is located west of the built up area of Stockton and is immediately adjacent and well related to existing residential development. As noted in the 2010 SHLAA update, the site is within 2 km of the Principal town centre of Stockton with its wide range of local services and facilities including shops, secondary schools (the site surrounds Bishopsgarth Secondary School) and the North Tees Hospital, by sustainable means of transport. In addition, the site is located on a Core Bus Route. The proximity to the existing residential area and to the Principal Town of Stockton suggests that the site can be considered to be a sustainable site for future development.

Our clients own part of the site to the south (please see the attached location plan for reference). Although our clients are happy to pursue development on their land individually, they are willing to work in partnership with the adjacent landowners to create and deliver a carefully planned comprehensive urban extension to the west of Stockton. We would be happy to meet with the relevant planning officers to discuss this in further detail.

Although the land is currently in open countryside (as it currently lies outside of the development limits of Stockton) it is not specifically designated as a site of significant importance. High quality, well thought out development in this location will serve to enhance the west of Stockton, round off the settlement and provide a greater level of housing choice with a limited impact on the environment.

The 2010 SHLAA report states the site is considered to "pass the test of being available for development and of being achievable". As a result of the accessibility of local services and facilities from the site, it has been identified in the consultation document that there are no conflicts and a number of significantly positive relationships between the site and the Sustainability Objectives. The wider development site will serve to secure an additional level of infrastructure contributions and ensure the viability of any highways mitigation scheme.

As stated in the consultation document, the site has a 'low landscape capacity'. This can, however, be addressed as it is considered that there is potential for future development to be designed so as to avoid significant impacts upon the surrounding landscape.

As set out in the accompanying Sustainability Appraisal, the land off Harrowgate Lane is the most sustainable development site to accommodate the level of housing necessary to address the current shortfall. In comparison with the other sites which have been assessed as part of this review, we consider that Harrowgate Lane is the most suitable site to achieve the objectives set out in the Core Strategy Review i.e. addressing housing need and demand in a suitable and sustainable location.

We particularly support the development of the site identified on the attached location plan.

## **21/9 Mr A Steele, Ms J Steele and Mr T Steele**

Issue 4: The Conurbation

It is considered that the Council should focus on the allocation and future development of an urban extension rather than conurbation sites

## **21/10 Mr A Steele, Ms J Steele and Mr T Steele**

### Conclusion

As we outline above, we welcome the Council's review of the Core Strategy. In particular, we support the suggestion of an urban extension off Harrowgate Lane, West Stockton, is the most appropriate development site to achieve the shortfall in housing development. This site is the most sustainable parcel of land when compared against the sites identified at Wynyard and the other sites identified to the west of Stockton (please refer to appendix 4 of the Core Strategy Review Sustainability Appraisal for further details).

The site is suitable, achievable and available for future development and provides a sustainable development opportunity which would have a minimal impact on the open countryside and surrounding area.

We strongly favour the "single site" solution and fully support the development of the land off Harrowgate Lane in that context. Should, however, the revised Strategy prefer a different solution to a "single site", our clients would still wish their land on the attached plan to be considered for development, and we would be happy to discuss this further with the relevant planning officers in due course.

## 22/1 Commercial Farmers within your District

1. We respond to your consultation on behalf of commercial farmers in your District whose experiences at the hands of Development Control policies, as interpreted in the District to date, have been far from happy. The Authority does not seem to be acting in line with the Strategy it sets out, so it seems evident that policies need re-writing. We make a suggestion at the end which you might care to adopt. Firstly, please could you confirm that this Practice is on your list to be consulted about all elements of the Stockton LDF and confirm what address you have for us. I picked up this consultation document when in the Planning Department, although I had written and asked formally to be put on the list to be consulted. I have no record that such a consultation took place. This causes me extreme concern.
2. In the consultation background document you say the Authority's policies are focussed on regeneration. In the summary of objectives at the back you have, inter alia, economic regeneration policies 2 and 3. We act for serious commercial farmers in your area whose activities generate spin-offs for the economy, who buy in from local suppliers, who output to local markets and make multi-million pound contributions to economic turnover. Yet it appears your Authority has interpreted its policies to stand in their way and seek to frustrate their progress over a number of years. It seems clear, therefore, your policies, or your interpretations, are at odds with your declared Strategy. Your policy must therefore, by definition, be unsound. You must therefore, by definition, put it right.
3. You refer in paragraph 2.4 to a deficit of affordable houses. There is also a deficit in parallel of appropriate, cost-effective, well located dwellings for agricultural workers. There should be a specific reference, please, to the need for employers at times to provide accommodation for their workers as one part of the solution to affordability. You also say, however, that you need a good housing offer in order to enhance the economic competitiveness of the Tees Valley. As your Authority has interpreted its policies recently to frustrate, oppose, question, obstruct and add cost to businesses wishing to improve their competitiveness in Tees Valley, again your policies must be unsound. Both the businesses I have in mind are seeking to become yet more sustainable and produce higher economic output in the area by producing beef herds on what had been predominantly cereal farms. Thus, the number of heavy vehicle journeys required is reduced by a factor of some 8 or 10 (the amount of corn fed through a beast in order to produce the same amount of live weight gain). That corn does not then need to be moved around the area. Higher value added is produced in the area, utterly sustainably, the grain is produced on the farm and fed through the beasts. This cannot be done without workers' accommodation on site and yet your Authority has held up the development of businesses over years.
4. In paragraph 2.13 you refer to the need for specialist housing. You should include in there the need for agricultural workers' accommodation. This need can only be increased by policies which refuse to allow any expansion of villages. However, when you refer to the section on villages you point out that some of them are more sustainable than others. Some have a range of facilities. You consider housing in a hierarchical way. When Development Control Officers look at an application for an agricultural dwelling however they appear to immediately judge it as unsustainable. This is done without thought as to how many journeys might need to be made to the farm or back again if the dwelling were not on site. To be soundly based and evidence-based your policy needs to acknowledge that you do have a rural area; and policies which are wholly driven by a focus on Stockton Town Centre are not appropriate to it. Sustainability is not solely defined by whether the housing is on a public transport route. Saving the carrying of food for thousands of miles ranks a good deal higher.

I therefore respectfully suggest that you include in your Core Strategy a section somewhat as follows.

Rural Workers' Housing : Stockton is a largely urban area and Authority. It has a range of urban fringe difficulties around the area. However, it does have some areas of true rural farming and it wishes to encourage them. It recognises the considerable long term contribution they make in keeping the countryside open and attractive but, most vitally at this time, to economic prosperity. It is recognised that farmers, farm families and farm workers need to be accommodated on holdings. No policy or wording elsewhere in this Core Strategy should be taken to imply that rural workers' dwellings are discouraged. They are recognised as one specific form of housing which cannot be accommodated within the urban area or necessarily within villages. Rural workers have a right to decent housing, quality housing, warm housing and housing of a decent size and type just as much as anyone in the urban area. There will be no discrimination in terms of type, size or quality of housing between those who are urban based and those who live and work in rural areas; although the general need for larger houses for rural workers is recognised ( to dry clothes, store produce, keep working dogs etc).

Where it is shown to be reasonably necessary to the proper functioning of an enterprise that a farm family or farm worker (and family) need to be

accommodated on site, then that will be encouraged. In such assessments particular weight will be given to :

(i) Best practice in livestock production (or other production systems). In particular it will not be suggested that simply because the minimum standards for the welfare of livestock do not require on-farm housing by name, that is sufficient. The aim would be to encourage best practice not minimum practice. The sustainability of local food production will also be given great weight.

(ii) The regeneration of Stockton is better driven by well run, properly managed, farms than more land broken up into small parcels and there are a myriad calls on the time of such commercial farmers and farm families. Such businesses can only function efficiently if run from an efficient farm centre with at least one dwelling.

(iii) If the dwelling proposed is located in a place where only a farmer would want to live, and is not readily severable from the business, then the presumption will be that it is truly needed by the business. If a farmer is willing to invest such money, and the property be subject to an agricultural occupancy condition, the presumption will be that it is needed.

It is recognised there will be cases where a worker, particularly a second or third worker - or a member of the farm family setting up their own home - might not need to be on-farm full-time solely for the efficient running of the business, but it is recognised that provision of workers' accommodation or family accommodation on-farm is a sustainable, socially inclusive, norm and will also be encouraged.

These policies will not apply to small scale or non commercial units.

Please let me know how you will take this issue forward from here as it is desperately urgent and your council's behaviour out of line with approaches everywhere else in the country we know of.

### **23/0 The Garden Centre Group**

### **23/1 The Garden Centre Group**

Stockton Planning for Housing Core Strategy Review Consultation

We write on behalf of our client, The Garden Centre Group, to submit comments in response to Stockton Borough Council's Planning for Housing Core Strategy Review Issues and Options (herein referred to as "Issues and Options document").

Our client owns the freehold for the Garden Centre at Yarm Road, Stockton on Tees, TS18 3SQ. It is a large site located at the western side of the Preston Farm Industrial Estate, which is located immediately to the south of Stockton Core Area. A Site Location Plan is enclosed with this letter.

We focus the comments of this representation on the proposed housing sites immediately surrounding the Yarm Road Garden Centre site. It goes on to comment on the implications of the Government's Draft National Planning Policy Framework (NPPF).

### **23/2 The Garden Centre Group**

#### Question 1

Our client supports the need to reconsider land for additional housing within Stockton. The Council can no longer rely on sites in the Stockton Core Area for new housing between 2013-2028 and it is necessary for other brownfield sites in sustainable locations to be considered for development even where these sites fall outside the Core Area.

Our client agrees with the Council's suggested approach not to rely exclusively on sites within the Core Area for new housing development between 2013 and 2028. Given uncertainty regarding the deliverability of potential housing sites in the Core Area, and issues surrounding the required public investment, additional sites should be identified outside the Core Area to ensure adequate housing land is identified to provide the sufficient supply of new housing development between 2013 and 2028.

### **23/3 The Garden Centre Group**

Response to Q2: do you agree with the approach outlined in section 3.14?

Our client supports the approach outlined within section 3.14 of the Issues and Options document and acknowledges that housing projections can not be expected to be perfect. With concerns surrounding delivery of sites within the Core Area identified earlier in the document, it is important to build flexibility in to planning the phasing of new housing sites.

Our client supports the proposal that if regeneration sites do come forward unexpectedly during the Core Strategy period to 2028 then their delivery should still be supported. This flexibility should apply to all suitable housing sites that may come forward within close proximity to the Core Area as there may be additional sites that are appropriate for development which have not currently been identified. Priority should be afforded to the delivery of brownfield sites in accordance with sustainability objectives. The inclusion of unexpected sites that are suitable should not affect the planned delivery of new housing sites that have been allocated.

## 23/4 The Garden Centre Group

Response to Q3: which of the following options for the distribution of new housing sites do you agree with?

In relation to Issue 2: Strategy, our client agrees with option b) that land should be allocated on a combination of sites because one single site is not considered adequate to provide the amount of additional land that is required for housing during the plan period. Sustainability should be the key test in assessing the suitability of sites and appropriateness for housing development. The Garden Centre Group supports the Council's position, as stated in section 3.8 of the Issues and Options document that: 'for developments to be sustainable they should be located on sites that are well served by public transport links and that allow residents easy access to local facilities and services, to reduce the number of trips made by private motor vehicles'.

Figure 8 of the Core Strategy Review Issues and Options outlines 16 potential sites for housing. The Sustainability Appraisal identifies that Land South of Preston Farm Industrial Estate could provide a potential yield of up to 1140 homes and The Garden Centre Group considers that the potential suitability of the Land South of Preston Farm Industrial Estate for development is worthy of further investigation.

The 51 hectare site has potential to support a housing development of strategic importance that could benefit the Borough's economy. There is potential compatibility with sustainability objectives, including good public transport links in close proximity to a Core Bus route and Preston Park provides good recreation opportunities.

It is noteworthy that the site is over a kilometre away from the nearest designated retail centre at Station Road, Eaglescliffe. Other services, including health facilities are further away. This demonstrates the need for adequate provision to be made for support services and complementary uses alongside the additional housing land allocations.

In addition to the 16 sites identified within the Issues and Options document, my client considers that the Garden Centre at Yarm Road, Stockton on Tees, TS18 3SQ should be considered for alternative uses to support the additional housing sites proposed. As previously development land, with good transport links and close proximity to Stockton ensure that its development would accord with the Council's sustainability objectives. The site could assist in addressing the need for additional housing within the Borough directly, or by providing complementary uses, such as retail, that would support new housing development within the surrounding area.

## 23/5 The Garden Centre Group

The draft National Planning Policy Framework (NPPF)

It is relevant that, since the Core Strategy was adopted in March 2010, the draft National Planning Policy Framework (NPPF) has been published for consultation. This Framework will replace the existing national planning guidance. In particular, the following areas within the draft NPPF should be considered by the Council as part of the Stockton Planning for Housing Core Strategy Review:

Presumption in favour of sustainable development

A key principle of the NPPF is planning to pro-actively drive and support development: 'Decision-takers at every level should assume that the default answer to development proposals is 'yes', except where this would compromise the key sustainable development principles set out in this Framework'. (Paragraph 19)

Paragraph 24 goes on to state that: 'Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework'.

The Development Management chapter states in paragraph 53 that 'the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development.' Paragraph 54 adds to this stating that to actively promote sustainable development local authorities need to:

approach development management decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so;

attach significant weight to the benefits of economic and housing growth;

influence development proposals to achieve quality outcomes; and

enable the delivery of sustainable development proposals.

The draft NPPF seeks to significantly increase the delivery of new housing, paragraph 107 states that this means:

Increasing the supply of housing;

Delivering a wide choice of high quality homes that people want and need;

Widening opportunities for home ownership; and

Creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.

To boost the supply of housing, paragraph 109 sets out, local planning authorities should:

identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. This should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land;

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible 11-15;

The Stockton Council's Planning for Housing Core Strategy Review needs to fully reflect these requirements. To accord with the Government's policy objectives set out within the draft NPPF, the Core Strategy Review should support a proactive and flexible stance in assessing development proposals that encourage economic growth. It should ensure the default answer to development is yes unless proposals would compromise the key sustainable development principles set out within the Framework and Development Plan. As a consequence my client considers that the Core Strategy Review should place greater emphasis on the opportunities presented by previously developed sites in assisting the delivery of sustainable development.

Furthermore, in accordance with Draft NPPF Paragraph 39, Stockton Council's Planning for Housing Core Strategy Review needs to ensure development is not threatened by viability:

„To enable a plan to be deliverable, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, local standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and on-site mitigation, provide acceptable returns to a willing land owner and willing developer to enable the development to be deliverable.“



## **23/6 The Garden Centre Group**

### Conclusions

In summary, our client The Garden Centre Group supports the need to reconsider land for additional housing within Stockton. It is agreed that the Council can no longer rely on sites in the Stockton Core Area for new housing between 2013-2028.

In addition to the 16 sites identified within the Issues and Options document, it is necessary for other brownfield sites in sustainable locations to be considered for development even where these sites fall outside the Core Area. As part of the Borough's review of sites for new housing development during the plan period, the Garden Centre at Yarm Road, Stockton on Tees, TS18 3SQ site should be considered for alternative uses, such as housing or retail.

To accord with the Government's policy objectives set out within the draft NPPF, Stockton Council's Planning for Housing Core Strategy Review should support a proactive and flexible stance in assessing development proposals that encourage economic growth.

## **24/1 Tees Archaeology**

I have considered all of the sites put forward and provided a summary of the archaeological potential in the following table (See Hard Copy)

## **24/2 Tees Archaeology**

In the majority of cases the sites are large Greenfield areas which have not had any previous archaeological work. Of the four sites which have had previous archaeological work, three produced significant archaeological remains. Two of these had previously had no recorded archaeological remains (South-east of Yarm – produced Roman Settlement and burials; Land at Ingleby Barwick – produced Bronze Age settlement and cremations). The Land to the South of Preston Farm Industrial Estate was previously known to include the remains of the medieval settlement of Preston-on-Tees. Archaeological work here in 1999 included geomagnetic survey and field walking. This produced evidence of a multi-period settlement from the Prehistoric, Roman and Medieval periods. The site at Wynyard Park has already been the subject of archaeological work with all remains present being preserved by record with no further archaeological requirements.

## **24/3 Tees Archaeology**

The penultimate column indicates where further archaeological assessment would be recommended under PPS5 in support of a planning application (usually taking the form of a field evaluation). The final column attempts to predict whether the results of such an assessment would have an impact on the housing yield as a result of nationally significant remains being present which would require exclusion from development.

## **25/1 Individual**

Having viewed the above, would you please log the following objections. Loss of further open green space when so much has been lost in the past decade to the detriment of the borough. Brownfield sites have not, as yet, been exhausted.

These potential developments are sited within the boundaries of the Tees Heritage Park, a designated open space, against the expressed policy of SBC. Though potential development, once these sites have been 'coloured in' it is the green light to developers to press for planning permission, to the detriment of the Tees Heritage Park.

## 26/1 Darlington Borough Council

Thank you for consulting Darlington Borough Council on Stockton's Core Strategy Review. The comments of Darlington Officers are as follows.

Officers note that Stockton's revised housing trajectory identifies that from 2021 there are insufficient sites that are both deliverable and compliant with the Core Strategy to meet the housing target. The result is a predicted shortfall of approximately 2,800 dwellings. The principal reasons are:

the funding sources that were previously available to support the delivery of infrastructure such as improvements to the strategic highways network and providing flood defences have now been significantly reduced;

plans under Stockton's Building Schools for the Future (BSF) programme to release some school land for housing has now been cancelled and,

the Government withdrew funding for a new hospital at Wynyard and decided not to make Private Finance Initiative credits available for the proposed Billingham Integrated Healthcare Centre, resulting in uncertainty as to the future availability of the University of North Tees Hospital site for residential development.

Officers note that in rolling forward the end date of the Core Strategy to 2028, Stockton is basing the additional housing requirement on the annual average housing requirement from the Regional Spatial Strategy i.e. 555pa. Rolling forward the end date of the plan seven years would suggest an additional housing requirement of 7 x 555 dwellings i.e. 3,885 dwellings. However, all of the justification in the document for allocating new housing sites is based on the uncertainty of delivering residential development on sites within the Core Area, on redundant school sites and on North Tees Hospital site by 2028. Are you assuming that housing will be delivered on these sites but later than originally envisaged or, perhaps, the 2,800 figure is an underestimate? Also, the document refers to Policy CS7 which states that no housing sites will be allocated before 2016. Is this Policy to be amended via this Review? It is not clear in the document when the selected site(s) will be allocated or phased for development.

Notwithstanding the numbers of dwellings required, Darlington Officers agree with the option of allocating new housing on a combination of sites, rather than concentrating on a single large site. As Figure 2 shows the greatest shortfall occurs in the period 2023 - 2028, when 2,775 dwellings will be required but there is only sufficient land for 520 dwellings. If the Council only allocates one large site, you are likely to find that there is a limit on the number of dwellings which can be sold annually on a single site. Even assuming three housebuilders are on site at the same time, the maximum contribution from a single site is likely to be less than 150 dwellings per annum or 750 dwellings over the five year period. Therefore, there would still be a shortfall of 1,505 dwellings (2,775 - 520 - 750 = 1,505) and the Council would have to allocate more land to fill the gap.

In terms of site selection, Darlington Officers have no particular preference for any of the sites, but consider that the sustainability assessment of each site is an appropriate and useful tool to guide selection. However, Darlington Officers suggest that the sustainability assessment should also include a criterion on the propensity for new residents to live in Stockton but commute to adjacent authorities by car, which is less sustainable. On this basis and for the reasons set out above, Darlington Officers would object to large sites located on the west side of Stockton (Harrogate Lane and Yarm Back Lane) sites close to the A66 road (West Preston and Durham Lane Ind Est) or sites adjacent to the A67 road (Urley Nook).

Darlington Officers have no comments on any of the other issues raised in the Review document.

## 26/2 Darlington Borough Council

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### **26/3 Darlington Borough Council**

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### **26/4 Darlington Borough Council**

Notwithstanding the numbers of dwellings required, Darlington Officers agree with the option of allocating new housing on a combination of sites, rather than concentrating on a single large site. As Figure 2 shows the greatest shortfall occurs in the period 2023 - 2028, when 2,775 dwellings will be required but there is only sufficient land for 520 dwellings. If the Council only allocates one large site, you are likely to find that there is a limit on the number of dwellings which can be sold annually on a single site. Even assuming three housebuilders are on site at the same time, the maximum contribution from a single site is likely to be less than 150 dwellings per annum or 750 dwellings over the five year period. Therefore, there would still be a shortfall of 1,505 dwellings (2,775 - 520 - 750 = 1,505) and the Council would have to allocate more land to fill the gap.

### **27/0 Kirklevington and Castle Leavington Parish Council**

#### **27/1 Kirklevington and Castle Leavington Parish Council**

Despite the timing constraints of, and the late delivering of relevant correspondence relating to this major issue, we have managed to inform all our residents and received feedback from a considerable number. The importance of this issue was clearly reflected in the take up of residents at the drop-in session organised by ourselves in Kirklevington. This drop in session was also attended by residents from neighbouring parishes.

Overwhelming objections to the proposed housing developments, that fall within our Parish, have been received from residents. The Parish Council at their September Parish Council meeting agreed to fully support these objections for the following reasons:

- Erosion of the existing strategic gap.
- Erosion of the wildlife corridor.
- Impact on highway – existing critical points.
- Increase in traffic at peak times.
- Existing queuing bottle neck at peak and popular times.
- Emergency route used when issues arise on A19 resulting in closure.
- Viability of adjoining farms.
- Relocation of playing field site.
- Leisure facilities, already at planning stage, would be lost.

#### **27/2 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South East Yarm as it will erode the wildlife corridor.

#### **27/3 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South East Yarm as it will erode the existing strategic gap.

**27/4 Kirklevington and Castle Leavington Parish Council**

Objects to the site at South East Yarm as development here will have an impact on the highway at existing critical points, increase traffic at peak times, impact on existing queuing bottle neck at peak and popular times, and impact on emergency routes when issues arise on A19 resulting in closure.

**27/5 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South East Yarm as it will affect the viability of adjoining farms.

**27/6 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South West Yarm as it will erode the wildlife corridor.

**27/7 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South East Yarm as it will lead to the loss of leisure facilities already at planning stage.

**27/8 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South West Yarm as it will erode the existing strategic gap.

**27/9 Kirklevington and Castle Leavington Parish Council**

Objects to the site at South West Yarm as development here will have an impact on the highway at existing critical points, increase traffic at peak times, impact on existing queuing bottle neck at peak and popular times, and impact on emergency routes when issues arise on A19 resulting in closure.

**27/10 Kirklevington and Castle Leavington Parish Council**

Objects to development on the site at South West Yarm as it will affect the viability of adjoining farms.

**27/11 Kirklevington and Castle Leavington Parish Council**

Objects to development on sites at South West Yarm as it would lead to the relocation of the [Yarm School] playing field site.

**28/1 Individual**

We live next to one of the fields that is potentially going to be changed to residential land. Talking to our neighbours, people aren't aware of the consultation that is going on. We don't believe you've done enough to let people know and voice their concerns.

**28/2 Individual**

That aside, we have some specific concerns that probably need looking at before a decision is made. The field is covered in ridge and furrow, are you aware of this? Is it protected? Should it be? It'd be a shame to lose it.

**28/3 Individual**

The area is an excellent habitat for a variety of wildlife. Foxes, owls and bats are regularly seen. Bats are protected. I don't know where they roost, but we see them every night. What effects would the building work have on their habitat? Is it something that needs to be considered? I guess the same question goes for the owls.

Has anyone thought about any of these things as part of the consultation?

**29/1 Billingham Town Council**

On behalf of Billingham Town Council Dianne would like to make the following comments on the document. Members do not have any comments to make on the potential housing sites identified for Billingham at North West Billingham and Billingham Bottoms. However concern has been expressed why Billingham Town Council was not consulted on potential sites prior to the release of the document and the Clarence's considered as a potential option.

**29/2 Billingham Town Council**

Following our email on 15th September 2011 regarding comments on the above review. Dianne would like to forward to you further comments received on the above consultation document. Members have raised concerns in respect of the potential housing sites at North West Billingham & Billingham Bottoms. In respect of North West Billingham a member has raised concern due to the potential increase of road traffic noise that would affect nearby residents more than it already does so and light on the A19 near this site. Also the site at Billingham Bottoms is subject to flooding.

### 30/0 Campaign to Protect Rural England

As enthusiastic supporters of the current housing strategy (concentration on the blue/green heart) we are bitterly disappointed at its possible abandonment, particularly since it is basic to the whole future of both Stockton on Tees and greater Teesside and was so recently adopted by the Council.

We understand the new financial constraints that the current economic crisis is imposing on Councils, but feel that it is important that very long term strategic ambitions should not be abandoned for short/medium term gain.

It is our contention that remediating despoiled land and providing necessary infrastructure, is crucial to the future of the Tees Valley and indeed the North East as a whole. It is one of the key factors holding up development in the area, heavily influencing its image. As construction/civil engineering is one of the few industries that is still fairly labour intensive, we consider it would be an appropriate area for government to direct the very limited funds it has at its disposal to try to alleviate the effects of the recession. If the North South divide is ever to be bridged it is essential that this problem is faced up to, and the image which has bedevilled the area for generations is dispelled once and for all.

We appreciate that this is not within your gift, but would like your assurance that it is still a key policy objective for Stockton in the foreseeable future, and that you will continue to press central government for its implementation.

We are unsure about the current situation with the Tees Marshalling Yard (fig 5). Are they no longer available for development? They were obviously critical to the whole concept of the Blue Green Heart. We would also surmise that because they have been used for this purpose for so long it is possible that this area is far less polluted than some of the other previously developed land at the Core, and therefore less expensive to remediate.

If we understand your statements correctly, you are trying to retain flexibility on your future policies. Can you confirm that if additional central government funds for remediation/infrastructure do become available, then the blue/green heart is still your preferred option? We would appreciate your confirmation on this point.

As you will be aware a key concern of CPRE has been to protect green belt, green wedge and avoid building on greenfield land wherever possible. I have personally participated at Examinations in Public where Stockton Council have stated, before an Inspector, that there was no requirement for a green belt in the area as, green wedge status conferred more than sufficient protection. It is therefore with astonishment that we see in the table on page 17 (fig 8) that Billingham Bottoms, Land at Ingleby Barwick and Land south of Preston Farm Industrial Estate (all green wedge) is under consideration for development. This is compounded by the fact that the Preston Farm land lies within the Tees Heritage Park whose protection is written into all Stockton Councils future plans. If the reason given for these sites inclusion is that you have no choice under central government regulations, then we would also like your assurance that you will be vigorously opposing any development there.

We are also extremely concerned over deteriorating housing stock within the current limits to development. We feel that far more emphasis should be given to redevelopment within existing older housing areas and bringing back into use abandoned properties. The absence of such a policy will only exacerbate the doughnut syndrome that is becoming more evident in many towns, and affecting Stockton in particular. We consider that sadly, the recession will mean that far more windfall sites will appear in the future, dramatically reducing the requirement for new build on green field sites. We question whether pursuing this option (concentrating within the town) is in fact more expensive, given the huge cost of providing additional infrastructure, schools etc on greenfield land. We recognise the power of the building lobby and the fact that they would always prefer to build on flat greenfield land rather than brownfield.

As regards schools (2.6), we would like to flag up our concerns were there any proposals to build on existing land either currently used (or planned in the future) as playing fields. Again we would appreciate clarification on this point.

If it proves to be the case that it is impossible to concentrate all development within the existing development limits, which as you will have noted we dispute, then one site to us stands head and shoulders above all the others detailed on fig 8, page 17:

Harrowgate Lane, West Stockton has the potential to take virtually all of the projected shortfall detailed in your forecasts. For all the reasons stated in Sustainability 3.30 and 3.31 we feel that this would be the least bad option. It is an urban extension and the nearest match to our preferred option of developing/redeveloping within the existing limits, utilising existing infrastructure. In our view, any development outside the limits should take place on this site. This will protect Stockton from piecemeal development in the future which could prove to be "the thin end of the wedge". As a result we decline to commit to any other site as, for the reasons stated above, we do not think the requirement will ever arise.

We would however particularly like to reject development at Wynyard which, with its mobile population having more interest in using Newcastle, York and Harrogate as its preferred shopping areas, and because of its distance from the heart of the town, we feel could only be economically detrimental to Stockton. In addition planning was only given there at the outset because of commitments over job creation that turned out to be totally false. If you wish to see the decline of the existing residential areas of Stockton, then the easiest way to do it is to develop at Wynyard!

We would also be very concerned, in the current economic climate, at any suggestion of developing land allocated for employment, for housing. Therefore Durham Lane and Urray Nook should be excluded. We look forward in turn to your responses to the various questions raised.

### **30/1 Campaign to Protect Rural England**

As enthusiastic supporters of the current housing strategy (concentration on the blue/green heart) we are bitterly disappointed at its possible abandonment, particularly since it is basic to the whole future of both Stockton on Tees and greater Teesside and was so recently adopted by the Council.

We understand the new financial constraints that the current economic crisis is imposing on Councils, but feel that it is important that very long term strategic ambitions should not be abandoned for short/medium term gain.

It is our contention that remediating despoiled land and providing necessary infrastructure, is crucial to the future of the Tees Valley and indeed the North East as a whole. It is one of the key factors holding up development in the area, heavily influencing its image. As construction/civil engineering is one of the few industries that is still fairly labour intensive, we consider it would be an appropriate area for government to direct the very limited funds it has at its disposal to try to alleviate the effects of the recession. If the North South divide is ever to be bridged it is essential that this problem is faced up to, and the image which has bedevilled the area for generations is dispelled once and for all.

Para 4: We appreciate that this is not within your gift, but would like your assurance that it is still a key policy objective for Stockton in the foreseeable future, and that you will continue to press central government for its implementation.

### **30/3 Campaign to Protect Rural England**

We are unsure about the current situation with the Tees Marshalling Yard (fig 5). Are they no longer available for development? They were obviously critical to the whole concept of the Blue Green Heart. We would also surmise that because they have been used for this purpose for so long it is possible that this area is far less polluted than some of the other previously developed land at the Core, and therefore less expensive to remediate.

If we understand your statements correctly, you are trying to retain flexibility on your future policies. Can you confirm that if additional central government funds for remediation/infrastructure do become available, then the blue/green heart is still your preferred option? We would appreciate your confirmation on this point.

### **30/4 Campaign to Protect Rural England**

As you will be aware a key concern of CPRE has been to protect green belt, green wedge and avoid building on greenfield land wherever possible. I have personally participated at Examinations in Public where Stockton Council have stated, before an Inspector, that there was no requirement for a green belt in the area as, green wedge status conferred more than sufficient protection. It is therefore with astonishment that we see in the table on page 17 (fig 8) that Billingham Bottoms, Land at Ingleby Barwick and Land south of Preston Farm Industrial Estate (all green wedge) is under consideration for development. This is compounded by the fact that the Preston Farm land lies within the Tees Heritage Park whose protection is written into all Stockton Councils future plans. If the reason given for these sites inclusion is that you have no choice under central government regulations, then we would also like your assurance that you will be vigorously opposing any development there.

### **30/5 Campaign to Protect Rural England**

We are also extremely concerned over deteriorating housing stock within the current limits to development. We feel that far more emphasis should be given to redevelopment within existing older housing areas and bringing back into use abandoned properties. The absence of such a policy will only exacerbate the doughnut syndrome that is becoming more evident in many towns, and affecting Stockton in particular.

### **30/6 Campaign to Protect Rural England**

We consider that sadly, the recession will mean that far more windfall sites will appear in the future, dramatically reducing the requirement for new build on green field sites. We question whether pursuing this option (concentrating within the town) is in fact more expensive, given the huge cost of providing additional infrastructure, schools etc on greenfield land. We recognise the power of the building lobby and the fact that they would always prefer to build on flat greenfield land rather than brownfield. As regards schools (2.6), we would like to flag up our concerns were there any proposals to build on existing land either currently used (or planned in the future) as playing fields. Again we would appreciate clarification on this point.

### **30/7 Campaign to Protect Rural England**

Para 9: As regards schools (2.6), we would like to flag up our concerns were there any proposals to build on existing land either currently used (or planned in the future) as playing fields. Again we would appreciate clarification on this point.

### **30/8 Campaign to Protect Rural England**

If it proves to be the case that it is impossible to concentrate all development within the existing development limits, which as you will have noted we dispute, then one site to us stands head and shoulders above all the others detailed on fig 8, page 17:

Harrowgate Lane, West Stockton has the potential to take virtually all of the projected shortfall detailed in your forecasts. For all the reasons stated in Sustainability 3.30 and 3.31 we feel that this would be the least bad option. It is an urban extension and the nearest match to our preferred option of developing/redeveloping within the existing limits, utilising existing infrastructure. In our view, any development outside the limits should take place on this site. This will protect Stockton from piecemeal development in the future which could prove to be "the thin end of the wedge". As a result we decline to commit to any other site as, for the reasons stated above, we do not think the requirement will ever arise.

### **30/9 Campaign to Protect Rural England**

We would however particularly like to reject development at Wynyard which, with its mobile population having more interest in using Newcastle, York and Harrogate as its preferred shopping areas, and because of its distance from the heart of the town, we feel could only be economically detrimental to Stockton. In addition planning was only given there at the outset because of commitments over job creation that turned out to be totally false. If you wish to see the decline of the existing residential areas of Stockton, then the easiest way to do it is to develop at Wynyard!

### **30/10 Campaign to Protect Rural England**

We would also be very concerned, in the current economic climate, at any suggestion of developing land allocated for employment, for housing. Therefore Durham Lane and Urray Nook should be excluded. We look forward in turn to your responses to the various questions raised.

### **31/1 The Theatres Trust**

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as the topic of this consultation is not directly relevant to the Trust's work, we have no comment to make but look forward to being consulted on further planning policy documents especially your town centre Area Action Plans and Cultural Quarter.



### 32/1 Individual

I have recently seen in the local press that there are preliminary plans for a large housing development in South-East Yarm along Green Lane. I have been to the Stockton-on-Tees Borough Council website and viewed the plans and have a number of comments to make in strong objection to these plans.

I have lived on Green Lane for 15 years and witnessed a steady increase in the volume of traffic. There are existing problems with school traffic each school day resulting in major delays all around Yarm. The large increase in the volume of traffic that will result from developments of this magnitude will have a hugely detrimental effect on the whole area.

The Bridge at the bottom of Leven Bank is already a major bottleneck and accident area therefore an increase in the volume of traffic along Green Lane and over the bridge will exponentially exacerbate this problem. The bridge itself has already collapsed once recently following floods and the cold weather so an increase in the volume of traffic will accelerate any weakening of the bridge and will lead to another potentially more serious collapse.

When the original planning application was submitted for the golf course in South East Yarm, the developers had to take into account major complaints and considerations for the potential increased volume of traffic on Green Lane and protection of the flora and fauna in the area. Now, when it appears to suit the council, it seems that all these crucially important considerations can be completely ignored and a far greater volume of traffic and the complete removal of the flora and fauna is acceptable because it fits with what the council wants.

It is a well-known and well-acknowledged fact that the volume of traffic around, and especially through, Yarm is already a huge problem. I understand that there has been substantial pressure on Stockton-on-Tees Borough Council to reduce the volume of traffic in, around and through Yarm yet these developments will only greatly increase the volume of traffic to the point where there will be complete gridlock at rush hour and high volumes of slow moving traffic at almost all other times. There is also a lack of available parking in the town centre and the various attempts to resolve this have already caused major disagreements. These facts alone mean that any further development around Yarm, which will greatly exacerbate these problems, is irresponsible.

We have a comparatively low crime area and a pleasant town so why should it be spoilt by increasing the population beyond the ability of the town and infrastructure to cope? There is not enough employment in and around Yarm and precious little in the area to provide the increased population with employment and income.

Whilst my comments in this letter are targeted at the area closest to me, i.e. South East Yarm, they apply to all development in and around Yarm and I have a number of questions that need to be answered:

Why does the borough need 2,800 additional homes? (Is it purely to provide additional income to the council?)

Who says these are necessary and what is the basis of their reasoning?

Our communities are fine, why do they need future development with all the problems this will introduce?

To develop Yarm in this way would be an unmitigated disaster on just about every possible level.

### **32/2 Individual**

I have lived on Green Lane for 15 years and witnessed a steady increase in the volume of traffic. There are existing problems with school traffic each school day resulting in major delays all around Yarm. The large increase in the volume of traffic that will result from developments of this magnitude will have a hugely detrimental effect on the whole area.

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### **32/4 Individual**

There is also a lack of available parking in the [Yarm] town centre and the various attempts to resolve this have already caused major disagreements. This means that any further development around Yarm will greatly exacerbate this problem, which is irresponsible.

### **32/5 Individual**

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### **32/6 Individual**

Questions why the Borough needs 2800 dwellings, and whether it is purely for additional income for the Council. Questions who says the new dwellings are necessary and the basis for their reasoning. States that communities are fine and why future development is needed with all the problems this will bring.

### **32/7 Individual**

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### **32/9 Individual**

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### **32/10 Individual**

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### **32/11 Individual**

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### **32/13 Individual**

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**32/14 Individual**

Questions why the Borough needs 2800 dwellings, and whether it is purely for additional income for the Council. Questions who says the new dwellings are necessary and the basis for their reasoning. States that communities are fine and asks why future development is needed with all the problems this will bring.

**32/15 Individual**

There is also a lack of available parking in the [Yarm] town centre and the various attempts to resolve this have already caused major disagreements. This means that any further development around Yarm, will greatly exacerbate this problem, which is irresponsible.

**32/16 Individual**

Questions why the Borough needs 2800 dwellings, and whether it is purely for additional income for the Council. Questions who says the new dwellings are necessary and the basis for their reasoning. States that communities are fine and asks why future development is needed with all the problems this will bring.

### 33/1 Wynyard Park Ltd

This response is submitted in response to the Core Strategy Review initiated by the Council on 16th June 2011. The response is submitted on behalf of Wynyard Park Ltd who own land to the north of the A689 historically identified as a Key Employment Site on the outgoing RSS.

Issue 6 of the Core Strategy review suggests that a comprehensive fresh look should be taken at the overall Wynyard area, with a particular focus on the those parts of the Wynyard site that are allocated for employment development. Sub issues 6a and 6b pose questions relating to Wynyard as an Employment Location and as a Housing location.

Wynyard Park fully endorses the Council's thinking in terms of the need for a review and wish to play a full and supportive role in any such undertaking.

It will be appreciated that the whole Wynyard Park site extends to around 700 acres of land and involves land covered by two different planning authorities. Given this contextual position, it is considered desirable that any review of Wynyard Park should involve a joint approach by both Hartlepool and Stockton Councils.

Since the site was originally carried forward in the RSS as a key employment site, a number of external events have occurred which have a bearing upon the future of the site.

#### 1. New Hospital

The Hospital Trust has purchased 60 acres of land at Wynyard Park and has obtained planning permission for a major new hospital. The necessary capital investment to build the hospital was approved in early 2010. Following a change in government in May 2010, the plans have been revised and the Trust is hoping to receive a new formal Treasury approval in October. If such approval is forthcoming, the Trust aims to commence construction works in the spring of 2013, with completion no later than spring 2016. As far as is reasonably foreseeable, the area is going to benefit from the delivery of a new hospital and it is going to be located in the heart of Wynyard Park.

The provision of a new hospital will undoubtedly have a significant impact upon the area both directly and indirectly. A number of business inquiries are already in hand for healthcare related developments with the potential to be located in and around the new hospital. Similarly the training requirements that go alongside the healthcare sector are significant and offer up significant potential, not only for purpose designed accommodation on site but through strong links with existing educational providers in the Tees Valley.

#### 2. National Planning Policy Framework

In July 2011, the government produced for consultation purposes a new National Planning Policy Framework (NPPF) which sets out a strategic vision for the role the government expect the planning system to play in helping to kick-start the economy and increase the supply of housing to meet identified national as well as local shortfalls. There are a number of significant aspects of the proposed guidance that bear on the future development and direction of Wynyard Park.

##### 2.1 Core Planning Principles<sup>1</sup>

a) Within the proposed core principles is a requirement to "identify and meet the housing, business and other developments needs of an area and respond positively to wider opportunities for growth".

b) Specific encouragement is given to the promotion of vibrant mixed use developments.

c) Manage patterns of growth to make the fullest use of public transport, walking and cycling and to focus development in locations which are or can be made sustainable.

##### 2.2 Significantly Increasing the Supply of Housing

The guidance takes as a fundamental starting point the need to significantly increase the supply of housing land and attaches significant weight to the benefits of economic and housing growth. As the guidance notes at paragraph 109 it is now intended that the supply of housing land "should include an additional allowance of at least 20% to ensure choice and competition in the market for land." This advice supersedes the Councils position and highlights that consideration needs to be given to allocating more land for housing than the Council had at first thought. It is also considered that the Council's Recorded position may represent an underestimate of the position we actually face on the ground over the next five years as a result of worsening trends on construction starts and finishes. It is likely that the developing position will actually be more severe and will certainly 'bite' at an earlier date than that initially envisaged by the Council.

### 2.3 Planning Strategically Across Local Boundaries<sup>2</sup>

The guidance makes it clear that the government expects LPA's to cooperate on planning issues that cross administrative boundaries, particularly where to do so would enable the delivery of sustainable economic growth in consultation with Local Economic Partnerships. Reference is made to the need to evidence cooperation at the time plans are examined. Evidence of cooperation is suggested as taking the form of plans or policies prepared by a joint committee, memorandum of understanding, or jointly prepared strategy.

### 3. Hartlepool Core Strategy

The recent Core Strategy report of Hartlepool Borough Council supported the delivery of up to 200 executive homes on land at the extreme western end of Wynyard 3. A planning application pursuant to this position currently lies before the Council. It is likely that this application will be determined within the next two months. As the proposal is in accordance with the emerging Core Strategy, there are not considered to be any fundamental policy objections to the application. In allocating the site for executive development, the Planning Authority paid particular regard to the ability of the site to deliver high quality residential development. Having regard to the challenging market conditions we currently face, the successful delivery of housing, particularly of an executive nature must be a significant driver to boost the economy of the Tees Valley.

### 33/2 Wynyard Park Ltd

It is considered that through a combination of all of the above factors, the time is now right to consider the future development of Wynyard Park. In relation to the specific issues posed in the Council's review document at Question 6:

Do you think that the future employment strategy for the Key Employment Location at Wynyard should:-

a) Continue to provide a significant amount of office development opportunities in line with current planning permissions?

Wynyard Park will continue to be a desirable and attractive location for office and related supporting developments. It will deliver a significant quantum of commercial floorspace to boost the Tees Valley economy, particularly in support of the new Hospital. There is already an outstanding proposal for a substantial regional training facility currently being considered for funding. Wynyard Park do, however take the widest possible view of economic development and look to any active building sector to create jobs and attract investment into the region as a key commercial consideration. It is noted that housing as a construction activity generates a significant number of jobs and benefits an extended supply chain, as well as offering up local rewards through the New Homes Bonus, the latter going directly to the local authority.

It will be appreciated that It will be appreciated that reserved matter approval has been granted for all parts of the Wynyard Park land holding, conferring the ability to build out the specified quantum of B1, B2 and B8 developments. No further consents are required to implement the permissions which remain extant. Unless revocation of the current consents is proposed, it is only through joint work with the site owners that alternative development scenarios for the site can be delivered.

b) Consider alternative employment uses that will reduce the impact of the development on the strategic road network. For example logistics and manufacturing? Logistics and manufacturing already feature at Wynyard Park as a component of existing permissions. A substantial amount of B8 floor space has already been delivered on the Park and its attractiveness to logistics service will no doubt continue. However it will be appreciated that the market for logistics operations is finite and not generally buoyant, as evinced by the vacancy rate at other logistics site such as Allens West. Furthermore the capacity to accommodate B2 development without impacting upon the landscape or giving rise to environmental nuisance to other occupants may be limited.

As noted in (a) above, the employment permitted on the site is fixed in the extant consents. It is always possible for a consent to be reviewed and Wynyard park are happy to look at possible future options, provided that any review takes on board the need to maintain or improve site values.

c) Allow a mixed-use development where employment development remains the dominant use but an element of housing could be provided?

The concept of a mixed use development is strongly supported by Wynyard Park. Through the submission of an application for executive residential development to Hartlepool Council, which Stockton Council did not object to, the current position is largely at (c) already.

d) Allow a mixed-use development where housing is a significant part of the development mix?

Wynyard Park believes that there is considerable merit in looking towards a more balanced mix of uses on the site. As the new NPPF recognises, mixed use developments are inherently more sustainable than 'mono' uses, offering the potential for live work and play scenarios, with a presumption in favour of sustainable development being at the very heart of the draft NPPF. Evidence from mixed use developments in other parts of the country shows that a significant number of people on mixed use schemes choose to walk and cycle to work. In the context of the acknowledged traffic problems around the area, this has particular significance.

It has already been acknowledged by the Highways Agency that increasing the proportion of housing at the expense of office development would, itself be of considerable benefit to the eventual traffic flows on the surrounding network. Clearly it would not be sensible to ignore this conclusion and should be considered in revised master planning. It is noted that at para 3.123 of the officer report, concern is raised over the accessibility of land at Wynyard Park to public transport, pointing out the absence of services. Whilst correct at this moment in time, the position will change significantly once the hospital commences operation with dedicated links to both Hartlepool and Stockton Core Centres. Furthermore, as both housing and commercial development achieve a greater critical mass, the ability to deliver and operate a range of supporting services becomes achievable. The NPPF recognises that in terms of sustainability, it is legitimate to consider the potential end point rather than just the starting point. Furthermore, it is also acknowledged that developments of the size and scale of Wynyard, if they contain an appropriate balance of commercial, residential and other sectors provide the opportunity to deliver combined heat



and power facilities which significantly contribute to low carbon lifestyles. With the construction of the hospital now on track, it is clear that there are likely to be significant opportunities for Wynyard Park to provide an exemplar low carbon development. Indeed it is probably the only site within the Tees Valley where this can be achieved.

### **33/3 Wynyard Park Ltd**

In response to Q7:

It would be inappropriate for Wynyard Park to comment upon land outside its control and ownership. However it is clear that development on Wynyard Park will offset potential commercial development, be integrally linked with the emerging hospital development and associated infrastructure and offer up credible opportunities for low carbon lifestyles. As such, Wynyard Park provides a most appropriate location for new housing.

### **33/4 Wynyard Park Ltd**

In response to Q8:

It is considered that the particular environmental qualities of Wynyard make it one of the few locations within which executive housing can be successfully delivered. However Wynyard believe that wherever possible consideration should be given to developments with a varied character and that it is possible to build to executive standards without necessarily being inefficient in the amount of land taken. It is considered that there are unmet needs for aspirational housing, that is, housing built on conventional footplates but to executive standards. It is considered that this site is capable of accommodating such needs and can help stem outward migration into rural North Yorkshire and Durham areas. There is no reason why Wynyard cannot also accommodate housing for the older generation. There is a body of increasing evidence that insufficient attention has been made to the changing volume and needs of our elderly and that 'retirement villages' offering a range and spectrum of care facilities offer a positive way forward, enabling a care continuum across the same stable environment. The proximity of a hospital with specialist emphasis upon community care can only help enhance the attractiveness of such a facility to potential residents.

### **33/5 Wynyard Park Ltd**

In response to Q9, Wynyard recognise the desire on the part of the Councils for linkage between sites north and south of the A689. Given the speed and volumes of traffic using the A689, such a linkage can only be safely delivered with a segregated bridge. This will require private sector land on both sides which lies outside the control of the Highway Authority. It will also require a substantial capital contribution if the burden of this connection is not to be met by the public purse. For its part, Wynyard Park is happy to make available the land required on the northern part of the A689 to facilitate this connection. In the event that additional housing is permitted on Wynyard Park's land, it is also prepared to make a financial contribution towards the delivery of such a crossing. The amount of contribution to be the subject of further discussions and appropriate viability assessments of any permitted housing.

### **34/1 Sport England**

I refer to the above and your e-mail dated 11th July 2011. Thanks for seeking our views on this matter.

We have examined the potential housing sites and note that the eastern part of the site entitled 'South West Yarm' contains playing field. While this is acknowledged in the site description, it is not further examined in the consideration of its sustainability.

It is Sport England's policy to object to development proposals which involve the loss of playing field unless the proposal can be shown to comply with our playing field policy (and the test at paragraph 15 of PPG17). Until such time as the playing field is proven to be surplus to Stockton Borough's current and future pitch requirements or the playing field is detailed as being reprovided to at least the same quantity / quality in advance of development, then it will be necessary for Sport England to object to this site as a potential allocation.

I would be happy to discuss this matter further with you should you require.

### **35/1 Friends of Tees Heritage Park**

Having considered the appropriate documents we would like to comment as follows

1) As a Community Group dedicated to preserving one of the remaining major open spaces within the Borough, we are in principle against any loss of open space for housing use. We would much prefer to adhere to the Council's current policy of building within the urban areas as part of a wider regeneration programme. We do appreciate the Council's predicament that current economic circumstances may inhibit the development of such lands in future, but believe that allocating additional sites at this stage could result in the current preferred sites becoming second choice to developers, because of the greater costs involved. The final result could be exactly what we are all trying to avoid, new housing around the periphery and continued stagnation in the core.

### **35/2 Friends of Tees Heritage Park**

2) With particular reference to the Tees Heritage Park, we note that "Land South of Preston Farm Industrial Estate ref 1140" is shown as a possible site. This land is within the boundary of the Heritage Park as currently defined and we are both surprised and dismayed to see that it has been included at all. The Core Strategy includes the Tees Heritage Park as one of the most important environmental amenities within the Borough and should be protected. We, and the communities who have supported the creation of the Park, believed that it added another layer of protection to the open space and would in effect make the Heritage Park sacrosanct. To even consider a significant part of it as a housing site is, to say the least, totally contradictory to the Council's expressed policies for the Park. We must therefore object most strenuously to any consideration for this land to be allocated for housing. If it is allocated, there seems little point in maintaining the Tees Heritage Park as an objective and policy in the Core Strategy.

Thank you for the opportunity to comment. We hope you find our comments constructive and helpful

### **36/1 Scot Bros Environmental Services Ltd**

#### Introduction

We act for Scott Bros Environmental Services Ltd, who own land at Billingham Bottoms/Norton Bottoms. The Companies land ownership at this location extends to some 200 acres (81 ha.) and is bounded by the A19/ Fleet Bridge Road to the west and north west, New Road to the north, Haverton Hill Road to the south east and Haverton Hill industrial area to the east.

The southern half of the site is largely derelict land with extensive areas covered with gypsum, although it is currently undergoing a programme of remediation; an area of land in the central area of the site, bordering the A19, is in agricultural use; land north of that in agricultural use is unused scrubland; and to the west of this latter area is land that forms part of the Billingham Beck Local Nature Reserve, which extends northwards beyond the A139 Billingham Road. There is an established residential area to the immediate north and north east of the site with the major industrial area of Haverton Hill further east.

These representations are made with specific reference to the area of unused scrubland referred to above, which includes the site 'Billingham Bottoms' identified as a potential housing site by the Core Strategy Review Issues and Options consultation paper.

### **36/2 Scot Bros Environmental Services Ltd**

#### Question 1

Most definitely, yes.

As the Council has acknowledged, the deliverability of potential housing sites in the Core Area, particularly the three sites highlighted (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North) is reliant upon public investment coming forward and this can no longer be relied upon, given the current economic climate and the austerity measures being imposed on public finances by the Government. There are some who are suggesting that the effects of the current economic recession may continue to be felt for 10 years or more. Regardless, it cannot be envisaged that public investment will return to the levels experienced in the early years of this millennium. In this regard, if sites within the Core Area and particularly the three highlighted sites were not developed during times when public and private finance was more forthcoming then the likelihood of them being developed in the foreseeable future must be highly questionable. Moreover, it is worth noting that the private sector house-builders are finding it highly challenging to sell homes in the current economic climate.

Consequently, we would say that the Council has concluded correctly that it should no longer rely on these sites providing the new housing required to allow Stockton-on-Tees to prosper and is right to look to identifying alternative sites that will be deliverable as well as being sustainable and available.

### **36/3 Scot Bros Environmental Services Ltd**

#### Question 2

We support the principle of flexibility that is being proposed. Indeed, we would say that the principle of introducing flexibility into the phasing of new housing sites should be extended to include other suitable, available and deliverable housing sites that may come forward during the plan period and beyond. The Council should seek to encourage the identification of new potential housing sites and not stifle them. We say this having noted the Government's proposal in the draft National Planning Policy Framework that LPAs should "identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements ... [plus] ... an additional allowance of at least 20 per cent to ensure choice and competition in the market for land". (Bullet point 2 of paragraph 109 of the draft NPPF refers.)

### **36/4 Scot Bros Environmental Services Ltd**

#### Question 3

Option b, allocating new housing on a combination of sites, is the only sensible option. It avoids the potential problem that could arise of allocating a single site only whereby if that site does not proceed there remains a massive shortfall in housing numbers. In this regard we fully endorse the Council's approach of considering potential housing sites on the periphery of the conurbation (urban extensions), within the conurbation and at Wynyard at this stage together with reviewing the stance as regards housing development within/on the edge of the villages within the Borough.

## 36/5 Scot Bros Environmental Services Ltd

### Issue 4: The Conurbation

We fully endorse the Council's assessment that sites within the conurbation should be expected to provide some of the most sustainable options for housing development. The following comments are made with specific reference to the site identified as "Billingham Bottoms" (Figure 18 and paragraphs 3.64-3.68 of the Issues and Options consultation paper refer).

#### Land at Billingham Bottoms

The site identified in the Issues and Options consultation paper extends to 12 hectares, which has been assessed could deliver up to 260 dwellings. Although it is unclear from Figure 18 how the site would be accessed, we can confirm that our client's land ownership extends northwards to New Road from which both vehicular and pedestrian access could be taken. Extending the site northwards would also allow for the delivery of a higher number of dwellings and/or the provision of enhanced screen planting along the New Road frontage of the site.

It is stated that the site is currently designated as Green Wedge. It is accepted that Core Strategy Policy CS10 identifies the Billingham Beck Valley as being a Green Wedge, although the Strategic Diagram would appear to show the Green Wedge to not include the site. Certainly, the site was designated as part of the Billingham Beck Valley Green Wedge in the Local Plan under Policy EN14 and the Proposals Map clearly showed the site to lie within the Green Wedge but that is not the case with the Core Strategy Strategic Diagram. In this regard, it is our opinion that the identified site could be developed for housing without adversely impacting on Billingham Beck Valley and the Green Wedge as designated in the Core Strategy.

Indeed, the site is presently an area of unused scrubland, having previously been tipped with gypsum and bitumen which would benefit from remediation. In the current period of austerity such remediation cannot be expected to be financed from the public purse but could be financed through the after-use of residential development. Furthermore, our client would be prepared to provide monies for enhancements to the Billingham Beck Nature Reserve and land in his ownership to the south (known as Norton Bottoms) to provide further environmental and ecological enhancement of the Green Wedge should the identified site be allocated for housing and residential development proceed.

The Council has accepted that the identified site is capable of delivering a strategic level housing development, with benefits for the local economy. The site lies to the immediate south and south east of an established residential area with the major industrial area of Haverton Hill lying further to the east. Moreover, the site is located in close proximity to a 'Core Bus Route' and within walking distance of existing local services and facilities. We would say that the site would provide the very form of sustainable residential development that the draft NPPF seeks to encourage LPAs to allow. Indeed, it is noted that the Council's own Sustainability Appraisal has identified that there are a number of significantly positive relationships between the site and the Sustainability Objectives.

We disagree with the assertion that "there is significant potential for the development of the site to be in conflict with the Sustainability Objective relating to safeguarding and enhancing the Borough's environmental infrastructure." As stated above, the site is contaminated and remediation of it could be financed through allocation of the site for housing development. Furthermore, subject to the site being allocated for housing and residential development of the site proceeding, our client would be willing to provide monies (through an appropriately worded S106 agreement) for further environmental and ecological enhancement of the Billingham Beck Valley. Both measures would represent an enhancement of the Borough's environmental infrastructure.

It is our opinion that the Billingham Bottoms site is suitable for housing development, the land is available (subject to remediation) and housing development is deliverable. Moreover, we would say that the site is in a highly sustainable location and that it meets the Government's objectives set out in the draft NPPF.

### **37/1 Roland Firby on behalf of Tithebarn Land**

The identification of additional land for new housing should not only be concerned with satisfying the need to make good the shortfall in housing numbers anticipated in the next 15 years or so. For many years, much of the housing for sale in Stockton-on-Tees Borough has been dominated by the single source of supply at Ingleby Barwick. There has, admittedly, been new housing built on redevelopment and market renewal sites, but in terms of adding to the overall housing stock, the main contribution has been from outside the town of Stockton.

This has not only allowed the concentration of available housing land into the hands of a very limited number of developers, who have been able to control the release of the land to the market, but has also distorted housing markets and inhibited choice due to the general non-availability of alternative locations elsewhere in the Borough, particularly within Stockton.

### **37/2 Roland Firby on behalf of Tithebarn Land**

A further down-side has been the limited positive impact of new housing on the economy of Stockton Town Centre. With the focus of provision mainly in the south-east of the Borough, there has been little incentive for new households to use Stockton High Street as their preferred shopping destination, the majority choosing to head towards Middlesbrough and Tees Valley Retail Park or outside Tees Valley to Darlington, Northallerton and Stokesley. The catchment of Stockton Town Centre has been poorly served by new development with the consequence that footfall along the High Street has fallen and the prosperity and viability of the Centre declined, to the point where over 27% of shops in the High Street are now vacant.

### **37/3 Roland Firby on behalf of Tithebarn Land**

This needs to be given serious consideration in any decision over the future location of new housing development. There should be a positive move to allocate sites from which households may be more disposed to spend in Stockton Town Centre as the most accessible retail centre.

This suggests that, perhaps with the exception of the very specific provision of executive housing at Wynyard, new housing should be favoured around and within Stockton itself so that the centre of gravity of housing provision moves more towards Stockton, and offers the prospect of increased spending in the High Street to the benefit of the Centre as a whole.

### **37/4 Roland Firby on behalf of Tithebarn Land**

Selective demolition of certain areas of older, small, unpopular terraced houses close to the Centre and their replacement with contemporary homes was intended both to address housing market failure in parts of central Stockton, and also to help towards remedying the commercial decline of the Town Centre.

This emphasis on the redevelopment of poor quality brownfield sites in unpopular locations has proved costly and, even where redevelopment has gone ahead, it has been at lower densities than the housing demolished, leading to a reduction in stock levels in the neighbourhoods involved. In addition, redevelopment schemes have generally not been populated by households with income levels sufficiently high to prompt improved retail performance in the High Street, even assuming a significant proportion of such households consider Stockton Town Centre to be their destination of choice for retail purchases. The need to give a vital stimulus to the Town Centre will not be achieved without attracting the spending power of higher income households, which are unlikely to be located on sites on the Town Centre fringe.

Recent regeneration initiatives have tended to stress the relationship between the economic prospects of a Region and the quality of available housing. One of the arguments for the poorer economic performance of Tees Valley is the dominance of extensive areas of unattractive, small terraced houses and large, monotonous estates of local authority housing which create a poor impression of the area. Although as indicated above, a number of initiatives have been promoted to try to remedy the impact of the worst of such housing on the image of the area, the fact remains that for the foreseeable future there will continue to be considerable concentrations of such housing, which will conceivably arrest potential economic growth.

To counter the effect that such housing has on the image of the area, the Council needs to allocate sites that have a genuine prospect of being developed for quality housing that will attract key players in developing industries to occupy homes in Stockton rather than commute in from more distant rural locations in North Yorkshire and South Durham.

### **37/5 Roland Firby on behalf of Tithebarn Land**

While the consultation report alludes to a shortage of housing in the later part of the Core Strategy period, more land should be brought forward for much earlier release so that its impact on the Town Centre economy and the delivery of houses will be more immediately felt. There is an urgency to the economic decline that suggests that more immediate action is needed than awaiting a future release of land

### **37/6 Roland Firby on behalf of Tithebarn Land**

It is evident that the current strategy for providing for housing in the future has stalled because many allocated sites involve costly regeneration which in the current economic climate is less likely to be achieved, with the prospect of substantial public subsidy proving increasingly remote.

In order to address the problem this poses for the housing supply pipeline, it is necessary to change policy to recognise that the deficiency in supply will only be made good if a more positive view is taken of the potential of greenfield sites to contribute not only to providing additional numbers of houses but also to creating stimulating housing environments in which vibrant mixed communities can evolve and thrive without undue detriment to the environment.

The Council should, therefore, concentrate on providing additional housing on a range of sites that collectively offer the opportunity to strengthen the catchment of Stockton Town Centre, enable innovation and variety in house type and design, and assimilate well with surrounding development and, where housing on the urban fringe is involved, merge sensitively with the countryside beyond.

Provision on a single large site should be avoided because this will limit choice, at the very least in relation to location. Although offering the potential for a range of varied housing solutions, a single large allocation would tend to skew the market, dominating supply and preventing locational choice and variety. It would be unlikely to serve all the needs of the various housing sub-markets in the Borough.

### **37/7 Roland Firby on behalf of Tithebarn Land**

Within the above context, land at Harrowgate Lane has much to commend it as a logical urban extension.

### **37/8 Roland Firby on behalf of Tithebarn Land**

In order to avoid an over-concentration of supply in a single location, however, the site should be limited to a core of land between the Mitre Public House and Letch Lane, this to be released in two phases, the first between the Mitre and Bishopsgarth School, and the second between Bishopsgarth School and Letch Lane

### **37/9 Roland Firby on behalf of Tithebarn Land**

In the near term, the western edge of development need not extend to the pylon line suggested on the plan associated with the consultation document, an existing hedge presenting a feasible western limit and offering a basis for peripheral planting to screen and integrate the site with surrounding countryside, creating an attractive urban edge. However, land up to the pylons is readily developable and deliverable after stage one is completed.

Within the limit suggested above, the land west of Harrowgate Lane is on a scale that will allow a mix of housing to be provided, to meet the demands of a range of potential households in contemporary, well-designed and environmentally-friendly homes

### **37/10 Roland Firby on behalf of Tithebarn Land**

When the prospects of new sites for housing are being considered, there is often concern that Greenfield locations will prove more attractive to investment and divert development energies and resources away from regeneration initiatives being promoted in less favoured parts of the urban area. The land at Harrowgate Lane should be seen as a complement to the work being undertaken in central Stockton, offering the prospect of housing that is unlikely to compete directly with that being provided in the regeneration areas. This will particularly be the case in relation to housing redevelopment progressing within the Hardwick housing estate to the north and east of the site, where former local authority-owned properties are being replaced with modern homes of a type and within a price range unlikely to be provided at Harrowgate Lane.

### **37/11 Roland Firby on behalf of Tithebarn Land**

Development west of Harrowgate Lane represents a highly sustainable option, readily accessible from a number of directions, on foot, by car and using public transport, being situated on a principal distributor road, close to the local (and national) footpath and cycleway network and served by regular and frequent bus services. Penetration throughout the urban area is easily achieved from this location.

Although the location is accessible by the range of transport modes, many shopping, educational and recreational needs can be met locally with the presence shops, schools, public houses and clubs in the vicinity, thus reducing the need for trips to more distant centres to meet daily requirements.

### **37/12 Roland Firby on behalf of Tithebarn Land**

Agricultural land at Harrowgate Lane is classified as Grade 3.3 and has been in continuous arable use. There will, therefore, be no loss of high-grade farmland or land of high environmental quality as a result of housing development

### **37/13 Roland Firby on behalf of Tithebarn Land**

This site should be allocated for immediate development in order that its potential contribution to additional housing numbers and to the economy of the failing Town Centre are maximised

### **37/14 Roland Firby on behalf of Tithebarn Land**

Billingham Bottoms- It is difficult to accept that this site is sustainably-located to nearby housing areas, being isolated by significant watercourses. In terms of urban structure and as an urban extension, the site has little to recommend it. Although the consultation report argues that there are services and facilities within walking distance, they are still at some distance from the site, which may be a disincentive to residents to use them in preference to more distant centres accessible by car.

### **37/15 Roland Firby on behalf of Tithebarn Land**

Land at Ingleby Barwick- While there may be factors in favour of developing this site, there should be concern over its inclusion because to do so will help perpetuate the imbalance in new housing provision between the south east of the Borough and particularly with the need for more housing in Stockton.

Although adjacent to existing Ingleby Barwick housing, direct access to services and facilities within the existing estate will not be easy to achieve, necessitating circuitous trips on principal highways in order to satisfy essential daily needs.

Development here will do little to aid High Street revitalisation.

### **37/16 Roland Firby on behalf of Tithebarn Land**

Land at Urray Nook 1/Land at Urray Nook 2- Both sites would be unsuitable urban extensions, in real terms being at some distance from the true urban area. There is limited access to public transport and most trips will be by car, even with a number of elements such as the schools and shops scoring well on the sustainability assessment.

It is inappropriate that this land should be suggested for early development when there are major perceived highway network implications that are unlikely to be resolved by planning network implications. The site is not large enough to generate capital to resolve the highways issues.

There is little prospect that households in these locations will choose Stockton Town Centre as their destination of choice for shopping.

The site would be better left for industrial purposes rather than as a more remote extension to the urban area

### **37/17 Roland Firby on behalf of Tithebarn Land**

Land at Durham Lane Industrial Estate.

Although it is within the limits to development, the site is sandwiched between two significant industrial areas, and is some way away from services. The site is not “sustainable” in that it would require the duplication of existing infrastructure or long journeys to the existing facilities. The site is isolated and could possibly suffer from a lack of community identity.

The site will be affected by capacity constraints at the Elton Interchange on the A66 which requires major improvement the costs of which are unlikely to be resolved by funding that could be generated by housing development through planning obligations.

### **37/18 Roland Firby on behalf of Tithebarn Land**

Wynyard Hall Estate/Land East of Wynyard Village.

In order to improve the sustainability of the settlement to the south of the A689, there is logic in permitting high quality additional housing development that will generate funding to allow the provision of a wider range of community facilities at Wynyard and thereby reduce the number of trips to and from the village

### **37/19 Roland Firby on behalf of Tithebarn Land**

Land South of Preston Farm Industrial Estate.

There must be concerns over the release of this green wedge for housing purposes unless there is potential for speciality housing that will benefit from the setting and the work that has already been carried out at Preston Farm itself.

A small number of high quality houses would add to choice in the Borough whilst preserving the identity of the separate communities.

### **37/20 Roland Firby on behalf of Tithebarn Land**

North West Billingham.

Proximity to the A19 must be a concern in relation to creating a positive housing experience for residents in which traffic noise and pollution did not dominate.

It also does not seem to relate particularly well to the structure of the wider Billingham town, being somewhat out on a limb and not readily accessible by public transport.

### **37/21 Roland Firby on behalf of Tithebarn Land**

West Yarm/South West Yarm/South East Yarm.

It is difficult to conceive of these sites being allocated for future housing development given the daily chaotic state of the north and south approaches to Yarm Town Centre. The current traffic congestion cannot be other than made worse by the additional traffic that would be occasioned by further housing development. Given the difficulty of getting through the town, households are likely to be put off from heading towards Stockton to shop, preferring to aim towards Middlesbrough as a more convenient alternative.

### **37/22 Roland Firby on behalf of Tithebarn Land**

West Preston.

Development in this location would be difficult without major improvements to the Elton Interchange.

The site is remote Eaglescliffe and Stockton and therefore from services and facilities, is not well-served by public transport, and would be an over-concentration of housing in one location. The function of this extensive stretch of countryside should remain as a strategic gap between the two settlements



### **37/23 Roland Firby on behalf of Tithebarn Land**

Wynyard Park.

The focus of housing development at Wynyard should in the main continue to be the area to the south of the A689. The area should remain available predominantly for quality business development.

### **37/24 Roland Firby on behalf of Tithebarn Land**

Yarm Back Lane

The land at Yarm Back Lane would be generally suitable for residential development, and part could contribute to the series of housing sites suggested above as the means to provide for a more balanced distribution of housing land. In the context of this distribution, however, and in a similar way to the sites at Harrowgate Lane, it would not be appropriate to allocate all the land indicated on the consultation document plan. To avoid the over-concentration of development on any one site, the western limit should be Yarm Back Lane itself.

Although suitable for development as a modest urban extension, the site is not as ideally situated as Harrowgate Lane Land.

Access to the site would inevitably be via Yarm Back Lane, which is used as something of a western 'ring road' to the Town and already experiences high volumes of traffic between the A66 Trunk Road and Darlington Back Lane. Both these junctions are subject to congestion and queuing vehicles, circumstances which are unlikely to be resolved without considerable investment in new highway infrastructure, the funding for which is unlikely to be generated from housing development.

Due to its role as a ring road, vehicle speeds tend to be high along Yarm Back Lane, despite its sinuous nature. Considerable works will be required to limit traffic speeds to a point at which they will be compatible with safe and easy access to and from a substantial residential development.

Whilst the site is contiguous with existing housing at the western edge of the Town, there is little opportunity to provide for inter-connectivity between the existing estates and the services and facilities they accommodate and new development on the Yarm Back Lane site. As a result, lengthy journeys would be necessary via Yarm Back Lane and Darlington Back Lane in the north and Darlington Road in the south in order for households to satisfy daily needs. Although there is a frequent bus route along Surbiton Road in the estate to the east of the site, it is difficult to gain access to this service without a significant detour.

### **38/0 Cameron Hall Developments**

Question 7 – If housing were to be permitted in the broad Wynyard area, where should it be located?

- a) Wynyard Hall Estate
- b) Wynyard Park
- c) Land east of Wynyard Village
- d) Other

Housing development at Wynyard Hall Estate and Land East of Wynyard Village should be preferred to sites north of the A689, whether in the administrative boundaries of either Stockton-on-Tees or Hartlepool Borough Councils, because there is more prospect of providing meaningful community services and facilities to benefit the wider population south of the A689.

### **38/1 Cameron Hall Developments**

Attached is a copy of the Wynyard Village Master Plan - (Comment 2)

This has been prepared partly in response to Stockton Council's 'Core Strategy Review Development Plan Document – Issues and Options, June 2011' and is intended to create the framework for future housing development at Wynyard south of the A689.

I would be grateful if the Master Plan could be taken into account when consideration is being given to the allocation of sites for future housing in the Borough as a whole, but should emphasise that the Plan is expected to be the reference point for future policy by both Stockton-on-Tees Borough Council and Hartlepool Borough Council.

The Plan should also be read along with comments made in the on-line questionnaire, in which we have summarised our views on what we consider should be the outcome of the review, insofar as it relates to housing at Wynyard.

In the Plan we suggest that Wynyard should be considered a special case within the overall provision of housing. Wynyard has a particular role to perform in attracting investment into Tees Valley, a function that is founded on the quality and status of the housing offer. Whilst the Master Plan provides for a range of housing reflecting the character of what has already been developed, the product is particular to the Wynyard locality. It would be unfortunate and, indeed, it is unnecessary, to aim for the provision of affordable housing or to view Wynyard as just another site that will contribute to overall housing numbers.

You will note from the Master Plan that we consider that Wynyard requires a considerable increase in the allocated number of houses to be constructed and that these should be provided predominantly on land to the south of the A689. The increase in numbers is necessary both to lever the funding required to provide such community facilities and services as will improve the sustainability of the settlement and to create the critical mass of population that will sustain facilities into the future.

It is our view that the majority of that part of Wynyard should continue to be the focus for business and commercial uses based on the progressive development of the Business Parks, rather than being given over to housing, which would tend to be somewhat isolated from the community infrastructure intended for the area south of the A689.

Map attached - see hard copy.

## 38/2 Cameron Hall Developments

### A SUSTAINABLE FUTURE FOR WYNYARD.

1. The preparation of this Master Plan has been prompted by a growing conviction that the future development of Wynyard as a whole, both north and south of the A689, requires a considered and coordinated approach, more closely reflecting the original vision for the area.

2. A framework for future development at Wynyard is required because;

- a number of recent development decisions will place increasing strains on the infrastructure, both internal and in the surrounding area, on which the efficient operation of Wynyard depends;
- piecemeal permissions for future business and housing will fragment and dilute the advantage that Wynyard possesses for attracting high quality investment in innovative industries;
- uncoordinated policy and investment decisions will lead to internal competition, counterproductive to Wynyard's ambitions.

3. This Master Plan, therefore, aims to achieve a number of objectives:

- to reinforce the role of Wynyard as a location for Growth and as a catalyst for investment in innovative industries, strengthening the revival of the local economy;
- to create the conditions for the evolution of a thriving, healthy and sustainable community;
- to maintain the status of Wynyard village as the housing destination of choice for mobile, affluent in-migrant entrepreneurs and inward investors;
- to secure the future use and fabric of Wynyard Hall and its historic setting alongside parkland; and
- to enhance and extend the impact of green infrastructure in natural and man-made landscapes, to the benefit of both residents and visitors.

### WYNYARD – A RETROSPECT

4. Wynyard has been successful in attracting investment in business development and especially in high-status housing. It could be argued, however, that in recent years the original concept of Wynyard as a key strategic location for growth in which business development was supported by high status housing in a quality landscape offering specific leisure and recreational opportunities has, in no small measure, been overlooked.

5. This can be explained by a number of circumstances.

a. Regional Spatial Strategy.

6. Although now of declining importance, the Regional Spatial Strategy for the North East seemed not to acknowledge fully the scale of potential business development and its importance to both the regional and local economy, nor to appreciate the role of high-status housing at Wynyard as a stimulus to attracting inward investment. The fact that there is planning permission for in the order of 162 hectares (400 acres) of business park development, coupled with approximately 900 houses (complete and in the pipeline) seems to have been only grudgingly seen as an aid in stemming economic decline.

7. The benefits to economic growth offered by Wynyard are seen in a negative light in the Strategy, because of what is argued to be Wynyard's unsustainable location, in which investment is seen as very much at odds with the aspiration of encouraging the compact urban growth of existing towns in the area, driven by inner-urban regeneration at the heart of the Tees Valley conurbation. Development at Wynyard has been seen to be in conflict with Regional and Local Regeneration Objectives and Initiatives.

8. New business development has tended to be encouraged elsewhere in the sub-region rather than at Wynyard. Because of their perceived greater sustainability, more urban locations have been favoured for promotion and subsidy.

9. This has been to under-sell both the original concept of Wynyard as a catalyst for economic growth and the value of the locality for a wide range of business and commercial uses. Rather than competing with urban locations and diverting investment from the conurbation, Wynyard has always offered the opportunity for attracting industries that would generate a beneficial spin-off for other parts of the local economy.

10. With the anticipated arrival of health and medical industries on the back of the proposed state-of-the-art hospital at Wynyard, the prospect of sustaining further investment in the Wynyard business parks must increase, not at the expense of other industrial and commercial areas, but offering opportunities for complementary entrepreneurial activity.

11. It is timely to re-visit the rationale of Wynyard and to reflect once more upon the high status and quality that it was always intended would underpin development there.

#### b. Administrative Boundaries

12. The area in which development has been permitted at Wynyard falls partly within the administrative area of Hartlepool Borough Council and partly within that of Stockton-on-Tees Borough Council. Whilst each Council has made an attempt to monitor proposals put forward within the neighbouring authority's boundaries and although there has been an attempt to maintain something of a common approach, it is probably true that Wynyard has not been handled as a single entity. Accepting that the normal requirements for inter-authority consultation have been generally complied with, applications for planning permission have been dealt with on a largely individual basis and not with reference to an over-arching forward plan setting the context against which future change and growth could be judged.

13. There are signs that there is an increasing awareness of the benefits of considering the future of Wynyard in a comprehensive and consistent way across the two authorities' areas both in the substance of the review of Stockton's Core Strategy and in particular in comments made by Stockton Council in response to consultation over the allocation by Hartlepool Council of a number of sites at Wynyard for housing development.

"However it is important that housing on the north side of the A689 is linked to the housing and facilities in the existing village and does not become a separate, unsustainable enclave of executive housing. The preferred way forward would be for an integrated master plan for Wynyard that both authorities could adopt so that development does not come forward in such a piecemeal fashion."

14. It is in just such a coordinated and comprehensive approach to future planning policy for Wynyard that a sustainable future for the village is to be found. There is added impetus to the adoption of a 'joined-up' plan in the Government's urging Councils to accept a duty to cooperate on planning issues that cross administrative boundaries.

15. It should be mentioned here, that it is not only the Councils that need to establish common purpose in their approach to Wynyard. The same should be said of the various landowners and other agencies which have an interest in the future of the area.

#### c. Wynyard and Sustainability

16. Wynyard is routinely viewed as an unsustainable location. Indeed, in its consultation response to the draft Hartlepool Core Strategy, the Highways Agency

comments:

“...in relation to the other housing development proposals, a number of these are in locations (Wynyard/south-western/western extensions) that could have a detrimental impact on the SRN [Strategic Road Network]. These are of particular concern to the Agency particularly given that they are not greatly sustainable locations and have the least opportunity to reduce the need to travel.”

17. The lack of the full range of community, retail, health and educational facilities and the absence of regular and frequent public transport within or to the current Wynyard complex has necessitated the majority of daily needs of residents to be satisfied by significant numbers of car journeys to locations outside the settlement. The absence of public transport to and from the developing business parks naturally results in employees resorting to the motor car for their journey to work.

18. Although not situated in an urban or urban fringe location, Wynyard is nonetheless in a highly accessible location, benefiting from its position close to the junction of the A689 with the A19. It, therefore, has the advantage of relatively easy access to the Trunk Road network, and although there are times when the junction suffers a degree of congestion, flows are generally unconstrained when compared to other key locations on the Strategic Road Network elsewhere in the country. The A689 and A19 facilitate access to a number of centres, Hartlepool, Billingham, Stockton and Middlesbrough being located at no great distance from Wynyard.

19. Arguments against the sustainability of Wynyard in terms of housing and the off-site traffic movements to which it gives rise should be seen against the context of Wynyard as a major strategic employment location. Given that planning permissions exist for the development of upwards of 162 hectares of land for the purposes of a wide range of industrial and commercial uses, it has been variously projected that this could give rise to around 15,000-20,000 jobs. Pending the introduction of public transport as an alternative, the majority of employees taking up these jobs will make their journeys to and from work mainly by car. This situation is already apparent from existing businesses located on the emerging business parks to the north of the A689.

20. The dynamics of the situation will be fundamentally affected by the location of a major and innovative hospital at Wynyard. The scale of activity that will be associated with such a facility will greatly alter the dynamics of interaction not only within the whole of the Wynyard area but between Wynyard and the wider area. Wynyard will become a hub for commuting workers and patients, drawn, in the main, from an extended catchment and not just local to Wynyard.

21. To stem an element of the daily leakage of commuters and to balance the number of incoming journeys to some degree, the situation would be improved by making more housing available at Wynyard, reducing the volume of external trips to the complex and internalising much of the current movement and activity, creating a dynamic and thriving community. More housing will build the critical mass of population required to fund and sustain the provision of services and facilities locally.

22. The Government's increasing emphasis on permitting sustainable development will be essential to assessing the potential of the Wynyard area as a whole to accommodate development outside the straight-jacket of earlier planning policy with its focus on reducing the reliance on the motor car as the mode of choice and concentrating development in what have been perceived to be those locations most-readily accessible to all by the widest means of transport available.

d. Dislocation by the A689

23. The presence of the A689 through the heart of Wynyard has tended to create a perception that Wynyard consists of two entirely distinct and unrelated entities, each of which has its own independent character and requirements that can be dealt with separately.

24. This is basically at odds with the original concept of Wynyard as a settlement in which employment and housing enjoy a more fully-integrated functional relationship, not necessarily brought about by ready physical interaction or movement between the housing and the employment areas, but more particularly in

the way in which quality housing in a quality setting would prove attractive to mobile investors and entrepreneurs who may be willing to exploit the business parks' offer.

25. Many of these issues are addressed in this Master Plan, reflecting as it does the emerging policy landscape now being introduced by the Government.

'Government expects the planning system to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs, while protecting and enhancing the natural and historic environment.'

#### THE FRAMEWORK FOR FUTURE INVESTMENT.

26. The Master Plan attempts to take account of what are understood to be current Government aspirations and priorities in respect of:

- encouraging economic growth;
- promoting sustainable development;
- increasing the number of houses constructed, ('such that supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land');
- ensuring the viability of residential development ('which should not be subject to such a scale of obligations and policy burdens that the ability to be developed viably is threatened');
- the recognition that intelligently managed change may be necessary if heritage assets are to be maintained for the long term;

- reducing energy consumption and the volume of greenhouse emissions.

27. In response to these concerns and in order to fulfil the objectives set out in 3 above, it is essential that Stockton-on-Tees and Hartlepool Borough Councils work together with major landowners to agree a common approach to providing for the needs of the Wynyard area as a whole but acknowledging the distinct contributions that will be made by the business parks to the north of the A689 as the driver to economic growth and innovation, and by the residential village to the south, building on its unique combination of an historic, attractive landscape setting and mix of high quality housing, recreation and leisure provision.

28. Although the business parks and the village will continue to evolve their own specific character and while physical inter-connectivity between the two areas will always be constrained by the A689, the conceptual link between the two areas should be given higher prominence in planning for the future of each area. The importance of the area to the south of the road as the focus for the housing and related needs of potential investors and stakeholders in industries and businesses to the north and elsewhere in the sub-region should be a prime consideration in determining how planning policy should be framed to secure the right stimulus for economic expansion and more sustainable living.

29. In this context, it is again important that Wynyard is viewed as a unique location with potential beyond the normal considerations of need (whether for industrial/commercial space or for particular types of housing to achieve notional targets for future housing delivery) and of site allocations to satisfy that need. Whatever it is agreed should be allowed by way of development at Wynyard, it must be on the basis not of how much of a certain type of development should be allocated in Council policy documents but rather what type of development should be allowed that will best enable Wynyard to reach its true potential to benefit the wider economy. Wynyard should be given unique status in policy terms, dealt with consistently as a single entity and subject to specific policy considerations, geared to promoting growth in both business and housing in order to generate internal income sufficient to provide local services and amenities required to improve the sustainability of the settlement.

30. This is the important principle that should underpin all future consideration of how Wynyard should move forward and it is on the basis of such a common understanding that this present framework is promoted.

31. It will be seen below that a substantial increase in the amount of housing is a fundamental element. The reason for this is straightforward. In order to provide the local services and amenities required to improve Wynyard's sustainability and to contribute additional necessary infrastructure and ensure the maintenance of heritage and landscape assets, there is a need to generate a considerable amount of finance for both capital projects and revenue purposes.

32. Such funding will not be forthcoming from the public sector.

33. The most appropriate alternative means of financing the range of facilities needed is to realise the potential value currently locked in land surrounding existing development.

34. While the Master Plan discusses below the specific locations for the various elements missing from the mix of uses and buildings that will add considerably to Wynyard's sustainability, the following are seen to be essential to the future of the Wynyard Village in particular:

- educational facilities, in the form of a primary school and by providing a site for the relocation of Red House School, currently occupying a severely-constrained site in Norton,;
- meeting facilities in the form of a community hall and/or a Church Hall, this latter to complement the thriving Chapel at Wynyard Hall, backed perhaps by a new cemetery. A Community Hall could house such amenities as a local library;
- doctor's surgery and complementary medical services;
- sports facilities, providing both changing facilities and flexible playing surfaces to allow the development of a range of different sports;

- cycle ways, footpaths and nature trails in and around existing and proposed housing areas to encourage active pursuits and healthier lifestyles;
- green infrastructure including tree planting, water features and open spaces to add to the overall amenity of the Village and assist in achieving a better carbon balance;
- public transport facilities to serve both the housing areas and the business parks, facilitating internal movement and providing an alternative mode of transport to the motor car to and from Wynyard;
- improved and discreet signage to and within the Wynyard area to better define the different functional zones and neighbourhoods;
- a wider (though still modest) range of retail facilities, including an estate agent to help improve the marketing of the area and individual opportunities within the estate;
- a management office from which to conduct the routine maintenance and up-keep of the open spaces, highways and public areas throughout the Village.

35. In terms of funding, the last element in the list above, i.e. the management office, is particularly important. The day-to-day maintenance and security involved in protecting the particular image and special character of the housing environment created at Wynyard carries with it a substantial operational cost. As the Village grows, these costs will increase as the maintenance workload expands.

36. At present Wynyard Estates Services undertakes the day-to-day maintenance of the area, and is the ideal vehicle to manage the extended role of maintaining a broader range of services. The company is funded by a service charge levied on households. This enables the employment of maintenance workers, security personnel and administrative staff, together with necessary equipment such as tractors, trailers and grass cutters. In order to service the wider range of amenities now sought for Wynyard, to maintain the standards already achieved, and to extend the role to include the management of proposed leisure and recreational facilities and the more widespread network of footpaths and cycle ways, the annual budget will increase significantly.

37. Revenue to cover the scale of activity required will need to be generated from new development within the wider Village area.

38. Although the Councils may benefit from income through the Government's New Homes Bonus initiative, it is anticipated that the majority of such funding will be used to the benefit of services away from Wynyard. By the same token, Councils are urged not to apply the Community Infrastructure Levy to Wynyard. The scale of investment required to enhance the sustainability of Wynyard Village suggests that all capital receipts generated from the sale of housing land will be needed to fund specific community facilities. An insistence on paying a Community Infrastructure Levy or funding other Planning Gain will compromise the viability of providing facilities within Wynyard and severely undermine the ability to make the Village more sustainable.

39. It is in the context of generating the capital and revenue funding to provide for and sustain the amenities outlined above that additional housing is especially important at Wynyard. More housing will raise capital that will be invested in the provision of facilities and services necessary to improve the sustainability of the area. In order to sustain and maintain such facilities, revenue funding by way of a service charge is essential to ensure their continued day-to-day operation and use.

40. Importantly, additional housing will generate the critical mass of population required to underpin the provision of services and facilities local to Wynyard, obviating the need to travel outside the area to satisfy many daily requirements, and thereby improving Wynyard's sustainability.

The Future – Wynyard Village.

41. The 'Wynyard Village', the whole of the housing area south of the A689, should continue to be the principal focus of future housing development. While there may be a benefit in providing a modest amount of housing north of the A689, the area allocated for Business Parks, and for which planning permission



already exists, should be primarily for commercial or significant employment-generating uses. As has been suggested in comments made by Stockton Council in relation to Hartlepool's Core Strategy consultation, housing to the north of the A689 would be isolated from the core housing provision to the south. Residents would be unlikely to be able to take full advantage of facilities that will develop in Wynyard Village, which may themselves be in jeopardy if the appropriate critical mass of local users fails to materialise because the population is too widely dispersed to the north of the A689.

42. Stockton Council has identified for discussion a number of sites with potential for housing development ranging from what is described as 'Wynyard Hall Estate' in the west, (straddling the administrative border between Hartlepool Borough and Stockton-on-Tees Borough and with a suggested yield of up to 300 houses) to 'Land East of Wynyard Village' (between the existing eastern limit of the Village and the A19 and with a possible yield of 280 houses).

43. Hartlepool Council has indicated that it would be prepared to agree to a modest amount of housing within the area intended for business park development. There are, quite rightly, concerns over such housing becoming an isolated outlier divorced from the main housing areas south of the A689 and remote from complementary facilities developing or proposed for the Village.

44. Although these sites are currently subject to consultation, this Master Plan goes beyond what is suggested by each Council because it considers the needs of the settlement in the round, not only as a source of future employment but also in the context of improving the sustainability of Wynyard as a whole.

45. The start point is an ambition to provide services and facilities that will meet more of the needs of residents without the inevitable extended journey outside the Village by car. Although more detail is provided below, elements missing from a sustainable mix of uses at Wynyard Village include educational, community, social, health and sports facilities and open space, together with local shopping and provision for policing and security.

46. As alluded to above, such facilities naturally come at a price. In the current economic climate there is neither the appetite nor the capacity by either Central or Local Government to make the necessary provision at the Village. An alternative means of financing desired elements must therefore be found.

47. The plan, therefore, is to expand the amount of housing at the Village, increasing overall provision from 900 dwellings to 1,800 dwellings in order not only to fund the required provision of facilities and services but also to achieve the necessary threshold of population needed to guarantee the viability of facilities and sustain their existence. Additional housing will not only generate the capital required to construct the buildings that will house facilities but also secure a stream of revenue funding through appropriate service charges to ensure the maintenance of provision into the future.

48. Additional housing on some scale, therefore, has, considerable benefits to bring to the Wynyard community, as well as mitigating some of the environmental concerns to which current activities give rise.

49. This presumes a level and type of housing provision beyond any identified by the two Councils, either independently or collectively, and lifts the matter outside the scope of merely satisfying housing targets. The housing proposed and the location of the various components of the housing mix have been determined with reference to the need to provide for a range of services and amenities across the estate but also with an element of maintaining the high quality of the housing offer as a whole to ensure its continued appeal to the targeted mobile investor and entrepreneur.

50. The physical infrastructure, in the form of sewerage and utilities, is already in place to accommodate the scale of housing increase proposed.

Housing proposals.

51. Wynyard has already been successful in creating housing environments of exceptional quality. Considerable care has been exercised over where additional housing to the south of the A689 might be provided in a way that enhances the existing structure and layout of the settlement, without harming the exceptional setting that is such a feature of Wynyard's attraction and success. The distribution of proposed sites is illustrated on the Master Plan Diagram. Six sites have been identified, each offering housing of a different character but which, when taken together with existing provision, will provide a complementary mix of quality housing that will help sustain the appeal of the Village to key investors, business owners and senior managers.

52. The component parts of the proposed housing include:

- S1 – a new ‘village’ within wooded plantations in the west of the estate (Black Squares Plantation north).

This will be modelled on the ‘original’ village clustered around ‘The Stables’ and ‘The Granary’, echoing the range and mix of sizes and designs to create an intimate complex within wooded surroundings.

The plantations are coming to the end of their productive life and need considerable management involving thinning and replacement. The intention is to undertake a careful programme of felling and clearance in order to create suitable pockets within which the village can be accommodated. Cleared sites and planting around the periphery of the village will be replaced where appropriate with native hardwoods to create a more sustainable and varied woodland.

- S2 and H2 – two locations of high-quality, low-density housing in spacious grounds, the first situated between Black Square Plantation and the Castle Eden Walkway and the second in the triangle formed by Salter House Wood, the A689 and the Hartlepool/Stockton boundary,, this latter to be screened along its northern edge by a substantial landscape buffer not only to enhance the setting adjacent to a landscaped mound and a lake but also to insulate houses from the effects of the A689.

The focus here will be on bespoke properties, individually-designed to reflect contemporary aspirations for self-expression and incorporating the latest thinking on sustainable design, functionality, energy efficiency and reducing the emission of ‘greenhouse gases’.

- H1 and S3 – two sites which will provide for high-quality market housing similar in style to existing/developing housing to which they will each represent a sympathetic extension..
- S4 – a site for market housing south of the A689 and west of the A19, with potential for a wider housing mix, perhaps including smaller houses in terms of size but built to the high specification for which Wynyard is already recognised.

53. All housing will be constructed to take advantage of solar gain, reduce heat loss, avoid the creation of ‘heat island’ effects, maximise opportunities for the use of renewable energy and sustainable drainage techniques. Green infrastructure within and around housing development will be an extension of existing open spaces and designed to reflect the character of the historic parkland surrounding Wynyard Hall.

54. H1, S1 and S3 will be accessed by means of a new distributor road, extending westwards from ... swinging south behind Holderness and Harestones to join ... The road will cost in the order of £3 million and will be fundamental to unlocking the housing potential of the western part of the Wynyard Village

Education Provision.

55. One of the key deficiencies within the village as it now stands is the absence of any provision for education, with the result that this must be accommodated by the unsustainable expedient of parents taking pupils to schools outside Wynyard. To address this issue it is proposed to provide for:

- a new school providing facilities for nursery and primary education on a site to the south of Nursery Drive and the new distributor road;
- a site for the relocation of Red House School, presently occupying a constrained site adjacent to The Green in Norton. It is worth noting that currently 50% of the school’s pupils are drawn from Wynyard. The alternative site at Wynyard will not only enable an expansion of the school and the facilities it is able to offer pupils, eliminate congestion and disturbance experienced around The Green, Norton but also reduce the daily number of education trips from Wynyard made by car at peak traffic times.

Community, Social and Religious Resource.

56. As the community evolves, it is recognised that there will be a need to cater for communal activities and accommodate a range of social and religious interaction within the Wynyard population. To facilitate such valuable social intercourse, it is proposed that an adaptable building will be provided in proximity to the primary school, offering local residents the opportunity to engage in a wide range of activities and for the two centres to be able to pool resources the better to meet the diverse aspirations of residents. Flexible internal space will allow for a range of support services and facilities such as a library.

#### Provision for Sports and Indoor/Outdoor Physical Recreation.

57. Physical activity is an essential element of a healthy community. To enable members of the community to follow a range of active pursuits, the better to improve their health, a substantial playing surface will be provided, capable of adapting to a range of sporting activities such as football, rugby and tennis. Changing facilities will be available either in the form of a free-standing building or within the primary school or community building referred to above. The design of the community building will provide for flexible space that will allow for certain types of indoor sport.

58. In addition, open spaces will be a feature within new housing areas, linked by a series of carefully-designed and constructed cycle-ways and footpaths, engineered to be accessible to all, whether able-bodied or mobility-impaired. Ultimately, the network proposed will link with publicly-accessible routes along and around the Castle Eden Walkway and to private walks in the vicinity of Wynyard Hall.

59. Open spaces and the network of footways will be designed to reflect the character of the historic parkland, representing a contemporary extension of that historic environment and fashioned so as to more fully integrate the whole of the Wynyard Village.

#### Policing and Security.

60. As development proceeds at Wynyard both within increasingly diversified housing areas and on the business parks, there will be a need for residents, employees and visitors to have access to information, advice and direction that will help familiarise them with the geography of the complex as a whole and the many facilities on offer, so as to enable them to get the most of their involvement with Wynyard.

61. To provide for such needs, a small attractively-designed office building is proposed to house a visitor centre, information centre and management office.

62. The management office will provide a base for the management company that will be responsible for safeguarding and security, and for administering service charges levied to maintain the appearance and condition of the Village and its facilities. Security is already a high priority, recently enhanced by the installation of a digi-cam vehicle recognition system

#### The Future – Wynyard Hall and Parkland.

63. In order to generate some of the funding necessary to renovate the historic buildings and features of the Estate, considerable investment has already been made in the Hall itself and in generating an alternative, sensitive use for the Hall as a hotel and a centre for conferences and functions. The new use has been particularly successful, attracting wedding parties and a diverse range of corporate functions. While this success is fuelling further demand to use the Hall as a venue, it is nonetheless failing to generate the income needed fully to finance the constant need to refurbish and repair specific parts of the historic structure.

#### Conservation Plan.

64. In the past, Stockton Council and English Heritage have encouraged the preparation of a Conservation Plan for the whole of the Wynyard Estate, the better to appreciate how the character and fabric of the Hall and historic Parkland will be maintained into the future.

65. While it has been difficult to formalise thinking into a comprehensive plan for the future until the pressing concern with stabilising the fabric of the Hall, developing a viable use for the Hall, and assessing the quality of aging trees across the Parkland had been addressed, the current proposals represent a significant move forward in bringing extra life to the estate. The proposals outlined below will introduce activities that, in the long term, will generate income to re-

invest both in the Hall, further adding to what the Hall is able to offer, and the Registered Parkland, bringing the walled garden to life and ultimately helping towards continuing maintenance of key features of the Parkland, including the trees and landscaping and the various structures (Temples and bridges) scattered throughout what are known as the Pleasure Grounds, the wooded valley and slopes to the west of the Hall.

66. It has to be stressed, however, that even the income from activities such as those proposed will be insufficient to carry out all the necessary high-quality refurbishment that will be required to the Hall and grounds over time. Further significant injections of capital are essential. The rationale for the release of more housing land at Wynyard has been explained above insofar as it revolves around improving the sustainability of the settlement. While funding is necessary to support the development agenda that will lead to successful provision of local facilities the better to enable a sustainable community to evolve, an important element in the overall Wynyard future is maintaining the viability of the Hall.

67. It has already been said that commercial use of the Hall will not generate sufficient income to guarantee the fabric of the Hall and grounds. Additional funding from the release of housing land is as important to the future of the Hall as it is to the Village as a whole. The following checklist emphasises the scale of the problem.

68. In order to complete the restoration and preservation of the Hall and historic parkland, the minimum that is required includes:

- a new roof to the main building (at a cost of £700,000-£1 million);
- repair and renewal of stained glass windows and panels in which the 200-year old lead beading has deteriorated to the point at which it can no longer contain the glazed elements (at a cost of approximately £250,000);
- follies in the Pleasure Gardens are in urgent need of repair to restore to their original splendour and prevent further deterioration (at a cost of approximately £150,000);
- urgent repairs to the structure of Lion Bridge and the replacement of broken and deteriorating concrete balusters along the main parapets estimated at a cost of £100,000-£150,000);
- re-engineering footpaths through the Pleasure Gardens to be HSE compliant and accessible to mobility-impaired as well as able-bodied visitors (approximately £150,000);
- urgent works to trees throughout the historic parkland, to include topping and lopping, and the re-planting of dead or dangerous specimens with subsequent continuing maintenance overall, subject to a formal management plan (estimated at a cost of £1 million over a period of 10 years);
- draining and dredging of the lake to remove the build-up of silt (£50,000-£100,000);
- the replacement of the original Victorian swing/suspension bridge in front of the Hall (£250,000).

69. With the assistance of English Heritage, these various elements will be incorporated within a Conservation Plan that will identify the specific costs, funding and programming of works required to secure their completion. Accepting that the maintenance and further restoration of the Hall and grounds will need to be constantly under review, the Conservation Plan will be a living document, to be amended and extended as priorities emerge and change.

Events Marquee.

70. Ultimately, the continued viability of the hotel and conference use at the Hall, and hence an increasing ability to be self-sufficient in relation to the up-keep of the building and grounds, will require specialised conference facilities to be provided by means of a more diversified range of meeting rooms, together with additional bedrooms created through an extension to the Hall itself.

71. In the meantime, the size and the nature of the rooms available within the Hall constrain the ability to accommodate additional functions. In order to take advantage of the growing demand and to maximise income streams for future investment on the up-keep of the Hall and grounds, it is proposed that a Marquee is erected to the north of the Hall, to provide for functions on a scale that cannot be accommodated within the Hall.

72. This will provide a venue for a number of concerts and events, wedding 'fayres' and gardening shows that cannot be held in the Hall. The Marquee will be an adaptable space in order to tailor provision to specific activities. It will have capacity to accommodate audiences of between 750-1000 for concerts, but for shows and exhibitions can be expected to manage a through-put of in the order of 3000-4000 visitors per day over a three-day weekend period.

73. The preferred location for the Marquee is illustrated on the Master Plan Diagram, to the north of the Hall on a site currently occupied by tennis courts. The Marquee will be discreetly positioned and naturally screened by topography and mature trees so as to be relatively unobtrusive and not harmful to the setting of the Hall.

74. It is envisaged that the Marquee will be in place for a period of 9-10 years.

#### Rose Garden.

75. In order to replicate some of the past splendour of the walled garden and the Italian Garden terrace, a Rose Garden is to be developed within the walled garden, spreading outwards across the terrace to the south. The Rose Garden will feature a diverse selection of rose varieties, contained within a series of 'rooms', punctuated by 'classical' structures and highlighted by a series of water features. The Rose Garden is intended to be a contemporary contribution to the history of the Hall and a 21st-century addition to the character of Registered Parkland.

76. The Garden will be complemented by a range of buildings adjacent to the eastern edge of the walled garden, incorporating a visitor information and interpretation centre, together with shop and tea-room.

#### SUMMARY.

The aspiration for the Wynyard Village Master Plan is that:

- Stockton-on-Tees and Hartlepool Borough Councils will adopt the Plan as the basis for future growth at Wynyard Village;
- Wynyard Village is agreed to be a unique location for specific high-status housing which does not fit easily within the modelling of future housing numbers and which will generate its own momentum of demand independent of overall need for housing in the Boroughs as a whole;
- both Councils accept the need to allow more housing development at Wynyard in order to generate the necessary funding from the sale of land for housing to provide community and neighbourhood education, sports and recreational amenities and substantial green infrastructure to improve both sustainability and the overall housing experience of residents;
- Wynyard Village remains the focus for future housing provision at Wynyard, with the land to the north of the A689 endorsed as the appropriate location for commercial and business activity;
- the need to apply a Levy on new houses will be waived in view of the commitment to invest the money raised from the sale of land towards the provision of a wide range of necessary community facilities and amenities.

### **38/3 Cameron Hall Developments**

Response to Questions Raised in the Consultation Document.

The Wynyard Village Master Plan (appended below) has been prepared in order to establish a framework for future housing development at Wynyard Village, the area south of the A689, identifying sites for a range of high-status housing in numbers sufficient to lever capital and future revenue necessary to provide and sustain community facilities and services that will improve the sustainability of the settlement.

Although the production of the Master Plan was begun before the Core Strategy Review was launched, it is directly relevant to the outcome of the Review. However, whilst the Review is specific to potential development sites in Stockton-on-Tees Borough, the Master Plan addresses a wider brief, seeking not only to identify sites that will bolster housing numbers and improve sustainability but also to secure consistency in planning policy between the two Councils in whose administrative boundaries opportunities for housing growth are situated, thus encapsulating possible housing sites in Hartlepool Borough.

Coincidentally, the Master Plan addresses a number of the key questions raised in the Core Strategy Issues and Options document.

### **38/4 Cameron Hall Developments**

Question 1 – Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

Whilst it is argued that Wynyard is a 'special case' in respect of future housing delivery, in which substantial growth can be allowed without competing with or affecting provision elsewhere, it seems inevitable that the Council will not be able to rely on sites within the Core Area identified in the Core Strategy to provide the considerable numbers of houses required if people in Stockton-on-Tees Borough are to be given the best chance of satisfying their housing needs. For some time to come, economic conditions will prevent sites requiring costly assembly, remediation and public subsidy from coming forward.

### **38/5 Cameron Hall Developments**

Question 2 – Do you agree with this approach?

In view of economic constraints, the Council is correct to introduce a flexible approach to housing provision.

### **38/6 Cameron Hall Developments**

Question 3 – Which of the following options for the distribution of new housing sites do you agree with?

- a) Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b) Allocate new housing on a combination of sites

It would be inadvisable for the Council to focus future housing provision on one single site. A more flexible portfolio of opportunities is needed. A combination of sites should be promoted, offering the chance for innovative housing in a variety of locations not only in and around the urban area but which also complement existing development in certain more rural locations.

### **38/7 Cameron Hall Developments**

Question 4 – Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- All Villages
- Only the most sustainable villages
- No village extensions

In the Council's sustainability ranking of villages, Wynyard is classified as a Tier 4 village, within which there would be a presumption against further housing development.

The Master Plan explains why additional housing development should be encouraged at Wynyard to underpin the provision of services and community facilities currently lacking for residents, in order that the village becomes more sustainable.

### **38/8 Cameron Hall Developments**

Question 6 – Do you think that the future employment strategy for the Key Employment Location at Wynyard should:

- a) Continue to provide a significant amount of office development opportunities in line with the current planning permissions?
- b) Consider alternative employment uses that will reduce the impact of the development on the strategic road network. For example logistics or manufacturing?
- c) Allow a mixed-use development, where employment development remains the dominant use but an element of housing could be provided?
- d) Allow a mixed-use development where housing is a significant part of the development mix?
- e) Follow another strategy?

The focus of housing at Wynyard should continue to be to the south of the A689 in order to maximise the potential to provide services and facilities required to create a more sustainable community. The principal function of the area to the north of the A689 should remain business/industrial

### **38/10 Cameron Hall Developments**

Question 8 – If housing were permitted, what types of properties should be part of the mix?

- a) Executive housing
- b) Mid-range family housing
- c) Affordable housing
- d) Older-people's housing

Housing south of the A689 should continue to be 'Executive' and 'Mid-range Family Housing'.

### **38/11 Cameron Hall Developments**

Question 9 – If a new master plan is prepared for the area, how could connectivity between the northern area and southern area be provided?

Measures need to be put in place for viable public transport throughout the Wynyard area, both to the north and south of the A689, to ensure not only that Wynyard can be accessed from more distant locations by that means but also that circulation between the north and south is readily achievable.

### **39/0 Mr Matthew Hall**

Land at Yarm Back Lane, West Stockton

The site identified as Yarm Back Lane, West Stockton includes the site identified as Ref 23: Hartburn Grange land between Yarm Back Lane and West Stockton built up area in the 2010 Strategic Housing Land Availability Assessment: Final Report. A plan of the land in the ownership of the Hall family has been enclosed. The site in the ownership of the Hall family extends to some 61 acres (24.7ha), which is less than the extent of the SHLAA site.

As identified in both the SHLAA and the Review the development of the site is likely to have a major impact on the Strategic Road Network. The location of the site within the ownership of land in the ownership of the Hall family is closest to the existing facilities and is generally more sustainable than the whole of the site identified in the Review.

While it is acknowledged that the improvements to the Strategic Road Network may require that the whole site is brought forward for development consideration should be made of assessing the site in smaller sections, with possible phasing of development.



### 39/1 Mr Matthew Hall

Our client, Mr Matthew Hall and his family own land at Hartburn Grange, to the west of Stockton, which is part of a site identified as a potential housing site by the Core Strategy Review Issues and Options Consultation (the Review). The site owned by the Hall family is identified as Ref 23: Hartburn Grange land between Yarm Back Lane and West Stockton built up area in the 2010 Strategic Housing Land Availability Assessment: Final Report. We have been instructed to make the following representations to Stockton-on-Tees Borough Council.

A copy of the completed Questionnaire has also been submitted.

#### Question 1

Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

We agree that the loss of the public investment, which is required to redevelop the Core Area sites identified (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North Sites), means that the Council should no longer rely on these sites to provide the new housing required to allow Stockton-on-Tees to prosper.

#### Question 2

Do you agree with this approach?

The principle of flexibility proposed is supported. However, it is suggested this should be taken further and incorporated into the approach for identifying new potential housing sites.

#### Question 3

Which of the following options for the distribution of new housing sites do you agree with?

- a. Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. Allocate new housing on a combination of sites?

If you think that a particular site or combination of sites should be chosen for new housing, please complete and return the Core Strategy Review Issues and Options Questionnaire or send your comments to one of the addresses listed in the How to Comment section at the front of this document.

Both options could provide the Council with the new housing sites required to meet the identified shortfall.

However, a more flexible approach could also be considered as the sites identified in the Figure 30: Overview Map could also be broken down into smaller sections. This option has been considered in relation to the Land at Urray Nook, with two options being considered. Other sites identified in the review could also be broken into smaller options. This would have the benefit of supporting the principle of flexibility and allow the market to decide the best location(s) for development to take place.

#### Issue 3: Urban extensions

We support the Council's assessment that urban extensions offer more opportunity for comprehensive masterplanning. We agree that it is unlikely to be possible to achieve the housing target without allocating sites of a significant scale.

Land at Yarm Back Lane, West Stockton

If you have a view about whether this site should be allocated for new housing, please complete and return the Core Strategy Review Issues and Options Questionnaire or send your comments to one of the addresses listed in the How to Comment section at the front of this document.

The site identified as Yarm Back Lane, West Stockton includes the site identified as Ref 23: Hartburn Grange land between Yarm Back Lane and West Stockton built up area in the 2010 Strategic Housing Land Availability Assessment: Final Report. A plan of the land in the ownership of the Hall family has been enclosed. The site in the ownership of the Hall family extends to some 61 acres (24.7ha), which is less than the extent of the SHLAA site.

As identified in both the SHLAA and the Review the development of the site is likely to have a major impact on the Strategic Road Network. The location of the site within the ownership of land in the ownership of the Hall family is closest to the existing facilities and is generally more sustainable than the whole of the site identified in the Review.

While it is acknowledged that the improvements to the Strategic Road Network may require that the whole site is brought forward for development consideration should be made of assessing the site in smaller sections, with possible phasing of development.

#### Comments

The Draft National Planning Policy Framework has implications for this review into housing for Stockton-on-Tees. The draft proposes at paragraph 109 that Councils:  
identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land

This has not been considered by this review as the draft NPPF was published after the Review was put out for consultation. However, the 'Preferred Option' stage should take this into consideration. A 20% increase in housing target numbers required just to make up the identified shortfall equates to 560 additional houses, a total of 3360.

If a 20% increase is added to the Total required for 2013-2028 a further 1620 housing target numbers should be added to the 8100 target identified in figure 2 of the Review, giving a total of 9720. Assessed against the trajectory numbers of 5650 for the 2013-2028 period a housing target number of 4070 should be identified by this review.

Furthermore, the draft NPPF encourages a presumption in favour of sustainable development which should be incorporated into the Core Strategy Review.

Also see hard copy for location map.

#### **39/2 Mr Matthew Hall**

##### Question 1

Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

We agree that the loss of the public investment, which is required to redevelop the Core Area sites identified (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North Sites), means that the Council should no longer rely on these sites to provide the new housing required to allow Stockton-on-Tees to prosper.

**39/3 Mr Matthew Hall**

Question 2

Do you agree with this approach?

The principle of flexibility proposed is supported. However, it is suggested this should be taken further and incorporated into the approach for identifying new potential housing sites.

**39/4 Mr Matthew Hall**

Question 3

Which of the following options for the distribution of new housing sites do you agree with?

- a. Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. Allocate new housing on a combination of sites?

If you think that a particular site or combination of sites should be chosen for new housing, please complete and return the Core Strategy Review Issues and Options Questionnaire or send your comments to one of the addresses listed in the How to Comment section at the front of this document.

Both options could provide the Council with the new housing sites required to meet the identified shortfall.

However, a more flexible approach could also be considered as the sites identified in the Figure 30: Overview Map could also be broken down into smaller sections. This option has been considered in relation to the Land at Urray Nook, with two options being considered. Other sites identified in the review could also be broken into smaller options. This would have the benefit of supporting the principle of flexibility and allow the market to decide the best location(s) for development to take place.

Issue 3: Urban extensions

We support the Council's assessment that urban extensions offer more opportunity for comprehensive masterplanning. We agree that it is unlikely to be possible to achieve the housing target without allocating sites of a significant scale.

**40/1 Mr N I Snowdon**

Our client, Mr N.I. Snowdon owns land to the east of Ingleby Barwick, which is part of a site identified as a potential housing site by the Core Strategy Review Issues and Options Consultation (the Review). We have instructed us to make the following representations to Stockton-on-Tees Borough Council. A copy of the completed Questionnaire has also been submitted.

**40/2 Mr N I Snowdon**

Question 1

We agree that the loss of the public investment, which is required to redevelop the Core Area sites identified (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North Sites), means that the Council should no longer rely on these sites to provide the new housing required to allow Stockton-on-Tees to prosper.

**40/3 Mr N I Snowdon**

Question 2

The principle of flexibility proposed is supported. However, it is suggested this should be taken further and incorporated into the approach for identifying new potential housing sites.

#### **40/4 Mr N I Snowdon**

##### Question 3

The preferred option is b. Allocate new housing on a combination of sites. However, a more flexible approach could also be considered as the sites identified in the Figure 30: Overview Map could also be broken down into smaller sections. This option has been considered in relation to the Land at Urray Nook, with two options being considered. Other sites identified in the Review could also be broken into smaller options. This would have the benefit of supporting the principle of flexibility and allow the market to decide the best location(s) for development to take place.

#### **40/5 Mr N I Snowdon**

##### Issue 4: The conurbation

We support the Council's assessment that it is reasonable to assume that sites within the conurbation would provide some of the most sustainable options for development. We agree that it is unlikely to be possible to achieve the housing target without allocating sites of a significant scale.

#### **40/6 Mr N I Snowdon**

The site identified as Land at Ingleby Barwick includes the site identified in the SHLAA as Land adjacent to Teeside Industrial Estate. A plan of the land in the ownership of Mr N.I. Snowdon has been enclosed.

The site is identified in the Core Strategy as a 'Green Wedge', to which Policy CS10 relates. The policy sets out their locations:

ii) Green wedges within the conurbation, including:

- River Tees Valley from Surtees Bridge, Stockton to Yarm;
- Leven Valley between Yarm and Ingleby Barwick;
- Bassleton Beck Valley between Ingleby Barwick and Thornaby;
- Stainsby Beck Valley, Thornaby;
- Billingham Beck Valley;
- Between North Billingham and Cowpen Lane Industrial Estate.

The Bassleton Beck is located along the north-west edge of the site, as shown both in the Stockton Borough Council Open Space Audit and the Environment Agency Flood Risk Map.

However, the Core Strategy Strategic Diagram indicates that the Green wedge will follow the south and east boundaries of the site. The stated intention is to provide for: The separation between settlements, together with the quality of the urban environment, will be maintained through the protection and enhancement of the openness and amenity value of [Strategic Gaps, Green Wedges and Urban open space and play space. The site could be developed for housing without impacting on Bassleton Beck Valley and the Green Wedge. As stated above, the principle of flexibility should also be considered in relation to individual sites. The design of any housing scheme on the site could take into account the amenity value of the Bassleton Beck Valley while providing the quality urban environment for both existing and new residents required by the Core Strategy.

#### **40/7 Mr N I Snowdon**

The benefits of the site are that the site is well connected to the Strategic Road Network and can make use of the bus routes serving the Teeside Industrial Estate. The site would be an in-fill to the existing urban environment of Ingleby Barwick and would not extend the settlement into the surrounding countryside and is therefore likely to have less impact on the rural environment than the large urban extensions also considered in the Review.

#### **40/8 Mr N I Snowdon**

Furthermore, the comprehensive development of the site for housing could also include other facilities such as retail units which would also benefit the existing residents of Ingleby Barwick and provide facilities for Teeside Industrial Estate. The increase in population would also help support Thornaby's newly regenerated Town Centre.

#### **40/10 Mr N I Snowdon**

The Draft National Planning Policy Framework has implications for this review into housing for Stockton-on-Tees. The draft proposes at paragraph 109 that Councils: 'identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20 per cent to ensure choice and competition in the market for land. This has not been considered by this review as the draft NPPF was published after the Review was put out for consultation. However, the 'Preferred Option' stage should take this into consideration. A 20% increase in housing target numbers required just to make up the identified shortfall equates to 560 additional houses, a total of 3360.

If a 20% increase is added to the Total required for 2013-2028 a further 1620 housing target numbers should be added to the 8100 target identified in figure 2 of the Review, giving a total of 9720. Assessed against the trajectory numbers of 5650 for the 2013-2028 period a housing target number of 4070 should be identified by this review. Furthermore, the draft NPPF encourages a presumption in favour of sustainable development which should be incorporated into the Core Strategy Review.

#### **41/1 Maltby Northern Edge Residents Group**

I'm sure that you are aware that the single purpose of Maltby Northern Edge Residents Group (MNERG) is to campaign against development in and around the village of Maltby. Our reasoning has been clearly stated during the first Core Strategy review and during the development of the DPD. It goes without saying that membership of the group by individuals is solely to achieve that purpose. There have been no resignations from the group since it last responded.

It follows that you may take it for granted that MNERG is and always will be against development in villages. On behalf of the members I urge you to ensure that development, (if indeed it is necessary with thousands of unoccupied properties already available), takes place only around the core area of Stockton. Anything else would be a betrayal of the confidence and relief felt by villagers at this time due to the acceptable terms of the current Core Strategy.

#### **41/2 Maltby Northern Edge Residents Group**

Given what appears to many to be a knee jerk reaction to a possibly transitory economic position, what hope is there that when the situation reverses making brownfield development easier, there would be the will to revert the Core Strategy and remove greenfield sites from the SHLAA? I urge you to ensure that the villages are not caught up in this unwanted policy change.

## 42/1 Individual

I understand the need to undertake this review in the light of the changed landscape of public finance stemming from the consequences of the global banking crisis and arising out of the approach of the current Government to the reduction of public borrowing levels.

However, I must take issue with parts of the approach as set out in the review document. I very much regret the manner in which the original Core Strategy is to be set aside in the face of what is likely to be a short to medium term problem. The original core strategy offers the opportunity to begin the transformation of Teesside into a 'City Region'; the alternative approach will continue to consolidate the pattern of separate towns, none of which is able to offer the higher level services which the population justifies. Opportunities for significant economic, environmental and social benefits for the whole community will be lost if the original approach is jettisoned. The prospect of incursions into currently protected areas arising out of this change of direction is equally regrettable in an area which contains so much blighted land at its core.

At this stage, I do not propose to comment in detail on the new sites which are offered as I believe that the overall approach needs to be settled before a sensible process of site selection can be commenced.

My current comments are as follows.

1. I have reservations about the construction of the 'housing trajectory'. The Development Industry has a clear interest in influencing a move away from brownfield to Greenfield where risks are lower, values higher and hence development, on the face of it is a much more profitable prospect. The basis of the trajectory in the current circumstances requires much greater transparency.
2. I do not accept that it is necessary to abandon the prospect of new development within the Core Area to meet the whole of the projected housing gap when the timeframe is so extended. The current recession is unlikely to endure for more than five years and a different approach to public investment is likely to emerge, which will offer resources for remediation, site preparation and infrastructure in areas most at need, including the inner areas of Teesside. It would certainly seem reasonable to factor in a delay in Core Area site availability but certainly not to write off the prospect altogether at this stage. I would suggest for example, an assumption that 50% of the currently projected gap could be met within the Core Area within the period, leaving 50% to be identified in revised core strategy allocations. Clearly monitoring and review will ensure a response to variances from initial assumptions in any event. It is wholly inappropriate to completely jettison a widely supported Core Strategy on the basis of assumptions which are highly uncertain themselves.
3. In respect of the shape of an alternative approach, clearly this would be dependent on the numbers involved. A need for 1400 new plots would provoke a different response to the need for 2800. I entirely agree that the response should be planned and co-ordinated rather than piecemeal. However, the document does not explore the processes of a planned response in setting out the alternatives. New development can be a mechanism for bringing forward improvements in infrastructure and services. Where are these opportunities evaluated? Which of the sites put forward would provide the best opportunities to enhance current conditions and which would be likely to impose additional external costs on neighbouring areas and communities? In similar vein, site analysis takes a very static view of the sustainability of individual sites, for example the existence of a bus service in summer 2011. Bus services come and go; does the existence of a bus service today guarantee its availability in 2016, let alone 2028? Do any of the sites offer the prospect of enhancing the sustainability of the district in which they are located by generating additional demand to which providers would be likely to respond? In essence what I believe the document lacks at this stage is any form of Impact Analysis of the development of each of the sites offered. This should be a critical tool in evaluating which are worthy of further consideration for inclusion in the Core Strategy.
4. I do not wish to comment on the merits of individual sites at this stage for the reasons I have set out above, but by way of illustration, I would like to offer a personal perspective as a Yarm resident. A number of the sites included in the paper are in Yarm or could have an impact on Yarm. Most are urban extension sites outside the current limits, some are conurbation sites. None individually would satisfy the likely requirement for additional housing in the plan period, so there is the prospect that more than one would be in consideration for allocation on the basis of the current analysis. These sites are likely to be highly attractive to the development industry so will come under great pressure from that quarter. Yarm is a settlement which has developed largely piecemeal over many centuries, albeit now largely suburban development with the historic town at its core. It has many advantages as a place to live but also suffers from a number of well known problems. Perhaps understandably it has not had access to any significant funding to address these problems. Foremost of the problems

experienced by residents are those associated with traffic volumes and journey times and with car parking in the centre. Incremental development may have a marginal impact on these issues when viewed in isolation. Inevitably increments start to add up and this is part of what has produced the problems currently experienced. This brings into sharp focus the need for Impact Analyses to address the issues, whether contemplating a single site or a combination of sites which may affect Yarm. It could and no doubt will be argued that Yarm is currently operating beyond its capacity, requiring investment to address its current problems before any significant further development is permitted. The ability of any of the developments under consideration to mitigate their external costs is highly questionable. At the present time no such assessment is evident, hence the need for rigorous Impact Analyses, themselves subject to consultation, before allocations are made. Subsequently, in the event that sites in Yarm and/or Eaglescliffe are so included, this would inevitably require the reinstatement of the Yarm and Eaglescliffe Area Action Plan to ensure that the new developments could be properly phased and assimilated in harmony with necessary improvements to public services including Highways and Parking.

In summary, I have serious reservations about the underlying analysis and I would need to see a more rigorous and dynamic assessment of the consequences of the various options which have been advanced in order to make a reasoned judgement on the future strategy. I have sought to be as objective as possible in putting forward this response to what I appreciate is a real dilemma and I hope my comments are helpful.

#### **42/2 Individual**

#### **42/3 Individual**

My current comments are as follows.

1. I have reservations about the construction of the 'housing trajectory'. The Development Industry has a clear interest in influencing a move away from brownfield to Greenfield where risks are lower, values higher and hence development, on the face of it is a much more profitable prospect. The basis of the trajectory in the current circumstances requires much greater transparency.

2. I do not accept that it is necessary to abandon the prospect of new development within the Core Area to meet the whole of the projected housing gap when the timeframe is so extended. The current recession is unlikely to endure for more than five years and a different approach to public investment is likely to emerge, which will offer resources for remediation, site preparation and infrastructure in areas most at need, including the inner areas of Teesside. It would certainly seem reasonable to factor in a delay in Core Area site availability but certainly not to write off the prospect altogether at this stage. I would suggest for example, an assumption that 50% of the currently projected gap could be met within the Core Area within the period, leaving 50% to be identified in revised core strategy allocations. Clearly monitoring and review will ensure a response to variances from initial assumptions in any event. It is wholly inappropriate to completely jettison a widely supported Core Strategy on the basis of assumptions which are highly uncertain themselves.

#### **42/4 Individual**

3. In respect of the shape of an alternative approach, clearly this would be dependent on the numbers involved. A need for 1400 new plots would provoke a different response to the need for 2800. I entirely agree that the response should be planned and co-ordinated rather than piecemeal. However, the document does not explore the processes of a planned response in setting out the alternatives. New development can be a mechanism for bringing forward improvements in infrastructure and services. Where are these opportunities evaluated? Which of the sites put forward would provide the best opportunities to enhance current conditions and which would be likely to impose additional external costs on neighbouring areas and communities? In similar vein, site analysis takes a very static view of the sustainability of individual sites, for example the existence of a bus service in summer 2011. Bus services come and go; does the existence of a bus service today guarantee its availability in 2016, let alone 2028? Do any of the sites offer the prospect of enhancing the sustainability of the district in which they are located by generating additional demand to which providers would be likely to respond? In essence what I believe the document lacks at this stage is any form of Impact Analysis of the development of each of the sites offered. This should be a critical tool in evaluating which are worthy of further consideration for inclusion in the Core Strategy.

#### 42/5 Individual

4. I do not wish to comment on the merits of individual sites at this stage for the reasons I have set out above, but by way of illustration, I would like to offer a personal perspective as a Yarm resident. A number of the sites included in the paper are in Yarm or could have an impact on Yarm. Most are urban extension sites outside the current limits, some are conurbation sites. None individually would satisfy the likely requirement for additional housing in the plan period, so there is the prospect that more than one would be in consideration for allocation on the basis of the current analysis. These sites are likely to be highly attractive to the development industry so will come under great pressure from that quarter. Yarm is a settlement which has developed largely piecemeal over many centuries, albeit now largely suburban development with the historic town at its core. It has many advantages as a place to live but also suffers from a number of well known problems. Perhaps understandably it has not had access to any significant funding to address these problems. Foremost of the problems experienced by residents are those associated with traffic volumes and journey times and with car parking in the centre. Incremental development may have a marginal impact on these issues when viewed in isolation. Inevitably increments start to add up and this is part of what has produced the problems currently experienced. This brings into sharp focus the need for Impact Analyses to address the issues, whether contemplating a single site or a combination of sites which may affect Yarm. It could and no doubt will be argued that Yarm is currently operating beyond its capacity, requiring investment to address its current problems before any significant further development is permitted. The ability of any of the developments under consideration to mitigate their external costs is highly questionable. At the present time no such assessment is evident, hence the need for rigorous Impact Analyses, themselves subject to consultation, before allocations are made. Subsequently, in the event that sites in Yarm and/or Eaglescliffe are so included, this would inevitably require the reinstatement of the Yarm and Eaglescliffe Area Action Plan to ensure that the new developments could be properly phased and assimilated in harmony with necessary improvements to public services including Highways and Parking.

In summary, I have serious reservations about the underlying analysis and I would need to see a more rigorous and dynamic assessment of the consequences of the various options which have been advanced in order to make a reasoned judgement on the future strategy. I have sought to be as objective as possible in putting forward this response to what I appreciate is a real dilemma and I hope my comments are helpful.

#### 43/1 Individual

I would like to voice my concerns in respect of any future development on the land classed as South West Yarm.

My main concerns are in respect of traffic.

Firstly I need to cross Green Lane close to the Kirklevington roundabout on a daily basis in order to walk my children to Yarm Primary school. Due to the extremely heavy volume of traffic at peak times it can take in excess of 5 minutes until there is a suitable gap in the traffic to enable us to safely cross. This I believe would be further exacerbated by additional housing in that area.

My second concern is in respect of the volume of traffic along the A67 Spittal Bank into Yarm. at peak times the traffic can already be backed up to Healaugh Park. It can at these times take in excess of half an hour to drive the 2 miles to the home of my elderly parents in Eaglescliffe. This can be repeated on the return journey. The amount of CO2 emissions that must be emitted in those traffic queues must be substantial. Again this would be further exacerbated by the building of further houses on that site. Yarm High street has already had the number of parking spaces reduced significantly which has led to the roads and High St reaching saturation point.

In respect of the land itself, part of the proposal includes Yarm School Sports fields. The pupils already have to walk 3/4 mile to use the fields. where would the sports fields be relocated to? I am not aware of any land that is closer that they could use.

I am also concerned about urban sprawl. We have already seen Eaglescliffe meeting Ingleby Barwick. Are we now to see Yarm and Kirklevington be pushed together, losing their identities in the process?

I walk on this land and it is teeming with wildlife including Deer and Hares and birds of prey. It would in my opinion have a devastating effect upon the Ecology of the area if this development were to take place.

There are surely enough Brown Field sites within the Borough that can be redeveloped without adding to Yarm's traffic congestion problems.



#### **44/1 Hartlepool Borough Council**

We have reviewed your Core Strategy Review Paper and would make the following officer level comments.

Para 2.9 – Looking at past build rates a steady growth of the business park is likely to continue over this period. The impacts of the developments at Wynyard on the highway network are already evident and any applications that come forward over this period should secure contributions towards the improvement of the Wynyard Highway Network. Housing developments at Wynyard will still impact on these network problems, it just changes the flows of the traffic, and still needs to be mitigated against.

#### **44/2 Hartlepool Borough Council**

Para 2.10 – Hartlepool Council has only allocated sites for executive housing at Wynyard to meet a local and sub regional need. We have no objection to Stockton proposing sites at Wynyard for executive housing and related facilities to ensure the sustainability of the executive housing offer at Wynyard.

We would not support the allocation of general market housing at Wynyard, especially on the Wynyard Park Land which forms part of the Prestige Business Park which serves the region and is probably the leading business park in the Tees Valley.

In allocating only executive housing sites at Wynyard, on small distinct sites which are geographically separate from the main Prestige Business Park, Hartlepool Borough Council were very aware of the negative impact that general market housing at Wynyard would have had both on the housing market within Hartlepool and also the negative impact this would have had on the town centre within Hartlepool.

#### **44/3 Hartlepool Borough Council**

Para 2.12 – Clarity on what basis the housing trajectory is formed would be helpful to justify how the gap of 2800 dwellings is calculated. Is the gap the number of dwellings which are now considered undeliverable on your brownfield sites?

#### **44/4 Hartlepool Borough Council**

Page 48 - Issue 6a – Wynyard as a Key Employment Location

Question 6 - Do you think that the future employment strategy for the Key Employment Location at Wynyard should:

- a. continue to provide a significant amount of office development opportunities in line with the current planning permissions?
- b. consider alternative employment uses, that will reduce the impact of the development on the strategic road network. For example logistics and manufacturing?
- c. Allow a mixed-use development, where employment development remains the dominant use but an element of housing could be provided?
- d. Allow a mixed-use development where housing is a significant part of the development mix?
- e. Follow another strategy (please explain your response)?

HBC Officer Response – Within the emerging Hartlepool Core Strategy Wynyard Park is retained as a Prestige Employment Location. Policy CS11 of the Revised Preferred Options Report promoted the site for B1 use where buildings are of an exceptionally high quality design standard, high quality landscaping/woodland planting are provided as appropriate to the surrounding natural environment, there is no more than 25% coverage of each developable site by buildings and car parking areas are landscaped and any outside storage is well sited and screened.

The Policy also allows for general industrial development and warehousing within classes B2 and B8 where they meet the above criteria and where they are not on the A689 frontage, they do not have a significant detrimental effect on the amenities of the occupiers of adjoining or nearby properties and they do not prejudice the development of adjacent sites.

As such we would be supportive of a policy which was generally in line with the approach to continue to develop the area as a Prestige Business Park with development as suggested in options A & B above.

#### **44/5 Hartlepool Borough Council**

Page 49 – Wynyard Hall Estate – If this site is developed it should be for purely executive housing. Wynyard is the sub regions most prestigious executive housing location and has the ability of attracting wealth creators into the Tees valley. The provision of general market housing on this site would jeopardise the exclusivity of the Wynyard offer. The Parkland of special historic importance / wooded area helps to create the attractive environment which the executive housing offer needs to create a sense of place and should be protected.

#### **44/6 Hartlepool Borough Council**

Page 51 – Wynyard Park – It is considered that this forms an important part of the Prestige Business Park at Wynyard and that housing development on this part of the site should be resisted. The provision of up to 1000 general market houses on this location would not only impact on the Prestige Business Park but would also severely undermine Wynyard's exclusive role in the executive housing market, would impact on the town centre area of Hartlepool and would also set a precedent for further housing development within the Business Park in the future.

#### **44/7 Hartlepool Borough Council**

Page 53 – Land East of Wynyard Village – The field acts as an environmental barrier between the A19 and the executive housing at Wynyard. There is also a high pressure gas main which runs to the north of the site and a significant proportion of this site is within the consultation zone for this pipeline. This would severely impact on the deliverability of housing in this location. For these reasons the site to the west of Wynyard may be more suitable for an executive extension to Wynyard village. If this site is brought forward our comments in relation to Wynyard being an executive housing market and not one for general market housing apply.

#### **44/8 Hartlepool Borough Council**

Page 54 - Q7: If housing were to be permitted in the broad Wynyard area, where should it be located?

- a. Wynyard Hall Estate
- b. Wynyard Park
- c. Land east of Wynyard Village
- d. Other (Please provide a location plan and give your reasons for suggesting this location)

HBC Officer Response – As previously stated HBC would consider the land at Wynyard Hall Estate the most suitable should housing be provided at Wynyard.

#### **44/9 Hartlepool Borough Council**

Page 54 - Q8: If housing were permitted, what types of properties should be part of the mix?

- a. Executive housing
- b. Mid-range family homes
- c. Affordable housing
- d. Older-people's housing

HBC Officer Response – As previously stated it is considered that Wynyard provides a location for the top executive housing in the Tees Valley and this offer should be protected from any other types of housing development in this location.

#### **44/10 Hartlepool Borough Council**

Page 54 - Q9: If a new master plan is prepared for the area, how could connectivity between the northern area and the southern area be improved?

HBC Officer Response – A pedestrian bridge linking the employment land at Wynyard Park to Wynyard Village in the south is much needed to help improve the sustainability of this location.

#### **44/11 Hartlepool Borough Council**

HBC are committed to working on a joint masterplan for the Wynyard area at the appropriate point in time to ensure that any developments which come forward at Wynyard do so in the most sustainable way possible.

## 45/1 National Grid

National Grid has appointed AMEC (formerly Entec) to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

### Overview - National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

### Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

### Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

### Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

## National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;
- site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;
- land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;
- any policies relating to the diverting or undergrounding of overhead transmission lines;
- other policies relating to infrastructure or utility provision;
- policies relating to development in the countryside;
- landscape policies; and
- waste and mineral plans.

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

## National Grid infrastructure within Stockton Borough Council's administrative area

### Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Stockton Borough Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- 4VC line – 400kV route from Norton substation in Stockton to Osbaldwick substation in York
- 4TF line – 275/400kV route from Hawthorn Pit substation in Durham to Norton substation in Stockton
- XC line – 275kV route from Spennymoor substation in Durham to Norton substation in Stockton
- YYJ/N line – 400kV route from Saltholme substation in Stockton to Norton substation in Stockton
- ZZA line – 275kV route from the 4TH line in Hartlepool to Lackenby substation in Redcar and

Cleveland via Saltholme substation in Stockton

The following substations are also located within the administrative area of Stockton Borough Council:

- Norton substation – 400kV, 275kV & 132kV
- Saltholme substation – 275kV

National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the

following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

#### Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Stockton

Borough Council:

Ref: Pipeline

FM06 Little Burdon to Billingham ICI

FM06 Elton to Pickering

FM06/13 Cowpen Bewley to Teeside Terminal

FM13 Bishop Auckland to Yafforth

National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

#### Gas Distribution

Northern Gas Networks owns and operates the local gas distribution network in Stockton Council's administrative area. Contact details for Northern Gas Networks can be found on the Energy Networks website:

[www.energynetworks.org](http://www.energynetworks.org)

#### Specific Comments

##### Electricity Transmission

The following sites identified as potential housing sites in the Core Strategy Review Issues and Options document, are crossed by National Grid's high voltage overhead electricity transmission lines:

Yarm Back Lane, West Stockton

West Preston

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:

[www.nationalgrid.com/uk/senseofplace](http://www.nationalgrid.com/uk/senseofplace)

Further information regarding development near overhead lines and substations is available here:

[http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl\\_final/pdf/brochure.htm](http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm)

#### Gas Transmission

The following site identified as a potential housing site in the Core Strategy Review Issues and Options document, is located within close proximity to one of National Grid's high pressure underground gas transmission pipelines:

West Yarm

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

- Gas Transmission Underground Pipelines – Guidance

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gasguidance.htm>

Should these sites be taken forward as development sites in the future, the developers should be made aware of the above issues.

#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;

specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and

A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Damien Holdstock  
Consultant Town Planner  
damien.holdstock@amec.com

(Please note that any emails sent to the previous Entec email address will be automatically forwarded to this address.)

AMEC E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire  
CV32 6JX

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

#### **46/1 Taylor Wimpey Strategic Land**

This representation has been prepared by Taylor Wimpey Strategic Land in response to the Stockton on Tees Core Strategy DPD Review - Issues and Options Consultation, and in particular the role that the land to the South of Preston Farm Industrial Estate can play in addressing the identified shortfall in housing land supply, and meeting the regeneration aspirations of Stockton Borough Council.



## 46/2 Taylor Wimpey Strategic Land

### HOUSING NEED

Prior to addressing the matters raised within the consultation document we consider it necessary to firstly address the matter of housing need and demand, in particular the Council's housing growth assumptions.

It is understood that the Council wish to retain, notwithstanding its impending abolition, the housing requirement/targets as set out in the Regional Spatial Strategy. This is supported. At present, until updated by the Council's own more up to date assessment of need, the RSS offers the most up to date evidence based projections. As the Council will be aware however, the targets set out in the RSS are an absolute minimum.

As the Council is aware however, the Government has, since the publication of the RSS, published both its 'Planning for Growth' agenda, as set out in the Ministerial Statement of the 23rd March 2011 (which the Issues and Options report fails to mention), and in July 2011, its draft National Planning Policy Framework (NPPF). The NPPF echoes the 'Planning for Growth' Ministerial Statement of the 23rd March 2011 and sets out the Government's clear direction of travel in respect of housing growth.

Both the 'Planning for Growth' Ministerial Statement and the draft NPPF are material considerations in connection with this review. Given the clear message that runs throughout both, they must be afforded very significant weight by the Council in reviewing the Core Strategy.

In respect of policy development, the Government's objectives for housing are unambiguous. NPPF states (Paragraph 107):-

'The Government's key housing objective is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live. This means:

increasing the supply of housing  
delivering a wide choice of high quality homes that people want and need  
widening opportunities for home ownership; and  
creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.

To enable this the planning system should aim to deliver a sufficient quantity, quality and range of housing consistent with the land use principles and other policies of this Framework."

The 'Planning for Growth' approach does not yet appear to be reflected in the Council's suggested strategy for delivering new housing over the plan period.

The LPA must move swiftly to increase the supply of housing and deliver a wide choice of homes that people 'want and need'.

## 46/3 Taylor Wimpey Strategic Land

### DELIVERABILITY

Taylor Wimpey Strategic Land agree with the Council's conclusions that without significant public investment a number of potential housing sites in the defined core area cannot be relied upon for the delivery of housing over the next 15 years. We would note however that it is not just simply those sites identified within the Issues & Options Document (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North). There are a large number of sites that were identified as commitments or deliverable sites in the SHLAA 2010 that will not be brought forward at all for housing development in the short to medium term or, if development does take place, given their location and character of surroundings, are unlikely to deliver housing at the rate assumed and are unlikely to bring about the type of housing for which Stockton has an overwhelming need.

In light of the current position in respect of the Building Schools for the Future Programme and NHS funding, it would be unrealistic to factor/plan for any housing development upon any existing school or hospital sites.

Notwithstanding the Council's suggested supply of housing land set out in the Issues & Options Document, it is our opinion that the Council has a significant shortfall in deliverable and developable housing land supply and as such is failing to meet the requirements of PPS3 to maintain a 5 year rolling supply of housing land. This shortfall is of course exacerbated by the requirements of the emerging NPPF for LPA's to maintain 5 year supply + 20% to ensure "choice and competition in the market for land" (Paragraph 109).

The action of the Council to increase the range of deliverable housing sites by way of the Core Strategy Review is welcomed, however, seeking to allocate sites for housing to come forward over the next 10 – 15 (2013 -2028) years will in not go far enough to addressing what are, in many respects, short term issues.

Given the significant deliverability and housing market issues associated with a large number of sites which the Council unrealistically consider will be brought forward over the next 0 to 10 years, it is imperative that the LPA allocate land, and grant planning permissions, for significant housing developments on deliverable sites in the short term (immediately). Failure to do so will exacerbate this already significant problem and seriously jeopardise the Council's regeneration aspirations.

As will be set out below, the land to the South of Preston Farm offers an unconstrained, deliverable and sustainable development opportunity, with a willing developer and landowner, that could begin to address the significant shortfall (in terms of both volume and mix of housing) in the short term to tackle the identified housing needs and aspirations. This site would also assist directly in meeting the Council's regeneration aspirations.

#### **46/4 Taylor Wimpey Strategic Land**

##### HOUSING STRATEGY/LINKS WITH THE CORE STRATEGY

As evidenced in the Tees Valley Strategic Housing Market Assessment Update (2009) and from Taylor Wimpey's (formally George Wimpey's) intimate understanding of the Tees Valley Housing Market, there are clearly a number of different housing markets across the Borough, each of which serves a different function. These housing market areas can be defined by way of their function, typology and a variety of economic, demographic and policy factors.

The Tees Valley SHMA, even at the broad sub regional level, identified a number of discrete housing market areas. They include the localised market of Billingham, the self-contained urban area of Stockton and those areas serving the city region market i.e. Ingleby Barwick and Yarm and rural areas. Taylor Wimpey's more detailed understanding of the market suggests that there are indeed further sub areas within those identified.

The variety of housing markets across the Borough and the main strategic objectives of housing policy (PPS3) to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community dictates that Stockton Borough Council must allocate new housing on a combination of sites and not concentrate on a single large site. Failure to adopt such an approach would inevitably render the Core Strategy Review unsound and open to the same problems as is currently being experienced i.e. lack of choice and flexibility.

It is right that the Council continue to strive to achieve regeneration. However, it is clear that the approach of constraining almost all new development within the Core Area, as per the Core Strategy 2010, has failed and will result in a failure to meet the housing needs of the existing and future population and will stymie much needed regeneration. Adopting a similar approach of restricting new development to a single location would create the same issues.

#### **46/5 Taylor Wimpey Strategic Land**

##### SUGGESTED SITES

Taking into account the aspirations of the Sustainable Community Strategy, the Core Strategy (Appendix 1 of the Issues & Options Paper) the roles of the differing housing markets (identified in the SHMA), and own understanding of the housing markets within the Borough it is clear that a significant amount of the required housing development over the plan period should take place in and around Stockton's Main Urban Area. This will ensure that the aspirations are met, in particular to deliver a healthy and vibrant Stockton Town Centre as the main centre of the Borough. Moreover the housing must be located in a location that ensures good accessibility to all jobs, facilities, good and services within the Borough.

Taylor Wimpey Strategic Land have considered the range of sites put forward by the Council to address the identified housing needs over the plan period. Mindful of the regeneration aspirations of the Council and the need to deliver new development in the most sustainable locations (Core Strategy, PPS1 & PPS3), it is our view that an urban extension to the west of Stockton's urban area would provide an appropriate and sustainable location for significant housing development that meets the identified needs of the existing and future population of the urban area.

#### **46/6 Taylor Wimpey Strategic Land**

Taylor Wimpey Strategic Land would strongly support the allocation of the land south of Preston Farm Industrial Estate - shown on Figure 1 overleaf, as a strategic housing site in the Revised Core Strategy.

The site shown on Figure 1 (excluding the existing converted Farm Buildings on Preston Lane) extends to approximately 34ha gross. It is split in two by Yarm Road with the area to the west of Yarm Road extending to approximately 5.5ha and the land to the east covering 28.5ha. Both areas are flat with few distinguishing physical features and are currently in intensive agricultural use (arable). There is limited public access to this area except along Preston Lane and the River Tees. The area shown on Figure 1 is smaller than that identified in the Issues and Options Consultation Report (51 ha) which includes additional land to the east adjacent to Queen Elizabeth Way.

The site is bounded by Preston Farm Industrial Estate to the North, the Darlington / Yarm - Stockton railway line to the west, Preston Park to the south and agricultural land, beyond which is the River Tees, to the east.

## 46/7 Taylor Wimpey Strategic Land

In planning policy terms the site is allocated in the Core Strategy (see extract from Key Diagram – Figure 3) as Green Wedge and as part of the Tees Heritage Park (Policy CS10). Policy CS10 states that the purpose of Green Wedges is to maintain the separation of settlements and the quality of the urban environment through the protection and enhancement of the areas designated as Green Wedge. The aim of the Tees Heritage Park designation is to also to improve the quality of the urban environment where this would contribute towards the “strengthening habitat networks” and the “robustness of designated wildlife sites.

In the light of this policy context Taylor Wimpey Strategic Land consider that it would be possible to combine the overall Policy CS10 objectives concerning Green Wedge and the Tees Heritage Park with the delivery of housing development on a substantial part of the land south of Preston Farm Industrial Estate, as shown on Figure 1.

In the Local Plan Proposals Map the Green Wedge in this area is shown as incorporating the whole of the ‘gap’ between Preston Farm Industrial estate to the north and Preston Park and the built up area of Eaglescliffe to the south. The only characteristic of this ‘gap’ that contributes towards Policy C10 objectives is its openness. In all other respects it is of little inherent landscape, ecological or amenity value. For the most part the ‘gap’ is only experienced on the ground by those vehicle occupants on Yarm Road as a very fleeting interlude between the built up area of Eaglescliffe and the visually dominant larger scale industrial buildings and car dealerships at the southern end of Preston Farm Industrial Estate.

The opportunity exists therefore, to reconsider whether it is necessary or desirable to continue to allocate all of this land as Green Wedge in order to maintain the functions that have been outlined for it in policy CS10, i.e. separation of settlements and improving the quality of the urban environment. Consideration should be given as to whether there is a better way to achieve these objectives, and whether as part of that process it is possible to incorporate an element of new housing development into this area whilst still maintaining the separation of settlements.

Green Wedges are a common and long established policy designation throughout the Tees Valley and come in a variety of shapes, sizes and widths – many are much narrower than the gap between Preston Farm Industrial Estate and Eaglescliffe e.g. Spencer Beck, Ormsey Beck in Middlesbrough and still deliver the functions of the policy. On this basis a Green Wedge does not need to be of any specific minimum width to be effective, nor does its width have to be consistent.

It is our view that if one takes an imaginative design led approach to development in this location, that seeks to combine the provision of pockets of new housing development in this area together with significant amounts of landscaping, tree planting and public open / amenity space that will help to emphasise the physical differences and physical / visual separation between the predominantly industrial area to the north and the residential area to the south, a high quality sustainable environment can be delivered. This solution will maintain physical gap between these two sections of the wider conurbation, sufficient to delineate their separate characters, but also through the use of careful tree planting, landscape design and sensitively located housing areas, significantly enhances the quality of the urban environment and provide a much greater element of publicly accessible amenity opens space and woodland to enhance the setting of Preston Park to the south.

## 46/8 Taylor Wimpey Strategic Land

In all other respects the development of housing in this broad location would be a sustainable development option – as demonstrated by the Council’s own Sustainability Appraisal. Bearing in mind the smaller scale of the site being promoted by Taylor Wimpey Strategic Land, compared to that identified in the issues and Options Report and the design led approach to this site suggested above we would however suggest the following changes to this assessment of the site:

SA6 Health and Wellbeing: We would recommend that that the correct Impact Assessment for this objective should be a . Adequate ‘separation distances’, landscaping etc could be provided as part of detailed designs to ensure no adverse impact from the occupants of the industrial estate to the north.

SA7 Environmental Infrastructure: We would recommend that that the correct Impact Assessment for this objective should be a . As highlighted above issues relating to the green wedge/strategic gap can be addressed through detailed designs and layouts whilst the revised site boundary ensures that the development will be remote from Local Nature Reserve sites that are several hundred metres away to the east on the other side of Queen Elizabeth Drive.

SA8 Sustainable Communities: We would recommend that that the correct Impact Assessment for this objective should be a . It is acknowledged that the nearest retail designation is Station Road, Eaglescliffe, approximately 1.5km to the south. However this distance is not excessive and as pointed out in relation to SA9 the site is in an otherwise highly sustainable location with good road and public transport access to the town centre, employment areas etc. Accessibility to shops is little different to other sites identified in the Issues and Options report. We also do not accept the comment that the site’s location makes “access to any facilities to the north of the site, unattractive.” In any event this has no bearing on sustainability objectives.

SA10 Culture and Heritage: We would recommend that that the correct Impact Assessment for this objective should be a . The design led approach would allow any potential heritage features on the site to be integrated within the overall design and to be properly protected for future generations.

#### **46/9 Taylor Wimpey Strategic Land**

The Council, in light of the 'Planning for Growth' Ministerial Statement and the emerging National Planning Policy Framework should plan to 'increase significantly the delivery of new homes' (Draft NPPF Key Housing Objective). This will not be realised by simply relying on RSS targets.

Given significant delivery issues associated with them, we agree that the Council can no longer rely on sites in the Core Area for new housing between 2013 and 2028.

Given the uncertainty over Education and Health Care funding it would be unrealistic to factor in/plan for any housing development upon any existing school or hospital sites.

The Council have significantly over-estimated the deliverability of a number of sites in the urban area which are heavily constrained or in areas that are unattractive to the market. The result is that the Council does not have a robust and credible supply of deliverable housing sites as required by PPS3 (and emerging future policies). Immediate action must be taken to address this through the grant of planning permission and allocation of land for housing development.

Stockton has a number of discrete housing market areas. In order to deliver a wide choice of high quality homes, both affordable and market housing and to address the requirements of the diverse community and housing markets, Stockton Borough Council must allocate new housing on a combination of sites.

In order to achieve a number of the Council's key aspirations of the Sustainable Community Strategy and Core Strategy, to deliver a healthy and vibrant Stockton Town centre as the main centre of the Borough and to deliver housing in a location that ensures good accessibility to all jobs, facilities, goods and services, the Council should make provision for significant housing development around Stockton's main urban area.

Overall Taylor Wimpey Strategic Land consider that the Land South of Preston Farm has the potential to deliver a significant number and mix of new dwellings, is in a location that is well related to the pattern of development in the Conurbation, is highly accessible by a variety of modes of transport and is in a location that people want to live. It should therefore be considered to be a 'priority site' for allocation through the Revised Core Strategy. Policy issues relating to existing green wedge policy can be addressed through an imaginative design led approach to the development of the site that will not only preserve adequate separation between settlements but enhance the area's appearance and improve the quality of the urban area in line with adopted Core Policy.

#### **47/0 Yuill Homes and Persimmon Homes**

We support any planning policy that provides flexibility for housing delivery. One of the key faults with the planning system has been complete its inability to cope with changing economic conditions and its reactive nature to circumstances. This, together with slow response times that mean that by the time a plan is adopted, circumstances have changed yet again, have meant that it has failed consistently to provide for enough housing.

If the Core regeneration sites become deliverable between now and 2028, then their delivery should be supported and there will be developers willing to develop them, provided it can be done so viably. In the meantime, the Council is correct to identify alternatives.

## 47/1 Yuill Homes and Persimmon Homes

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

We agree that this is the case, and have expressed doubts as to the deliverability of significant housing levels on the Core brownfield sites identified for some considerable time.

Q2: Do you agree with the approach?

We support any planning policy that provides flexibility for housing delivery. One of the key faults with the planning system has been complete its inability to cope with changing economic conditions and its reactive nature to circumstances. This, together with slow response times that mean that by the time a plan is adopted, circumstances have changed yet again, have meant that it has failed consistently to provide for enough housing.

If the Core regeneration sites become deliverable between now and 2028, then their delivery should be supported and there will be developers willing to develop them, provided it can be done so viably. In the meantime, the Council is correct to identify alternatives.

Q.3 Which of the following options for the distribution of new housing sites do you agree with?

- a. concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. allocate new housing on a combination of sites

We support option b, which is to allocate new housing on a combination of sites. Yuill and Persimmon continue to promote the land at Yarm Back Lane for an urban extension, in particular that part of it to the east of Yarm Back Lane (2010 SHLAA ref 23). We would support allocation of the latter area together with other sites if the Council prefers that approach.

Depending upon how the Council decides to phase the release of site, we believe that the gap of 2,800 units is more likely to be deliverable if a wider choice of sites is available. In Fig.1 the trajectory suggests that the deficit will not start until 2021 (assuming other existing permissions are actually delivered up to that point), which is approximately 8 years remaining in the Plan period. This assumes that the 'new' site(s) would have to deliver approximately 350 per annum to meet the housing shortfall.

We believe it is unlikely that a single large site would deliver 350 units per annum, even if more than one developer were involved. Such levels would have been difficult to achieve before the credit crunch.

We believe the land promoted by Yuill and Persimmon is an appropriate urban extension, because the traffic impact on the existing road network will be less, as much of the additional traffic travelling outwith the area will use the relatively quiet Yarm Back Lane, rather than existing main roads through the town, which will already see heavy use. This is notwithstanding any highway impact mitigation provided as a result of any major development. A representation to the original Core Strategy, submitted at the end of 2008, included a master plan of how the area east of Yarm Back Lane could be developed, and this included measurements of distances to various local services. This, together with the original representation, has been forwarded (separately by post) for the Council's attention once again as a reminder. Much of it remains relevant and forms a useful basis for discussion on how the site could be developed.

Clearly, if the Council decided to allocate the wider Yarm Back Lane area for 3,120 dwellings, then this provides sufficient critical mass to provide extensive local services. Given this would mean less need to travel off-site, proximity to existing services is less of an issue. However, even if the Council decided to only allocate as far west as Yarm Back Lane (as promoted by Yuill and Persimmon), there is scope to include some local services within this area, e.g. a small retail centre with some local services.

We do have concerns that the addition of further land to the west of Yarm Back Lane has compromised the assessment in the Sustainability Appraisal of the land originally promoted by Yuill/Persimmon, in particular the measurements of distances to existing services etc. We feel that taken alone, the Yuill/Persimmon land included in SHLAA ref 23 would have a much more favourable assessment, and indeed this has been reflected in its inclusion in the SHLAA as being suitable. This area alone has a capacity of between 795-927 dwellings if the proposed master plan was accepted. We would query the Council's reasons for including the additional land to the west, given the relatively unfavourable assessment that results from this.

In the Sustainability Appraisal, we would query whether the adverse comments under SA2 Climate Change, and SA9 Transport and Communication, and the comments in paragraph 3.37 have actually taken account of the master plan submitted with the representation of December 2008, which showed attractive routes to the existing bus stops on Surbiton Road, through the existing residential area. This contradicts the Council's comments under SA2, SA3 and SA9.

We would also query why this site has been highlighted under SA3 Environmental Limits as potentially causing road network issues, when the same potential has not been highlighted at Harrowgate Lane. One would have thought that any major allocation would have some traffic impact; yet in the absence of detailed assessments favouring one over the other, it would seem prudent to treat both sites the same at this stage.

However, we do believe that an urban extension of this size is deliverable and if properly designed, sustainable. We believe it will be possible to assemble the site, and also that an urban extension of this size allows for sufficient economies of scale that all adverse impacts can be mitigated against.

Paragraph 3.38 points out the unsuitability of Yarm Back Lane as an access point, due to its being a 60mp road with no lighting etc. Yet, paragraph 3.35 then contradicts this in stating that Yarm Back Lane should become redundant as a new estate road will be required. We therefore think the unfavourable comments on Yarm Back Lane in paragraph 3.38 are irrelevant, since the nature of Yarm Back Lane could easily change if the site were to be developed. The submitted master plan included the provision of a new cycle route through the site.

In conclusion, Yuill and Persimmon remain willing to work with the Council to bring the site at Yarm Back Lane (or part of it) forward to achieve the Council's housing delivery targets, and also to discuss how it might assist in achieving other regeneration priorities.

#### **47/2 Yuill Homes and Persimmon Homes**

We agree that this is the case, and have expressed doubts as to the deliverability of significant housing levels on the Core brownfield sites identified for some considerable time.

#### **47/4 Yuill Homes and Persimmon Homes**

We support option b, which is to allocate new housing on a combination of sites. Yuill and Persimmon continue to promote the land at Yarm Back Lane for an urban extension, in particular that part of it to the east of Yarm Back Lane (2010 SHLAA ref 23). We would support allocation of the latter area together with other sites if the Council prefers that approach.

#### **47/5 Yuill Homes and Persimmon Homes**

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#### **47/6 Yuill Homes and Persimmon Homes**

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However, we do believe that an urban extension of this size is deliverable and if properly designed, sustainable. We believe it will be possible to assemble the site, and also that an urban extension of this size allows for sufficient economies of scale that all adverse impacts can be mitigated against.

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In conclusion, Yuill and Persimmon remain willing to work with the Council to bring the site at Yarm Back Lane (or part of it) forward to achieve the Council's housing delivery targets, and also to discuss how it might assist in achieving other regeneration priorities.

#### **47/7 Yuill Homes and Persimmon Homes**

#### **47/8 Yuill Homes and Persimmon Homes**

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#### **47/9 Yuill Homes and Persimmon Homes**

Clearly, if the Council decided to allocate the wider Yarm Back Lane area for 3,120 dwellings, then this provides sufficient critical mass to provide extensive local services. Given this would mean less need to travel off-site, proximity to existing services is less of an issue. However, even if the Council decided to only allocate as far west as Yarm Back Lane (as promoted by Yuill and Persimmon), there is scope to include some local services within this area, e.g. a small retail centre with some local services.

#### **48/1 Individual**

I know it is remiss of me replying so late, but I would like to say that I think quite a lot of the old guard in planning department know about my opposition to any development taking place in West Stockton, especially land on Yarm Back Lane. I have fought for years for this open countryside to be left as such. That has been for the last thirty years as long as I have been a councillor. I hope my comments will be taken into account.

#### **49/1 Howson Developments Ltd**

Re: Development Assessment, Land off Green Lane/Leven Bank Road, Yarm

I refer to the above and enclose a Development Assessment prepared by Howson Development Limited for a parcel of land previously identified by the Council for potential housing development within the SHLAA.

This analysis considers the site, its constraints and the manner in which it could be developed whilst maintaining the leisure facility that has been approved for the land.

You will see that we have considered the site in terms of its accessibility, sustainability and, crucially, deliverability over the next 20-25 years.

You may be aware that the land in question has full planning permission for an 18 hole golf course and outline permission for a country club including a range of health and leisure facilities. A full planning application for the country club will shortly be submitted to the Council for consideration. The plans for that facility are currently the subject of a public consultation exercise.

In light of the Council's decision to review the development potential of this land, we felt it would be useful to assess how part of the site could be developed to provide both the required housing in this part of Yarm alongside the much needed leisure and recreational facility.

It can be seen that the only likely variation in the delivery of the overall development would be a change in the golf offer - from the proposed 18 hole golf course to a 9 hole course. Subject to the allocation of the area indicated on the attached plans for housing, we would envisage providing the 18 hole course and amending this in the timescale of approximately 10 years to allow housing development to proceed.

We remain more than happy to discuss the form and phasing of any development on the site with the Council.

See hard copy of site assessment attached.

#### **49/2 Howson Developments Ltd**

Development Assessment submitted by Howson Developments. The proposed development now includes a larger site and partially retained for golf and leisure facilities, with the remainder for housing.

#### **49/3 Howson Developments Ltd**

#### **50/1 Individual**

We have studied the Development Plan and as residents of the Stockton area are shocked to learn of the number of dwellings which could be built here.

We live in Yarm and already have difficulty driving into the High Street as all roads are frequently blocked by traffic, not only at normally busy times but all day. This problem will not be helped by the position and expansion of the new medical centre and also by the enlargement of Yarm School.

Already parking in Yarm and at the existing medical centre are next to impossible. The infrastructure of the area cannot cope with more buildings of the suggested number.

We find it difficult to see the need for more housing here as there are so many new houses and flats that have been left unoccupied for the last few years.

### **51/1 Partner Construction**

We write in respect of the Issues and Options Consultation, pertaining to a revised Version of the Core Strategy in response to the lack of residential delivery over the period since adoption of the existing Core Strategy (March 2010). These representations are prepared on behalf of Partner Construction who have discussed the possibility of an affordable housing residential development within the 'Tier 1' village of Stillington.

Representations have been made against the questions within the Issues and Options Core Strategy which are relevant to the land interests of Partner Construction.

### **51/2 Partner Construction**

Question 1.

Partner Construction supports Stockton Borough Council's review of its allocated housing sites over the LDF plan period, having regard to the identified likely shortfall in residential delivery (circa 2,800 residential properties) over the period to 2028. A rolling review of land allocations is supported throughout national planning policy and allows local planning authorities to review the deliverability of existing allocated sites and any potential other sites which may contribute towards the 5 year housing land supply and beyond.

In this respect, the Council's review of deliverability of existing Core Area sites for development between 2013 and 2028 is considered to be appropriate. Partner Construction supports the approach taken by the Council in this respect. Whilst this is the case, it should be noted that an independent review of each of the individual sites has not been undertaken at this stage.

## 51/3 Partner Construction

### Question 3

It is important to maintaining the sustainability of smaller rural settlements within the Borough, to allocate a proportion of development within these areas over the development plan period. Due to the scale of these settlements, it is not, however, considered that significant proportions of the identified 2,800 dwelling shortfall need to be identified within these areas albeit development may be considered 'significant' in the context of the size of the villages.

In this respect, Issue 5 of the Issues and Options Core Strategy considers the provision of development within the village communities. It is important that any village development continues to recognise the wider sustainability objectives of national planning policy in locating development in the most suitable settlements. In this respect the provisions of the emerging National Planning Policy Framework (NPPF) and Localism Bill are taken into consideration.

The Council's 2008 document 'Planning for the future of Rural Villages in Stockton-on-Tees' is an important part of the evidence base for development within the village community. In this respect, it is noted that the village of Stillington is the only 'Tier 1' settlement within the study out of a total of 14 settlements. Tier 1 settlements are considered to be the most sustainable locations and, having regard to wider sustainability objectives, would be the preferred location for rural development.

As it is noted that Stillington is the most sustainable of the villages within the Borough, it is also noted that there are only 2 sites within the village identified within the most recent version of the SH LAA.

Of those two sites, the site known as Land north of South Street, Stillington was promoted with the only restriction over its deliverability within the SHLAA being the need to relocate the existing allotments. The alternative site within Stillington (SHLAA Ref: 38) lies to the north-west of Stillington, adjacent to the existing employment uses, and was considered to be unsuitable due to its poor relationship with existing housing and bad neighbour uses, unavailable due to multiple ownerships and unachievable due to the access being an unadopted road.

It is confirmed through these representations that discussions have been held with the allotment holders with a view to relocating them to the immediate north of the existing site. Any planning application for development of the site would include such re-provision.

Having regard to this matter it is clear that the only 'deliverable' site within Stillington by reference to the requirements of PPS3 and the emerging national planning policy framework is the existing allotments site. The restrictions to delivery associated with the alternative site are more problematic having regard to the need to establish land ownership and ensure there is no environmental conflicts with surrounding land uses which cannot be easily altered as part of any development.

Having regard to the above matters it is considered that the existing allotment site is a suitable site for an allocation within the draft Core Strategy, under the consideration of development within sustainable villages.

In response to the Issues and Options question, it is considered that at least an element of the housing shortfall should be provided on a variety of sites in order to ensure the allocation of a single site does not result in further deliverability problems if a site is delayed for any particular reason.

## 51/4 Partner Construction

### Question 4

Having regard to the need to maintain development in the most sustainable locations, it is considered that only the most sustainable villages should be considered for village extensions within the development plan. Any other villages may be suitable for development over the development plan period (ie. affordable exception sites) although they are more likely to be required to demonstrate special circumstances to overcome any policy restriction.

**51/5 Partner Construction**

We trust the above representations are straight forward and will be given appropriate consideration in the preparation of the revised LDF Core Strategy. In this respect it is also suggested that the Council, in the consideration of representations to the Issues and Options Core Strategy, considers the emerging NPPF and the requirement for local authorities to prepare 'Local Plans' as part of their development plan framework.

In the meantime, should you have any further queries in relation to this matter please do not hesitate to contact me.

**52/1 Long Newton Parish Council**

Urlay Nook sites 1 and 2 have a combined number of 910 proposed houses, the Council feel that considerable investment will need to be made to the infrastructure in the area to cope with the requirements this size of development will create.

## 53/1 Theakston Estates (North East) Limited and Yarm School

### 1.0 Introduction

#### Purpose

1.1 This representation to the Stockton-on-Tees Core Strategy Review Issues and Options Development Plan Document (“the Review”) has been prepared by Nathaniel Lichfield and Partners (“NLP”) on behalf of Theakston Estates (North East) Limited and Yarm School (“the Client”).

1.2 It is submitted specifically in respect of land at South West Yarm, which Stockton-on-Tees Borough Council (“the Council”) has identified in the Review as a potential urban extension site for housing (figure 15). Indeed, that Review confirms the site “can support a housing development of strategic importance and is located adjacent to a number of local services and facilities, including Yarm Railway Station, which is located in the centre of the site and provides excellent public transport links”.

1.3 This representation should be read alongside the accompanying ‘Visioning Document’ which outlines the strategy for the development of land at South West Yarm and the Client’s wider landholdings.

### Background

1.4 South West Yarm is being promoted for housing development by the Client as part of a wider strategy which will deliver:

- Residential development of approximately 750 new dwellings at South West Yarm;
- Relocation of Yarm School playing pitches at South West Yarm to land directly opposite the school;
- Provision of a new long-stay car parking facility for Yarm Town Centre;
- Increased public open space for residents of Yarm and Egglecliffe with new and enhanced linkages to Yarm Town Centre;
- Restoration of a heritage asset in Egglecliffe.

1.5 Land South West of Yarm therefore provides a unique opportunity to deliver a comprehensive development strategy which will bring wider community benefits to Yarm. Further details are provided in accompanying Visioning Document.

### Structure

1.6 The representation responds to the issues and questions set out in the Review and is structured as follows under the document’s headings as appropriate:

- Section 2.0: Rationale for Reviewing the Housing Element of the Core Strategy and at South West Yarm : Representation to Stockton-on-Tees Core Strategy Review
- Section 3.0: Deliverability of Core Area Sites
- Section 4.0: Flexibility
- Section 5.0: Distribution of Housing Sites
- Section 6.0: South West Yarm
- Section 7.0: Concludes.

## 2.0 Rationale for Reviewing the Housing Element of the Core Strategy

2.1 Our clients strongly support the Council’s decision to undertake a Review of the Core Strategy to ensure the Borough’s housing requirements can be met.

### The Current Policy Context

### The National Context

2.2 The Council’s approach reflects current national Planning Policy Statement 3 (“PPS3”) Housing (June 2011). Local planning authorities are, inter alia, required to:

- Use an evidence based policy approach to the delivery of housing
- Delivery of a flexible supply of land for housing

- Maintain a flexible, responsive supply of land.

2.3 Indeed, where local planning authorities do not have an up-to-date five year supply of deliverable housing sites paragraph 71 directs the favourable consideration of planning applications for housing. As such, to facilitate the proper planning of Stockton it is important a five year supply of deliverable sites is identified.

#### The Regional Context

2.4 The requirement to maintain housing delivery is equally highlighted in the requirements set by the Regional Strategy (RS). This requires that Stockton on Tees provides the following net additional dwellings:

- 2004 – 2011 600 units per annum
- 2011 – 2016 530 units per annum
- 2016 – 2021 525 units per annum.

2.5 This is the equivalent of 555 units per annum on average, the figure local authorities are required to plan for post 2021 (see policy 28). Additionally, paragraph 3.89 confirms that:

“the gross and net dwelling provisions set out in Policy 28 are guideline figures and do not represent a ceiling; LDFs may make the case for higher figures as appropriate.”

2.6 We note, however, that structural reforms of the planning system are currently underway through the Localism Bill which proposed revocation of the RS and incorporation of the National Planning Policy Framework (“NPPF”) which will replace all current Planning Policy Statements and Guidance Notes. It is, therefore, likely that the Review will ultimately be finalised under the emerging policy context as opposed to the current framework.

#### The Emerging Policy Context

2.7 The emerging NPPF (July 2011) confirms:

“The Government’s key housing objective is to increase significantly the delivery of new homes.”

2.1 This was recently re-affirmed by Grant Shapps MP, Minister for Housing and Local Government, stating that:

“...we must build more homes. The ‘demographic imperative’ demands it.”<sup>1</sup>

2.2 Accordingly, the NPPF requires that local planning authorities should, amongst other aspects,:

- Use an evidence base to ensure that their Local Plan meets the full requirements for market and affordable housing
- Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land
- Identify a supply of specific, developable sites or broad locations for growth, for years 6 – 10 and, where possible, for years 11 – 15
- Not make an allowance for windfall sites in the first 10 years unless they can provide specific evidence of genuine local circumstances which prevent specific sites being identified.

2.3 Further, in order to deliver a wide choice of quality homes and widen the opportunities for home ownership the NPPF states that Local Planning Authorities should:

“...plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community...”

“...identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand...”

2.4 The Planning Inspectorate has confirmed the emerging NPPF represents a material consideration in development plan casework confirming:

“...it gives a clear indication of the Government’s ‘direction of travel’ in planning policy. Therefore, the draft National Planning Policy Framework is capable of



being a material consideration, although the weight to be given to it will be a matter for the decision maker's planning judgment in each particular case.”

2.5 More recently, the Government's NPPF 'Myth Buster' records:

1 Speech at the Housing Market Intelligence Conference 2010, 25 November 2010

“The average first time buyer is already well over thirty. House building has slumped to its lowest level since 1924 and planning is a significant factor. .... This is about building homes which future generations can be proud of.”

The Evidence Base

The Housing Requirement

2.6 The Council's proposed Review is predicated on a rolling forward of the RS requirement set down at policy 28. This, however, is based on evidence which is some four plus years old.

2.7 As the Council notes the Review will likely be finalised in a policy environment where RS has been revoked. This provides an opportunity and requirement for the Council to determine housing requirements locally subject to the provision of robust evidence to support the chosen target.

2.8 More recent evidence, taking into account the most recent household and population projections<sup>2</sup> would, in our view, support a dwelling target in excess of the RS. In this context the RS target should be regarded as an absolute minimum.

2.9 We, therefore, consider the Council should give further consideration to outlining the evidence base which will underpin the housing target and the quantum of additional allocations through the Review. Based on an initial review of the more recent contemporaneous evidence a requirement above the currently stated 2,800 dwelling' shortfall may be appropriate.

2.10 Additionally, the emerging NPPF also requires the incorporation of an additional allowance of at least 20% in the rolling five year supply to ensure choice and competition in the market for land.

2.11 We look forward to working with the Council to ensure that the overall target and the requirement for additional housing allocations based thereon, is fully up- to date and appropriately evidenced.

The Strategic Housing Market Assessment (“SHMA”)

2.12 The 2009 SHMA confirms:

- A largely self contained market for the main urban area of Stockton
- A Tees Valley City Regional Market comprising Ingleby Barwick and Yarm (insofar as it relates to Stockton).

2 ONS 2008-based Household Projections 2008 to 2033 (26 November 2010) and ONS 2008-based Sub-national Population Projections for England (SNPP) (27 May 2010)

2.13 Further, within Stockton the data indicates:

- An overall picture of demand exceeding supply, particularly in the Yarm/Preston/Eaglescliffe, outer core and rural areas
- Demand largely reflecting supply in Ingleby Barwick and Thornaby;
- Shortfalls of one and two bedroom dwellings across most sub-areas, with demand exceeding supply of larger three or more dwellings in the Inner Core, Outer Core, Rural and Yarm/Preston/Eaglescliffe sub areas.

2.14 Additionally, there is a strong desire (25%) for detached houses, which considerably exceeds the proportion of the dwelling stock (15%). Conversely, the preference for terraced housing (19%) is considerably less than the stock (28%).

## Mortgage Availability Index

2.15 NLP's Mortgage Availability Index has considered the alignment between identified housing sites and mortgage finance.

### Transaction Rates

2.16 The number of transactions in Stockton fell from 4,601 in 2007 to 2,077 in 2009; this represents a fall of 55% which is close to the North East average of 60%. However, analysis at the post code sector level is the most illuminating as it demonstrates that the real impact of the changing market conditions is at the local level. Falls in transaction levels were recorded in all post code sectors in Stockton. 13 out of the 27 postcode sectors in the Borough experienced an above regional average fall in transaction levels and these are largely concentrated in the inner urban area.

2.17 Before looking at the housing supply picture it is necessary to establish criteria within which localities will be considered high risk for the non delivery of planned housing sites. Whilst this is ultimately a judgement based decision, it is reasonable to assume that those postcode sectors that performed worse than the regional average would be viewed as unattractive by lenders due to the risks posed by those who were applying to buy homes there and the inherent risks in the property market in that particular location. As the North East has been England's worst performing region, we suggest that lenders would recognise the relative merits of focusing upon those areas that have performed most robustly through the market turbulence. Areas of risk are therefore defined as having a decrease in the percentage of housing transactions the same as or greater than the North East average.

2.18 In summary, the Mortgage Availability Index highlights potential housing delivery challenges ahead for those post code sectors that have had falls in housing transaction levels of greater than the regional average.

### Housing Supply Pipeline

2.19 PPS3 seeks to identify a pipeline of housing supply through the requirement for each local authority to prepare a Strategic Housing Land Availability Assessment (SHLAA) and Annual Monitoring Report (AMR). It is therefore relatively straightforward to map the Borough's housing supply pipeline.

2.20 The Stockton SHLAA (2010) identified a potential housing supply within the borough of 10,251 dwellings as at 1st April 2010. This supply is 1,444 dwellings short of the requirement albeit that position is now far worse as confirmed in the Review document and potential future housing requirements.

2.21 To establish the proportion of the deliverable and developable supply (i.e. the 0-5 and 6-15 year supply) that scores badly on the Mortgage Availability Index it is necessary to map falls in the level of housing transactions against planned housing supply.

2.22 GIS data for each of the deliverable and developable sites was provided by the Council. The results are shown in the Table 1 and Figure 1 below.  
Table 1 SHLAA deliverable and developable supply and % 'at risk'

Figure 1 Stockton housing supply mapped against the % change in housing transactions by postal sector

2.23 As shown above, the implication of this analysis is that 22% of the deliverable housing supply identified by the Stockton SHLAA 2010 is assessed as being subject to a delivery risk on the basis of a reduced mortgage lending context. Figure 1 shows that the high risk locations are both concentrated on central Stockton and are performing consistently poorly indicating that a strategy of restricting supply to locations in central Stockton only is likely to further exacerbate the existing problem of undersupply.

### The Economic Imperative

2.24 Our clients fully support the Council in recognising the economic importance of new housing. Not only will new housing provide a direct boost to the regional construction industry it also makes an important contribution to the economic competitiveness of an area.

2.25 New housing will also assist in securing the longer term economic benefits and inward investment that flow from the spending power and wealth creation of increased population through providing greater housing choice.

2.26 Additionally housing delivery will enable the Council to harness financial receipts from the Government's New Homes Bonus amounting to £3.9m for every 555 dwellings delivered (the annual RS requirement) and commensurately higher for housing delivered beyond this level.

#### Implications for Society

2.27 There is a need to deliver new housing requirements to ensure that the provision of affordable housing can be maximised. The current Core Strategy policy target seeks the provision of 15 – 20% affordable housing.

2.28 In determining the Council's strategy viability will plainly remain a central issue. As such, it will be important for the Council to focus on innovative measures to deliver affordable housing and, particularly, those sites which are attractive to the market and will generate higher values.

2.29 Additionally, as the attached Visioning Document for land at South West Yarm demonstrates the opportunity exists for development to secure wider public benefits, for example:

- Provision of a new long-stay car parking facility for Yarm Town Centre;
- Increased public open space for residents of Yarm and Egglecliffe with new and enhanced linkages to Yarm Town Centre;
- Restoration of a heritage asset in Egglecliffe.

2.30 Finally, as noted above, new housing and population will also assist in supporting public services and retail provision.

#### Conclusions

2.31 Drawing the preceding together the following are of note:

- Our clients fully support the Council in the Review
- Both current and emerging policy emphasises the need to provide new housing to meet defined requirements
- In determining future housing requirements a robust evidence base will be essential and it is suggested the Council gives consideration to the implications of the 2008 ONS projections in this regard
- Without a 5 year housing supply it is difficult for the Local Planning Authority to plan properly
- The Review provides an opportunity to address the SHMA defined imbalance in housing stock
- Through the Review there is an opportunity to capture the socioeconomic benefits of new house-building.

#### 3.0 Question 1: Deliverability of Core Area Sites

3.1 It is entirely appropriate that the Council re-appraises and review the approach to meeting stated housing requirements.

3.2 The Council's Core Strategy represents an ambitious and challenging strategy to meet the Borough's housing market with the priority being focused to the Core Area. The Core Area, however, represents the most challenging market within the Borough and, notwithstanding the current economic climate, many of the sites identified required public sector finance (this is no longer an option).

3.3 The Core Strategy envisaged approximately 38% of all new dwellings (2,600 units) being constructed within the Core Area in the period to 2016. Thereafter, the proportion of new development is expected to rise around 55% (500 – 700units) for the period to 2021. Finally, in the latter plan period, 2021 to 2024, the proportionate emphasis on the Core Area increases further to 73% - 82% (450 – 550 units) albeit from a smaller overall output.

3.4 Whilst the Council currently has over 200 sites with planning permission, totalling some 6,781 units, there remains a requirement to identify further land – particularly in the latter phases on the plan period. This is because a number of sites within the Core Area are currently being re-planned (e.g. North Shore) and the overall yields will likely decrease.

#### The Delivery Challenges

3.5 The Strategic Housing Land Availability Assessment (“SHLAA”) identifies some 1,352 units as being not currently available. These comprise Chandlers Wharf, Tees Marshalling Yards and Bowesfield North, the Council acknowledging (paragraph 3.13) that the public investment required for these sites to be developed is too uncertain to be relied on. We also note these sites are similarly located in the most challenging housing market areas as confirmed by the mortgage availability analysis.

#### Chandlers Wharf

3.6 The SHLAA records:

- The site is not currently available and subject to a number of different leaseholds
- The Council is supporting attempts to secure the freehold
- The site is at risk of flooding and will be designated flood zone 2
- The impact on the strategic road network would be major.

3.7 There are, therefore, a number of significant obstacles to release of Chandlers Wharf, not least, land ownership. Further, the site’s location within flood zone 2 indicates a presumption against development through both PPS25 and the emerging NPPF.

#### Tees Marshalling Yards

3.8 The SHLAA records:

- The site is not currently available but anticipated to become available in 2018
- 23% of the site is at risk of flooding and will be designated flood zone 2
- The impact on the strategic road network would be major
- New electricity sub station would be required
- Remediation costs would be high.

3.9 The Council has previously cautiously estimated that any new dwellings would be completed post 2021. Significant work and viability challenges remain, as outlined above and as such the Council anticipates outputs cannot now be assumed in line with the PPS3/NPPF deliverability tests.

#### Bowesfield North

3.10 The SHLAA records that:

- The site is not currently available and subject to a number of different ownerships
- Agreement to a comprehensive master plan is actively being pursued
- Part of the site is at flood risk
- Highways impacts to the strategic road network.

3.11 Again, it is therefore, clear that the Bowesfield North site has a number of obstacles to be overcome, including the establishment of a clear vision for the future through a joint master plan. Our clients, therefore, support the Council in their revised assessment of deliverability.

#### Conclusions

3.12 The Core Strategy has previously provided a clear focus on development within the Stockton Core Area. This has been projected to increase, proportionately, throughout the Core Strategy period to 2024.

3.13 There are, however, a series of delivery challenges which now justify a revised approach:

- Falling yields within the Core Area through re-master planning and the loss of flatted developments
- Difficult market conditions within a market area which is predominantly internal to Stockton
- Strategic sites cannot be relied upon to deliver given the stated constraints and requirement for public sector investment.

#### 4.0 Question 2: Flexibility

4.1 We note and welcome the Council's comments at paragraph 3.14 which align with the emerging NPPF to provide for choice and competition within the market for land. Given the significant investments required to progress a development site it is important that land owners and developers are provided with certainty, such that if a site is allocated, it can be reasonably expected to be developed. The Council's approach provides for this whilst also enabling regeneration sites to be brought to the market should the issues in section 3.0 be overcome more quickly than anticipated.

#### 5.0 Question 3: Distribution of Housing Sites

5.1 The most appropriate option to meeting the housing shortfall is through the allocation of a combination of urban extension sites across the Borough.

5.2 This spatial approach will ensure a balanced approach to meeting future housing requirements in line with the Government's objectives for housing. Importantly, through providing a combination of sites it will be possible to address a number of the issues outlined in the SHMA and target different housing market areas.

5.3 Further, through the release of a number of urban extension sites of a significant scale (500 units plus) the opportunity to secure significant investment in community infrastructure remains. This enables a series of strategic developments to be brought forward across the Borough each delivering specific local improvements.

#### 6.0 South West Yarm

##### Introduction

6.1 The section of our submission to the Review outlines the proposition for South West Yarm, figure 15 (page 29) within the Review document and should be considered alongside the accompanying Visioning Document.

##### The Proposition

6.2 South West Yarm is being promoted for housing development by the Client as part of a wider strategy which will deliver:

- Residential development of approximately 750 new dwellings at South West Yarm;
- Relocation of Yarm School playing pitches at South West Yarm to land directly opposite the school;
- Provision of a new long-stay car parking facility for Yarm Town Centre;
- Increased public open space for residents of Yarm and Egglecliffe with new and enhanced linkages to Yarm Town Centre;
- Restoration of a heritage asset in Egglecliffe.

6.3 Further details are provided within the Vision Document.

##### Deliverability

6.4 The following presents an analysis of the South West Yarm site against the objectives of both PPS3 and the emerging NPPF.

##### Availability

6.5 We can confirm, on behalf of our clients, that the land is available for residential development now.

6.6 Whilst part of the development would be contingent upon the re-location of Yarm School's existing playing pitches this comprises approximately 20% of the overall site area. As such, any residential development could be phased from west to east to enable sufficient time for the relocation proposals to be implemented. Notwithstanding, it is our clients intention that a joint planning application would be lodged for all elements of the proposition thereby enabling an early relocation of the playing pitches and on-site landscaping to be implemented.

#### Suitable Location

6.7 The Council's Review document and associated Sustainability Appraisal demonstrates that South West Yarm is one of the most sustainable sites for a residential release. No conflicts with the ten sustainability objectives are identified, further information on sustainability being provided below.

#### Achievable

6.8 Our clients can confirm that national house-builders have already expressed a strong interest in the development of South West Yarm following release of the Review document. As such, it is considered there is a realistic prospect that housing will be delivered on the site within five years.

6.9 Additionally, because contracts have recently been concluded, cognisant of current market circumstances and Core Strategy requirements (e.g. affordable housing), there are no viability issues that would preclude the release for housing now.

#### Sustainability Credentials

6.10 Sustainable development is defined by the Government as follows<sup>3</sup>:

"Our approach to sustainable development involves making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same."

6.11 The draft NPPF also identifies that:

"Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations."

#### Sustainability Appraisal

6.12 The Council's Sustainability Appraisal which accompanies the Review confirms the positive sustainable credentials of the South West Yarm site. Indeed, the Appraisal confirms the "site performs highly against the Sustainability Objectives".

6.13 We do, however, make the following observations in relation to the site: • SA4 – Developing a More Sustainable Employment Market - Whilst the Council indicates no strong relationship with this objective it is noted that the Yarm area is characterised by the 'professional rewards' socio-economic group who make a significant contribution to realising the economic success of an area. As such, releasing development at South West Yarm would play an important role in retaining those higher earning individuals within the Borough and stimulating economic activity.

#### 3 Presumption in Favour of Sustainable Development, Communities and Local Government, 15 June 2011

##### • SA6 – Health and Wellbeing

- Whilst a railway runs through the centre of the site this does not represent an obstacle to development. Early acoustic advice has confirmed any effects can be satisfactorily mitigated through enhanced glazing, boundary treatments and separation distances.

- Whilst the development would result in the loss of Yarm School's playing pitches these are in private ownership. As such, there is no public access currently. It is, however, important that compensatory provision is made for Yarm School and this is provided for within the proposition (together with controlled public access) thereby according with SA6.

##### • SA7 – Environmental Infrastructure

- The site's location adjacent to a Local Wildlife site is noted. As such, the master plan has been carefully designed such that any adverse effects are avoided through the creation of a significant landscape buffer providing a definitive southern edge to Yarm.

- SA8 – Sustainable Communities

- Through the release of South West Yarm the opportunity exists to maximise the role of Yarm Station as a key public transport interchange with increased car parking and better linkages to the core bus route. This will provide enhanced accessibility not only for the new residents but the existing community alike.

- SA10 – Culture and Heritage

- The South West Yarm proposition also provides for the restoration of the historic parkland located between Yarm and Egglecliffe. Additionally, also proposed is the restoration of Old Hall within Egglecliffe.

### Summary

6.14 Drawing the above together it is considered the South West Yarm site has the potential to make a significant contribution, above that stated within the Sustainability Appraisal, to the sustainability objectives.

### Socio-Economic Implications

#### Construction Benefits

6.15 Based upon an estimate of construction costs, it is projected the development would support the creation of more than 670 temporary jobs in the construction industry. Additionally, linkages with local suppliers and trades, and wage spend on local goods and services will support the creation of a further 80 permanent spin-off jobs.

6.16 Capitalising on the foregoing it is also estimated the proposed development will generate an additional £9.6m of Gross Value Added within the local area and beyond.

#### Increased Local Expenditure

6.17 In delivering high quality family housing the site will help attract and retain economically active households in Stockton Borough. This will assist in supporting the local economy, through increased expenditure, but also through new business formation. It is estimated the South West Yarm site could generate total gross annual expenditure in the order of £14.6m.

6.18 Recognising that not all residents will be new to the area and that only a proportion of their expenditure will be retained locally, it is estimated that the scheme could result in net additional spending within the local economy of approximately £3m per annum. This net uplift in expenditure can help to support the continued viability of existing shops and services in the local area, whilst also creating a market for ventures. It is estimated that this could result in the creation of more than 20 additional jobs in the retail and leisure sector in Stockton.

#### Increased Local Authority Revenue

6.19 Through the New Homes Bonus the proposed development will generate £9.4m for the local authority.

6.20 Additionally, a further £1.6m of Council Tax receipts will be secured per annum.

### Conclusions

6.21 In conclusion:

- The South West Yarm site represents a strong proposition for Yarm and Egglecliffe
- The site is deliverable now
- The site is one of the top performing in the Sustainability Appraisal with no conflicts identified
- The site will make a significant contribution to the local economy
- The opportunity exists to enhance the sustainability credentials of South West Yarm further.

6.22 We look forward to working with the Council and local community in progressing the South West Yarm proposition.

Please also see brochure vision document.

## **54/1 Co-operative Group**

### Question 1

The Core Strategy represented an ambitious and challenging strategy to meet the Borough's housing requirements with the priority being focused to the Core Area. The Core Area, however, represents the most challenging market within the Borough as confirmed by our analysis of mortgage availability (see Appendix 1) which confirms its relative unattractiveness to the development market.

It is clear that significant uncertainty of delivery within the Core Area has also arisen as a result of;

- Falling yields on sites with planning permission within the Core Area through re-master planning and the loss of flatted developments (e.g. North Shore);
- Constraints and requirement for public sector investment (which will not be forthcoming) to deliver Strategic sites at Chandlers Wharf, Tees Marshalling Yards and Bowesfield North (totalling 1,352 units).

The identification of new housing sites which are not subject to such delivery challenges will provide certainty in meeting stated housing requirements for Stockton over the plan period. In this regard the mortgage availability analysis indicates that Harrowgate Lane is in an area that has performed well in mortgage availability terms thereby providing confidence in its delivery prospects.

There is a clear requirement to identify further land for housing, particularly in the latter phases of the plan period. The CSR identifies a need to bring forward additional housing sites from 2018. However, through the most recent household projections and the draft NPPF's requirement for flexibility (see section 3.0) the opportunity to expedite release of new housing sites exists. Indeed, the Harrowgate Lane site could make an early contribution to meeting the Council's stated housing shortfall. We therefore consider it entirely appropriate that the Council re-appraises and reviews the Core Strategy's approach to housing supply.



## 54/2 Co-operative Group

Question 2:

We note and welcome the Council's comments at paragraph 3.14. Given the significant investments required to progress a development site it is important that land owners and developers are provided with certainty, such that if a site is allocated, it can be reasonably expected to be developed. It would not be appropriate to hold back the release of greenfield allocations in the event that Core Area sites become deliverable. We therefore support the Council's approach which facilitates the delivery of new allocations whilst also enabling regeneration sites to be brought to the market should the issues in section 2.0 be overcome more quickly than anticipated.

The emerging NPPF requires local authorities to take a flexible approach to supply to provide for choice and competition within the market for housing land. Therefore, to ensure adequate flexibility and certainty of meeting housing requirements, we contend that sites should be allocated to deliver the 2,800 additional dwellings required as an absolute minimum.

Furthermore, the Review will likely be finalised in a policy environment where the RS has been revoked thereby providing an opportunity and requirement for the Council to determine housing requirements locally subject to the provision of robust evidence to support the chosen target. We note that the Council's proposed Review is predicated on a rolling forward of the RS requirement set down at policy 28. This, however, is based on evidence which is now some four plus years old. Based on an initial review, the more recent contemporaneous evidence would support a dwelling target in excess of the RS target proposed (i.e. in excess of 700 dwellings per annum). A requirement above the currently stated 2,800 dwelling shortfall may therefore be appropriate.

In the light of the above we look forward to working with the Council to ensure that the overall target and the quantum of additional allocations proposed through the Review is fully evidenced.

## 54/3 Co-operative Group

We consider that the allocation of a combination of urban extension sites across the Borough is the most appropriate option to meeting the housing shortfall.

This strategy will ensure a balanced spatial approach to meeting future housing requirements in line with the Government's objectives for housing. Importantly, through providing a combination of sites it will be possible to target housing need in different housing market areas in the Borough and address a number of the issues outlined in the SHMA.

Furthermore, through the release of a number of urban extension sites of a significant scale (including Harrowgate Lane) the opportunity to secure significant investment in community infrastructure remains. This would enable a series of strategic developments to be brought forward across the Borough each delivering specific local sustainability improvements.

## 54/4 Co-operative Group

With regard to the proportional allocation of the housing requirement throughout the Borough we consider it appropriate that a large proportion of new housing should be focussed on Stockton commensurate with;

- Its size and role as the main urban area in the Borough;
- Housing demand - the SHMA indicates that housing need outstrips demand in the outer core area across all house types (except semidetached houses);
- Affordable housing need - the SHMA indicates that annual need in the outer core area is the highest of all sub-areas in the Borough;
- The location which most closely aligns with the Core Strategy's locational strategy for new development.

A focus on Stockton as the priority location for new housing development would not preclude the allocation of strategic sites in other locations reflecting the need for a balanced spatial approach (as above).

## 54/5 Co-operative Group

### Suitability

We strongly support the Council's conclusion at paragraph 3.31 that land west of Harrowgate Lane is; "one of the most sustainable locations considered within the issues and options report"

### Location

The site is sustainably located on a core bus route and within walking distance of services and facilities including:

- High Newham Court designated Neighbourhood Centre (within 700m of the site)
- Marske Parade designated Local Centre (within 300m of the site);
- Tesco supermarket (directly adjacent)
- Bishopsgarth School (directly adjacent)
- Hardwick Green Primary School (within 200m of the site)
- North Shore Health Academy (within 500m of the site)
- Hardwick Social Club (directly adjacent)
- Roseworth Community and Social Club (within 200m of the site)
- The Mitre and the Horse and Jockey Public Houses (directly adjacent)
- North Tees Hospital (within 1km of the site)

There are 8 park/recreation facilities within 500m of the site giving residents very good access to sport and recreation opportunities.

Development at Harrowgate Lane could provide an opportunity to enhance sustainability in this part of Stockton through development of a Community Hub which could incorporate ancillary convenience retail provision and other services and community uses.

### Transport and Accessibility

Access to the site from Harrowgate Lane is achievable.

As well as being within a convenient walking distance of a number of key shops and services set out above, the site is located on a Core Bus route and there are existing bus stops and laybys along Harrowgate Lane which would minimise the need to travel by car. Bus services are frequent (every 15 minutes Monday to Saturday).

We note that the SA does not envisage any significant network issues at this stage. However a Transport Assessment will be undertaken in due course to assess the likely effect on the road network and required mitigation.

The site is also directly accessible to the Castle Eden cycleway. Existing pedestrian crossings and cycle lanes on Harrowgate Lane provide safe access and connections to neighbouring residential areas. The development of the site would provide an opportunity to enhance pedestrian and cycle provision and connections along Harrowgate Lane and in the local area.

### Landscape

The site is within an area identified by the Council as having a mostly low but some medium landscape capacity for development although noting:

- The strong influence of urban development to east;
- Electricity transmission towers and large substations within the landscape and on the outskirts of Stockton

Preliminary Landscape and Visual Impact Assessment work has indicated that housing development would be viewed primarily from the west and higher ground to the north. However establishment of woodland blocks and structure planting along the western and northern boundaries would help to mitigate this, together

with internal planting. The visual impact of development in the northern part of the site is anticipated to be limited given the disused railway line and existing development which provide visual separation in views of this part of the site.

#### Ecology

The site is currently in use as arable farmland. Preliminary species and habitat investigations indicate, in broad terms, that the habitats present at the site are likely to be of low ecological value. The following initial findings are noted:

- Presence of hedgehogs and breeding birds;
- Potential bat roost (a further survey will be required to formally establish the presence or absence of bats at the site);
- No evidence of badger activity, reptiles, great crested newts or other amphibians;
- No suitable habitat for water vole.

A full Phase 1 Ecological Assessment across the entire site will be undertaken in due course to ascertain the impact of development on wildlife and appropriate mitigation. New wildlife areas and green space provision will be incorporated within the development to enhance the site's wildlife potential.

No environmental designations apply.

#### Utilities

Pylons and overhead wires run parallel with the western site boundary although there is scope for development within the site to achieve adequate separation distances without compromising the developable area. The power lines crossing the site, which are not of strategic importance, can be diverted as appropriate.

Discussions with utility providers will be undertaken in due course to assess the adequacy of existing and future capacity requirements.

#### Flood Risk and Drainage

The site is Flood Zone 1 (i.e. not located in an area at risk of flooding). Proposals will incorporate sustainable urban drainage to mitigate surface runoff thereby avoiding increasing flood risk elsewhere.

A full Flood Risk Assessment will be undertaken to ascertain what level of mitigation may be required.

#### Archaeology

Consultant's initial investigations have not identified any significant archaeology at the site. A more detailed investigation will be undertaken in due course.

#### Noise

The site is not affected by any potentially noisy uses. A noise impact assessment will be commissioned in due course but it is anticipated that noise can be addressed through typical design and construction details

### **54/6 Co-operative Group**

#### Availability

The site is currently the subject of an agricultural tenancy however we can confirm, on behalf of our client, that both the Co-operative's and the adjacent landowner's land is available for residential development now.

## **54/7 Co-operative Group**

### Achievability

The site is part owned by the Co-operative Group and another landowner who have agreed to work jointly to bring forward a comprehensive residential development proposal for this site. A small strip of land in the northern part is owned by the Council. There are therefore no ownership constraints to bringing the site forward for housing development.

Additionally we note that there have already been approaches to both landowners from more than one housebuilder which confirms market interest in developing the site.

## **54/8 Co-operative Group**

### Sustainability Credentials

Sustainable development is defined by the Government as follows:

"Our approach to sustainable development involves making the necessary decisions now to realise our vision of stimulating economic growth and tackling the deficit, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same."

The draft NPPF also identifies that:

"Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations".

### Sustainability Appraisal

We strongly support the Council's commentary on the site's sustainability provided in the CSR (paragraph 3.30) which concludes that; "there are no conflicts and a number of significantly positive relationships between the site and the sustainability objectives".

An extract from the Council's Sustainability Appraisal (SA) which accompanies the Review document is appended overleaf. We strongly support the appraisal and conclusions provided by the SA which confirms the positive sustainable credentials of the Harrowgate Lane site.

Indeed we highlight that the SA identifies Harrowgate Lane as the closest aligned to the Sustainability Objectives of all the potential housing sites within the Stockton sub-area, and second most sustainable site overall.

We do, however, make the following additional observations in relation to the site:

- SA8 – Sustainable Communities

Through the release of Harrowgate Lane the opportunity exists to provide a new community hub thereby providing opportunity to enhance provision and increase accessibility to community facilities and services, not only for the new residents but the existing community alike.

- SA6 – Health and Wellbeing

Development of the site provides scope to address the abandoned and derelict buildings at Summerville Farm. Many of these are unsightly, in a state of disrepair and a target for vandalism. Their removal will preclude vandalism and associated antisocial behaviour thereby contributing positively to this objective.

- SA9 – Transport and Communication

The release of the land west of Harrowgate Lane provides an opportunity to enhance and add value to public rights of way, including along Harrowgate Lane and the Castle Eden Cycleway that can be accessed directly from the site.

It is therefore considered the Harrowgate Lane site has the potential to make a significant contribution, above that stated within the Sustainability Appraisal, to the sustainability objectives

## **54/9 Co-operative Group**

The Core Strategy has previously provided a clear focus on development within the Stockton Core Area. There are, however, a series of delivery challenges which now justify a revised approach. We strongly support the Council in its review of the CSR and the need for new housing sites to meet the housing shortfall.

A requirement above the currently stated 2,800 dwelling' shortfall may also be appropriate given recent contemporaneous evidence which supports a dwelling target in excess of the RS target. The need for flexibility in the land supply is imperative.

Land west of Harrowgate lane is one of the top performing sites in the Sustainability Appraisal and is the most sustainable of the potential sites in the Stockton sub-area. Furthermore

- The site is deliverable now, being available now and suitable for development;
- There are no known constraints to the site's development for housing which could provide benefits including;
  - Improved community facilities provision;
  - Removal of redundant and unsightly farm infrastructure and buildings improving the physical appearance of the area, in a prominent location on a key route into Stockton;
  - Enhanced public open space provision;
  - Enhanced wildlife habitat.

The site has no known constraints to development, as confirmed by initial investigations to date, and will make a positive contribution to meeting future housing requirements as well as providing additional benefits. It is therefore considered that the site represents a suitable urban extension site for allocation in the Core Strategy.

We look forward to working with Stockton on Tees Borough Council, the local community and key stakeholders to shape and deliver the Vision for the site as outlined in the accompanying Vision Document.

## **55/1 Individual**

I have completed survey monkey but that didn't really give the opportunity for further comments. I am a Wynyard village resident and would offer the following:-

I welcome your observations about Wynyard village and its sustainability ranking as a Tier 4 village. This is correct - there are limited facilities in terms of shops, bus routes, childrens activities, surrounding infrastructure etc. To make the village larger would require such facilities - I would not welcome this - and this is not a sustainable option. Your appraisal of this situation is really accurate.

## **55/2 Individual**

I'm concerned about the impact of further housing on the A 689 and the safety implications of this.

## **55/3 Individual**

Differences between town and country should be relished - I don't think that we want the Borough to become a wholly urban area - there should be different types of accommodation to suit all in different parts of the borough.

## **55/4 Individual**

I would welcome Stockton and Hartlepool working more closely together to present combined Wynyard plan - I have today received a letter that informs of Hartlepool proposals to build 219 dwellings in the area - combined with Stockton proposals we are looking at 1800 dwellings. This is just not sustainable on a number of levels - facilities and infrastructure immediately spring to mind.

**55/5 Individual**

I am very concerned with regards to proposals to clear woodland areas near the Castle Eden Walkway in order to build housing - this beautiful facility would be ruined by views of housing. The impact on wildlife is also immeasurable. I do not agree with the clearance of woodland areas where there are sites of historical significance - our history is important and should not be erased for housing needs.

In addition, the financial costs (without mentioning ecology implications) of clearance would be huge and is simply wrong.

**55/6 Individual**

I would be interested to know how many properties in the borough are vacant and what plans there are to develop these and also redevelop existing neighbourhoods

Thanks for the opportunity to comment

**56/1 Individual**

Ref your document planning for housing. With ref to the suggestion that ~100 houses could be built here. This idea is preposterous . Somebody should come and inspect this area. This is classic Green Belt land and should never be considered. There are many more reasons for objecting but will provide these later.

**57/1 Taylor Wimpey**

We write in response to the above mentioned consultation document, and in particular the role that the land to the South of Bishopsgarth School, Harrowgate Lane can play in addressing the shortfall in housing land supply and meeting the regeneration aspirations of Stockton Borough Council.

## 57/2 Taylor Wimpey

### HOUSING NEED

Prior to addressing the matters raised within the consultation document we consider it necessary to firstly address the matter of housing need and demand, in particular the Council's housing growth assumptions.

It is understood that the Council wish to retain, notwithstanding its impending abolition, the housing requirement/targets as set out in the Regional Spatial Strategy. At present, until updated by the Council's own more up to date assessment of need, they offer the most up to date evidence based projections.

However, things have now moved on significantly since the original drafting of the RSS. The Issues & Options Consultation Document is silent on the Government's 'Planning for Growth' agenda which was set out in the Ministerial Statement of the 23rd March 2011. Indeed, since the drafting of the Issues & Options Consultation Document, the Government has published its draft National Planning Policy Framework (NPPF). The NPPF echoes the 'Planning for Growth' Ministerial Statement of the 23rd March 2011 and sets out the Government's clear direction of travel in respect of housing growth.

The 'Planning for Growth' Ministerial Statement and emerging NPPF is a material consideration. Given the clear message that runs throughout both, they must be afforded very significant weight by the Council in reviewing the Core Strategy. In respect of policy development, its objectives for housing are unambiguous:-

'The Government's key housing objective is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live. This means:

- increasing the supply of housing
- delivering a wide choice of high quality homes that people want and need
- widening opportunities for home ownership; and
- creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.

The draft NPPF states that to enable this, 'the planning system should aim to deliver a sufficient quantity, quality and range of housing consistent with the land use principles and other policies of this Framework'.

The 'Planning for Growth' approach is in no way reflected in the Council suggested strategy for delivering new housing over the plan period. As the Council will be aware, the targets set out in the RSS are the absolute minimum.

The LPA must move swiftly to increase the supply of housing and deliver a wide choice of homes that people 'want and need'.

## 57/3 Taylor Wimpey

### DELIVERABILITY

England & Lyle and Taylor Wimpey (North Yorkshire) Ltd agree with the Council's conclusions that without significant public investment a number of potential housing sites in the defined core area cannot be relied upon for the delivery of housing over the next 15 years. We would respectfully comment however that it is not just simply those sites identified within the Issues & Options Document (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North). There are a large number of sites that were identified as commitments or deliverable sites in the SHLAA 2010 that will not be brought forward at all for housing development in the short to medium term or, if development does take place, given their location and character of surroundings, are unlikely to deliver housing at the rate assumed and are unlikely to bring about the type of housing for which Stockton has an overwhelming need.

In light of the current position in respect of the Building Schools for the Future Programme and NHS funding, that it would be unrealistic to factor/plan for any housing development upon any existing school or hospital sites.

Notwithstanding the Council's suggested supply of housing land set out in the Issues & Options Document, it is our opinion that the Council has a significant shortfall in both their deliverable and developable housing land supply and as such are failing to meet the requirements of PPS3 to maintain a 5 year rolling supply of deliverable housing land. This shortfall is of course exacerbated by the requirements of the emerging NPPF for LPA's to maintain 5 year supply + 20% to ensure to ensure choice and competition in the market for housing land,

The action of the Council to increase the range of deliverable housing sites through the Core Strategy Review is welcomed, however, seeking to allocate sites for housing to come forward over the next 10 – 15 (2023 – 2028) years will in no way go far enough to addressing what are in reality immediate issues.

Given the significant deliverability and housing market issues associated with a large number of sites which the Council unrealistically consider will be brought forward over the next 0 to 10 years, it is imperative that the LPA allocate land, and grant planning permissions, for significant housing developments on deliverable sites in the short term (immediately). Failure to do so will exacerbate this already significant problem and seriously jeopardise the Council's regeneration aspirations.

As will be set out below, the land to the south of Bishopsgarth School offers an unconstrained, deliverable and sustainable with a willing developer and landowners that could begin addressing the shortfall (in terms of both volume and mix of housing) in the short term to address the identified needs of Stockton. This site would assist directly in meeting the Council's regeneration aspirations.



## 57/4 Taylor Wimpey

### HOUSING STRATEGY/LINKS WITH THE CORE STRATEGY

As evidenced in the Tees Valley Strategic Housing Market Assessment Update (2009) and from Taylor Wimpey's (formally George Wimpey's) intimate understanding of the Tees Valley Housing Market, there are clearly a number of different housing markets across the Borough, each of which serves a different function. These housing market areas can be defined by way of their function, typology and a variety of economic, demographic and policy factors.

The Tees Valley SHMA, even at the broad sub regional level, identified a number of discrete housing market areas. They include the localised market of Billingham, the self contained urban area of Stockton and those areas serving the city region market i.e. Ingleby Barwick and Yarm and rural areas. Taylor Wimpey's more detailed understanding of the market suggests that there are indeed further sub areas within those identified.

The variety of housing markets across the Borough and the main strategic objectives of housing policy (PPS3) to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community dictates that Stockton Borough Council must allocate new housing on a combination of sites and not concentrate on a single large site. Failure to adopt such an approach would inevitably render the Core Strategy Review unsound.

It is right that the Council continue to strive to achieve regeneration. However, it is clear that the approach of constraining almost all new development within the Core Area, as per the Core Strategy 2010, has failed and will result in a failure to meet the housing needs of the existing and future population and will stymie much needed regeneration. Adopting a similar approach of restricting new development to a single location would create the same issues.

## 57/5 Taylor Wimpey

### SUGGESTED SITES

Mindful of the aspirations of the Sustainable Community Strategy, the Core Strategy (Appendix 1 of the Issues & Options Paper) and the roles of the differing housing markets (identified in the SHMA), it is clear that a significant amount of the required housing development over the plan period should take place in and around Stockton's Main Urban Area to ensure that the aspirations are met, in particular to deliver a healthy and vibrant Stockton Town Centre as the main centre of the Borough. Moreover the housing must be located in a location that ensures good accessibility to all jobs, facilities, good and services within the Borough.

The steady decline in the use of Stockton High Street and the downward spiral in the quality of the retail offer have quite rightly been a significant cause for concern for the Council for over 20 years. The injection of City Challenge money and others schemes (Britain in Bloom etc) have had a positive impact in terms of its appearance, however, high vacancy rates and the quality of the retail offer has a significant detrimental impact upon the vitality and viability of the town centre. This has been evidence in a recent study (Local Data Company) which places Stockton in the Top Ten worst performing Town Centres (based on occupancy) in the Country.

To date the emphasis on concentrating the majority of development on Brownfield sites and a very conservative housing requirement from the RSS has significantly constrained deliverability of the housing required to stabilise and increase the population in the parts of Stockton's main urban area where there will be an increased use in the Town Centre. This has conspired against its regeneration.

The Government's shift, in respect of removing brownfield targets and the principles embedded in 'Planning for Growth' and the NPPF, provide an opportunity to address this imbalance immediately.

England & Lyle and Taylor Wimpey (North Yorkshire) have considered the range of sites put forward by the Council to address the identified housing needs over the plan period. Mindful of the regeneration aspirations of the Council (in particular to support and improve Stockton Town Centre) , and the need to deliver new development in the most sustainable locations (Core Strategy, PPS1 & PPS3) , it is our view that an urban extension to the west of Stockton's urban area provides most logical and sustainable location for significant housing development that meets the identified needs of the existing and future population of the urban area and will deliver the regeneration aspirations and needs.

## 57/6 Taylor Wimpey

### LAND SOUTH OF BISHOPSGARTH SCHOOL

To this end there is no better site than that on land to the South of Bishopsgarth School, Harrowgate Lane, West Stockton to assist the Council in achieving its regeneration aspirations and servicing the housing requirements of the 'self contained urban area of Stockton'. The accompanying document titled 'Land South of Bishopsgarth School – A Sustainable Urban Extension' demonstrates why this site is wholly deliverable and is suitable, available and achievable in all respects.

The Council have already accepted that the land at Harrowgate Lane, subject to an acceptable landscape impact, 'would be one of the most sustainable locations considered within the issues & options report' (page 22 Issues & Options Report). Our Clients site offers the most sustainable location for significant housing development in Stockton's main urban area to form part of a combination of sites across the differing market areas to meet the needs. The site offers excellent transport links to the Town Centre (public and private transport) and is within walking distance of local services and facilities to provide a genuine location for sustainable day to day living. Full details of the sustainability value of the site are set out in the accompanying report.

The site has excellent linkages, both physical and visual, with the existing urban area and subject to a robust landscaping strategy; housing development will assimilate well into the landscape.

The development of the site will result in a very low environmental impact that would be mitigated by way of biodiversity enhancements.

There is sufficient capacity in the local highway network to accommodate the proposed development, the highway impact of the development of this site would be much reduced from that of the alternative sites along the western extension of the urban area.

It is noted that the Council have already undertaken a Sustainability Appraisal (SA) of the Site Options put forward in the Issues & Options Report. In terms of potential development in and around the urban area of Stockton, the land at Harrowgate Lane scores significantly better against the sustainability objectives than any of the other sites. The SA has identified 4 occasions of a significantly positive relationship between the development of the site and the sustainability objectives. These includes strengthening the Stockton Borough economy, adapting and mitigating against climate change, improving health and well being and building sustainable communities. In all other respects the SA suggests that the development of the land for housing will have potential for some compatibility with the objectives, be neutral or have no relationship. There is no conflict with any of the Council's sustainability objectives.

To put the sustainability value benefits of the development of the land to the south of Bishopsgarth School in context, it is worth comparing its performance against the Council's sustainability objectives against the land at Yarm Back Lane, West Stockton. The site at Yarm Back Lane only results in a neutral relationship with the objective of building sustainable communities (the site has very limited linkages with the existing urban area and services and facilities), it conflicts with the objective of development sustainable transport and communication (due to road network issues) and conflicts with the objective of adapting and mitigating against climate change and living within environmental limits.

## 57/7 Taylor Wimpey

### CONCLUSION

- The Council, in light of the 'Planning for Growth' Ministerial Statement and the emerging National Planning Policy Framework should plan to 'increase significantly the delivery of new homes' (Draft NPPF Key Housing Objective). This will not be realised by simply relying on RSS targets.
- Given significant delivery issues associated with them, we agree that the Council can no longer rely on sites in the Core Area for new housing between 2013 and 2028.
- Given the uncertainty over Education and Health Care funding it would be unrealistic to factor in/plan for any housing development upon any existing school or hospital sites.
- The Council have significantly over estimated the deliverability of a number of sites in the urban area which are heavily constrained or in areas that are unattractive to the market and unviable. The result is that the Council do not have a robust and credible supply of deliverable housing sites as required by PPS3. Immediate action must be taken to address this, through the grant of planning permission and allocation of land for housing development.
- Stockton has a number of discrete housing market areas. To deliver a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community dictates that Stockton Borough Council must allocate new housing on a combination of sites.
- To achieve a number of the Council's key aspirations of the Sustainable Community Strategy and Core Strategy, to deliver a healthy and vibrant Stockton Town centre as the main centre of the Borough and to deliver housing in a location that ensures good accessibility to all jobs, facilities, goods and services, the Council should make provision for significant housing development around Stockton's main urban area.
- As identified in the England & Lyle Document 'Land South of Bishopsgarth School – A Sustainable Urban Extension' the land offers the most sustainable location for significant housing development as part of the main urban area of Stockton as part of a combination of sites across the Borough to meet the needs of the differing market areas. The results of investigations have established that the site is deliverable (suitable, available and achievable) for housing development with a willing National House Builder to inject significant investment into Stockton to deliver high quality housing on the site immediately.

## 58/1 Church Commissioners

.We write with regard to the above document on behalf of our client, the Church Commissioners for England.

The Church Commissioners have land interests both in proximity to Wynyard Village, as well as at Wolviston. In respect of their land at Wynyard, the Commissioners are working collaboratively with Cameron Hall Developments in support of their aspirations for the wider master planning of Wynyard village on the southern side of the A689, in order to help support the achievement of a truly sustainable community.

Our client generally supports the Borough Council's early review of the adopted Core Strategy, having identified difficulties regarding the deliverability of identified sites to meet its housing targets during the Plan period, as a result of changing economic conditions. The Commissioners support the need to identify additional housing sites in order to meet the identified housing shortfall to enable the Borough's housing needs to be met during the Plan period. The emphasis of ensuring an adequate supply of housing is all the more relevant following the most recent moves by the Government to overhaul the planning system, as demonstrated by the publication of the draft National Planning Policy Framework (NPPF) in July 2011. Whilst being published at the same time as the Core Strategy Review document (CSR), its timing has meant that this is not reflected in the CSR which clearly has further implications for future levels of housing and how this should be planned for. As such, we make reference as necessary to the NPPF within our representations below, in order to ensure that its implications are taken fully into account through the review of the Core Strategy.

## **58/2 Church Commissioners**

Question 1 – Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

PPS3 states at paragraph 52 that the Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land and should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing delivery objectives. Paragraph 53 continues that Local Planning Authorities (LPAs) should set out in their

LDDs policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption. Paragraphs 54 to 57 further advise on the requirements to ensure sufficient, specific, deliverable sites are identified and can be delivered during the Plan period.

Paragraph 60 of PPS3 also advises that in seeking to maintain a flexible, responsive supply of housing land, LPAs should monitor their progress on delivery annually and where necessary, update their housing market and land availability evidence base and initiate a review of relevant LDDs in order to continue to maintain an up-to-date five year supply of deliverable sites.

More recently, the draft NPPF has been published which provides the Government's 'direction of travel' in planning policy and is therefore capable of being a material consideration, as confirmed by the Planning Inspectorate's advice to Inspector's dated 30th August 2011. Paragraph 28 of the draft NPPF requires that LPAs should have a clear understanding of housing requirements in their area and establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period. Separately at paragraph 107, the Government also highlights that its key housing objective is to increase significantly the delivery of new homes. Paragraph 109 continues that in boosting the supply of housing, LPAs should: use an evidence base to ensure the full requirements for market and affordable housing are met; and that the supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land.

It is clear from the supporting text within the CSR that evidence and monitoring has shown that there are significant concerns regarding the deliverability of housing sites within the Core Area, an area which is to provide the biggest share of housing supply within the Borough. In view of more recent uncertainty regarding public investment necessary to bring Core Area sites forward during the Plan period, there is a likelihood that such sites, including Chandlers Wharf, Tess Marshalling Yard and Bowesfield North, will not be developed in the period to 2028, leaving a shortfall of some 2,800 dwellings against the original housing target. We therefore agree that, with reference to the requirements of both existing and emerging National planning policy, the Council can no longer rely on sites within the Core Area to contribute towards its housing supply during the Plan period.

## **58/3 Church Commissioners**

Question 2 – Do you agree with this approach?

In light of our comments above, we agree that ensuring that flexibility is built into the planning and phasing of new housing sites is a sensible approach, this accords with current and emerging planning policy. This would enable regeneration sites to come forward later in the Plan period if circumstances change, but this should not affect the planned delivery of new housing sites that are to be allocated.

## 58/4 Church Commissioners

Question 3 – Which of the following options for the distribution of new housing sites do you agree with?

- a) Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b) Allocate new housing on a combination of sites

We support Option (b) principally because this would provide the greatest flexibility in terms of the planning and phasing of new housing sites, as is supported elsewhere within the CSR in light of issues arising from the current over reliance on a small number of large sites within the current adopted Core Strategy. Concentrating new housing on a single large site may face similar issues regarding its deliverability within the Plan period on grounds of viability, particularly where the impacts of development on such a scale are likely to concentrate traffic and other infrastructure impacts within a small area,. As highlighted at paragraph 3.17 of the CSR. Furthermore, draft NPPF states at paragraph 107 that in increasing the supply of housing, this should include delivering a wide choice of high quality homes that people want and need, and at paragraph 109 that LPAs should include an additional allowance of at least 20% in supply to ensure choice and competition in the market for land. It is therefore evident that providing a 'portfolio' approach to the provision of housing sites will be beneficial in providing a choice of housing for its residents, whilst promoting competition within the house building industry that will also benefit the local community.

Recent evidence in the housing market also indicates that progress on large, strategic housing sites has stalled across the country with small and medium sites being of preference to the industry due to the ability to bring sites to the market quickly without the need to make significant upgrades to local infrastructure upfront.

It is also relevant to note that allocating a single large housing site would ignore the issues identified at Wynyard, as highlighted at paragraphs 2.8-2.11 and Issue 6 of the CSR, which require a comprehensive review regarding its future.

Our views regarding the choice of particular sites for new housing are detailed later in this response.

## 58/5 Church Commissioners

Question 4 – Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- All Villages
- Only the most sustainable villages
- No village extensions

In the context of the responses already provided above, we believe there is scope to support extension to only the most sustainable villages (i.e. Tier 1 and Tier 2 settlements). This is supported by PPS3 which advises at paragraph 37 that in identifying suitable locations for housing, account should be taken, inter alia, of the need to create and maintain sustainable, mixed and inclusive communities in all areas, both urban and rural. Further guidance at paragraph 38 highlights the need and benefits of providing new housing in rural areas in order to help enhance or maintain community facilities, infrastructure and services, and hence their sustainability. Paragraph 112 of the draft NPPF also highlights that in rural areas, LPAs should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs – this is particularly relevant in the Borough, with paragraph 2.13 of the CSR highlighting that there is currently a serious shortage of affordable housing.

In relation to Wolviston, this is identified as a Tier 2 settlement and therefore considered to be a sustainable village in that it has existing services and facilities that suggest it is capable of accommodating additional but proportionate growth to help it sustain and enhance its sustainability. The Commissioners have previously promoted land adjacent to the western side of the village through the SHLAA (SHLAA Site Ref 20), which concluded that on the basis that it was not well related to the built up area and that there were concerns regarding highway capacity, it was not considered to be developable. Clearly, as part of the CSR, the expansion of suitable rural settlements beyond existing boundaries is being reconsidered and issues relating to highway capacity on the A689 and A19 corridors is also under review in the context of nearby Wynyard. We therefore consider that SHLAA Site 20 should therefore be given further consideration as a potential housing site.

Notwithstanding the above comments, it is clear as highlighted elsewhere within the CSR that in relation to Wynyard (a Tier 4 settlement) there are particular circumstances relevant to this settlement that would indicate additional housing would be appropriate here and is therefore an exception to the comments detailed above. We provide responses in relation to Wynyard separately below.

## 58/6 Church Commissioners

Question 6 – Do you think that the future employment strategy for the Key Employment Location at Wynyard should:

- a) Continue to provide a significant amount of office development opportunities in line with the current planning permissions?
- b) Consider alternative employment uses that will reduce the impact of the development on the strategic road network. For example logistics or manufacturing?
- c) Allow a mixed-use development, where employment development remains the dominant use but an element of housing could be provided?
- d) Allow a mixed-use development where housing is a significant part of the development mix?
- e) Follow another strategy?

It is evident from the supporting text within the CSR that the strategy for Wynyard needs to be reviewed in light of the development already permitted in this location. This also offers the opportunity, as highlighted at paragraphs 3.110 and 3.111 of the CSR, to help enhance the sustainability of the existing residential element, whilst also helping meet the strategic housing requirements of the Borough.

The Church Commissioners are seeking to work collaboratively with Cameron Hall Developments in order to help secure additional housing development on the southern side of the A689 which can create the critical mass needed to support new community infrastructure, and therefore create a sustainable and inclusive settlement. This in itself will help address some of the traffic movements from existing residents by providing day-to-day facilities on site to help internalise such trips, as detailed in the Master Plan which Cameron Hall Developments have prepared. The additional housing development south of the A689 would also help to support new or enhanced public transport facilities, and as part of a wider transport and access strategy, has the ability to improve the connectivity between the employment areas to the north and the residential areas to the south. Again, this will assist in reducing extraneous traffic movements in the future.

Whilst it is considered important to retain Wynyard's unique offer as a Key Employment Location, as this provides an attractive location for new and innovative industries that may not otherwise locate in Stockton, it is evident that a review of this employment allocation and its implications for the strategic highway network needs to be addressed. As such, our preference would be to support either Option (c) or Option (d), as the opportunities to secure a mixed-use development provides an option for existing and new residents to be located close to their place of work. Providing additional housing opportunities close to existing and new employment opportunities, including those associated with the new hospital, can also assist in reducing the number of traffic movements created by workers travelling in from the surrounding area.

## 58/7 Church Commissioners

Question 7 – If housing were to be permitted in the broad Wynyard area, where should it be located?

- a) Wynyard Hall Estate
- b) Wynyard Park
- c) Land east of Wynyard Village
- d) Other

In line with the objective of seeking to increase the level of housing at Wynyard to help create the critical mass to support a full range of community facilities as referred to above, we consider that housing should be permitted at both (c) Land east of Wynyard Village and (a) Wynyard Hall Estate as these provide the best locations in order to help achieve the aspirations detailed within the master plan prepared by Cameron Hall Developments.



### **58/8 Church Comissioners**

Question 8 – If housing were permitted, what types of properties should be part of the mix?

- a) Executive housing
- b) Mid-range family housing
- c) Affordable housing
- d) Older-people's housing

Clearly the success of Wynyard as a residential location has been based on creating a residential environment of exceptional quality and in order to continue to maintain its attractiveness to mobile investors and entrepreneurs, care is needed to ensure this offer is not diluted. However, it should be noted that the existing housing offer at Wynyard is not solely low density 'Executive' housing and provides a good range of housing sizes, albeit built to a high specification. New housing at Wynyard should therefore seek to continue this concept by maintaining quality, whilst ensuring a suitable mix of housing to deliver a sustainable, mixed community. We would therefore support a continuation of the existing house types at Wynyard to include a mix of Executive housing and Market housing to meet a range of needs including families.

### **58/9 Church Comissioners**

Question 9 – If a new master plan is prepared for the area, how could connectivity between the northern area and southern area be provided?

As referred to above, the master plan prepared by Cameron Hall Developments and the accompanying supporting statement they have prepared seeks to address this matter in detail.

We trust the above comments are of assistance in progressing the review of the Core Strategy and we look forward to providing further input to this document over the coming months. In the interim, should you have any queries or require any further clarification on the comments provided, please do not hesitate to contact the writer in the first instance.

### **59/0 Environment Agency**

Due to the large size of most of these sites, there is plenty of scope for using sustainable drainage schemes in their development. Infiltration methods should be fully explored. We appreciate that in some areas, existing contamination or sensitive underlying aquifers, infiltration type SUDS may not prove appropriate, however ponds, wetlands and swales can still be used for water storage and attenuation, creating attractive features within the site. Permeable paving should be used wherever appropriate or filter strips placed alongside impermeable paving to reduce the need for formal drainage.

### **59/1 Environment Agency**

General advice:

Your SFRA should advise on area which might be susceptible to surface water drainage problems in your borough. If redevelopment is proposed near those areas then opportunities to address these issues through the development should be sought.

### **59/2 Environment Agency**

As you are aware, we would object in principle to any proposed allocation falling within flood risk areas without the sites having been subject to a Sequential Test (and Exception Test as applicable). We would recommend that this process is undertaken as soon as possible.

### **59/4 Environment Agency**

Depending on the nature of historic land uses there may be the potential for land contamination to be an issue. We recommend that risks from land contamination to controlled waters are considered as part of any development and remedial measures put in place if and when required.

### **59/5 Environment Agency**

East Wynyard Village - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There is an ordinary watercourse within the site. Ideally it should be protected and used to create a feature within the development. If it is necessary to cross the watercourse we would encourage the use of clear span crossings rather than culverting.

Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the Environment Agency under the Land Drainage Act 1991.

Our records show that there could be Water Vole in the area. These are protected under the Wildlife & Countryside Act 1981. Any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

### **59/6 Environment Agency**

Wynyard Park - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There is a small ordinary watercourse within the site. Ideally it should be protected and used to create a feature within the development. If it is necessary to cross the watercourse we would encourage the use of clear span crossings rather than culverting.

Our records show that there may be an existing culvert onsite. Any opportunities to restore this to an open channel should be investigated. Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the Environment Agency under the Land Drainage Act 1991.

### **59/7 Environment Agency**

Wynyard Hall Estate - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There are numerous small ordinary watercourses within the site. They should ideally be protected and used to create features within the development. If it is necessary to cross any of the watercourses we would encourage the use of clear span crossings rather than culverting.

Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the the Environment Agency under the Land Drainage Act 1991.

Our records show that there could be Great Crested Newt in the area. These are protected under the Wildlife & Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010. Further guidance can be found at Natural England's website <http://www.naturalengland.org.uk/>

### **59/8 Environment Agency**

Ingleby Barwick - The vast majority of the site lies in flood zone 1 and is therefore at the lowest fluvial flood risk.

Very small areas of the north and western boundary lie in fluvial flood zone 3 and a watercourse follows the whole of the western boundary. Over the lifetime of the development, the effects of climate change may result in larger areas of land being at risk of flooding. Therefore any development should be set back from the watercourse and raised appropriately to prevent flooding.

The Flood Risk Assessment (FRA) will also need to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there may be an existing culvert onsite. Any opportunities to restore this to an open channel should be investigated.

### **59/9 Environment Agency**

Urley Nook Sites 1 and 2 - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there could be Water Vole and Great Crested Newts in the area. These are protected species and as such any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

### **59/10 Environment Agency**

Durham Lane Industrial Estate - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There are a couple of small ordinary watercourses within the site. They should ideally be protected and used to create features within the development. If it is necessary to cross any of the watercourses we would encourage the use of clear span crossings rather than culverting.

Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the the Environment Agency under the Land Drainage Act 1991.

Our records show that there could be Great Crested Newt in the area. These are protected under the Wildlife & Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010. Further guidance can be found at Natural England's website <http://www.naturalengland.org.uk/>

There is a hazardous waste landfill site approximately 800m from the development. Effluent and waste treatment activities at the landfill will continue even though the main plant is close.

Site is also within 250m of two historic waste sites, references CLE 20 & CLE 45.

We hold no information on CLE 20.

CLE 45 (grid ref NZ 514 221)

This licensed to British Steel Corporation between June '85 and August 1990 for the disposal of industrial waste, tars and asphalt, ferrous metal scrap drums. The surrounding area has history of industrial use and is considered to be contaminated land.

In view of the above, we would recommend that a full site investigation be undertaken to check for the presence of any flammable gas and for contaminated materials which might affect the development.

### **59/11 Environment Agency**

Preston Farm Industrial Estate - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Due to the close proximity of the flood extents to the southern boundary, the Flood Risk Assessment (FRA) will need to show the development is safe from the 100 year flood fluvial flood event on the River Tees and consider the effects of climate change on the flood risk.

The FRA will also need to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there could be Water Vole in the area. These are protected under the Wildlife & Countryside Act 1981. Any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

## **59/12 Environment Agency**

### Billingham Bottoms

The vast majority of the site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. However there may be some areas which lie in flood zone 2 and 3 or at least are very close to the flood risk areas.

Furthermore it is possible for the whole site to become a dry island during a flood event due to the presence of watercourses on both sides. With predictions for climate change as they are, the areas at risk may increase in size too, thereby reducing the area within flood zone 1.

Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from all sources of flooding for the lifetime of the development and that appropriate surface water management will be provided.

The development must not result in any loss of floodplain capacity. It would also need to demonstrate all residents have safe access to and from their homes during times of flood.

Billingham Beck to the south and west is a main river so the Environment Agency retain permissive powers to undertake works when necessary.

Our records show that there could be Water Vole and Great Crested Newts in the area. These are protected species and as such any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

This site is within 250m of an historic landfill site, reference CLE 47 (grid ref NZ 453 218) This licence was issued to A. Buckler Limited in July 1977 and permitted the deposit of waste from the construction industry. The licence was subsequently revoked in May 1978. There is evidence to suggest that construction wastes were being tipped on this land prior to the licence being issued, and prior to waste disposal licensing in 1976. All wastes were deposited in the form of a land raise. There has been no landfill gas monitoring of this land.

Due to the nature of the waste deposited some biodegradable material will have been deposited on site. Therefore, the possibility of landfill gas generation/migration should not be excluded.

## **59/13 Environment Agency**

### South East Yarm

The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there could be Water Vole in the area. These are protected under the Wildlife & Countryside Act 1981. Any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

## **59/14 Environment Agency**

South West Yarm - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there could be Water Vole in the area. These are protected under the Wildlife & Countryside Act 1981. Any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

## **59/15 Environment Agency**

West Yarm - The site lies in flood zone 1 and is therefore at the lowest fluvial risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

Our records show that there could be Water Vole in the area. These are protected under the Wildlife & Countryside Act 1981. Any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

## 59/16 Environment Agency

West Preston - The vast majority of the site lies in flood zone 1 and is therefore at the lowest fluvial risk. Our flood map shows one of the watercourses across the central part of the site to flood, however the flood zones are well constrained to the channel. We also have historical records of northern areas of the site flooding.

Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from all sources of flooding and that appropriate surface water management will be provided.

The northernmost part of the site lies adjacent to the Lustrum Beck. This is a main river and as such any development must not prevent the Environment Agency accessing the watercourse for maintenance purposes.

As the watercourses within the site are tributaries of the Lustrum Beck system, any surface water discharge must be attenuated appropriately to prevent any increase in flood risk downstream.

All the watercourses within the site should ideally be protected and used to create features within the development. If it is necessary to cross any of the watercourses we would encourage the use of clear span crossings rather than culverting.

Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the the Environment Agency under the Land Drainage ACT 1991.

Our records show that there could be Water Vole and Great Crested Newts in the area. These are protected species and as such any development would need to provide an adequate assessment and appropriate mitigation measures implemented.

There is a hazardous waste landfill site approximately 800m from the development. Effluent and waste treatment activities at the landfill will continue even though the main plant is closed.

There are several other waste sites within area:

### CLE 7 NZ 408 161

This licence was issued to British Chrome and Chemicals Ltd in May 1977 for the disposal of chrome residue sludge, non-hazardous industrial waste and waste from the construction industry. The disposal of sludges from the chromatic process had occurred of some time prior to licensing, since 1947. Since 1976 when the site was partly lined chrome residue has been exclusively deposited on site. A report in 1974 suggests that there was some contamination of the ground water in the vicinity of the site. No monitoring infrastructure or other results on record.

In view of the above, I would recommend that a full site investigation be undertaken to check for the presence of any flammable gas and for contaminated materials which might affect the development.

### CLE 80 NZ 412 174

This licence was issued to Cement Construction in July 1979 and permitted the deposit of waste from the construction industry. The licence was returned to the Agency in October 1980. The Agency has no gas monitoring results for this site.

Due to the nature of the waste deposited some biodegradable material will have been deposited on site. Therefore, the possibility of landfill gas generation/migration should not be excluded.

CLE 99 NZ 408 161

This licence was issued to British Chrome & Chemicals in December 1980 and permitted the deposit of waste from the construction industry, non-hazardous industrial waste and chrome residue sludge. The base of the site lined with a low permeability membrane. The Agency has no records of landfill gas or leachate problems on site.

Due to the nature of the waste deposited some biodegradable material will have been deposited on site. Therefore, the possibility of landfill gas generation/migration should not be excluded.

CLE 147 NZ 412 173

This licence was issued to R. Davis in November 1984 and permitted the deposit of waste from the construction industry. The licence was returned to the Agency September 1985. The Agency has no monitoring records from this site.

Due to the nature of the waste deposited some biodegradable material will have been deposited on site. Therefore, the possibility of landfill gas generation/migration should not be excluded.

Also CLE 17, CLE 20, CLE 147  
No information on these sites.

#### **59/17 Environment Agency**

Harrogate Lane - The site lies in flood zone 1 and is therefore at the lowest fluvial risk.

Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There are numerous small ordinary watercourses within the site. They should ideally be protected and used to create features within the development. If it is necessary to cross any of the watercourses we would encourage the use of clear span crossings rather than culverting.

Our records show that there may be an existing culvert onsite. Any opportunities to restore this to an open channel should be investigated. Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the Environment Agency under the Land Drainage Act 1991..

Our records show that there could be Great Crested Newt in the area. These are protected under the Wildlife & Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010. Further guidance can be found at Natural England's website <http://www.naturalengland.org.uk/>

### **59/18 Environment Agency**

North west Billingham - The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

The proposed site is approximately 150m to the South East of a historic landfill (CLE098). However they are separated by the A19.

This licence was issued to Dowsett Engineering in October 1980 and permitted the disposal of waste from the construction industry. Waste deposits restricted to excavated materials arising from the construction of the A19 Billingham by-pass. The licence was returned to the Agency November 1981. The Agency has no monitoring records from this site.

Due to the nature of the waste deposited some biodegradable material will have been deposited on site. Therefore, the possibility of landfill gas generation/migration should not be excluded.

### **59/19 Environment Agency**

Yarm Back Lane, West Stockton

The site lies in flood zone 1 and is therefore at the lowest fluvial flood risk. Any development on this site would need a Flood Risk Assessment (FRA) to demonstrate it is safe from other sources of flooding and that appropriate surface water management will be provided.

There are existing flood risks downstream of this site on the Lustrum Beck which must not be exacerbated so any surface water discharge to this watercourse or its tributaries must be attenuated and managed appropriately.

There are numerous small ordinary watercourses within the site. They should ideally be protected and used to create features within the development. If it is necessary to cross any of the watercourses we would encourage the use of clear span crossings rather than culverting.

Any proposal to obstruct, divert or culvert the flow will require the prior written consent of the Environment Agency under the Land Drainage Act 1991.

Our records show that there could be Water Vole and Great Crested Newts in the area. These are protected species and as such any development would need to provide an adequate assessment and appropriate mitigation measures implemented.



## 60/1 Mr Vinay Bedi

### 1.0 Introduction

#### Purpose

1.1 This representation to the Stockton-on-Tees Core Strategy Review Issues and Options DPD (“the Review”) has been prepared by Nathaniel Lichfield & Partners (“NLP”) on behalf of Mr Vinay Bedi (“the client”) representing the owners of the site.

1.2 It is submitted specifically in respect of land to the south of St Martins Way in Kirklevington and highlights its potential for housing development.

#### Structure

1.3 The representation responds to the issues and questions set out in the Review and is structured as follows, under the Review’s headings as appropriate:

- Section 2.0: The Housing Requirement;
- Section 3.0: Response to Question 1;
- Section 4.0: Response to Question 3;
- Section 5.0: Response to Question 4;
- Section 6.0: Land South of St Martin’s Way; and
- Section 7.0: Conclusions

### 2.0 The Housing Requirement

2.1 Our client strongly supports the Council’s decision to undertake a Review of the Core Strategy to ensure the Borough’s housing requirements can be met.

2.2 Paragraph 2.3 of the Review states that 2,800 additional dwellings must be delivered up to 2028.

2.3 However, the emerging National Planning Policy Framework (NPPF) requires local authorities to take a flexible approach to supply to provide for choice and competition within the market for housing land<sup>1</sup>. Therefore, to ensure adequate flexibility and certainty of meeting housing requirements, we contend that sites should be allocated to deliver the 2,800 additional dwellings required as an absolute minimum, and preferably additional land should be identified.

2.4 Furthermore, the Review will likely be finalised in a policy environment where RS has been revoked thereby providing an opportunity and requirement for the Council to determine housing requirements locally subject to the provision of robust evidence to support the chosen target. We note that the Council’s proposed Review is predicated on a rolling forward of the RS requirement set down at policy 28. This, however, is based on evidence which is now some four plus years old. Based on an initial review, the more recent contemporaneous evidence<sup>2</sup> would support a dwelling target in excess of the RS target proposed (i.e. in excess of 700 dwellings per annum). A requirement above the currently stated 2,800 dwelling’ shortfall is therefore appropriate.

<sup>1</sup>The draft NPPF requires the incorporation of an additional allowance of at least 20% in the rolling five year supply.

<sup>2</sup> ONS 2008-based Household Projections 2008 to 2033 (26 November 2010) and ONS 2008-based Sub-national Population Projections for England (SNPP) (27 May 2010)

### 3.0 Response to Question 1

Question 1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

3.1 We agree.

3.2 The Core Strategy represented an ambitious and challenging strategy to meet the Borough's housing requirements with the priority being focused on the Core Area. The Core Area, however, represents the most challenging market within the Borough.

3.3 It is clear that significant uncertainty of delivery on housing land within the Core Area has arisen as a result of:

- Difficult market conditions within a market area which is predominantly internal to Stockton;
- Falling yields on sites with planning permission within the Core Area through re-master planning and the loss of flatted developments (e.g. North Shore);
- Constraints and requirement for public sector investment (which will not be forthcoming) to deliver Strategic sites at Chandlers Wharf, Tees Marshalling Yards and Bowesfield North (totalling 1,352 units).

3.4 This has manifest itself in a reduction of housing delivery, and in this context our view would be that sites in the Core Area should no longer be relied upon as the only source in spatial terms for new housing delivery. Present market conditions dictate a demand for more family houses in suburban locations rather than higher density urban living in the Core Area.

3.5 There is therefore a clear requirement to identify further land for housing in alternative locations, particularly in the latter phases of the plan period.

3.6 We therefore consider it entirely appropriate that the Council re-appraises and reviews the Core Strategy's approach. The identification of new housing sites which are not subject to the delivery challenges of the Core Area will provide certainty in meeting stated housing requirements for Stockton over the plan period. Our client's land, presented in greater detail at Section 5.0, represents such a site.

3.7 We contend that suburban greenfield housing will serve a different market from urban high density brownfield sites. As such, the allocation of greenfield sites will not, in themselves, inhibit the delivery of brownfield sites and vice versa. Both types of sites are required to meet Stockton's housing needs and the LDF needs to respond to this. In the short term, with market conditions so difficult, the emphasis should be on earlier and faster delivery of a range of greenfield options.

#### 4.0 Response to Question 3

Question 3: Which of the following options for the distribution of new housing sites do you agree with?

- a Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b Allocate new housing on a combination of sites.

4.2 We support Option B.

4.3 New housing should be allocated on a combination of sites in order to provide a range and choice of housing and to ensure sustainability. We consider the most appropriate option to meet the housing shortfall would be through a range of urban sites and the allocation of a combination of urban extension sites and small-scale village extensions in the most sustainable locations.

4.4 This strategy will help to ensure a balanced spatial approach to meeting future housing requirements and target housing need in different housing market areas in the Borough, in line with the Government's objectives for housing and issues outlined in the SHMA.

4.5 If a single large site was chosen, then that would prevent housing in the villages thus denying them of opportunities to link new market housing development to:

- the provision of much-needed affordable housing;
- the attraction of more family and aspirational housing to the Stockton Borough;
- the development of new community, sports and environmental facilities;
- the creation of new infrastructure.

4.6 Appropriate levels of new housing in villages will also help avoid placing undue stress on the road infrastructure in the centre of the conurbation, especially if the village benefits from an existing school and public transport, such as at Kirklevington.

#### 5.0 Response to Question 4

Question 4: Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- a All villages
- b Only the most sustainable villages
- c No village extensions.

#### 5.2 We support Option B.

5.3 It is acknowledged that, given the scale of new housing required across the Borough, urban extensions will be required to provide the majority of residential growth up to 2028. However, an amount of residential development in the most sustainable villages is also required to ensure the long-term viability and sustainability of Stockton's villages and the services therein.

#### Kirklevington

5.4 Kirklevington is ranked as a 'Tier 2' settlement in terms of its sustainability. This means that the Council deem the village to be one of the most suitable for future development based on existing services and accessibility by public transport. The village is also within close proximity to the A19 which provides access to other areas of Teesside and the North East.

5.5 Unlike some other villages, Kirklevington has not witnessed the social and economic benefits that new housebuilding can bring. The very limited supply of new housing in Kirklevington has had consequential adverse impacts on the affordability of housing in the village, particularly for first-time buyers. In our view, allocating new housing land in Kirklevington for an appropriate range and choice of housing, potentially including affordable housing, would help sustain the future of the village. In particular, a release of an appropriate site could enable the funding of:

- appropriate transport facilities;
- new affordable housing in an area of high demand;
- new sports and leisure facilities – perhaps a new sports club for the village, including new cricket, football and tennis facilities;
- extension of two village school playing fields;
- new environmental facilities including a new park/ play facilities;
- new community/ retail/ other appropriate facilities.

#### 6.0 Land south of St Martin's Way

6.1 This Section provides a commentary on our client's site and explains why it would be a suitable location for a village extension in Kirklevington.

#### The Site

6.2 Our client's site relates to approximately 10 ha of land located to the south of St Martin's Way in Kirklevington, and is shown by the red line in Figure 6.1 below.

Figure 6.1 Land south of St Martin's Way, Kirklevington Source: Google Earth

6.3 The site is currently agricultural land, and lies beyond, but immediately adjacent to, the defined limits to development of Kirklevington. However, the Council has acknowledged that sites beyond the development limits will be required to meet the housing need up to 2028.

6.4 Vehicular access to the site is gained between no. 14 and no. 16 St Martins Way. Alternative access could be provided from the A67.

6.5 The site is bound as follows:

- To the north by residential properties on St Martins Way, Pump Lane and Town End Close, as well as Kirklevington Primary School;
- To the east by the A67; and
- To the south and west by agricultural land.

6.6 It is estimated that the site could accommodate up to 200 dwellings (based on an indicative density of 30 dwellings per hectare).

6.7 The site is located immediately adjacent to existing residential areas of the village and would, therefore, provide a natural extension to the village to the south. Although presently undeveloped, the site is of limited landscape value and is not protected under any specific local plan policy or designation. Rather it is “white land”. The site is visually unobtrusive from the surrounding area due to existing boundary treatment. Indeed, a sensitively designed housing development on the site could result in the improvement of the site’s ecological value through increased landscaping and planting.

6.8 The site is available for housing immediately. It is in two ownerships – both of whom are committed to its early delivery, along with the provision of community facilities.

#### The Surrounding Area

6.9 The site adjoins the built-up area of Kirklevington, which is predominantly residential in character. The majority of the dwellings within the village are relatively modern.

6.10 Kirklevington is defined as a ‘Tier 2’ settlement in the Council’s ‘Planning the Future of Rural Villages in Stockton-on-Tees’ document in terms of its sustainability. Existing facilities within the village include Kirklevington Primary School, St Martins Church, Kirklevington Village Hall, the Crown Hotel public house, a garage and a public play park, including formal play facilities. All of these services and facilities are easily accessible by foot and cycle from the site.

6.11 The site is located within 300 metres of bus stops on The Green and Strathmore Drive and within 500 metres of a stop on Forest Lane. These stops provide services to Yarm, Stokesley, Thornaby and Maltby. Yarm Railway Station is located approximately 3 km (by road) to the north of the site providing direct services to Middlesbrough, Thornaby, Northallerton and Thirsk.

6.12 The site is also within easy walking distance of Kirklevington Primary School which currently has a surplus of 47 places (32%)<sup>3</sup>. Additional residential development in Kirklevington will help to ensure the long-term viability of the school, which achieves high standards and provides a “valuable asset to a rural community” (School Organisation Plan, p. 19). The developers would be willing to explore options as to how the development could bring benefits to the school, perhaps in the form of new sports pitches, changing facilities or new buildings.

3 Stockton Borough Council, School Organisation Plan 2010-2015

6.13 In this light, the site would be a suitable location for a village extension at Kirklevington.

#### The Housing Opportunity

6.14 The site could accommodate around 200 dwellings with an appropriate mix to help meet local need. There may also be scope to provide some executive houses to help meet local need and demand. There will also be an opportunity to contribute towards affordable housing.

6.15 Section 106 contributions generated through the development of the site would be used to enhance the local community. Whilst in due course we would seek to enter into dialogue with local residents and the Council as to how this investment could best be used to enhance the area, our initial ideas are that it could include:

- New sporting facilities, such as a new Kirklevington Sporting Club, including new cricket, tennis and football facilities with changing accommodation;
- new and enhanced footpath and cycle links from the site to the surrounding area and the offer to help improve existing links in the Village;
- Improvements to the Village Hall should they be needed – such as investment in the buildings or the facilities within them;
- Improvements to the local church should it be needed;
- Financial assistance towards delivering the local community's priorities for the village to be identified within the Kirklevington Community Plan where relevant and reasonable;
- new green infrastructure, including new tree and landscape planting at the site; and
- Equipped children's play areas.

6.16 In addition, the development of 200 houses on the site would result in the following economic benefits:

- New money direct into Stockton Council, including:
  - i £1.7 million New Homes Bonus Payment;
  - ii £287,000 of additional Council Tax receipts per annum
- New residents will spend £3.5m per annum in local shops; and
- 300 person-years of construction employment.

6.17 An extensive list of regional, sub-regional and local strategies and studies identify a strong requirement in the North East to increase provision of high quality family homes<sup>4</sup>, and this site would provide an opportunity to develop such dwellings and to ensure the long-term viability of Kirklevington village.

<sup>4</sup> Including Regional Spatial Strategy; Regional Housing Strategy; and Regional Housing Aspirations Study

## 7.0 Conclusions

7.1 The Core Strategy has previously provided a clear focus on development within the Stockton Core Area. There are, however, a series of delivery challenges which now justify a revised approach. We strongly support the Council in its Review and the need for new housing sites to meet the housing shortfall in alternative locations.

7.2 The Review seeks to allocate sites for an addition 2,800 dwellings, based on rolling forward the RS requirement. However, this requirement was based on evidence which is now at least four years old. More recent evidence indicates that a dwelling target in excess of the RS target, and therefore above the 2,800 stated dwellings, would be appropriate.

7.3 The Council can no longer rely solely on new housing development in the Core Area due to the challenging housing market in this area and site constraints and the requirement for public sector investment which will not be forthcoming in the near future. It is, therefore, imperative for the Council to identify new housing sites which provide certainty in meeting the housing requirements over the plan period.

7.4 The most appropriate option to meet the housing shortfall is through the allocation of a combination of urban extension sites and small-scale village extensions in the most sustainable locations. This strategy will ensure a balanced spatial approach to meeting future housing requirements.

7.5 Kirklevington, as a Tier 2 settlement, is one of the most sustainable villages in the Borough and is, therefore, suitable to accommodate a village extension.

7.6 The client's land, to the south of St Martin's Way, is available and suitable to be developed for housing and could provide a number of benefits including community and sporting uses for the village, increased expenditure to support local services and ensure the long-term viability of Kirklevington Primary School which currently has a 32% surplus of places.

**60/2 Mr Vinay Bedi**

Supports the Review of the Core Strategy. The requirement of 2800 dwellings should be a minimum and additional land should be identified.

**60/3 Mr Vinay Bedi**

The Review is predicated on rolling forward the Regional Strategy requirement set out in Policy 28. The evidence for this is four years old and evidence would support a dwelling target in excess of the RS target (700 dwellings per annum). A requirement above the 2,800 shortfall is therefore appropriate.

**60/4 Mr Vinay Bedi**

Agrees with the Council and suggests that further land should be identified in alternative locations, particularly in the latter phases of the plan period. The Core Area is a challenging market in the Borough. Uncertainty of delivery is a result of difficult market conditions within an internal market area, falling yields on sites, and constraints and requirement for public sector investment to deliver sites at Chandlers Wharf, Tees Marshalling Yards and Bowesfield North. Takes the view that the Core Area can no longer be relied upon, and the demand is for family homes not high density urban living. Is of the view that greenfield sites will serve a different market from urban high density brownfield sites. As such the allocation of greenfield sites will not inhibit the delivery of brownfield sites and vice versa.

**60/5 Mr Vinay Bedi**

Supports Option b allocate new housing on a combination of sites. This will provide a range and choice of housing and ensure sustainability. Provision should be on a range of urban sites and allocation of a combination of urban extension sites and small scale village extensions in the most sustainable locations. This will give a balanced approach to meeting future housing requirements and target housing need in different housing market areas in the Borough, in line with Government objectives for housing and issues outlined in the SHMA. One large site would prevent housing in the villages, denying an opportunity for affordable housing, family and aspirational homes, new community, sports and environmental facilities and the creation of new infrastructure. Village development will help relieve stress on road infrastructure in the centre of the conurbation, especially where the village benefits from services and facilities such as Kirklevington.

**60/6 Mr Vinay Bedi**

Supports Option b. Although urban extensions will be required to provide for the majority of residential growth up to 2028, some redevelopment in the most sustainable villages is also required to ensure the long-term viability and sustainability of Stockton's villages and services therein. Kirklevington is ranked as a Tier 2 settlement by the Council as one of the suitable for future development based on existing services and accessibility by public transport. Limited supply in the village has had an adverse impact on affordability in the village, and allocating housing for an appropriate range and choice of housing, potentially including affordable housing, would help sustain the future of the village, which could enable funding for appropriate transport facilities; affordable housing; new sports and leisure facilities; extension of two village school playing fields; new environmental facilities including a new park/play facilities and new community/retail/other appropriate facilities.

## 60/7 Mr Vinay Bedi

Proposes a site on Land South of St Martin's Way. Approximately 200 dwellings, mixed house types including the possibility of executive and affordable housing on 10 ha (30dph) of agricultural land, beyond but adjacent to the defined limits to development of Kirklevington. Vehicular access to the site is gained between no. 14 and no. 16 St Martins Way. Alternative access could be provided from the A67. The site boundaries: To the north residential properties on St Martins Way, Pump Lane and Town End Close, as well as Kirklevington Primary School; To the east by the A67; and to the south and west by agricultural land.

The site is located immediately adjacent to existing residential areas of the village and would, therefore, provide a natural extension to the village to the south. Although presently undeveloped, the site is of limited landscape value and is not protected under any specific local plan policy or designation. Rather it is 'white land'. The site is visually unobtrusive from the surrounding area due to existing boundary treatment. Indeed, a sensitively designed housing development on the site could result in the improvement of the site's ecological value through increased landscaping and planting.

The site is available for housing immediately. It is in two ownerships, both of whom are committed to its early delivery, along with the provision of community facilities.

The site adjoins the built-up area of Kirklevington, which is predominantly residential in character. The majority of the dwellings within the village are relatively modern.

Kirklevington is defined as a 'Tier 2' settlement in the Council's 'Planning the Future of Rural Villages in Stockton-on-Tees' document in terms of its sustainability. Existing facilities within the village include Kirklevington Primary School, St Martins Church, Kirklevington Village Hall, the Crown Hotel public house, a garage and a public play park, including formal play facilities. All of these services and facilities are easily accessible by foot and cycle from the site. The site is located within 300 metres of bus stops on The Green and Strathmore Drive and within 500 metres of a stop on Forest Lane. These stops provide services to Yarm, Stokesley, Thornaby and Maltby. Yarm Railway Station is located approximately 3 km (by road) to the north of the site providing direct services to Middlesbrough, Thornaby, Northallerton and Thirsk. The site is also within easy walking distance of Kirklevington Primary School which currently has a surplus of 47 places (32%). Additional residential development in Kirklevington will help to ensure the long-term viability of the school, which achieves high standards and provides a valuable asset to a rural community (School Organisation Plan, p. 19). The developers would be willing to explore options as to how the development could bring benefits to the school, perhaps in the form of new sports pitches, changing facilities or new buildings. In this light, the site would be a suitable location for a village extension at Kirklevington.

Section 106 contributions generated through the development of the site would be used to enhance the local community. Whilst in due course we would seek to enter into dialogue with local residents and the Council as to how this investment could best be used to enhance the area, our initial ideas are that it could include:

- New sporting facilities, such as a new Kirklevington Sporting Club, including new cricket, tennis and football facilities with changing accommodation;
- new and enhanced footpath and cycle links from the site to the surrounding area and the offer to help improve existing links in the Village;
- Improvements to the Village Hall should they be needed, such as investment in the buildings or the facilities within them;
- Improvements to the local church should it be needed;
- Financial assistance towards delivering the local community's priorities for the village to be identified within the Kirklevington Community Plan where relevant and reasonable;
- New green infrastructure, including new tree and landscape planting at the site; and
- Equipped children's play areas.

In addition, the development of 200 houses on the site would result in the following economic benefits:

- New money direct into Stockton Council, including:
  - £1.7 million New Homes Bonus Payment;
  - £287,000 of additional Council Tax receipts per annum

New residents will spend £3.5m per annum in local shops; and 300 person-years of construction employment.

An extensive list of regional, sub-regional and local strategies and studies identify a strong requirement in the North East to increase provision of high quality family homes<sup>4</sup>, and this site would provide an opportunity to develop such dwellings and to ensure the long-term viability of Kirklevington village. Including Regional Spatial Strategy; Regional Housing Strategy; and Regional Housing Aspirations Study

#### **61/1 Individual**

Please could the site located to the north of Thorpe Thewles, be considered for the core strategy review, in the issues and options consultation process. The grid references for the location are NZ3924, NZ4024, NZ3923 and NZ4023. The map showing that location has been scanned on to your system.

I am especially keen that this location is developed as the borough council has already invested heavily in the area with the walkway and a wonderful play area. There is also more expenditure planned to develop the cycle route. The village used to have a school, two pubs, and a shop but as there has been very little development in Thorpe Thewles these facilities are gradually closing. It would be tragic to see them all close.

The development would be within the A177 boundary and is a very attractive proposition. I look forward to hearing from you soon.

#### **62/1 Ingleby Barwick Town Council**

We do not feel we could comment on specific other sites in the Borough, and should only comment on Ingleby Barwick where we all live and therefore have a valid opinion.

#### **62/2 Ingleby Barwick Town Council**

We feel the number of houses to be built should be spread through out the Borough and not all on one site. we feel this would ensure building is then were it would be most needed.

#### **62/3 Ingleby Barwick Town Council**

We would only consider a small number of houses on Ingleby Barwick if they were to come with extensive community facilities which Ingleby Barwick is sadly lacking.

#### **62/4 Ingleby Barwick Town Council**

We are also very concerned about increase in Traffic issues which may occur with more development on Ingleby Barwick, this concern has also been raised by residents with some of our Councillors.



### **63/1 Middlesbrough Council**

Thank you for consulting the Council on the above document.

Middlesbrough Council recognises the need for each of the Tees Valley authorities to set the housing levels required to meet the needs of their communities in these challenging times. Such commitments, however, can give rise to a whole range of issues and impacts which extend beyond Borough boundaries. We would welcome the opportunity of working with you to look at how we could resolve these issues to the wider benefit of the Tees Valley.

A particular issue of concern will be the impact upon transport infrastructure. The proposed allocation of additional housing to accommodate 2,800 dwellings within Stockton Borough could have impacts on traffic congestion on the A19, A66 and wider road network. The proposed sites are greenfield in predominantly peripheral locations. The location of these new sites is likely to generate a greater level of traffic than the more sustainable brownfield regeneration sites which you no longer consider to be deliverable.

As stated from the outset it is recognised that Middlesbrough will be facing very similar issues in the review of its LDF. It may be useful as our LDFs progress for appropriate planning and highways officers of each local authority to meet to discuss these issues and how they can be resolved.

I, therefore, suggest that we share our thinking on a regular basis and, if appropriate, look jointly at shared issues such as infrastructure.

### **63/2 Middlesbrough Council**

A particular issue of concern will be the impact upon transport infrastructure. The proposed allocation of additional housing to accommodate 2,800 dwellings within Stockton Borough could have impacts on traffic congestion on the A19, A66 and wider road network. The proposed sites are greenfield in predominantly peripheral locations. The location of these new sites is likely to generate a greater level of traffic than the more sustainable brownfield regeneration sites which you no longer consider to be deliverable.

## 64/1 Individual

Please see my comments below with regards to the proposed sites at West Yarm and South West Yarm.

The proposed development at West Yarm is located outside the established urban limits of Yarm and as such, one believes that development would normally be resisted unless it focussed on the continuation of farming and forestry, it contributed to rural diversification or catered for tourism, sport or recreation. The proposal for the development of 330 houses would not fall within these categories.

In addition to this, the proposed developments at both West Yarm and South West Yarm, totalling 810 houses would affect the following:

- Transport in to and out of Yarm – already the transport link through the centre of Yarm is overwhelmed. Queues of traffic regularly build up at both ends of the High Street, extending for significant lengths from these points, preventing viable access through the town centre and affecting the access of residents along these main routes. This is not a one-off occurrence and is a regular feature of the 'Yarm rush hour' and a Friday afternoon and all day Saturday. If this number of houses were to be built, and amenities not provided on site, then there would be no option for homeowners but to travel in to the centre of Yarm.

- Parking in Yarm – already the parking within Yarm is highly restricted. Some of the traffic problems are exacerbated by cars trying to find a parking space. The businesses along the High Street will be affected by a greater build up of traffic and the current lack of parking in the town centre.

- Schools – there is a local primary and high school located at the south/west end of Yarm, which, one believes, would be swamped by a huge influx of additional students. Do these schools have the capacity to take on, what could be, a huge number of extra individuals? If this is not the case, where are the children of the families moving in to these houses meant to attend school?

- Other services, such as Doctors, Dentists etc – in a similar vein to the Schools, do these services have the capacity to cope with the influx of people?

- Transport links – there is only one real access route to the proposed sites from the main route in to Yarm from the A19 and the A1044 – which is the B1264. The increase in traffic along these routes will, no doubt, cause a subsequent increase in traffic congestion at this point.

Situated on the B1264 is Conyers High School. An increase in traffic from the commuting families from these two proposed sites will affect the safety of the students accessing the High School.

Also on the B1264 is a small, humped back bridge over the top of the railway line. This is a single file road which would obviously be affected by a huge increase in traffic from the proposed developments and would cause congestion at this point.

- Noise pollution – In the short-term there would be significant disruption caused by the building on these proposed sites. In the long-term, also, associated with the increase in traffic, there would be an increase in noise pollution for those individuals living on the housing estate which these proposed developments would surround. This will have an impact on the value of all houses on this estate.

- Personal well being – at present there is a significant contingent of dog owners on the estate around which these proposed houses are planned. These dog owners, and other individuals such as runners and cyclists, regularly access the green spaces around the estate to exercise their dogs and improve their own health and wellbeing. By building additional housing on these sites, the owners and users of these spaces will be negatively impacted upon by this reduction in green areas.

- Setting a precedent – if proposals were put forward for these sites, then the precedent would be set for future housing developments and would increase the likelihood of a large-scale planning application for a supermarket to service these houses.

#### **64/2 Individual**

Transport in to and out of Yarm – already the transport link through the centre of Yarm is overwhelmed. Queues of traffic regularly build up at both ends of the High Street, extending for significant lengths from these points, preventing viable access through the town centre and affecting the access of residents along these main routes. This is not a one-off occurrence and is a regular feature of the 'Yarm rush hour' and a Friday afternoon and all day Saturday. If this number of houses were to be built, and amenities not provided on site, then there would be no option for homeowners but to travel in to the centre of Yarm.

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Also on the B1264 is a small, humped back bridge over the top of the railway line. This is a single file road which would obviously be affected by a huge increase in traffic from the proposed developments and would cause congestion at this point.

#### **64/3 Individual**

Parking in Yarm – already the parking within Yarm is highly restricted. Some of the traffic problems are exacerbated by cars trying to find a parking space. The businesses along the High Street will be affected by a greater build up of traffic and the current lack of parking in the town centre.

#### **64/4 Individual**

Schools – there is a local primary and high school located at the south/west end of Yarm, which, one believes, would be swamped by a huge influx of additional students. Do these schools have the capacity to take on, what could be, a huge number of extra individuals? If this is not the case, where are the children of the families moving in to these houses meant to attend school?

Other services, such as Doctors, Dentists etc – in a similar vein to the Schools, do these services have the capacity to cope with the influx of people?

#### **64/5 Individual**

Noise pollution – In the short-term there would be significant disruption caused by the building on these proposed sites. In the long-term, also, associated with the increase in traffic, there would be an increase in noise pollution for those individuals living on the housing estate which these proposed developments would surround. This will have an impact on the value of all houses on this estate.

#### **64/6 Individual**

Personal well being – at present there is a significant contingent of dog owners on the estate around which these proposed houses are planned. These dog owners, and other individuals such as runners and cyclists, regularly access the green spaces around the estate to exercise their dogs and improve their own health and wellbeing. By building additional housing on these sites, the owners and users of these spaces will be negatively impacted upon by this reduction in green areas

#### **64/7 Individual**

The proposed development at West Yarm is located outside the established urban limits of Yarm and as such, one believes that development would normally be resisted unless it focussed on the continuation of farming and forestry, it contributed to rural diversification or catered for tourism, sport or recreation. The proposal for the development of 330 houses would not fall within these categories.

#### **64/8 Individual**

Transport in to and out of Yarm – already the transport link through the centre of Yarm is overwhelmed. Queues of traffic regularly build up at both ends of the High Street, extending for significant lengths from these points, preventing viable access through the town centre and affecting the access of residents along these main routes. This is not a one-off occurrence and is a regular feature of the 'Yarm rush hour' and a Friday afternoon and all day Saturday. If this number of houses were to be built, and amenities not provided on site, then there would be no option for homeowners but to travel in to the centre of Yarm.

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Also on the B1264 is a small, humped back bridge over the top of the railway line. This is a single file road which would obviously be affected by a huge increase in traffic from the proposed developments and would cause congestion at this point.

#### **64/9 Individual**

Parking in Yarm – already the parking within Yarm is highly restricted. Some of the traffic problems are exacerbated by cars trying to find a parking space. The businesses along the High Street will be affected by a greater build up of traffic and the current lack of parking in the town centre.

#### **64/10 Individual**

Schools – there is a local primary and high school located at the south/west end of Yarm, which, one believes, would be swamped by a huge influx of additional students. Do these schools have the capacity to take on, what could be, a huge number of extra individuals? If this is not the case, where are the children of the families moving in to these houses meant to attend school?

Other services, such as Doctors, Dentists etc – in a similar vein to the Schools, do these services have the capacity to cope with the influx of people?

#### **64/11 Individual**

Noise pollution – In the short-term there would be significant disruption caused by the building on these proposed sites. In the long-term, also, associated with the increase in traffic, there would be an increase in noise pollution for those individuals living on the housing estate which these proposed developments would surround. This will have an impact on the value of all houses on this estate.

#### **64/12 Individual**

Personal well being – at present there is a significant contingent of dog owners on the estate around which these proposed houses are planned. These dog owners, and other individuals such as runners and cyclists, regularly access the green spaces around the estate to exercise their dogs and improve their own health and wellbeing. By building additional housing on these sites, the owners and users of these spaces will be negatively impacted upon by this reduction in green areas.

#### **64/13 Individual**

#### **64/14 Individual**

The proposed development at West Yarm is located outside the established urban limits of Yarm and as such, one believes that development would normally be resisted unless it focussed on the continuation of farming and forestry, it contributed to rural diversification or catered for tourism, sport or recreation. The proposal for the development of 330 houses would not fall within these categories.

### **65/1 Stillington & Whitton Parish Council**

The Members would only like to comment on future development in this Parish only and not across the Borough.

As such, for the villages of Stillington, Whitton and Old Stillington, Members do not think that the villages should be allowed to get bigger by building houses on land around the villages. Members would be willing to allow the villages to get bigger by building houses on undeveloped land inside the current boundaries of the villages.

### **66/1 Natural England**

Natural England considers that site selection should be based on the most sustainable options, tested through the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) process rather than a choice between smaller or larger sites.

In general Natural England would wish to see priority given to infill sites and those on the periphery of existing settlements, provided there is no detrimental effect on biodiversity and the character of the existing settlement. Such locations will ensure new development is close to existing services and facilities, including public, cycle and pedestrian links. Proposed development boundaries should reflect the size and character of the existing settlement and the need for development in that area.

### **66/2 Natural England**

The Local Planning Authority (LPA) should also recognise the importance of green space within and on the periphery of settlements. In addition networks between open spaces should be considered to ensure links are not lost by new development. Furthermore there should be no detrimental effect to the right of way (RoW) network. The DPD should also consider the opportunities for increasing access links to new sites and surrounding green space and the open countryside. This should be in accordance with the Rights of Way Improvement Plan.

### **66/3 Natural England**

The DPD should seek to protect areas of green space from future development. GI provides multiple functions, such as improving health and wellbeing as well as strengthening biodiversity. PPS9 (Biodiversity and Geological Conservation) advises that networks should be maintained and strengthened where possible:

Networks of natural habitats provide a valuable resource. They can link sites of biodiversity importance and provide routes or stepping stones for the migration, dispersal and genetic exchange of species in the wider environment. Local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans. Such networks should be protected from development, and, where possible, strengthened by or integrated within it. (PPS9, Para 12)

The LPA should consider the role of GI when bringing sites forward for development by considering important green corridors and opportunities areas as outlined in the Tees Valley Green Infrastructure Strategy.

### **66/4 Natural England**

Natural England supports principles behind the development brownfield sites ahead of greenfield, as these tend to offer the best access to services and facilities. However, Paragraph 13 of PPS9 points out the importance of retaining biodiversity interest on previously developed land. The Council should, therefore, ensure that valuable habitats and species found on brownfield sites, as well as greenfield, are not lost through development. This can be achieved by reviewing ecological information on brownfield sites to check on the likelihood of the presence of protected or BAP species and habitats and considering appropriate means of ensuring such interest is retained through site specific policies or other policies in the LDF.

### **66/5 Natural England**

The Council should also consider any natural features within the site, which are important for wildlife and landscape character, for example water bodies, hedgerows, tree cover. This information can be ascertained by site survey and/or aerial photographs.

#### **66/6 Natural England**

Billingham Bottoms - Natural England raise concern with developing this site for housing. Instead, the site provides huge opportunities for Green Infrastructure (GI), particularly given its location on the edge of the settlement area and its current status as a 'green wedge'. Furthermore the site is located adjacent to the Billingham Back Valley County Park and Billingham Valley Local Nature Reserve. Therefore, housing in this locality has the potential to result in a negative impact on biodiversity. Instead, the LPA should seek biodiversity opportunities in this area and create opportunities for GI, particularly given the location of a local cycle route to the south of the site.

#### **66/7 Natural England**

Harrowgate Lane, West Stockton - Given the agricultural use of the site there does not appear to be any reference to the quality of soils in this locality. Planning Policy Statement 7 requires that the presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification system), should be taken into account alongside other sustainability consideration. Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations.

The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development. Further information is available on Natural England's website.

#### **66/8 Natural England**

Land at Ingleby Barwick - We would reiterate the comments made above ( Harrowgate Lane ) in relation to ALC and the importance of protecting best and most versatile land.

#### **66/9 Natural England**

Land at Uraly Nook - Site 1 and 2 - No specific comments to make in addition to those made in the Issues and Options paper. However the LPA should also take into account the location of local nature conservation sites to the south and north - Eliff's Mill and Elementis nature reserve.

#### **66/10 Natural England**

Land at Durham Lane Industrial Estate - No comments, however please refer to general comments in the introduction to this letter.

#### **66/11 Natural England**

Land East of Wynyard Village - Natural England would wish to see hedgerows retained and improved where possible.

There is also a public right of way running through part of the site, providing links to nearby residential areas; this should be retained.

As with all sites brought forward for development Natural England would wish to see appropriate ecological survey undertaken prior to development to inform biodiversity enhancement and mitigation. Existing detail on Biodiversity Action Plan habitats and protected species, as well as designated sites can be found on Natural England website.

#### **66/12 Natural England**

Land to the South of Preston Farm Industrial Estate - Natural England would wish this site to remain open in nature. We would support its continued allocation as a 'green wedge' as a means to prevent coalescence of built up areas. Such areas should create opportunities for conservation and enhancement of the natural environment.

Soils resources should also be considered in this location and we reiterate earlier comments on this issue.

**66/13 Natural England**

North West Billingham - Natural England would wish to see hedgerows retained and approved where possible.

As with all sites brought forward for development Natural England would wish to see appropriate ecological survey undertaken prior to development to inform biodiversity enhancement and mitigation. Existing detail on Biodiversity Action Plan habitats and protected species, as well as designated sites can be found on Natural England website.

Soils resources should also be considered in this location and we reiterate earlier comments on this issue.

**66/14 Natural England**

South West Yarm

Natural England would wish the site to remain open in nature and would reiterate earlier comments in relation to opportunities for GI and biodiversity enhancement.

**66/15 Natural England**

West Preston - Natural England would raise concern with the loss of such a large area of open fields in a potentially unsustainable location, in terms of access to key services, facilities and transport links. Given the existing agricultural use of the site there would need to be further investigation on the importance of its soil resource. We would reiterate comments made in relation to ALC and the need to assess the quality of farmland to enable informed choices to be made.

Furthermore, we agree that development of this site would relate poorly to existing residential areas and as it is located within a 'Strategic Gap' has the potential to impact negatively on the landscape.

**66/16 Natural England**

West Yarm - Natural England would wish to see the site remain open in nature and reiterate comments made in relation to agricultural land and the need to protect soil resource.

**66/17 Natural England**

Wynyard Hall Estate - Natural England raises concern with allocating this site for housing. The site is greenfield and consists of areas of mature tree cover.

**66/18 Natural England**

Wynyard Park - No specific comments. Refer to general comments made in the introduction of this letter

**66/19 Natural England**

Yarm Back Lane, West Stockton - No specific comment, but would reiterate ALC comments given the current agricultural nature of the site.

**66/20 Natural England**

Natural England welcomes early development of the Habitat Regulations Assessment (HRA) and the opportunity this presents to inform the emerging options of the Core Strategy Review.

### **66/21 Natural England**

Effects can arise from a number of factors of which location is only one. Likely Significant Effects (LSE), may include factors such as disturbance of interest features and loss of/or damage to the habitats necessary to support them. They can derive from impacts of use, related infrastructure, outputs e.g. temperature, aerial emissions (particulates, NOx), water quality, groundwater impacts (hydrology, groundwater, seasonality etc) as well as impact of land-take/ footprint; these effects may cause damage not only within the European Site but to any areas which support them, for example SPA bird populations use land outside the SPA boundary for off-site feeding, roosting etc.

Overall, the screening report covers the relevant issues in terms of direct and in-direct effects. LSE identified at this stage should be addressed through counteracting measures (i.e. remove the option from the plan) or if its intended to bring forward proposals that result in LSE an Appropriate Assessment (AA) will be required.

### **66/22 Natural England**

As the review progresses to the Preferred Option stage it is crucial to consider the location of development sites in combination with each other and also existing policies/proposals set out in the Core Strategy. Furthermore the Council should be satisfied that all other plans and projects are considered in the in-combination assessment. Presently the in-combination list appears to be focussed on development plans; projects (planning proposal/approvals etc) should also be considered along with other strategic plans, such as Local Transport Plans.

Natural England would welcome early consultation as the HRA progresses further.

### **67/1 The Crathorne Estate**

Thank you for your help.

As discussed please see the attached plan -

The land edged red is the land that I submitted on my earlier email of today - this is owned by my client 'The Crathorne Estate'

The land edged blue is land outside our ownership but land that we consider to be the link between Kirlevington and the development of the land edged red.

I look forward to receiving confirmation that you have received these.

See hard copy of location plan.

### **68/1 High and Low Worsall Parish Council**

The Parish Council are concerned that consultation has taken place with Hambleton District Council in view of the impact on the B1264, it being the main route through the parish.

The proposed housing development sites border the B1264, these are, West Yarm South West Yarm and South East Yarm. The Parish Council also have concerns about the impact on Yarm itself as it is already a bottleneck.

### **68/2 High and Low Worsall Parish Council**



## **68/3 High and Low Worsall Parish Council**

## **68/4 High and Low Worsall Parish Council**

### **69/1 Sven Developments**

We are delighted to enclose an electronic version of the Sustainability Assessment of the candidate site for strategic housing land for inclusion within the revised Core Strategy.

A BREEAM "Method of Assessment for Communities" has been considered as an objective measure of what a sustainable community comprises, evolves and ultimately how it is managed and maintained has been applied. The report seeks to set out our commitment to work in partnership and to made the sustainable requirements into both statutory planning conditions and a development agreement with Local Authorities. This unique development opportunity represents a deliverable, sustainable community that is locally managed; potential to create 400 skilled jobs; establish a new identity for Stockton to enhance the residential offer; and develop a reputation in Tees Valley in renewable energy. The size of the West Preston site is key to its strength to allow the development to allow such important dimensions of sustainable development.

This submission goes to the heart of the Coalition's objectives for housing and planning for people as identified in the draft National Planning Policy Framework (2011). The Government's key housing objective within NPPF is to increase significantly the delivery of new homes. The stated aim is that "everyone should have the opportunity to live in a high quality, well designed homes, which they can afford, in a community where they want to live". To achieve this objective the Government identifies four key areas which Stockton Borough Council are directed to consider in considering strategic housing allocation:

- Increasing the supply of housing
- Delivering a wide choice of high quality homes that people want and need
- Widening opportunities to home ownership
- Creating sustainable, inclusive and mixed communities.

It is considered that West Preston fulfils the objectives of Central Government and is seen as a highly sustainable candidate site for a strategic housing allocation. Should you have any queries in relation to the enclosed submission please do not hesitate to contact the writer directly.

See hard copy for accompanying document.

### **70/1 West Raynham Developments**

The estimated yield of Site 1 is circa 557 (plus 28 No. potential apartments) on a medium to low density development. Site 2 considers the eastern portion of the site with a potential yield of 312 (plus 18. No potential apartments). This site extends to circa 15.4 hectares. [Masterplan submitted].

### **70/2 West Raynham Developments**

The purpose of this submission is to identify firstly the proximity of the site which is wholly within the settlement boundary of Eaglescliffe and Egglescliffe and also to establish the proximity of local services, schools and retail facilities. It is therefore considered that both Site 1 and Site 2 could be allocated and available immediately for residential development. It is also considered that the site is highly sustainable as a candidate site for an extension within the settlement boundary.

### **70/3 West Raynham Developments**

Previous discussions with your department have identified that the Elementis Chromium Works is no longer under COMAH regulations due to it being decommissioned. There is a Health and Safety Executive Consultation Zone which partially extends to include the western section of the site. It is considered that this can be lifted and discussions with Elementis are advancing. Ongoing discussions with Elementis, HSE and Stockton Council will ensure that Site 1 will be available for residential development.

### **70/4 West Raynham Developments**

A proportion of the wider allocation forms part of an outdated employment allocation with the adopted Stockton on Tees Local Plan. The site has been actively marketed for a period in excess of 4 years by joint agent Edward Symmons and HBSV and more recently by Sanderson Weatherall. It is considered that in the first instance there is no market demand for this site, the site therefore lends itself to an alternative land use.

We therefore commend the site to Stockton Council as a sustainable extension to the urban area within the settlement boundary and request that it forms part of a strategic housing allocation within the Core Strategy.

### **71/0 Tithebarn Land**

To the planners

This not part of my submission, unless your protocol demands that it be treated as such, but just as a point for you to consider.

Rosemary Young said that it was not Ingelby Barwick that killed the High Street; it was Teesside Park. As you know, I disagree. I think the chronology supports my case, but I would like you to think of York.

It is a unitary authority not so much bigger than SBC. It has massive out-of-town retail developments at the Designer Centre, Monks Cross and Clifton Moor parts 1 and 2 and six big supermarkets, five of them away from the town centre. It has suffered lots of industrial closures:- the railway and carriage works, sugar factory, Terrys, a lot of Nestle, printers. However, the principle retail areas of Coney Street and Parliament Street thrive.

Those two streets will benefit a little from tourism, but the principle tourist area is near the Minster, Petergate, Stonegate, the Shambles.

Over the years York has controlled housing development making it contiguous to the town. Development has occurred all round the town, but always with good public transport to the centre. There have been plenty of "villages" proposed, one of them on land belonging to the C of E, which was highly fancied when John Gummer was at Environment, but the Council have kept the town compact, with the exceptions of Wiggington and Haxby, which fortunately have several good commuter runs into the centre. Acomb, Fulford and Heslington are to York what Norton is to Stockton. There is no "Ingleby Barwick" or "Wynyard".

Because the spending power has been kept around the town, the prosperity has been maintained. York, like Stockton, has not benefited from being a county administrative town. The town centre prosperity has been kept because of the compact nature of the residential areas and their proximity to that centre. The correct planning decisions were able to be made over the last forty years/since car ownership became common.

### **71/1 Tithebarn Land**

The owners of Tithebarn Land have submitted a formal Comment on the Issues and Options with the reasoning formalised by Mr M. Mealing.

I write to further emphasis various considerations, and in particular to again make the case for land along Harrowgate Lane. I have promoted the land south of Letch Lane, north of the Mitre and east of the pylon line ever since the Stockton Borough Council (SBC) survey "New Life in the High Street" proved by straightforward deduction that residential development here was, and is, the only residential development which will aid the revitalisation of the High Street. The evidence given at the 2009 examination of SBC Local Development Framework (LDF) by the Home Builders Federation representatives, in particular the Persimmon executive, served to reinforce this.

### **71/2 Tithebarn Land**

No other land promoted at that LDF examination, or in the 2010 Strategic Housing Land Availability Assessment (SHLAA) would either house people who would regard Stockton High Street as their main retail and personal business centre, or who would have the spending power to improve the retail offer. I can write that confidently having read SBC's analysis of the New Life in the High Street survey which SBC conducted to support their campaign to win City Challenge money to regenerate the High Street area.

### **71/3 Tithebarn Land**

The one large housing allocation at Ingelby Barwick was a disastrous one for the prosperity of Stockton town centre. Because delivery was slow, some times at less than a quarter of the planned delivery, and taking more than twenty years longer than promised a very big percentage of SBC's housing allocation from Cleveland C.C., then the TVJSU, then the RSS, was tied up in sterile allocations resulting in the loss of the spin-off prosperity which comes with well sited development.

No one who cares for the town would ever wish to see SBC tie up all its allocations on one site ever again. It's probable a wise thing not to have too many sites in the control of one builder ever again

### **71/4 Tithebarn Land**

I was invited to sum up the evidence presented to the 2009 Examination of SBC's LDF by the Inspector. Two points are worth reiterating:-

1. The planners have to work against national and RSS backgrounds
3. The ODPM set a target of 4.4 million houses over twenty years. That is 74,000 houses per million of UK population. Stockton has about 180,000 people. Therefore a national average allocation would be 13,320 houses plus all of the connected investment and wealth creating opportunity. The RSS allocated us 6,885

Fortunately planners are no longer constrained by national and RSS targets. No doubt some councils in the over built south east will cut back, but SBC has the chance to ignore the undeveloped sites at Ingelby Barwick and go for growth and prosperity, allocating extra sites to aid the revitalisation of the High Street. At the point 3 above we see how the RSS had planned to condemn us to decline, by allocating us only 50% of our share. This gives a positive indication of the need for extra and early planning permissions, to redress the decline imposed on us by the RSS policy. Various SBC planners will have known this for years, and yet never been able to do anything about it

### **71/5 Tithebarn Land**

Another piece of really positive news for Stockton High Street prosperity was announced in the Budget Speech by the Chancellor. There is no longer a presumption in favour of brown field development. This means that SBC no longer have to give an over riding regard to brown field sites that have not been able to be regenerated by residential development during the recent housing booms, nor do they need to make allowance for brownfield sites which may appear during the plan period. This is fortunate, as the chance of public money to regenerate these has gone. Also the PFI money for knocking down schools and hospitals, creating brown field land, and building new ones, creating debts for our grand children, has gone. The Coalition Government has gone for a carrot and stick approach. The carrot is that for occupancies of new dwellings SBC will get the New Homes Bonus as well as the satisfaction of knowing that they are aiding the prosperity of the borough if the housing is allocated on the periphery of Stockton town and Norton.

### **71/6 Tithebarn Land**

Probably all of the sites on your map are developable. There is no reason to suppose that any of them south of the A66 will be delivered any faster than Ingelby Barwick has been. None of them will contribute much to revitalising the High Street; going by your own survey about 8% of their retail spend would have been there before Teesside Park was built. As people will have to 'get into the car' from all of these sites the proportion of their retail spend going into Stockton High Street will be far less than 8%. Sixteen hundred of these sites will serve to clog up the traffic flow around Yarm completely at busy times, making Stockton High Street even less likely as a shopping venue. Not sustainable.

### **71/7 Tithebarn Land**

There is no reason to suppose that any of the Wynyard sites will aid Stockton High Street. What is certain is that nearly all journeys will be by car, be it going out for employment or the food and cleaners coming in. These sites will definitely add to the carbon foot print of the town, without revitalising the High Street. At Wynyard Hall Estate there is scope to add to the original concept of a regional executive area by allowing another 10 – 20 houses. At say £250k per site this should allow a margin to improve some infrastructure. It was a sad day for the site when the cheap houses were allowed. At the time I was building no houses as cheap as that; the best ones were hardly up to the spec, but were up to the price. Some extra houses there is reasonable; hundreds along the northern boundary of the borough will do almost nothing for the retailers in the High Street but will bump up the carbon footprint of the borough. Not sustainable, if they were sustainable they would be using already existing infrastructure, not crying out for more.

One would not contemplate building an additional 150 houses at any of the other villages, so why 300 at Wynyard. I helped formulate regional NFU policy on building in villages and still think that the policy of the 90s was sound. That is, that low numbers of housing should be allowed in all villages every few years. This allows newcomers to be assimilated without creating too much of a "two communities" in the one village, it allows the chance for low cost housing as part of a deal, and also other community benefits. The Council will have to decide whether the New Homes Bonus goes to the village, the Borough, or is shared

### **71/8 Tithebarn Land**

I thought Billingham Bottoms was a green wedge area. I certainly thought it was idyllic when as a child I used to go there catching minnows and sticklebacks in a jam jar

### **71/9 Tithebarn Land**

A case could be made for some houses on the meadow land to the east of Yarm Back Lane if ever the proposition could be got past Natural England and the CPRE at a time in the future when the economy has recovered sufficiently to fund the highway infrastructure. Allocations made here could turn out to be very delayed in delivery, to the detriment of the High Street.

### **71/10 Tithebarn Land**

This leaves Harrogate Lane. The northern most section I have always thought would be better in commercial use; it would be a horrible place to live- sub station, pylons, roads, 24 hour super market.

Phase 3 should be Letch Lane to the walk way and the western edge. At present these areas appear very rural, but would look a reasonable continuation after Phases 1 and 2.

Phase 2 should be the walk way to the School. If it was built before Phase 1 (below) it would appear as more of an intrusion, whereas the land south of the school is just a continuation of the development as contemplated in SBC plans as far back as 1955.

Phase 1 consists of Tithebarn Land, Coalgarth Land, the SBC's own 4.4 acres (wouldn't you feel guilty if front line services in the borough were cut and this land lay unused?) and any surplus school land. This is exactly what you need for housing delivery, New Homes Bonus and High Street revitalisation

## 72/1 Mr John Mason, 18A Braeside, Kirklevington

Although the on-line questionnaire has been completed on Mr Mason's behalf, the following comments are directly in response to the questions raised in the Core Strategy Review draft. They include greater detail than provided for in the on-line questionnaire, but the two submissions should be read as one.

Question 1 – Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

It is clear from proposed changes to national planning policy that the Government considers there to be a need for more houses to be provided, more quickly and in a more diverse range of locations

By the Council's own admission, the strategy contained in its Core Strategy has not proved to be sufficiently flexible to respond to changing circumstances, particularly, at this time, the prolonged economic downturn, and is thus serving the Borough's population poorly in relation to the supply of new homes.

The Core Strategy review is welcomed as an opportunity to change the approach to housing provision, to allow for more creative solutions to the slow pace of housing provision in both urban and rural locations. In addition, the review will allow the Council to take account of the emerging Government commitment to ensuring that there is a suitable choice of locations for housing and to securing increased competition in the housing land market by making provision for an additional 20% of anticipated capacity, so that no one site dominates housing supply.

Not only are the identified Core Area sites in the Core Strategy unable in the short term to provide the housing numbers originally anticipated, but they are also incapable of providing for the 20% additional allowance expected by the Government.

It is inevitable that alternatives will need to be found unless the delivery of new homes is to be allowed to slip further.

Question 3 – Which of the following options for the distribution of new housing sites do you agree with?

- a) Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b) Allocate new housing on a combination of sites

The option of concentrating development essentially into a single major site should be avoided. Doing so would re-create the situation that has arisen from development at Ingleby Barwick, the unfortunate locational imbalance that has for so long harmed the prosperity of Stockton. A range of sites offers flexibility, locational choice and the opportunity better to manage housing growth without the potential brake on development that could be exercised by a single site in a single ownership.

Future housing provision should be on the basis of a combination of sites in both urban and rural locations.

Question 4 – Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- All Villages
- Only the most sustainable villages
- No village extensions

Although it is accepted that the majority of provision will be made by a change in policy that promotes the release of a selection of medium-sized sites, preferably on greenfield sites on the edge of Stockton, there should be more scope for new housing in rural areas, especially in and around principal villages.

Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services

and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted.

This has tended to reflect a limited perception of the role of the villages within the Borough. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties to particular rural communities.

Such households have found access to housing in villages difficult because much of the housing stock has been bought by more affluent 'incomers', with house prices, over time, inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'.

By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage.

This can be achieved by allowing housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing.

Such an approach is foreshadowed in the Government's draft National Planning Policy Framework which suggests that councils should be minded to provide for market housing in rural areas when this is part of development which includes a significant amount of affordable housing to meet the needs of local people.

As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes.

One such site, approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

See accompanying map with hard copy.

**72/2 Mr John Mason, 18A Braeside, Kirklevington**

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#### **72/4 Mr John Mason, 18A Braeside, Kirklevington**

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Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted.

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As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes.

#### **72/5 Mr John Mason, 18A Braeside, Kirklevington**

One such site, approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

See accompanying map with hard copy.



### **73/1 Preston Farm Developments**

Under the current Government's agenda, housing provision is not just about housing numbers, albeit that providing sufficient houses in a timely fashion in order to address the serious gap between housing need and supply remains a fundamental objective. As important, is the need for development, whether housing, commercial or industrial, to contribute to economic recovery, a consideration of major significance within Tees Valley as a whole and Stockton Borough in particular.

In reviewing land with housing potential, the Council should not only be aiming to identify sites capable of providing the additional houses required to close the gap caused by the poor house-building performance that has resulted from the economic downturn of recent years, but also be looking to diversify the housing offer, in particular investigating opportunities to provide for a style of housing that may not currently be represented in the major developments that have characterised the offer in the recent past.

### **73/2 Preston Farm Developments**

In addition, given what has been perhaps a disproportionate concentration in the recent past of housing development at Ingleby Barwick in particular, new sites should widen the distribution more towards Stockton, both to add to choice and to bolster the catchment of the struggling Stockton Town Centre.

New housing sites are needed, unless increasing numbers of households are to be deprived of the opportunity of living in decent homes. However, sites that are allocated to create the much-needed accommodation should serve a number of purposes in addition to adding to housing stock numbers. They must make sense in terms of urban structure and functionality, urban design and amenity, and contribute to the sustainability of urban areas. New releases must also allow for imaginative responses to changing needs and to aspirations for a different form of housing provision.

### **73/3 Preston Farm Developments**

Housing provision tends to be dominated by the large scale development of fairly standard units. This is inevitable in the pursuit of volume provision to cater for increasing demand.

To broaden the choice available to households, a variety of locations should be promoted offering opportunities for families to realise their particular aspirations, different in character from the houses on offer from the volume builders.

In particular, sites should be identified which offer the chance for those who would prefer to live in somewhat more individual and distinct locations offering a high degree of amenity and a chance to stamp their own character on the houses provided.

Such sites would have considerable value in terms of the local economy because it is just such sites to which entrepreneurs and industry leaders are likely to aspire. Although Wynyard has successfully provided a means of satisfying such aspirations, there is an unfortunate lack of sites throughout the Borough within which individual expression can be exercised. While it is expected that Wynyard will continue to perform its dominant role in catering for a particular element of the executive housing market, there is merit in broadening the distribution somewhat by providing alternative bespoke sites in quality locations.

Land at Preston Farm between Preston Lane and the southern edge of Preston Farm Industrial Estate has particular potential in terms of high status housing provision in Stockton.

### **73/4 Preston Farm Developments**

Accepting the important value of this land in terms of the green wedge, it is considered that an element of quality housing could be permitted on part of the land without harm to the role and integrity of the wedge.

Although the consultation document highlights the whole of this part of the green wedge for discussion, it is suggested that housing development across the whole area would not be desirable but that an allocation could be made adjacent to and west of the present Preston Farm complex.

The scale of development would be dictated by the nature of the use made of the green wedge.

If its use for agricultural purposes continues, then a site allowing for in the order 12-15 dwellings laid out and designed to reflect the feel of a rural hamlet already created by existing development based around the original farmhouse and outbuildings would be appropriate.

Given its position within the urban area, agricultural operations in the green wedge are becoming increasingly difficult. If there was a willingness to permit the development of a larger number of houses, then this should be capable of generating sufficient income to fund the creation of a country park available to the wider public but still performing the essential function of the green wedge. A balance can be achieved between innovative new housing and open space, so as to create a bespoke housing complex complementary to an accessible public amenity.

### **73/5 Preston Farm Developments**

The review of the Core Strategy in relation to housing provision is timely, given the scale of the developing housing shortage. In due course it is hoped that the Spatial Strategy underpinning the Core Strategy will be re-assessed.

The Spatial Strategy makes little reference to the need to provide new sites for housing development outside the central regeneration and redevelopment areas. Although there are existing housing allocations and planning permissions for housing elsewhere in the Borough, the focus of attention on some of the more run down parts of the borough, admittedly in an attempt to facilitate their improvement, neglects to identify that within the structure of the urban area are other areas in which select development on a modest scale could be encouraged. Such areas have the potential to benefit economic growth by providing quality housing of a type that is recognised to have a link with economic growth and development.

The Spatial Strategy should be widened to include reference to the acceptability of sites outside the core area, which offer the prospect of innovative high quality modern housing. Such sites could include for a modest amount of development in particular green wedges where housing development could be permitted, sufficient in size to fund complementary country park or parkland treatment to the balance of the wedge, this to be dedicated for public and community use. Such an approach would open up public access to green wedges on the basis of limited development that would neither compromise the integrity of the green wedge nor its function in maintaining separation between settlements. Land at Preston Farm would present such an opportunity.

Without a broader perspective on housing supply, the Borough is going to struggle to keep pace with the increasing demand for housing because so much new development is currently proposed in areas notoriously difficult to redevelop. In addition the context or setting of such sites will prejudice their appeal for households who have considerably higher aspirations for housing. The review suggests that the Council recognises that it must take a fresh look at the potential of controlled release of greenfield sites, and this should involve a re-appraisal of the role of green wedges.

## 74/1 England and Lyle

This document seeks to address the matters raised within the consultation document we consider it necessary to firstly address the matter of housing need and demand, in particular the Council's housing growth assumptions.

It is understood that the Council wish to retain, notwithstanding its impending abolition, the housing requirement/targets as set out in the Regional Spatial Strategy. At present, until updated by the Council's own more up to date assessment of need, they offer the most up to date evidenced based projections.

However, things have now moved on significantly since the original drafting of the RSS. The Issues & Options Consultation Document is silent on the Government's 'Planning for Growth' agenda which was set out in the Ministerial Statement of the 23rd March 2011. Indeed, since the drafting of the Issues & Options Consultation Document, the Government has published its draft National Planning Policy Framework (NPPF). The NPPF echoes the 'Planning for Growth' Ministerial Statement of the 23rd March 2011 and sets out the Government's clear direction of travel in respect of housing growth.

The 'Planning for Growth' Ministerial Statement emerging NPPF is a material consideration. Given the clear message that runs throughout both, they must be afforded very significant weight by the Council in reviewing the Core Strategy. In respect of policy development. Its objectives for housing are unambiguous:

'The Government's key housing objective is to increase significantly the delivery of new homes. Everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live. This means:

- increasing the supply of housing
- delivering a wide choice of high quality homes that people want and need
- widening opportunities for home ownership; and
- creating sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.

The draft NPPF states that to enable this, 'the planning system should aim to deliver a sufficient quantity, quality and range of housing consistent with the land use principles and other policies of this Framework'.

The 'Planning for Growth' approach is in no way reflected in the Council suggested strategy for delivering new housing over the plan period. As the Council will be aware, the targets set out in the RSS are the absolute minimum.

The LPA must move swiftly to increase the supply of housing and deliver a wide choice of homes that people 'want and need'.

### DELIVERABILITY

England & Lyle agree with the Council's conclusions that without significant public investment a number of potential housing sites in the defined core area cannot be relied upon for the delivery of housing over the next 15 years. We would respectfully comment however that it is not just simply those sites identified within the Issues & Options Document (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North). There are numerous sites that were identified as commitments or deliverable sites in the SHLAA 2010 that will either not be brought forward at all for housing development in the short to medium term or if development does take place, given their location and character of surroundings, are unlikely to deliver housing at the rate assumed and are unlikely to bring about the type of housing for which Stockton has an overwhelming need.

In light of the current position in respect of the Building Schools for the Future Programme and NHS funding, that it would be unrealistic to factor/plan for any housing development upon any existing school or hospital sites. Any such opportunities should now be seen as windfall.

## SUGGESTED SITES

Mindful of the aspirations of the Sustainable Community Strategy, the Core Strategy (Appendix 1 of the Issues & Options Paper) and the roles of the differing housing markets (identified in the SHMA), it is clear that allocations should be spread around the authority area with the main focus on the main urban areas but with allocations to the south of the main urban area in the Yarm area to ensure that the aspirations are met. Moreover the housing must be located in a location that ensures good accessibility to all jobs, facilities, goods and services within the Borough.

England & Lyle have considered the range of sites put forward by the Council to address the identified housing needs over the plan period. Mindful of the regeneration aspirations of the Council and the need to deliver new development in the most sustainable locations (Core Strategy, PPS1 & PPS3), it is our view that an urban extension to the west of Yarm (Morley Carr Farm) provides most logical and sustainable location for housing development that meets the identified needs of the existing and future population of the south of the authority.

We would ask that the Council considers the accompanying report which outlines the merits of this site and that it refers back to the sustainability appraisal in relation to all of those other sites in the Yarm, Eaglescliffe & Preston area. Morley Carr Farm or West Yarm is clearly the best performing of those sites and should be seen as being sequentially preferable to the alternatives.

See hard copy for accompanying document.

## 75/1 Mr Rod Bickenson

We are instructed by Mr Rod Bickenson ("our client") of Knowles Close, Kirklevington to respond to the Core Strategy Development Plan Review.

Our client is a joint owner of land in the village of Kirklevington, identified as suitable for housing development in years 6 - 10 of the plan period in the Council's SHLAA as site 26 "Land south of Knowles Close, Kirklevington".

Our comments on behalf of our client are set out below. Please note that we have not answered all of the questions.

### Question 1

We agree that the Council can no longer rely solely on sites in the Core Area for new housing development between 2013 and 2028. We consider those sites in the Core Area are no longer viable or attractive to the housing market and are therefore unlikely to deliver the housing requirement.

We would therefore suggest that to retain the existing strategy would not deliver the housing requirements for Stockton. In the circumstances and acknowledging PPS3, PPS12 and the draft NPPF, we consider it appropriate for Stockton Council to undertake a review of the Plan and to allocate additional land for development, notwithstanding that we do not agree with all of the sites or indeed the locational strategy for allocation. We consider that the Council needs to look also at extension of the most sustainable villages to truly offer range and choice for housebuilders and house buyers/renters.

In accordance with the guidance in the draft NPPF, which carries weight as a material consideration both in plan making and determining planning applications, the objective of the revised Plan should be to significantly increase the supply of deliverable housing. Amongst other things, in accordance with that draft guidance, the Council must ensure that there is at least a five year supply and should include an additional allowance of at least 20 percent to ensure choice and competition in the market for land and therefore delivery. This principle should be written into the Core Strategy Review.

### Question 2

We support the principle of flexibility in allocating additional land. We agree with the Council that the trajectory of housing must be flexible to accommodate changes in market conditions. We agree that some of the urban core sites such as Tees Marshalling yard will take longer to deliver than anticipated and that other sites should be allocated to make up any under delivery.

As part of the flexible approach to housing delivery, we consider that the Council should also allocate land in sustainable Tier 1 and 2 villages. At the current time no such allocations are proposed. This isn't the flexible approach that the Council suggests.

New housing in sustainable villages should be allowed to contribute towards range and choice, support rural services and facilitate affordable housing. In the AMR December 2010 it is recorded that whilst there was some affordable housing delivery, the focus was in the urban areas with little if any apparent delivery in the rural areas. This is something which should be addressed in the revised Core Strategy. In this respect the advice in para 112 of the Draft NPPF states that in rural areas LPAs should be responsive to local circumstances and plan housing development to reflect local requirements, particularly for affordable housing. The draft NPPF states that LPAs should in particular consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.

### Question 3

We support option b, namely allocating new housing on a combination of sites. We would go further and suggest that the allocated sites needs to be not just in the main urban area but also in the most sustainable villages (tier 1 and 2). We consider that as a minimum, 10% of future housing should be allowed to extend the tier 1 and 2 villages. This would allow the majority of development in the urban areas but allowing for some expansion of sustainable villages.

We do not consider that to allocate one large site would provide the range and choice for the housing market. It would not be attractive to the house builders and would not be flexible to changes in the market or offer choice to house buyers/renters.

We would also suggest that there has been a significant amount of the development in and around Ingleby Barwick for many years and there are a significant number of houses yet to be constructed. Acknowledging this we consider that development elsewhere in the Borough would provide greater range and choice for the market which would be more likely to deliver new homes.

Question 3 asks whether we consider any particular combination of the sites identified by the Council would be appropriate to deliver new housing. We would comment that at the current time the Council hasn't identified any sites in the sustainable villages and for that reason we do not consider that the right sites have yet been identified.

#### Question 4

We consider that village extensions of an appropriate scale and character should be considered only in the most sustainable villages. By the most sustainable villages we consider only those villages in Tier 1 and Tier 2 as set out in figure 26 of the Issues and Options Paper.

In particular we would support an extension to the village of Kirklevington, the largest of the second tier villages. In terms of the number of dwellings it is equal in size to Stillington (the only tier 1 village) and we therefore consider it has the critical mass for a further extension. We also consider that there is a suitable site for the extension of the village to the south of Knowles Close which is identified in the Stockton SHLAA (site 26) as being suitable for housing deliverable in years 6-10 of the plan period. That site would represent a sustainable extension to the village. With an estimated yield (as set out in the SHLAA) of 75 it could accommodate all of the housing land needed for a 15% expansion of the village. Whilst the SHLAA indicates that the site would be deliverable in years 6-10 of the plan period, we consider it can be delivered in the next 5 years and would therefore contribute to the short term requirement for new housing land.

We would therefore support as a minimum a 15 percent expansion of Tier 1 and Tier 2 villages. Based on a 15 percent expansion the six villages falling within tier 1 and 2 would deliver about 274 dwellings. This figure is less than 10% of the 2,800 required and would not undermine the overall Core Strategy approach of focusing development towards the urban area.

#### Question 5

Infill development should only be allowed in Tier 1 and Tier 2 villages. These are villages where there is the greatest range of services and facilities and as such are the most sustainable locations where new housing development should be focused.

#### Question 8

If housing is to be permitted in Wynyard, it should be limited in number and limited to executive housing.

#### Summary

In summary and on behalf of our client, our main points are as follows:

- We agree that the Council can no longer rely on the Core Area for new housing because the market will not deliver those sites as projected in the current Core Strategy. They are difficult and costly to deliver and are not currently viable.
- We consider that the main focus for new housing should be extension to the urban area, on a range of sites (not just one large site) but that the Council should allow for at least 10% of new housing to be located within and as extensions to tier 1 and 2 villages.
- We consider that Tier 1 and 2 villages should be expanded by 15%.
- We consider that SHLAA site 26 on land south of Knowles Close, Kirklevington would accommodate the 15% expansion of the village.



## 76/0 North Tees and Hartlepool NHS Foundation Trust

University Hospital of North Tees Site

The existing University Hospital of North Tees site is in a sustainable location to the North West of Stockton-on-Tees town centre and is well served by good existing infrastructure and community facilities, as is consistent with the approach set out in Planning Policy Statement 3 (PPS3) :Housing, June 2010, which also specifically advocates 'consideration of the opportunity for housing provision on surplus public sector land' adding 'priority for development should be previously developed land, in particular vacant and derelict sites and buildings', a definition that will apply to the existing UHNT site upon delivery of the proposed new hospital at Wynyard Park.

Further to this, development of this site within the plan period would assist in achieving the key targets set out in the Core Strategy Policies. Specifically; CS1 (3) – 'The remainder of housing development will be located elsewhere.....with priority given to sites that support the regeneration of Stockton, Billingham and Thornaby.'

CS2 (1) – '....by ensuring that all new development is well serviced by an attractive choice of transport modes'.

CS3 – Sustainable living and Climate change aspirations.

CS6 (4) – ' Support will be given to.....the provision of healthcare services and facilities through Momentum: Pathways to Healthcare Programme'.

CS7 (1) & (3) – Housing Distribution and Phasing. In particular the ability to maintain the significant contribution to housing provision in the Stockton sub-division under policy justification 12.13.

CS8 (1) & (3) – Addressing the provision of sustainable housing provision at the appropriate densities, helping SBC achieve the target housing numbers set out in the Core Strategy.

CS11 – Planning Obligations, enabling the contribution towards delivery of additional infrastructure in the Borough.

Once the services at UHNT are transferred to the new hospital at Wynyard Park, the existing hospital will become redundant and as such will represent a prime Brownfield site on the edge of Stockton Town Centre.

Making effective use of land by re-using previously developed land is promoted by PPS3 and SBC follow the guidance by setting a target of achieving 75% of new housing on previously developed land (pdl)within the Borough. Development of this site could significantly contribute to achieving this target when there is considerable doubt about the ability to deliver on some of the other previously allocated pdl sites within the Core Area and the consideration now being given to a high proportion of Greenfield sites in the Core Strategy Review Issues and Options.

In the Core Strategy Issues and Options Review report it states that

'for developments to be sustainable they should be located on sites that are well served by public transport links and that allow the residents easy access to local facilities and services, to reduce the number of trips made by private motor vehicles'.

This statement of aim is consistent with the advice in PPS3 paragraph 36, as previously referred to, as the site already has good public transport links and benefits from a range of nearby services. This site would therefore be inherently sustainable and so it is our request that it be allocated for new housing development within the plan period.

It is our expectation that the existing University Hospital of North Tees will become redundant in the medium term and that the site will become vacant and available in the lifetime of the Core Strategy and therefore this site should be considered as an allocation for future housing development. The site is considered to be sustainable and deliverable by virtue of its location near to the town centre of Stockton surrounding by services and facilities. This would assist SBC in meeting the Key Targets of the Core Strategy in housing provision and sustainability, as well as conforming to guidance in PPS3, with regard to sustainability and effective use of land, and PPS1 which states:

'Plans should take full account of other relevant strategies and programmes and, where possible, be drawn up in collaboration with those responsible for them'.



Although we recognise the need for SBC to consider other sites for housing we do not feel SBC overlook the opportunity this site presents as they may be unclear about the certainty of the delivery of the new hospital at Wynyard Park. We would therefore welcome continued engagement with SBC regarding the future availability of the UHNT site so as to ensure the appropriate allocation is made within the Core Strategy a part of the current review.

The site was previously considered appropriate for allocation based on its suitability when considered against sustainability criteria and the recognition that it represents efficient and effective use of land. The same can not be said of other sites that are proposed for consideration by SBC, many of which represent greenfield sites.

Accordingly we request on behalf of North Tees and Hartlepool NHS Trust that the existing University Hospital of North Tees be allocated for future housing development in the Core Strategy.

#### **76/1 North Tees and Hartlepool NHS Foundation Trust**

Please find attached a copy of our submission document in response to the consultation on the Core Strategy Review 'Issues and Options'. This submission is made on behalf of our client, the North Tees and Hartlepool NHS Foundation Trust.

We respectfully ask that you include the University Hospital of North Tees in the Preferred Options Core Strategy as a housing allocation and if you require any clarification on the issues raised in this submission, or surrounding the NHS Trust's wider initiative that will facilitate the availability of this site, then please do not hesitate to contact me in the first instance.

I will contact you during week commencing 17 October for an update on progress with this matter.

## 76/2 North Tees and Hartlepool NHS Foundation Trust

### 1.Introduction

This representation by AMEC Environment and Infrastructure UK Ltd is made on behalf of North Tees and Hartlepool NHS Trust, to Stockton-on-Tees Borough Council with regard to the Local Development Framework Core Strategy Review Development Plan Document 'Issues and Options' report (CSR), June 2011. The representation is made in support of the allocation of the site of the existing University Hospital of North Tees (UHNT) as a future housing land allocation.

It is noted that the evidence Stockton-on-Tees Borough Council (SBC) has 'strongly suggests that not enough housing sites have been identified that are compliant with the adopted Core Strategy and which can deliver the number of homes that need to be built in the Borough by 2028'. It is understood that the Council are seeking to review the housing element of the adopted Core Strategy and that comments are welcomed on this Issues and Options paper.

Through this representation we are seeking to ensure that the existing site of the University Hospital of North Tees is identified as an allocated housing site in the Local Development Framework Core Strategy by setting out the reasons why this should be the case and also addressing the questions raised in the CSR document.

### 2.Background

Planning permission for a proposed new hospital at Wynyard was secured in October 2009 following the approval of an outline planning application (Ref. No. H/2009/0335) by Hartlepool Borough Council and subsequent engrossment of the associated Section 106 Agreement. Since the previously approved funding for the new hospital was withdrawn in June 2010, by the then new Coalition Government, North Tees and Hartlepool NHS Trust have been exploring the delivery of the new hospital by means of private finance.

We note that Stockton-on-Tees Borough Council have identified uncertainty over the delivery timeframe for the new hospital and this has resulted in the exclusion of the existing University Hospital of North Tees as a future housing site, either in part or as a whole., however North Tees and Hartlepool NHS Trust are committed to delivering the new hospital facility and are currently preparing for a selection process to identify a preferred developer. This process is likely to seek a completion date of the new hospital at some point during 2016.

### 3.Need for Housing

#### 3.1 Shortfall

The Council's cumulative housing trajectory suggests that there will be a shortfall of 2800 dwellings between the cumulative housing target and the cumulative net housing completions between 2004 and 2028. This statistic shows therefore that the number of sites currently allocated for housing in the Core Strategy Development Plan Document is not sufficient. Further sites for housing need to be considered so that this shortfall can be addressed.

The existing Core Strategy Policy CS1 prioritises brownfield land in the Core Area and locating the remainder of housing development elsewhere within the conurbation, with priority given to sites that support the regeneration of Stockton, Billingham and Thornaby

Core Strategy Policy CS7 sets out housing distribution and also phasing of housing. This policy states that no new housing sites will be allocated before 2016 and that the rural parts of the Borough will not be allocated sites for housing with the largest share of new housing sites being in the Core Area. The development limits of Stockton Town Centre have also been allocated a significant amount of new housing. Brownfield sites in the town will therefore be able to make a significant contribution to the shortfall identified.

There is recognition by SBC that delivery of housing sites in the Core Area requires public investment and due to the significantly reduced funds available for this purpose there is considerable uncertainty about the ability to deliver some key sites within the Core Area. This will create a shortfall in the housing supply and

impact on the ability of SBC to meet its underlying regeneration aims and prioritise housing delivery in sustainable locations, unless suitable developable alternatives are allocated.

#### 4.New Sites for Housing

##### 4.1University Hospital of North Tees Site

The existing University Hospital of North Tees site is in a sustainable location to the North West of Stockton-on-Tees town centre and is well served by good existing infrastructure and community facilities, as is consistent with the approach set out in Planning Policy Statement 3 (PPS3) :Housing, June 2010, which also specifically advocates 'consideration of the opportunity for housing provision on surplus public sector land' adding 'priority for development should be previously developed land, in particular vacant and derelict sites and buildings', a definition that will apply to the existing UHNT site upon delivery of the proposed new hospital at Wynyard Park.

Further to this, development of this site within the plan period would assist in achieving the key targets set out in the Core Strategy Policies. Specifically; CS1 (3) – 'The remainder of housing development will be located elsewhere.....with priority given to sites that support the regeneration of Stockton, Billingham and Thornaby.'

CS2 (1) – '....by ensuring that all new development is well serviced by an attractive choice of transport modes'

CS3 – Sustainable living and Climate change aspirations.

CS6 (4) – ' Support will be given to.....the provision of healthcare services and facilities through Momentum: Pathways to Healthcare Programme'.

CS7 (1) & (3) – Housing Distribution and Phasing. In particular the ability to maintain the significant contribution to housing provision in the Stockton sub-division under policy justification 12.13.

CS8 (1) & (3) – Addressing the provision of sustainable housing provision at the appropriate densities, helping SBC achieve the target housing numbers set out in the Core Strategy.

CS11 – Planning Obligations, enabling the contribution towards delivery of additional infrastructure in the Borough.

Once the services at UHNT are transferred to the new hospital at Wynyard Park, the existing hospital will become redundant and as such will represent a prime Brownfield site on the edge of Stockton Town Centre.

Making effective use of land by re-using previously developed land is promoted by PPS3 and SBC follow the guidance by setting a target of achieving 75% of new housing on previously developed land (pdl)within the Borough. Development of this site could significantly contribute to achieving this target when there is considerable doubt about the ability to deliver on some of the other previously allocated pdl sites within the Core Area and the consideration now being given to a high proportion of Greenfield sites in the Core Strategy Review Issues and Options.

In the Core Strategy Issues and Options Review report it states that

'for developments to be sustainable they should be located on sites that are well served by public transport links and that allow the residents easy access to local facilities and services, to reduce the number of trips made by private motor vehicles'.

This statement of aim is consistent with the advice in PPS3 paragraph 36, as previously referred to, as the site already has good public transport links and benefits from a range of nearby services. This site would therefore be inherently sustainable and so it is our request that it be allocated for new housing development within the plan period.

#### 4.2Other Sites

##### 4.2.1Wynyard

The review of the Core Strategy places considerable emphasis on sites at Wynyard as part of a review of the role of Wynyard in terms of providing new sites for

housing. Wynyard is identified as an attractive location for executive housing, but it is noted that there is heavy reliance on the car due to lack of services in this area. The lack of local facilities would need to be addressed, public transport links provided and also improvements to the road network. The review paper also notes that connectivity between the Northern and Southern areas at Wynyard would require improvement.

The employment land allocated at Wynyard was designated as a 'Key Employment Location' because of its importance to the regional economy. However it is clear that employment development in this location will impact upon the highway network and constraints upon the highway network could be a barrier to future development in this location.

It is therefore considered that there would need to be significant investment in Wynyard to make it a sustainable location for future housing development. Clearly the new hospital proposed on part of Wynyard Park will help to direct investment to this area and provide services and add to the significant employment opportunities in this location.

Sites which are already in sustainable locations, e.g. the existing hospital site in Stockton, would represent a more viable location for future housing in the medium to longer term since the site is in an accessible location and would not require the same level of investment in supporting infrastructure as other sites that are proposed for consideration, which are almost exclusively on Greenfield sites.

Hartlepool Borough Council have confirmed that since the original Outline Planning Permission for the hospital, Wynyard Park have secured Business Park uses on the wider site, as previously proposed and in addition there is currently an application pending by Wynyard Park for 219 houses.

#### 4.2.2 Sites Allocated for Employment Uses

Land to the South of Preston Farm Industrial Estate.

Some of the other sites considered for housing in the review paper include land which is currently allocated for employment uses, for example Land to the South of Preston Farm and Land at Durham Lane Industrial Estate. These sites are in or adjacent to industrial locations and the suitability of these sites for housing should be questioned given the neighbouring uses and market attractiveness which would reduce confidence in the deliverability of housing in such locations.

With regards to the site south of Preston Farm Industrial Estate there are significant accessibility and sustainability issues with this site, in particular the distance from retail, health and education services. The Council notes in the commentary that this site falls within the catchment area for Bowesfield Primary School, but which is outside of reasonable walking distance. In addition the commentary recognises the potential for the existing industrial estate to create conflict through noise and disturbance if housing was developed on land to the south. Given the issues with regard to the location of services for this site its sustainability must be questioned

Land at Durham Lane Industrial Estate

The Core Strategy Issues and Options review notes in relation to the Durham Lane site that:

'As well as the industrial estate to the south, the development area is also adjacent to the site a recently approved manufacturing development and other existing industrial development to the north. It is considered that these adjacent uses may cause noise and disturbance to any adjacent residents as well causing a separation from existing residential areas.'

Similar issues regarding accessibility to education and retail would also be applicable to this site as with the land south of Preston Farm Industrial Estate.

In both cases we would question whether the potential net capacity of each site would make deliverability of mitigation measures viable in order to address the accessibility and sustainability issues. This would raise significant doubt as to the suitability and deliverability of these sites for housing.

Land at Urray Nook

There is also land under consideration at Uray Nook which is currently allocated for employment uses. Again there appears to be sustainability issues with this site due to proximity of public transport to certain parts of the site and the impact on any future housing from the existing adjacent employment uses is also identified.

The site is recommended for retention of the employment land allocation in the SBC Employment Land Review and would represent a loss of immediately available employment and training opportunities for residents within the Borough, if allocated for housing.

It is therefore suggested that the sites being considered for housing provision that are currently allocated as, or adjacent to, employment uses, either in part or whole, would not be suitable for housing allocations. SBC should maintain the approach set out in Core Strategy Policy 1 paragraphs 2 & 3, by prioritising housing development on previously developed land that will support the regeneration of Stockton, Billingham and Thornaby.

## 5. Responses to Questions in the Core Strategy Review Issues and Options

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

We agree that the Council should not just rely on housing sites in the Core Strategy Area and that other sustainable sites for housing should be prioritised.

It is considered that there will be a much greater chance of delivering the housing that the Borough needs if a range of sites are allocated, thereby reducing the risk of a future shortfall, if some sites do not come forward for development within the plan period.

We consider that the UHNT Site represents a sustainable Brownfield site that could make a significant contribution to new housing development within the plan period and that would help SBC deliver the aims of the relevant Core Strategy and national planning policies. If SBC do not make provision for the delivery of housing on the UHNT site in the Core Strategy review then it is potentially unnecessarily placing pressure on the release of Greenfield sites for development and leaving a sustainable, previously developed site unallocated and creating uncertainty over its future use once the new hospital is developed at Wynyard Park.

Q2: Do you agree with this approach?

Potential housing sites on school and hospital land

We fully support an approach that would seek to deliver new housing on land currently in use as school or hospital sites. Such an approach is in the spirit of guidance in PPS3, and particularly paragraphs 36 and 40. Once the new hospital is built at Wynyard, the existing UHNT site will become redundant, as the majority of services will be transferred to the new hospital. This will create a sustainable and vacant Brownfield site in Stockton Town Centre, which could make a significant contribution to meeting the identified shortfall of housing as outlined in the Core Strategy review DPD.

We also consider that school sites may be appropriate for allocation as sites for housing as some, either in part or whole, that were previously included as sites for housing may become available within the plan period. Like the UHNT site these are likely to be in sustainable locations and represent, at least partially, previously developed land.

Q3: Which of the following options for the distribution of new housing sites do you agree with?

- a. Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. Allocate new housing on a combination of sites

If you think that a particular site or combination of sites should be chosen for new housing, please complete and return the Core Strategy Review Issues and Options Questionnaire or send your comments to one of the addresses listed in the How to Comment section at the front of this document.

We believe that housing should be allocated on a number of sites but maintain a policy approach that prioritises development on previously developed land in sustainable locations and particularly where such sites help support the regeneration of main urban centres.. Whilst there is still some uncertainty in the housing market it would seem eminently sensible to allocate a combination of sites, so as to reduce the risk of non-delivery of the housing target. This approach could be underpinned by a single significantly sized site, the UHNT, which would fulfil the strategic aims of the Core Strategy, as outlined in the previous sections, and would represent the most effective use of public sector land.

If a single large site became unviable any reasons or could not be developed within the lifetime of the Core Strategy then there would be no other sites to fall back on and a further review of the Core Strategy would be required with the likely scenario of a revised approach to site allocations, some of which may have been lost to other uses or policy changes in the interim period.

If there is a wider range of sites available to supplement a more significant allocation such as the UHNT there is wider choice for the developer/customer and should a smaller site become undeliverable there is the opportunity for windfall sites to recover the numbers in the short/medium term. If the UHNT site underpinned this approach to meet the bulk of the housing shortfall currently identified this would then allow smaller sites to come forward first, as there development will not require such significant levels of financial exposure by the developer, particularly in the early years of the Core Strategy when the underlying economic conditions are likely to continue to be challenging, or large exposure to infrastructure costs which is likely to make these smaller site more viable in the short-term.

This approach would provide flexibility with respect to housing land supply such that new sites could be considered for housing which may not have been available when the original housing land allocations were made.

## 6.Conclusions

It is our expectation that the existing University Hospital of North Tees will become redundant in the medium term and that the site will become vacant and available in the lifetime of the Core Strategy and therefore this site should be considered as an allocation for future housing development. The site is considered to be sustainable and deliverable by virtue of its location near to the town centre of Stockton surrounding by services and facilities. This would assist SBC in meeting the Key Targets of the Core Strategy in housing provision and sustainability, as well as conforming to guidance in PPS3, with regard to sustainability and effective use of land, and PPS1 which states:

‘Plans should take full account of other relevant strategies and programmes and, where possible, be drawn up in collaboration with those responsible for them’.

Although we recognise the need for SBC to consider other sites for housing we do not feel SBC overlook the opportunity this site presents as they may be unclear about the certainty of the delivery of the new hospital at Wynyard Park. We would therefore welcome continued engagement with SBC regarding the future availability of the UHNT site so as to ensure the appropriate allocation is made within the Core Strategy a part of the current review.

The site was previously considered appropriate for allocation based on it’s suitability when considered against sustainability criteria and the recognition that it represents efficient and effective use of land. The same can not be said of other sites that are proposed for consideration by SBC, many of which represent greenfield sites.

Accordingly we request on behalf of North Tees and Hartlepool NHS Trust that the existing University Hospital of North Tees be allocated for future housing development in the Core Strategy.

## **76/4 North Tees and Hartlepool NHS Foundation Trust**

### 4.2.1 Wynyard

The review of the Core Strategy places considerable emphasis on sites at Wynyard as part of a review of the role of Wynyard in terms of providing new sites for housing. Wynyard is identified as an attractive location for executive housing, but it is noted that there is heavy reliance on the car due to lack of services in this area. The lack of local facilities would need to be addressed, public transport links provided and also improvements to the road network. The review paper also notes that connectivity between the Northern and Southern areas at Wynyard would require improvement.

The employment land allocated at Wynyard was designated as a 'Key Employment Location' because of its importance to the regional economy. However it is clear that employment development in this location will impact upon the highway network and constraints upon the highway network could be a barrier to future development in this location.

It is therefore considered that there would need to be significant investment in Wynyard to make it a sustainable location for future housing development. Clearly the new hospital proposed on part of Wynyard Park will help to direct investment to this area and provide services and add to the significant employment opportunities in this location.

Sites which are already in sustainable locations, e.g. the existing hospital site in Stockton, would represent a more viable location for future housing in the medium to longer term since the site is in an accessible location and would not require the same level of investment in supporting infrastructure as other sites that are proposed for consideration, which are almost exclusively on Greenfield sites.

Hartlepool Borough Council have confirmed that since the original Outline Planning Permission for the hospital, Wynyard Park have secured Business Park uses on the wider site, as previously proposed and in addition there is currently an application pending by Wynyard Park for 219 houses.

## **76/5 North Tees and Hartlepool NHS Foundation Trust**

Land to the South of Preston Farm Industrial Estate.

Some of the other sites considered for housing in the review paper include land which is currently allocated for employment uses, for example Land to the South of Preston Farm and Land at Durham Lane Industrial Estate. These sites are in or adjacent to industrial locations and the suitability of these sites for housing should be questioned given the neighbouring uses and market attractiveness which would reduce confidence in the deliverability of housing in such locations.

With regards to the site south of Preston Farm Industrial Estate there are significant accessibility and sustainability issues with this site, in particular the distance from retail, health and education services. The Council notes in the commentary that this site falls within the catchment area for Bowesfield Primary School, but which is outside of reasonable walking distance. In addition the commentary recognises the potential for the existing industrial estate to create conflict through noise and disturbance if housing was developed on land to the south. Given the issues with regard to the location of services for this site its sustainability must be questioned

## **76/6 North Tees and Hartlepool NHS Foundation Trust**

Land at Durham Lane Industrial Estate

The Core Strategy Issues and Options review notes in relation to the Durham Lane site that:

'As well as the industrial estate to the south, the development area is also adjacent to the site a recently approved manufacturing development and other existing industrial development to the north. It is considered that these adjacent uses may cause noise and disturbance to any adjacent residents as well causing a separation from existing residential areas.'

Similar issues regarding accessibility to education and retail would also be applicable to this site as with the land south of Preston Farm Industrial Estate.

In both cases we would question whether the potential net capacity of each site would make deliverability of mitigation measures viable in order to address the accessibility and sustainability issues. This would raise significant doubt as to the suitability and deliverability of these sites for housing.

## **76/7 North Tees and Hartlepool NHS Foundation Trust**

Land at Urray Nook

There is also land under consideration at Urray Nook which is currently allocated for employment uses. Again there appears to be sustainability issues with this site due to proximity of public transport to certain parts of the site and the impact on any future housing from the existing adjacent employment uses is also identified.

The site is recommended for retention of the employment land allocation in the SBC Employment Land Review and would represent a loss of immediately available employment and training opportunities for residents within the Borough, if allocated for housing.

It is therefore suggested that the sites being considered for housing provision that are currently allocated as, or adjacent to, employment uses, either in part or whole, would not be suitable for housing allocations. SBC should maintain the approach set out in Core Strategy Policy 1 paragraphs 2 & 3, by prioritising housing development on previously developed land that will support the regeneration of Stockton, Billingham and Thornaby.

## **76/8 North Tees and Hartlepool NHS Foundation Trust**

Q1: Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028? Please explain your answer.

We agree that the Council should not just rely on housing sites in the Core Strategy Area and that other sustainable sites for housing should be prioritised.

It is considered that there will be a much greater chance of delivering the housing that the Borough needs if a range of sites are allocated, thereby reducing the risk of a future shortfall, if some sites do not come forward for development within the plan period.

We consider that the UHNT Site represents a sustainable Brownfield site that could make a significant contribution to new housing development within the plan period and that would help SBC deliver the aims of the relevant Core Strategy and national planning policies. If SBC do not make provision for the delivery of housing on the UHNT site in the Core Strategy review then it is potentially unnecessarily placing pressure on the release of Greenfield sites for development and leaving a sustainable, previously developed site unallocated and creating uncertainty over its future use once the new hospital is developed at Wynyard Park.



## **76/9 North Tees and Hartlepool NHS Foundation Trust**

Q2: Do you agree with this approach?

Potential housing sites on school and hospital land

We fully support an approach that would seek to deliver new housing on land currently in use as school or hospital sites. Such an approach is in the spirit of guidance in PPS3, and particularly paragraphs 36 and 40. Once the new hospital is built at Wynyard, the existing UHNT site will become redundant, as the majority of services will be transferred to the new hospital. This will create a sustainable and vacant Brownfield site in Stockton Town Centre, which could make a significant contribution to meeting the identified shortfall of housing as outlined in the Core Strategy review DPD.

We also consider that school sites may be appropriate for allocation as sites for housing as some, either in part or whole, that were previously included as sites for housing may become available within the plan period. Like the UHNT site these are likely to be in sustainable locations and represent, at least partially, previously developed land.

## **76/10 North Tees and Hartlepool NHS Foundation Trust**

Q3: Which of the following options for the distribution of new housing sites do you agree with?

- a. Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b. Allocate new housing on a combination of sites

If you think that a particular site or combination of sites should be chosen for new housing, please complete and return the Core Strategy Review Issues and Options Questionnaire or send your comments to one of the addresses listed in the How to Comment section at the front of this document.

We believe that housing should be allocated on a number of sites but maintain a policy approach that prioritises development on previously developed land in sustainable locations and particularly where such sites help support the regeneration of main urban centres.. Whilst there is still some uncertainty in the housing market it would seem eminently sensible to allocate a combination of sites, so as to reduce the risk of non-delivery of the housing target. This approach could be underpinned by a single significantly sized site, the UHNT, which would fulfil the strategic aims of the Core Strategy, as outlined in the previous sections, and would represent the most effective use of public sector land.

If a single large site became unviable any reasons or could not be developed within the lifetime of the Core Strategy then there would be no other sites to fall back on and a further review of the Core Strategy would be required with the likely scenario of a revised approach to site allocations, some of which may have been lost to other uses or policy changes in the interim period.

If there is a wider range of sites available to supplement a more significant allocation such as the UHNT there is wider choice for the developer/customer and should a smaller site become undeliverable there is the opportunity for windfall sites to recover the numbers in the short/medium term. If the UHNT site underpinned this approach to meet the bulk of the housing shortfall currently identified this would then allow smaller sites to come forward first, as there development will not require such significant levels of financial exposure by the developer, particularly in the early years of the Core Strategy when the underlying economic conditions are likely to continue to be challenging, or large exposure to infrastructure costs which is likely to make these smaller site more viable in the short-term.

This approach would provide flexibility with respect to housing land supply such that new sites could be considered for housing which may not have been available when the original housing land allocations were made.

## **77/0 Individual**

Infrastructure needs and opportunities should be bound up with the selection of suitable housing sites. The overuse of the A19 by local traffic and the downgrading of the "Ring Road" with 30mph zones etc suggests that the increasingly used Darlington and Yarm Back Lanes should be upgraded in conjunction with housing developments on the west side of Stockton Town Urban area to form a western ring road.

## 77/1 Individual

Our comments on the housing development consultation which is completed on 19th September 2011 are set out below.

### General Comments

Our general comments are as follows:

1. We assume that there is an overall vision for urban form of Stockton-on-Tees and would advocate that this should aim to ensure that the urban form will remain as compact and accessible as practicable, that the attractiveness and amenity of the urban area will be improved, that the economy will be enhanced in a sustainable manner and that the use of greenfield land will be minimised.
2. We assume that the analysis of housing land need for Stockton borough has taken into account the housing and population dynamics of the wider Teesside area and especially Middlesbrough, rather than simply following through trend projections. Unfortunately the analysis seems to suggest that a crude trajectory method has been used projecting trends in Stockton-on-Tees during a period of what was with hindsight an economic boom. Over the last 30 years the decline of Middlesbrough's population has mirrored Stockton's rise in population and this resulted from a significant shift in population westward into Stockton especially with the development of Ingleby Barwick. From a strategic perspective we would advocate that this shift to the west should be reduced and realistic economic scenarios should be accepted by taking a "conservative" view of housing land need in Stockton. In the public interest this would help to halt the decline of Middlesbrough and encourage use of brownfield land across Teesside, while reducing the development of greenfield land in Stockton. If the analysis has not taken this into account we advocate that it should be revised and the need calculation reduced.
3. Rather than accepting the increased difficulty of developing brownfield sites as a given, increasing need for greenfield sites, the release of greenfield land should be directly linked to the facilitation of the development and regeneration of brownfield sites.
4. Landscape quality varies significantly and is much poorer in our opinion on the west side of Stockton Town Urban area (as distinct from Stockton Borough). We would contest the subjective judgements in the sustainability analysis that attribute "high landscape capacity" to the Yarm sites.
5. Infrastructure needs and opportunities should be bound up with the selection of suitable housing sites. The overuse of the A19 by local traffic and the downgrading of the "Ring Road" with 30mph zones etc suggests that the increasingly used Darlington and Yarm Back Lanes should be upgraded in conjunction with housing developments on the west side of Stockton Town Urban area to form a western ring road.
6. The scale of new housing developments should be sufficiently large to support the proper planning of infrastructure, landscaping and facilities but proportionate to adjoining urban communities, and should recognise the degree of change these communities have already undergone over the last generation.
7. The sustainability analysis presented in the consultation is in our opinion over mechanistic, confusing, partial and subjective. We would strongly contest some subjective and simplistic assessments for example the generally positive judgement assigned to the Yarm sites especially in relation to transport and "landscape capacity".
8. Have landscape quality and agricultural land quality assessments been undertaken and are maps of these available?

### Site Specific

Our site specific comments are as follows:

Sites at Yarm (3 in Number)

We are strongly opposed to these sites for the following reasons:

1. They would extend the urban area in a manner that opens up and sets precedents for further development into the open countryside and having weak boundaries to further development. The existing strong distinct boundary to development provided by Green Lane/Low Lane should be maintained.
2. These sites would over extend southwards and westward the Stockton Borough urban area.
3. The countryside landscape in this area is relatively attractive including open views of the Cleveland Hills and we would strongly contest the subjective judgement that there is "high landscape capacity" in relation to these sites.
4. The road transport infrastructure in Yarm is already overloaded with very significant congestion through Yarm. As a town centre and a conservation area Yarm is often inappropriately full of slow moving or stationary traffic for much of the day. It does not function to its proper potential in commercial and amenity terms due to this. A massive waste of fuel and time and consequential environmental damage is created by diverted journeys and the traffic waiting in queues. There is also poor air pollution, amenity and environmental conditions in the High Street and the approaches to it which need to be addressed. We would strongly contest the positive sustainability judgements assigned to these sites in the sustainability analysis.
5. The sustainability advantages of Yarm Station are over-played in analysis of the Yarm sites. The station tends to be used for longer distance commuting to Northallerton, York and Leeds etc and trips to Thornaby and Middlesbrough. Ironically the services to Stockton station and northwards are very poor. It would also appear that there is little potential to improve services. Hence for example Yarm station was not included in recent light rail metro proposals. Moreover the development proposed appears to be not of sufficient scale to result in any upgrade of services. We would again therefore strongly contest the positive sustainability judgements assigned to these sites in the sustainability analysis.

Sites West Stockton (Yarm Back lane, Harrogate Lane and West Preston)

We support the development of some of these sites for the following reasons:

1. These sites are well related to Stockton Town Urban area and are proportionate to size to Stockton Town Urban area where relatively little development has taken place over the last 30 years.
2. The landscape in this area is rather flat, unattractive and in our opinion of relatively poor quality.
3. These sites are large enough to provide for and support the proper planning of new housing areas.
4. In terms of location and scale these greenfield sites would seem justifiably linkable to brown field site developments in Central Stockton Town urban area. The development of the latter brownfield sites should and could be supported by the development of these greenfield sites. This should be a prerequisite of their development and Stockton Council should petition central government if necessary.
5. These sites provide opportunities to upgrade the strategic road infrastructure of the "back lanes" mentioned above to form a new "ring road".

Ingleby Barwick

We strongly oppose the proposed site south east of Ingleby Barwick for the following reasons;

1. The current south western edge of Ingleby Barwick is defined by a wooded valley which strongly defines the urban area and provides an attractive edge to the Ingleby Barwick Urban area. The attractive rural and urban landscape here would be lost.
2. This area was defined as a green wedge in previous plans and should remain so.

3. This part of Teesside Urban area has seen massive development over the last 30 years and should be allowed a period of consolidation.
4. Public transport facilities are very limited.
5. The development would be separate and is not capable of being well integrated into the rest of the Ingleby Barwick urban area.

Peter Scott, Linda Scott, John Scott, Rachael Scott.

#### **77/2 Individual**

We assume that there is an overall vision for urban form of Stockton-on-Tees and would advocate that this should aim to ensure that the urban form will remain as compact and accessible as practicable, that the attractiveness and amenity of the urban area will be improved, that the economy will be enhanced in a sustainable manner and that the use of greenfield land will be minimised.

#### **77/3 Individual**

We assume that the analysis of housing land need for Stockton borough has taken into account the housing and population dynamics of the wider Teesside area and especially Middlesbrough, rather than simply following through trend projections. Unfortunately the analysis seems to suggest that a crude trajectory method has been used projecting trends in Stockton-on-Tees during a period of what was with hindsight an economic boom. Over the last 30 years the decline of Middlesbrough's population has mirrored Stockton's rise in population and this resulted from a significant shift in population westward into Stockton especially with the development of Ingleby Barwick. From a strategic perspective we would advocate that this shift to the west should be reduced and realistic economic scenarios should be accepted by taking a "conservative" view of housing land need in Stockton. In the public interest this would help to halt the decline of Middlesbrough and encourage use of brownfield land across Teesside, while reducing the development of greenfield land in Stockton. If the analysis has not taken this into account we advocate that it should be revised and the need calculation reduced.

#### **77/4 Individual**

Rather than accepting the increased difficulty of developing brownfield sites as a given, increasing need for greenfield sites, the release of greenfield land should be directly linked to the facilitation of the development and regeneration of brownfield sites.

#### **77/5 Individual**

Landscape quality varies significantly and is much poorer in our opinion on the west side of Stockton Town Urban area (as distinct from Stockton Borough). We would contest the subjective judgements in the sustainability analysis that attribute " high landscape capacity" to the Yarm sites.

The sustainability analysis presented in the consultation is in our opinion over mechanistic, confusing, partial and subjective. We would strongly contest some subjective and simplistic assessments for example the generally positive judgement assigned to the Yarm sites especially in relation to transport and "landscape capacity".

#### **77/7 Individual**

Have landscape quality and agricultural land quality assessments been undertaken and are maps of these available?

## 77/8 Individual

We are strongly opposed to these sites for the following reasons:

1. They would extend the urban area in a manner that opens up and sets precedents for further development into the open countryside and having weak boundaries to further development. The existing strong distinct boundary to development provided by Green Lane/Low Lane should be maintained.
2. These sites would over extend southwards and westward the Stockton Borough urban area.
3. The countryside landscape in this area is relatively attractive including open views of the Cleveland Hills and we would strongly contest the subjective judgement that there is "high landscape capacity" in relation to these sites.
4. The road transport infrastructure in Yarm is already overloaded with very significant congestion through Yarm. As a town centre and a conservation area Yarm is often inappropriately full of slow moving or stationary traffic for much of the day. It does not function to its proper potential in commercial and amenity terms due to this. A massive waste of fuel and time and consequential environmental damage is created by diverted journeys and the traffic waiting in queues. There is also poor air pollution, amenity and environmental conditions in the High Street and the approaches to it which need to be addressed. We would strongly contest the positive sustainability judgements assigned to these sites in the sustainability analysis.
5. The sustainability advantages of Yarm Station are over-played in analysis of the Yarm sites. The station tends to be used for longer distance commuting to Northallerton, York and Leeds etc and trips to Thornaby and Middlesbrough. Ironically the services to Stockton station and northwards are very poor. It would also appear that there is little potential to improve services. Hence for example Yarm station was not included in recent light rail metro proposals. Moreover the development proposed appears to be not of sufficient scale to result in any upgrade of services. We would again therefore strongly contest the positive sustainability judgements assigned to these sites in the sustainability analysis.

## 77/9 Individual

We support the development of some of these sites for the following reasons:

1. These sites are well related to Stockton Town Urban area and are proportionate to size to Stockton Town Urban area where relatively little development has taken place over the last 30 years.
2. The landscape in this area is rather flat, unattractive and in our opinion of relatively poor quality.
3. These sites are large enough to provide for and support the proper planning of new housing areas.
4. In terms of location and scale these greenfield sites would seem justifiably linkable to brown field site developments in Central Stockton Town urban area. The development of the latter brownfield sites should and could be supported by the development of these greenfield sites. This should be a prerequisite of their development and Stockton Council should petition central government if necessary.
5. These sites provide opportunities to upgrade the strategic road infrastructure of the "back lanes" mentioned above to form a new "ring road".

### **77/10 Individual**

We strongly oppose the proposed site south east of Ingleby Barwick for the following reasons;

1. The current south western edge of Ingleby Barwick is defined by a wooded valley which strongly defines the urban area and provides an attractive edge to the Ingleby Barwick Urban area. The attractive rural and urban landscape here would be lost.
2. This area was defined as a green wedge in previous plans and should remain so.
3. This part of Teesside Urban area has seen massive development over the last 30 years and should be allowed a period of consolidation.
4. Public transport facilities are very limited.
5. The development would be separate and is not capable of being well integrated into the rest of the Ingleby Barwick urban area.

### **78/1 Mr S Singh**

England & Lyle Ltd has been instructed to submit representations to Stockton on Tees Borough council, on behalf of Mr s Singh, seeking the allocation of land at Yarm Riding Centre, Glaisdale Road, as shown on Figure 1 below, for housing development .

The site lies on the eastern edge of the built up area of Yarm immediately adjacent an area of late 20th Century suburban housing development - predominantly bungalows. The land extends to approximately 3.6ha (gross). The aerial photo in Figure 2 shows that it is split into two fields. Both are used for grazing and horse riding associated with a long established riding stables that lie on the eastern edge of the site. The southern field is gently sloping whilst the northern field slopes more steeply towards the R Leven. Access is currently via Glaisdale Road at the southern end of the site. Figures 3 and 4 show photographs of the site taken from the south (Figure 3 ) and from Ingleby Barwick to the east (Figure 4). This site has not previously been proposed or considered for housing development by Stockton Borough Council either as part of the Development Plan or Strategic Housing Land Availability Assessment process.

## **78/2 Mr S Singh**

### Current Core Strategy Review & SHLAA Proposals

The recent Core Strategy Review Issues and Options Report identifies a need for the Borough Council to identify deliverable housing sites for an additional 2800 dwellings over and above those already committed and the Council consider will be delivered by 2026. As described in the Core Strategy Review Report this is due to a fundamental reappraisal of the deliverability of existing 'committed' and potential housing sites within the urban area and a resulting reduction in the estimated number of new dwellings that these sites will contribute towards housing land supply in the Borough in the next 15 years.

The need for such a review and the reasons behind it are fully supported. Continuing adherence to the spatial strategy outlined in the adopted Core Strategy i.e. to concentrate virtually all development within the urban areas of the Borough and especially within the Urban Core is no longer a realistic proposition and if not revised would result in the Borough council failing to ensure the provision of sufficient deliverable and developable housing land in the Borough to meet projected needs, with the consequential effects such a shortfall would have on population stability, economic growth and regeneration.

Examining the Council's Strategic Housing land Availability Assessment (SHLAA) it is clear however that the Council's reassessment of the deliverability of 'committed sites' i.e. those with planning permission, remains overly optimistic, e.g. in relation to projected development rates on some of the larger sites and the assumptions made about when, if at all; whether certain apartment led schemes will now ever get developed; and the inclusion of an annual 'windfall' contribution in the supply totals contrary to government guidance. Rather than existing commitments being likely to deliver some 2932 dwellings within the next five years we consider that a figure of 2400 dwellings is a more realistic and reasonable figure on which to base future plans.

In the light of the above we consider that the Core Strategy Review should seek to allocate sufficient sites to deliver some 3300 dwellings within the plan period to 2026 rather than the 2800 dwellings figures assumed by the Council.

## **78/3 Mr S Singh**

### Revised Spatial Strategy

In the light of the delivery issues outlined above the Council is suggesting a revised Spatial Strategy that whilst still seeking to make best use of previously developed land within the conurbation and Core Area also includes a significant element of new house building on greenfield sites on the edge of the conurbation. We would support this revised spatial strategy and would argue that in order for such an approach to be successful the revised strategy will need to deliver a good range and choice of housing sites throughout the Borough to meet the varying projected needs and demands of its different housing markets. We consider this to be the most robust, flexible, sustainable and deliverable approach available with significant advantages over alternatives that would involve concentrating development on one or two very large sites. Indeed having a good range and choice of sites is essential if housing supply targets are to be met as capacity to deliver new dwellings on any one site in a given year is in practice limited e.g. one developer – 25dpa, two developers – 50dpa, 3 developers 65dpa.

The locations chosen for future housing allocations need to lie adjacent to the existing built up area and to offer the opportunity for a sustainable form of development, in areas where people want to live, without resulting in unacceptable harm to the local environment or residential amenity. They also need to offer a variety of environment to meet specific housing needs and demands e.g. as identified in the Strategic Housing Market Assessment.



## 78/4 Mr S Singh

Land at Yarm Riding Centre, Glaisdale Rd, Yarm

We consider that our client's land at Yarm Riding Centre, on the eastern edge of the built up area of Yarm, to provide an excellent opportunity for a discreet smaller scale high quality housing development, that will compliment the larger potential allocations on the edge of Yarm.

The site extends to 3.6ha gross, however it is estimated that the net developable area is closer to 2.6ha. This is because it is anticipated that land along the northern and eastern boundaries will be identified for structural landscaping, planting and open space/public access.

The maximum number of dwellings that could be accommodated on site is therefore estimated to be between 50 - 65, assuming an average density of 20-25 dwellings/hectare, reflecting the form and character of the adjacent housing estate. Alternatively the site could be developed for a smaller number of higher value, lower density 'executive' dwellings e.g. 26 dwellings at an average density of approximately 10dph, or indeed a combination of both.

The allocation of this site for executive dwellings would meet a particular need/demand in this part of the Borough that is not currently being met on other committed sites nor is likely to be met as effectively as part of larger scale allocations. It would also accord with Policy CS8 Housing Mix, which supports lower density housing development in Yarm

The site lies in a sustainable location, within walking distance of the nearest Primary school (Levendale Primary) and close to a secondary school, shops, sport facilities etc. The proposed access to the site will be via the existing site access off Glaisdale Road. The nearest bus route, with regular and frequent services throughout the day to Yarm, Stockton and Middlesbrough, is the X6 with stops on Glaisdale Road and Mount Leven Road.

The Riding Centre comprises a mix of stables, buildings and associated training areas. It lies within the adopted Limits to Development of the conurbation, in an area that is also designated as part of the Leven Valley Green Wedge and the Tees Heritage Park (Policy CS10).

As the site already lies within the adopted Limits to Development this site does not represent an urban extension and is therefore by definition sequentially preferable to other sites that would involve development outwith the Limits to Development.

The Leven Valley Green Wedge is one of a number of Green Wedges and Strategic Gaps identified originally in the Stockton on Tees Local Plan Policy. More recently Policy CS10 of the Core Strategy states that the: "Separation of settlements will be maintained through the protection and enhancement of the openness and amenity value" of Green Wedges within the conurbation such as: "Leven Valley between Yarm and Ingleby Barwick". No policy distinction is drawn in CS10 between aims and objectives of Green Wedges or Strategic Gaps.

The Core Strategy Key Diagram shows the broad locations and extent of the Green Wedges and Strategic Gaps identified in Policy CS10. For the time being however the Green Wedge boundaries defined in the Local Plan remain in place although it is proposed that these be reviewed as part of the forthcoming Environment DPD.

In terms of the Core Strategy Review the fact that a potential strategic Housing site currently lies within a Green Wedge or a Strategic Gap, as defined on the Local Plan Proposals Map, has not prevented their identification as a potential housing site. Indeed virtually all identified sites lie within either a Green Wedge or a Strategic Gap. On this basis therefore there is no absolute 'in principle' policy objection to housing on my client's site although clearly an assessment of the potential impact of development in this location on the specific features of the Leven Valley Green Wedge.

The Leven Valley in the vicinity of my client's site is steeply incised but broadens out towards the north where it connects with the larger Tees Valley. Land uses within the valley are a mix of agriculture and woodland. The valley separates the settlements of Yarm and Ingleby Barwick which occupy the higher plateau land either side of the valley and are plainly visible from each other. The built-up area of Ingleby Barwick runs along the break of slope on the eastern side of the Leven Valley. The built up area of Yarm is set back and separated from the break in slope on the western side of the valley by farmland and the riding centre site. Whilst there is public access to the eastern bank of the R Leven there is no public access along the western bank. The detailed Green Wedge boundary in

the Local plan Proposals Map has been drawn simply to encompass all undeveloped land between the two settlements.

The development of housing/landscaping/open space on the riding centre site would involve development on the Green Wedge but , because of the existing patterns of development would not result in a material reduction in its width nor the effectiveness of the remaining land to perform the principal function as a Green Wedge i.e. maintain the separate identity of the settlements of Yarm and Ingleby Barwick on either side of the Valley. The significant variations in topography across the valley and the lack of linkages reinforce the perception of separate identities as will the proposed structural landscaping and planting within my client's site. This planting and landscaping will also, in accordance with Policy CS10 improve the openness and amenity value of this part of the green wedge by screening development from the Green Wedge and by making land available for public amenity and enjoyment in an area where there is little public access to the countryside at present.

Core Strategy Policy CS10 also seeks the creation of The Tees Heritage Park . The Key Diagram shows the broad extent of the park but as yet there are no formal planning or legal boundaries. The aim of the Park is to improve environmental quality: "where this may contribute towards strengthening habitat networks, the robustness of designated wildlife sites, the tourism offer and biodiversity..."

Whilst no decision has yet been made to include my client's land within the Tees Heritage Park it does lie within the broad area for this designation shown for this purpose in the Core Strategy Key Diagram. However for the same reasons as outlined in relation to Green Wedge policy we do not consider that the inclusion or exclusion of the Riding Centre land would make a material difference to the aims and objectives of to the Tees Heritage Park . It is the Leven Valley itself that would contribute most towards the aims and objectives of the Park as this is the area with the greatest environmental and landscape value. The Riding Centre site is distant from the valley and separated from it by farmland of little particular environmental or landscape value. The proposed creation of an area of structural landscaping /amenity open space on the northern and eastern edges of the Riding Centre site would in fact contribute positively towards the aims of the Tees Heritage Park by improving biodiversity on the edge of the park and allowing public access where none exists at present.

## **78/5 Mr S Singh**

### Conclusions

We broadly agree with the Council's assessment of housing land supply outlined in the Core Strategy review, the reasons behind the recent decline and the approach proposed to address the problems highlighted. Page 7 of 9

It is agreed that the housing sites within the Core Area and Conurbation as a whole are not now likely to deliver the number of new dwellings required to meet projected future housing needs in the Borough. Existing housing sites in the conurbation will either not come forward at all in their current format or will come forward at a slower rate than previously anticipated. They cannot therefore be relied upon to deliver the amount of housing needed in the Borough within the next 15 years as previously expected in the adopted Core Strategy.

There is therefore a need to identify additional green field sites on the edge of the existing built up areas of Stockton and Yarm to address this shortfall. This will help ensure that projected housing needs are met and in turn help promote population retention and economic competitiveness.

The land at Yarm Riding Centre represents a highly sustainable and robust opportunity to meet projected future housing needs and demands within Stockton Borough.

It lies on the edge of the built up area of Yarm and is already within the existing adopted Limits to Development of the Teesside conurbation. It is accessible by public transport and in close proximity to nearby schools, recreation facilities and shops

It presents an opportunity to deliver a mix of housing types in a popular market area including, if considered appropriate, and the opportunity to meet specific housing needs such as high value, low density executive housing

Although quite small in scale the Riding Centre site represents a strategic development opportunity that needs to be considered /assessed as part of the Core Strategy Review and the SHLAA.

The site will have a positive impact on the aims and objectives of the Leven Valley Green Wedge. The area it occupies is peripheral and not critical to Green Wedge objectives. The proposed structural landscaping and the provision of open space adjacent to the northern and eastern boundaries of the site will improve the sense of separation, promote biodiversity, increase the provision of open space and for the first time create the opportunity for public access to the river banks in this part of the Borough. It will also contribute towards the creation of the proposed Tees Heritage Park.

Even following development more than sufficient open land will remain between Yarm and Ingleby Barwick to maintain the clearly separate identities of these two settlements as well as protecting the biodiversity and landscape quality of the Leven Valley itself.

The Riding Centre site represents an excellent opportunity for a new housing allocation and should be promoted as such through the Core Strategy/Local development Framework and the SHLAA

## **1498850464/0 Councillor**

I am not in favour of Land at Ingleby Barwick for the following reasons. 1) Ingleby barwick will be at full capacity once the Rings and Broomhill have both been completed.

## **1498850464/2 Councillor**

2) IB is full to capacity with Primary school children and a shortfall is predicted in the coming years.

**1498850464/3 Councillor**

3) IB also as only 1 secondary school and currently busses off over 800 children and even if a new 600 place secondary school was built we would still have a short fall.

**1498850464/4 Councillor**

4) Traffic issues is a big concern even now so a development like this would bring IB to a stand still.

**1498850464/5 Councillor**

5) Public transport is a big issue with a lack of transport at present.

**1500737969/0 CE Electric UK**

The site at Harrowgate Lane is bordered by electricity transmission lines. In addition it would place housing in close proximity to large substation sites which are an essential part of the local infrastructure. Whilst this in itself poses no initial problems to CE Electric UK operations and the core energy supplies to the area, we feel that, due to the size of the substation site at this location, it would be inappropriate to build residential housing which could potentially suffer noise or visual amenity issues as a result of ongoing necessary operations at this site. CE Electric UK is of the view that, should development be proposed for this site, a reasonable piece of land should be left between the substation site and any proposed development.

**1501711792/0 Yarm Residents Group**

Yarm is already overloaded with traffic.

**1501711792/2 Yarm Residents Group**

**1501711792/3 Yarm Residents Group**

Yarm is already overloaded with traffic.

**1501711792/4 Yarm Residents Group**

**1516844317/0 Norton Heritage Group**

Billingham Bottoms - this is a flood plain area Land East of Wynyard Village - will lose the character of Wolviston Area Wynyard Hall - could lose character of area Wynyard Park - could lose character of area Who will occupy this housing if no industry builds up?

**1523756648/0 Thorpe Thewles Residents Association**

I would like to see existing agricultural land on the outskirts of Hardwick, Bishopsgarth, Fairfield and Hartburn to be preserved. Housing development has already crossed over in to the Green Belt with the Blakeston Lane development which might lead to too much of our local countryside being used.

**1537230557/1 Tees Valley Local Access Forum**

I believe the villages should be allowed to expand - providing centres of community life allowing the development of shops, bank branches, post offices with a wide mix of local facilities.

**1538410355/1 Tees Valley Rural Community Council**

We have completed the Questionnaire and wish to make the following comments: Sites - We feel that using a number of small sites for new houses would allow for a mixture of properties across the Borough, which would give more choice in terms of type of housing and location.

**1538410355/2 Tees Valley Rural Community Council**

In terms of the individual sites, we would like to make the following comments, which reflect the way in which we have answered the questionnaire: Billingham Bottoms â€” We feel that this site is unsuitable, due to its proximity to the A19 and believe that the area already suffers from flooding.

**1538410355/3 Tees Valley Rural Community Council**

Harrogate Lane/Yarm Back Lane, West Stockton - We would support development on these sites as they are large enough to take further development and have good access in and out by roads. However, we would like to see the proposed number of houses reduced.

**1538410355/4 Tees Valley Rural Community Council**

Land at Ingleby Barwick - We would not support further development here, unless the road infrastructure was improved and further community facilities were provided, including a secondary school.

**1538410355/5 Tees Valley Rural Community Council**

Land at Uray Nook Site 1 & 2 - We would not support development here due to its location.

**1538410355/6 Tees Valley Rural Community Council**

Land at Durham Lane Industrial Estate - We would support development in this area.

**1538410355/7 Tees Valley Rural Community Council**

Land East of Wynyard Village/Wynyard Hall Estate/Wynyard Park - We would not support this development due to the sustainability of the area. For development to take place here, further community facilities (for example a village hall/community centre) and public transport would need to be provided. We would also have concerns regarding future development on the Wynyard Park site, such as the hospital and the affect that further traffic would have on access in and out of the area. Extensive development in the Wynyard area would also detract from the reasons which many people choose to live in this area.

**1538410355/8 Tees Valley Rural Community Council**

North West Billingham - We would not support development here, due to the poor access.

**1538410355/9 Tees Valley Rural Community Council**

South West Yarm/South East Yarm/West Yarm - We would not support development here, due to the impact on the wildlife corridor, farm land, lack of facilities and increased traffic with poor road access. Development here could also join these communities to become suburbs of Yarm or Ingleby Barwick, losing the areas village identity.

**1538410355/10 Tees Valley Rural Community Council**

West Preston - We would support development on this site, but feel that the number of homes should be reduced and access to the A66 would need to see substantial improvement.

**1538410355/11 Tees Valley Rural Community Council**

General Comments of potential sites - We feel that with most of the sites, new community facilities must be provided with any new housing developments. Road infrastructure and public transport must also be at the forefront of any decisions relating to housing development. All sites should provide different types of homes, whether it be size, style or tenure. Affordable housing should always be provided and this should be truly affordable, in line with local incomes, especially for young people and older people.

#### **1538410355/12 Tees Valley Rural Community Council**

Villages- In terms of the questions related to development within the villages, we feel that this should only take place in the villages with the most facilities and services and that this should be delivered as part of the developer's commitment.

#### **1538410355/13 Tees Valley Rural Community Council**

In terms of the underdeveloped land with a village, we believe that this is possible and would support this, but that this needs to be considered very carefully, especially where land is at a premium. This could be an option for land to be purchased by the community under the Right to Buy scheme within the Localism Bill.

#### **1538410355/14 Tees Valley Rural Community Council**

Wynyard - Whilst we agree that future development should focus on offices and warehousing, we do not understand how using the land for logistics or manufacturing would cause less congestion? We would like to see future business development provide some smaller units, which would support the rural economy. If more homes were to be built in Wynyard we would support this being mixed in size and style, but with no further Executive Homes. We would wish to see these being built in a style which was in keeping with other properties. However, if further properties were to be built, consideration needs to be given to the lack of public transport in the area.

#### **1540718128/0 High and Low Worsall Parish Council**

1 Before these sites could be considered adequate it is vital to address the issue of the Yarm High Street bottleneck. Also other roads are poor, namely the B1264 has a narrow bridge over the railway line and the A1044 road on either near the River Leven crossing would appear to be used to its capacity. 2 The use of green field sites is to be deplored. Efforts must be made to develop good quality high density housing on brown field sites.

#### **1541816392/0 Appletons**

Yarm Back Lane combines all the best features for the plan. It is only a natural extension to the town, it is as close as possible to centres of employment, schools, medical facilities and shopping, etc. it has excellent road links and as a result of the development a much needed widening and straightening of Yarm Back Lane could be achieved. Of most significance is the possibility for a complete range of housing types on this site from sheltered housing to executive with local convenience facilities and sports and leisure. Should the site be considered not in its entirety (the land east of Yarm Back Lane is a substantial area in its own right), it may be considered along with a smaller site eg South West Yarm, or part of Harrowgate Lane. In the main Harrowgate Lane is not suitable as it provides a much needed lung for mainly the Hardwick area, itself benefiting from a much needed regeneration which in time should go further and make use of the (hopefully), open spaces of Harrowgate Lane.

#### **1543065720/1 Yarm Civic Society**

I am making these comments not only on behalf of myself as a Yarm resident, but as secretary of Yarm Civic Society I have been tasked by the committee to object strongly to any further housing development in Yarm. As a society we believe that Yarm's infrastructure would struggle with even one of the identified developments. It would compromise the very unique and historic town that Yarm is as its roads and lack of parking could simply not cope with the increased amount of traffic.

#### **1544435972/0 Carlton Parish Council**

Development of these sites will damage the rural character of western Stockton and would cause congestion on local road networks.

#### **1544435972/2 Carlton Parish Council**

Development will damage the rural character of western Stockton and cause congestion on local roads.



## 1544453857/0 Preston Farm Developments Ltd

Selective Housing Development on Land South of Preston Farm Industrial Estate.

Under the current Government's agenda, housing provision is not just about housing numbers, albeit that providing sufficient houses in a timely fashion in order to address the serious gap between housing need and supply remains a fundamental objective. As important, is the need for development, whether housing, commercial or industrial, to contribute to economic recovery, a consideration of major significance within Tees Valley as a whole and Stockton Borough in particular.

In reviewing land with housing potential, the Council should not only be aiming to identify sites capable of providing the additional houses required to close the gap caused by the poor house-building performance that has resulted from the economic downturn of recent years, but also be looking to diversify the housing offer, in particular investigating opportunities to provide for a style of housing that may not currently be represented in the major developments that have characterised the offer in the recent past. In addition, given what has been perhaps a disproportionate concentration in the recent past of housing development at Ingleby Barwick in particular, new sites should widen the distribution more towards Stockton, both to add to choice and to bolster the catchment of the struggling Stockton Town Centre. New housing sites are needed, unless increasing numbers of households are to be deprived of the opportunity of living in decent homes. However, sites that are allocated to create the much-needed accommodation should serve a number of purposes in addition to adding to housing stock numbers. They must make sense in terms of urban structure and functionality, urban design and amenity, and contribute to the sustainability of urban areas. New releases must also allow for imaginative responses to changing needs and to aspirations for a different form of housing provision. Housing provision tends to be dominated by the large scale development of fairly standard units. This is inevitable in the pursuit of volume provision to cater for increasing demand. To broaden the choice available to households, a variety of locations should be promoted offering opportunities for families to realise their particular aspirations, different in character from the houses on offer from the volume builders. In particular, sites should be identified which offer the chance for those who would prefer to live in somewhat more individual and distinct locations offering a high degree of amenity and a chance to stamp their own character on the houses provided. Such sites would have considerable value in terms of the local economy because it is just such sites to which entrepreneurs and industry leaders are likely to aspire. Although Wynyard has successfully provided a means of satisfying such aspirations, there is an unfortunate lack of sites throughout the Borough within which individual expression can be exercised. While it is expected that Wynyard will continue to perform its dominant role in catering for a particular element of the executive housing market, there is merit in broadening the distribution somewhat by providing alternative bespoke sites in quality locations. Land at Preston Farm between Preston Lane and the southern edge of Preston Farm Industrial Estate has particular potential in terms of high status housing provision in Stockton. Accepting the important value of this land in terms of the green wedge, it is considered that an element of quality housing could be permitted on part of the land without harm to the role and integrity of the wedge. Although the consultation document highlights the whole of this part of the green wedge for discussion, it is suggested that housing development across the whole area would not be desirable but that an allocation could be made adjacent to and west of the present Preston Farm complex. The scale of development would be dictated by the nature of the use made of the green wedge. If its use for agricultural purposes continues, then a site allowing for in the order 12-15 dwellings laid out and designed to reflect the feel of a rural hamlet already created by existing development based around the original farmhouse and outbuildings would be appropriate. Given its position within the urban area, agricultural operations in the green wedge are becoming increasingly difficult. If there was a willingness to permit the development of a larger number of houses, then this should be capable of generating sufficient income to fund the creation of a country park available to the wider public but still performing the essential function of the green wedge. A balance can be achieved between innovative new housing and open space, so as to create a bespoke housing complex complementary to an accessible public amenity. The review of the Core Strategy in relation to housing provision is timely, given the scale of the developing housing shortage. In due course it is hoped that the Spatial Strategy underpinning the Core Strategy will be re-assessed. The Spatial Strategy makes little reference to the need to provide new sites for housing development outside the central regeneration and redevelopment areas. Although there are existing housing allocations and planning permissions for housing elsewhere in the Borough, the focus of attention on some of the more run down parts of the borough, admittedly in an attempt to facilitate their improvement, neglects to identify that within the structure of the urban area are other areas in which select development on a modest scale could be encouraged. Such areas have the potential to benefit economic growth by providing quality housing of a type that is recognised to have a link with economic growth and development. The Spatial Strategy should be widened to include reference to the acceptability of sites outside the core area, which offer the prospect of innovative high quality modern housing. Such sites could include for a modest amount of development in particular green wedges where housing development could be permitted, sufficient in size to fund complementary country park or parkland treatment to the balance of the wedge, this to be dedicated for public and community use. Such an approach would open up public access to green wedges on the basis of limited development that would neither compromise the integrity of the green wedge nor its function in maintaining separation between settlements. Land at



Preston Farm would present such an opportunity. Without a broader perspective on housing supply, the Borough is going to struggle to keep pace with the increasing demand for housing because so much new development is currently proposed in areas notoriously difficult to redevelop. In addition the context or setting of such sites will prejudice their appeal for households who have considerably higher aspirations for housing. The review suggests that the Council recognises that it must take a fresh look at the potential of controlled release of greenfield sites, and this should involve a re-appraisal of the role of green wedges.

#### **1544907244/1 Redmarshall Parish Council**

None of the above sites impacts directly on Redmarshall Parish Boundaries

#### **1546997462/1 Egglecliffe and Egglecliffe Parish Council**

Harrowgate Lane, West Stockton - Ideal site with good quality existing infrastructure and access to schools. Within walking distance of local facilities and linked with existing residential areas.

#### **1546997462/2 Egglecliffe and Egglecliffe Parish Council**

Land at Urlay Nook, site 1 - Site is likely to require work to improve links to existing infrastructure. Poor sustainability and further from local amenities than Urlay Nook site 2.

#### **1546997462/3 Egglecliffe and Egglecliffe Parish Council**

Land at Urlay Nook, site 2 - Site has better access to existing infrastructure than Urlay Nook site 1.

#### **1546997462/4 Egglecliffe and Egglecliffe Parish Council**

Land at Durham Lane Industrial Estate - Concerns re heavy industry to North of site and light industry to South of site, poor access to facilities and impact on traffic through to Yarm. Also imminent planning application to increase number of homes at Allen's West from 500 to 1000 would have a further cumulative impact on traffic and schools.

#### **1546997462/5 Egglecliffe and Egglecliffe Parish Council**

Land to the South of Preston Farm Industrial Estate - Concern re loss of green wedge and increased traffic through Yarm and Egglecliffe.

#### **1546997462/6 Egglecliffe and Egglecliffe Parish Council**

South West Yarm, South East Yarm and West Yarm - Concerns re impact on traffic through Yarm and Egglecliffe.

#### **1546997462/7 Egglecliffe and Egglecliffe Parish Council**

West Preston - Site is a long way from existing facilities. No sustainability, massive impact on traffic on Durham Lane, existing infrastructure could not cope.

#### **1546997462/8 Egglecliffe and Egglecliffe Parish Council**

Yarm Back Lane, West Stockton - Requires alternative provision for medium distance traffic, existing peak time traffic congestion at junction with Darlington Back Lane.

#### **1546997462/9 Egglecliffe and Egglecliffe Parish Council**

The Council think that it would be better to use one large site for all of the new houses, however, in agreeing with Harrowgate Lane it is appreciated that there would be a need for one large site and another or part of another, smaller site to make up the numbers required.

## 1547060102/1 Tithebarn Land

### General Observations.

The identification of additional land for new housing should not only be concerned with satisfying the need to make good the shortfall in housing numbers anticipated in the next 15 years or so. For many years, much of the housing for sale in Stockton-on-Tees Borough has been dominated by the single source of supply at Ingleby Barwick. There has, admittedly, been new housing built on redevelopment and market renewal sites, but in terms of adding to the overall housing stock, the main contribution has been from outside the town of Stockton. This has not only allowed the concentration of available housing land into the hands of a very limited number of developers, who have been able to control the release of the land to the market, but has also distorted housing markets and inhibited choice due to the general non-availability of alternative locations elsewhere in the Borough, particularly within Stockton.

A further down-side has been the limited positive impact of new housing on the economy of Stockton Town Centre. With the focus of provision mainly in the south-east of the Borough, there has been little incentive for new households to use Stockton High Street as their preferred shopping destination, the majority choosing to head towards Middlesbrough and Tees Valley Retail Park or outside Tees Valley to Darlington, Northallerton and Stokesley. The catchment of Stockton Town Centre has been poorly served by new development with the consequence that footfall along the High Street has fallen and the prosperity and viability of the Centre declined, to the point where over 27% of shops in the High Street are now vacant.

This needs to be given serious consideration in any decision over the future location of new housing development. There should be a positive move to allocate sites from which households may be more disposed to spend in Stockton Town Centre as the most accessible retail centre. This suggests that, perhaps with the exception of the very specific provision of executive housing at Wynyard, new housing should be favoured around and within Stockton itself so that the centre of gravity of housing provision moves more towards Stockton, and offers the prospect of increased spending in the High Street to the benefit of the Centre as a whole.

Selective demolition of certain areas of older, small, unpopular terraced houses close to the Centre and their replacement with contemporary homes was intended both to address housing market failure in parts of central Stockton, and also to help towards remedying the commercial decline of the Town Centre. This emphasis on the redevelopment of poor quality brownfield sites in unpopular locations has proved costly and, even where redevelopment has gone ahead, it has been at lower densities than the housing demolished, leading to a reduction in stock levels in the neighbourhoods involved. In addition, redevelopment schemes have generally not been populated by households with income levels sufficiently high to prompt improved retail performance in the High Street, even assuming a significant proportion of such households consider Stockton Town Centre to be their destination of choice for retail purchases. The need to give a vital stimulus to the Town Centre will not be achieved without attracting the spending power of higher income households, which are unlikely to be located on sites on the Town Centre fringe.

Recent regeneration initiatives have tended to stress the relationship between the economic prospects of a Region and the quality of available housing. One of the arguments for the poorer economic performance of Tees Valley is the dominance of extensive areas of unattractive, small terraced houses and large, monotonous estates of local authority housing which create a poor impression of the area. Although as indicated above, a number of initiatives have been promoted to try to remedy the impact of the worst of such housing on the image of the area, the fact remains that for the foreseeable future there will continue to be considerable concentrations of such housing, which will conceivably arrest potential economic growth.

To counter the effect that such housing has on the image of the area, the Council needs to allocate sites that have a genuine prospect of being developed for quality housing that will attract key players in developing industries to occupy homes in Stockton rather than commute in from more distant rural locations in North Yorkshire and South Durham. While the consultation report alludes to a shortage of housing in the later part of the Core Strategy period, more land should be brought forward for much earlier release so that its impact on the Town Centre economy and the delivery of houses will be more immediately felt. There is an urgency to the economic decline that suggests that more immediate action is needed than awaiting a future release of land.

### **1547060102/2 Tithebarn Land**

Potential Changes to Strategy for Providing Future Housing.

It is evident that the current strategy for providing for housing in the future has stalled because many allocated sites involve costly regeneration which in the current economic climate is less likely to be achieved, with the prospect of substantial public subsidy proving increasingly remote. In order to address the problem this poses for the housing supply pipeline, it is necessary to change policy to recognise that the deficiency in supply will only be made good if a more positive view is taken of the potential of greenfield sites to contribute not only to providing additional numbers of houses but also to creating stimulating housing environments in which vibrant mixed communities can evolve and thrive without undue detriment to the environment.

The Council should, therefore, concentrate on providing additional housing on a range of sites that collectively offer the opportunity to strengthen the catchment of Stockton Town Centre, enable innovation and variety in house type and design, and assimilate well with surrounding development and, where housing on the urban fringe is involved, merge sensitively with the countryside beyond. Provision on a single large site should be avoided because this will limit choice, at the very least in relation to location. Although offering the potential for a range of varied housing solutions, a single large allocation would tend to skew the market, dominating supply and preventing locational choice and variety. It would be unlikely to serve all the needs of the various housing sub-markets in the Borough

### **1547060102/3 Tithebarn Land**

The Merits of Land at Harrowgate Lane.

Within the above context, land at Harrowgate Lane has much to commend it as a logical urban extension. In order to avoid an over-concentration of supply in a single location, however, the site should be limited to a core of land between the Mitre Public House and Letch Lane, this to be released in two phases, the first between the Mitre and Bishopsgarth School, and the second between Bishopsgarth School and Letch Lane. In the near term, the western edge of development need not extend to the pylon line suggested on the plan associated with the consultation document, an existing hedge presenting a feasible western limit and offering a basis for peripheral planting to screen and integrate the site with surrounding countryside, creating an attractive urban edge. However, land up to the pylons is readily developable and deliverable after stage one is completed.

Within the limit suggested above, the land west of Harrowgate Lane is on a scale that will allow a mix of housing to be provided, to meet the demands of a range of potential households in contemporary, well-designed and environmentally-friendly homes. When the prospects of new sites for housing are being considered, there is often concern that Greenfield locations will prove more attractive to investment and divert development energies and resources away from regeneration initiatives being promoted in less favoured parts of the urban area. The land at Harrowgate Lane should be seen as a complement to the work being undertaken in central Stockton, offering the prospect of housing that is unlikely to compete directly with that being provided in the regeneration areas. This will particularly be the case in relation to housing redevelopment progressing within the Hardwick housing estate to the north and east of the site, where former local authority-owned properties are being replaced with modern homes of a type and within a price range unlikely to be provided at Harrowgate Lane.

Development west of Harrowgate Lane represents a highly sustainable option, readily accessible from a number of directions, on foot, by car and using public transport, being situated on a principal distributor road, close to the local (and national) footpath and cycleway network and served by regular and frequent bus services. Penetration throughout the urban area is easily achieved from this location.

Although the location is accessible by the range of transport modes, many shopping, educational and recreational needs can be met locally with the presence of shops, schools, public houses and clubs in the vicinity, thus reducing the need for trips to more distant centres to meet daily requirements. Agricultural land at Harrowgate Lane is classified as Grade 3.3 and has been in continuous arable use. There will, therefore, be no loss of high-grade farmland or land of high environmental quality as a result of housing development. This site should be allocated for immediate development in order that its potential contribution to additional housing numbers and to the economy of the failing Town Centre are maximised.

#### **1547060102/4 Tithebarn Land**

Billingham Bottoms

It is difficult to accept that this site is sustainably-located to nearby housing areas, being isolated by significant watercourses. In terms of urban structure and as an urban extension, the site has little to recommend it. Although the consultation report argues that there are services and facilities within walking distance, they are still at some distance from the site, which may be a disincentive to residents to use them in preference to more distant centres accessible by car.

#### **1547060102/5 Tithebarn Land**

Land at Ingleby Barwick.

While there may be factors in favour of developing this site, there should be concern over its inclusion because to do so will help perpetuate the imbalance in new housing provision between the south east of the Borough and particularly with the need for more housing in Stockton. Although adjacent to existing Ingleby Barwick housing, direct access to services and facilities within the existing estate will not be easy to achieve, necessitating circuitous trips on principal highways in order to satisfy essential daily needs. Development here will do little to aid High Street revitalisation.

#### **1547060102/6 Tithebarn Land**

Land at Uray Nook 1/Land at Uray Nook 2

Both sites would be unsuitable urban extensions, in real terms being at some distance from the true urban area. There is limited access to public transport and most trips will be by car, even with a number of elements such as the schools and shops scoring well on the sustainability assessment. It is inappropriate that this land should be suggested for early development when there are major perceived highway network implications that are unlikely to be resolved by planning network implications. The site is not large enough to generate capital to resolve the highways issues. There is little prospect that households in these locations will choose Stockton Town Centre as their destination of choice for shopping. The site would be better left for industrial purposes rather than as a more remote extension to the urban area.

#### **1547060102/7 Tithebarn Land**

Land at Durham Lane Industrial Estate.

Although it is within the limits to development, the site is sandwiched between two significant industrial areas, and is some way away from services. The site is not 'sustainable' in that it would require the duplication of existing infrastructure or long journeys to the existing facilities. The site is isolated and could possibly suffer from a lack of community identity. The site will be affected by capacity constraints at the Elton Interchange on the A66 which requires major improvement the costs of which are unlikely to be resolved by funding that could be generated by housing development through planning obligations.

#### **1547060102/8 Tithebarn Land**

Wynyard Hall Estate/Land East of Wynyard Village.

In order to improve the sustainability of the settlement to the south of the A689, there is logic in permitting high quality additional housing development that will generate funding to allow the provision of a wider range of community facilities at Wynyard and thereby reduce the number of trips to and from the village.

#### **1547060102/9 Tithebarn Land**

Land South of Preston Farm Industrial Estate.

There must be concerns over the release of this green wedge for housing purposes unless there is potential for speciality housing that will benefit from the setting and the work that has already been carried out at Preston Farm itself. A small number of high quality houses would add to choice in the Borough whilst preserving the identity of the separate communities

#### **1547060102/10 Tithebarn Land**

North West Billingham.

Proximity to the A19 must be a concern in relation to creating a positive housing experience for residents in which traffic noise and pollution did not dominate. It also does not seem to relate particularly well to the structure of the wider Billingham town, being somewhat out on a limb and not readily accessible by public transport.

#### **1547060102/11 Tithebarn Land**

West Yarm/South West Yarm/South East Yarm.

It is difficult to conceive of these sites being allocated for future housing development given the daily chaotic state of the north and south approaches to Yarm Town Centre. The current traffic congestion cannot be other than made worse by the additional traffic that would be occasioned by further housing development. Given the difficulty of getting through the town, households are likely to be put off from heading towards Stockton to shop, preferring to aim towards Middlesbrough as a more convenient alternative.

#### **1547060102/12 Tithebarn Land**

West Preston.

Development in this location would be difficult without major improvements to the Elton Interchange. The site is remote Eaglescliffe and Stockton and therefore from services and facilities, is not well-served by public transport, and would be an over-concentration of housing in one location. The function of this extensive stretch of countryside should remain as a strategic gap between the two settlements

#### **1547060102/13 Tithebarn Land**

Wynyard Park.

The focus of housing development at Wynyard should in the main continue to be the area to the south of the A689. The area should remain available predominantly for quality business development.

#### **1547060102/14 Tithebarn Land**

Yarm Back Lane

The land at Yarm Back Lane would be generally suitable for residential development, and part could contribute to the series of housing sites suggested above as the means to provide for a more balanced distribution of housing land. In the context of this distribution, however, and in a similar way to the sites at Harrowgate Lane, it would not be appropriate to allocate all the land indicated on the consultation document plan. To avoid the over-concentration of development on any one site, the western limit should be Yarm Back Lane itself. Although suitable for development as a modest urban extension, the site is not as ideally situated as Harrowgate Lane Land. Access to the site would inevitably be via Yarm Back Lane, which is used as something of a western 'ring road' to the Town and already experiences high volumes of traffic between the A66 Trunk Road and Darlington Back Lane. Both these junctions are subject to congestion and queuing vehicles, circumstances which are unlikely to be resolved without considerable investment in new highway infrastructure, the funding for which is unlikely to be generated from housing development. Due to its role as a ring road, vehicle speeds tend to be high along Yarm Back Lane, despite its sinuous nature. Considerable works will be required to limit traffic speeds to a point at which they will be compatible with safe and easy access to and from a substantial residential development. Whilst the site is contiguous with existing housing at the western edge of the Town, there is little opportunity to provide for inter-connectivity between the existing estates and the services and facilities they accommodate and new development on the Yarm Back Lane site. As a result, lengthy journeys would be necessary via Yarm Back Lane and Darlington Back Lane in the north and Darlington Road in the south in order for households to satisfy daily needs. Although there is a frequent bus route along Surbiton Road in the estate to the east of the site, it is difficult to gain access to this service without a significant detour.



## 1548322395/0 Kirklevington

Stockton-on-Tees Borough Council Core Strategy Review Development Plan Document: Issues and Options (June 2011). Response by Mr John Mason, 18A Braeside, Kirklevington Although the on-line questionnaire has been completed on Mr Mason's behalf, the following comments are directly in response to the questions raised in the Core Strategy Review draft. A paper submission of this note has been deposited at Gloucester House, incorporating a plan showing the location of the land proposed for housing development at Braeside, Kirklevington.

Question 1 - Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

It is clear from proposed changes to national planning policy that the Government considers there to be a need for more houses to be provided, more quickly and in a more diverse range of locations. By the Council's own admission, the strategy contained in its Core Strategy has not proved to be sufficiently flexible to respond to changing circumstances, particularly, at this time, the prolonged economic downturn, and is thus serving the Borough's population poorly in relation to the supply of new homes. The Core Strategy review is welcomed as an opportunity to change the approach to housing provision, to allow for more creative solutions to the slow pace of housing provision in both urban and rural locations. In addition, the review will allow the Council to take account of the emerging Government commitment to ensuring that there is a suitable choice of locations for housing and to securing increased competition in the housing land market by making provision for an additional 20% of anticipated capacity, so that no one site dominates housing supply. Not only are the identified Core Area sites in the Core Strategy unable in the short term to provide the housing numbers originally anticipated, but they are also incapable of providing for the 20% additional allowance expected by the Government. It is inevitable that alternatives will need to be found unless the delivery of new homes is to be allowed to slip further.

Question 3 - Which of the following options for the distribution of new housing sites do you agree with?

- a) Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b) Allocate new housing on a combination of sites

The option of concentrating development essentially into a single major site should be avoided. Doing so would re-create the situation that has arisen from development at Ingleby Barwick, the unfortunate locational imbalance that has for so long harmed the prosperity of Stockton. A range of sites offers flexibility, locational choice and the opportunity better to manage housing growth without the potential brake on development that could be exercised by a single site in a single ownership. Future housing provision should be on the basis of a combination of sites in both urban and rural locations.

Question 4 - Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- a - All Villages
- b - Only the most sustainable villages
- c - No village extensions

Although it is accepted that the majority of provision will be made by a change in policy that promotes the release of a selection of medium-sized sites, preferably on greenfield sites on the edge of Stockton, there should be more scope for new housing in rural areas, especially in and around principal villages. Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted. This has tended to reflect a limited perception of the role of the villages within the Borough. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties to particular rural communities. Such households have found access to housing in villages difficult because much of the housing stock has been bought by more affluent 'incomers', with house prices, over time, inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent

groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'. By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage. This can be achieved by allowing housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing. Such an approach is foreshadowed in the Government's draft National Planning Policy Framework which suggests that councils should be minded to provide for market housing in rural areas when this is part of development which includes a significant amount of affordable housing to meet the needs of local people. As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes. One such site, approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

#### **1548322395/1 Kirklevington**

It is clear from proposed changes to national planning policy that the Government considers there to be a need for more houses to be provided, more quickly and in a more diverse range of locations. By the Council's own admission, the strategy contained in its Core Strategy has not proved to be sufficiently flexible to respond to changing circumstances, particularly, at this time, the prolonged economic downturn, and is thus serving the Borough's population poorly in relation to the supply of new homes. The Core Strategy review is welcomed as an opportunity to change the approach to housing provision, to allow for more creative solutions to the slow pace of housing provision in both urban and rural locations. In addition, the review will allow the Council to take account of the emerging Government commitment to ensuring that there is a suitable choice of locations for housing and to securing increased competition in the housing land market by making provision for an additional 20% of anticipated capacity, so that no one site dominates housing supply. Not only are the identified Core Area sites in the Core Strategy unable in the short term to provide the housing numbers originally anticipated, but they are also incapable of providing for the 20% additional allowance expected by the Government. It is inevitable that alternatives will need to be found unless the delivery of new homes is to be allowed to slip further.

#### **1548322395/2 Kirklevington**

The option of concentrating development essentially into a single major site should be avoided. Doing so would re-create the situation that has arisen from development at Ingleby Barwick, the unfortunate locational imbalance that has for so long harmed the prosperity of Stockton. A range of sites offers flexibility, locational choice and the opportunity better to manage housing growth without the potential brake on development that could be exercised by a single site in a single ownership. Future housing provision should be on the basis of a combination of sites in both urban and rural locations.



#### **1548322395/4 Kirklevington**

Although it is accepted that the majority of provision will be made by a change in policy that promotes the release of a selection of medium-sized sites, preferably on greenfield sites on the edge of Stockton, there should be more scope for new housing in rural areas, especially in and around principal villages. Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted. This has tended to reflect a limited perception of the role of the villages within the Borough. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties to particular rural communities. Such households have found access to housing in villages difficult because much of the housing stock has been bought by more affluent 'incomers', with house prices, over time, inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'. By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage. This can be achieved by allowing housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing. Such an approach is foreshadowed in the Government's draft National Planning Policy Framework which suggests that councils should be minded to provide for market housing in rural areas when this is part of development which includes a significant amount of affordable housing to meet the needs of local people. As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes. One such site, approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

#### **1548322395/5 Kirklevington**

It is clear from proposed changes to national planning policy that the Government considers there to be a need for more houses to be provided, more quickly and in a more diverse range of locations. By the Council's own admission, the strategy contained in its Core Strategy has not proved to be sufficiently flexible to respond to changing circumstances, particularly, at this time, the prolonged economic downturn, and is thus serving the Borough's population poorly in relation to the supply of new homes. The Core Strategy review is welcomed as an opportunity to change the approach to housing provision, to allow for more creative solutions to the slow pace of housing provision in both urban and rural locations. In addition, the review will allow the Council to take account of the emerging Government commitment to ensuring that there is a suitable choice of locations for housing and to securing increased competition in the housing land market by making provision for an additional 20% of anticipated capacity, so that no one site dominates housing supply. Not only are the identified Core Area sites in the Core Strategy unable in the short term to provide the housing numbers originally anticipated, but they are also incapable of providing for the 20% additional allowance expected by the Government. It is inevitable that alternatives will need to be found unless the delivery of new homes is to be allowed to slip further.

#### **1548322395/6 Kirklevington**

The option of concentrating development essentially into a single major site should be avoided. Doing so would re-create the situation that has arisen from development at Ingleby Barwick, the unfortunate locational imbalance that has for so long harmed the prosperity of Stockton. A range of sites offers flexibility, locational choice and the opportunity better to manage housing growth without the potential brake on development that could be exercised by a single site in a single ownership. Future housing provision should be on the basis of a combination of sites in both urban and rural locations.

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### **1548322395/8 Kirklevington**

Approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

### **1548322395/9 Kirklevington**

Although it is accepted that the majority of provision will be made by a change in policy that promotes the release of a selection of medium-sized sites, preferably on greenfield sites on the edge of Stockton, there should be more scope for new housing in rural areas, especially in and around principal villages. Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted. This has tended to reflect a limited perception of the role of the villages within the Borough. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties to particular rural communities. Such households have found access to housing in villages difficult because much of the housing stock has been bought by more affluent 'incomers', with house prices, over time, inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'. By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage. This can be achieved by allowing housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing. Such an approach is foreshadowed in the Government's draft National Planning Policy Framework which suggests that councils should be minded to provide for market housing in rural areas when this is part of development which includes a significant amount of affordable housing to meet the needs of local people. As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes.

### **1548322395/10 Kirklevington**

### **1556516500/0 S.B.C.**

(1) Highways implications (2) environmental implications of noise from the A19. (3) very poor public transport links..



## 1564988255/0 representing Tithebarn, Coalgarth & SBC land Harrowgate Lane

The owners of Tithebarn Land have submitted a formal Comment on the Issues and Options with the reasoning formalised by Mr M. Mealing. I write to further emphasise various considerations, and in particular to again make the case for land along Harrowgate Lane. I have promoted the land south of Letch Lane, north of the Mitre and east of the pylon line ever since the Stockton Borough Council (SBC) survey "New Life in the High Street" proved by straightforward deduction that residential development here was, and is, the only residential development which will aid the revitalisation of the High Street. The evidence given at the 2009 examination of SBC Local Development Framework (LDF) by the Home Builders Federation representatives, in particular the Persimmon executive, served to reinforce this. No other land promoted at that LDF examination, or in the 2010 Strategic Housing Land Availability Assessment (SHLAA) would either house people who would regard Stockton High Street as their main retail and personal business centre, or who would have the spending power to improve the retail offer. I can write that confidently having read SBC's analysis of the New Life in the High Street survey which SBC conducted to support their campaign to win City Challenge money to regenerate the High Street area. The one large housing allocation at Ingelby Barwick was a disastrous one for the prosperity of Stockton town centre. Because delivery was slow, some times at less than a quarter of the planned delivery, and taking more than twenty years longer than promised a very big percentage of SBC's housing allocation from Cleveland C.C., then the TVJSU, then the RSS, was tied up in sterile allocations resulting in the loss of the spin-off prosperity which comes with well sited development. No one who cares for the town would ever wish to see SBC tie up all its allocations on one site ever again. It's probable a wise thing not to have too many sites in the control of one builder ever again. I was invited to sum up the evidence presented to the 2009 Examination of SBC's LDF by the Inspector. Two points are worth reiterating:- 1. The planners have to work against national and RSS backgrounds. 2. The ODPM set a target of 4.4 million houses over twenty years. That is 74,000 houses per million of UK population. Stockton has about 180,000 people. Therefore a national average allocation would be 13,320 houses plus all of the connected investment and wealth creating opportunity. The RSS allocated us 6,885. Fortunately planners are no longer constrained by national and RSS targets. No doubt some councils in the over built south east will cut back, but SBC has the chance to ignore the undeveloped sites at Ingelby Barwick and go for growth and prosperity, allocating extra sites to aid the revitalisation of the High Street. At the point 3 above we see how the RSS had planned to condemn us to decline, by allocating us only 50% of our share. This gives a positive indication of the need for extra and early planning permissions, to redress the decline imposed on us by the RSS policy. Various SBC planners will have known this for years, and yet never been able to do anything about it. Another piece of really positive news for Stockton High Street prosperity was announced in the Budget Speech by the Chancellor. There is no longer a presumption in favour of brown field development. This means that SBC no longer have to give an over riding regard to brown field sites that have not been able to be regenerated by residential development during the recent housing booms, nor do they need to make allowance for brownfield sites which may appear during the plan period. This is fortunate, as the chance of public money to regenerate these has gone. Also the PFI money for knocking down schools and hospitals, creating brown field land, and building new ones, creating debts for our grand children, has gone. The Coalition Government has gone for a carrot and stick approach. The carrot is that for occupancies of new dwellings SBC will get the New Homes Bonus as well as the satisfaction of knowing that they are aiding the prosperity of the borough if the housing is allocated on the periphery of Stockton town and Norton. Probably all of the sites on your map are developable. There is no reason to suppose that any of them south of the A66 will be delivered any faster than Ingelby Barwick has been. None of them will contribute much to revitalising the High Street; going by your own survey about 8% of their retail spend would have been there before Teesside Park was built. As people will have to "get into the car" from all of these sites the proportion of their retail spend going into Stockton High Street will be far less than 8%. Sixteen hundred of these sites will serve to clog up the traffic flow around Yarm completely at busy times, making Stockton High Street even less likely as a shopping venue. Not sustainable. There is no reason to suppose that any of the Wynyard sites will aid Stockton High Street. What is certain is that nearly all journeys will be by car, be it going out for employment or the food and cleaners coming in. These sites will definitely add to the carbon foot print of the town, without revitalising the High Street. At Wynyard Hall Estate there is scope to add to the original concept of a regional executive area by allowing another 10 - 20 houses. At say £250k per site this should allow a margin to improve some infrastructure. It was a sad day for the site when the cheap houses were allowed. At the time I was building no houses as cheap as that; the best ones were hardly up to the spec, but were up to the price. Some extra houses there is reasonable; hundreds along the northern boundary of the borough will do almost nothing for the retailers in the High Street but will bump up the carbon footprint of the borough. Not sustainable, if they were sustainable they would be using already existing infrastructure, not crying out for more. One would not contemplate building an additional 150 houses at any of the other villages, so why 300 at Wynyard. I helped formulate regional NFU policy on building in villages and still think that the policy of the 90s was sound. That is, that low numbers of housing should be allowed in all villages every few years. This allows newcomers to be assimilated without creating too much of a "two communities" in the one village, it allows the chance for low cost housing as part of a deal, and also other community benefits. The Council will have to decide whether the New Homes Bonus goes to the village, the Borough, or is shared. I thought Billingham Bottoms was a green wedge area. I certainly thought it was idyllic when as a child I used to go there catching minnows and sticklebacks in a jam jar. A case could be made for some houses on the meadow land to the east of Yarm Back Lane if

ever the proposition could be got past Natural England and the CPRE at a time in the future when the economy has recovered sufficiently to fund the highway infrastructure. Allocations made here could turn out to be very delayed in delivery, to the detriment of the High Street. This leaves Harrogate Lane. The northern most section I have always thought would be better in commercial use; it would be a horrible place to live- sub station, pylons, roads, 24 hour super market. Phase 3 should be Letch Lane to the walk way and the western edge. At present these areas appear very rural, but would look a reasonable continuation after Phases 1 and 2. Phase 2 should be the walk way to the School. If it was built before Phase 1 (below) it would appear as more of an intrusion, whereas the land south of the school is just a continuation of the development as contemplated in SBC plans as far back as 1955. Phase 1 consists of Tithebarn Land, Coalgarth Land, the SBC's own 4.4 acres (wouldn't you feel guilty if front line services in the borough were cut and this land lay unused?) and any surplus school land. This is exactly what you need for housing delivery, New Homes Bonus and High Street revitalisation. To the planners This not part of my submission, unless your protocol demands that it be treated as such, but just as a point for you to consider. Rosemary Young said that it was not Ingelby Barwick that killed the High Street; it was Teesside Park. As you know, I disagree. I think the chronology supports my case, but I would like you to think of York. It is a unitary authority not so much bigger than SBC. It has massive out-of-town retail developments at the Designer Centre, Monks Cross and Clifton Moor parts 1 and 2 and six big supermarkets, five of them away from the town centre. It has suffered lots of industrial closures:- the railway and carriage works, sugar factory, Terrys, a lot of Nestle, printers. However, the principle retail areas of Coney Street and Parliament Street thrive. Those two streets will benefit a little from tourism, but the principle tourist area is near the Minster, Petergate, Stonegate, the Shambles. Over the years York has controlled housing development making it contiguous to the town. Development has occurred all round the town, but always with good public transport to the centre. There have been plenty of "villages" proposed, one of them on land belonging to the C of E, which was highly fancied when John Gummer was at Environment, but the Council have kept the town compact, with the exceptions of Wiggington and Haxby, which fortunately have several good commuter runs into the centre. Acomb, Fulford and Heslington are to York what Norton is to Stockton. There is no "Ingleby Barwick" or "Wynyard". Because the spending power has been kept around the town, the prosperity has been maintained. York, like Stockton, has not benefited from being a county administrative town. The town centre prosperity has been kept because of the compact nature of the residential areas and their proximity to that centre. The correct planning decisions were able to be made over the last forty years/since car ownership became common.

**1476842249**

Billingham Bottoms floods at the threat of rain and North West Billingham would make it a near join up to Wolviston

**1477749400**

Billingham bottoms floods. Site occupied by closed down school on Mill Lane, Norton could be used.

**1477753583**

It seems strange to have the small gap south of Preston Farm. It is far from being open countryside, and serves no real purpose IMO. The land off Harrowgate Lane would also be ideal owing to the existing Bishopsgarth estate literally on the other side of the road.

**1478648387**

What a shame that potentially all areas around Fairfield, Hartburn & Hardwick could be ringed by this level of development. One of the real pleasures of living in Stockton has been the ability for you and your family to jump on a bike or walk and find yourself very quickly in the countryside. To suddenly find yourself stuck within an ever expanding urbanised area is sad to say the least, and would undoubtedly diminish the quality of life for so many existing residents. It will make no difference how many cycle / bus routes are put in. Traffic congestion will only increase. Finally I dread to think of the negative effect on Lustrum Beck, which is already prone to flooding.

**1478813365**

The Council will not let anyone else build on green belts then potentially allocate areas of potential development on these same sites. The inconsistent approach to planning consent particularly in Ingleby Barwick makes the department look incompetent. Utilise new areas of development without impacting on the areas you have tried to prohibit development on - oh tell a lie you break your rules for the public at large to build schools on green belts. Sorry but I feel any new housing should be away from Ingleby Barwick and Yarm and put into areas not experiencing problems with the lack of infrastructure due to bad planning in the past.

**1479073051**

I have chosen sites close to main roads such as A66 or A19 for ease of traffic. Any further housing in Yarm will make already intolerable traffic even worse. Traffic congestion in Yarm is not only a major problem for residents it is also environmentally damaging, to increase housing here makes no sense.

**1479077732**

Yarm can not take anymore building as traffic and parking is already a big problem.

**1479121139**

West Preston, although a green belt / open area will have little impact aesthetically for residents already situated nearby. It is close to excellent road infrastructure which has room to be improved further. It is close to Stockton Town Centre by car via the A66 and 1825 way or Yarm Road which would hopefully encourage residents to use the facilities already available and proposed ones too. Bus Routes could be improved and should the Tees Valley Metro proceed, it is nearby Eaglescliffe Station. The airport, Yarm, Middlesbrough, Thornaby and Darlington are all easily accessible. A large single site gives the opportunity to create a new 'village' and can offer a mixture of dwelling types. The current mixture of car garages and industrial units nearby allow a small supermarket or large convenience store and a small number of other local conveniences to buffer the boundary between Yarm Road and the proposed site.

**1479158183**

I feel there are lots of brown field and sites within in area that could be infilled before green belt land need be used

**1479673983**

Yarm Back lane is hellish trying to get from the A66 up towards the villages (Redmarshall, Stillington etc) and any expansion here needs to be accompanied by substantial highways improvements. Housing to the south of Yarm would be welcomed, however with research so uncertain away from power lines would be favoured - however this is a sustainable location near the train station. It would be fantastic to get some housing in this area that is less wimpy boxes and more architect designed on larger plots - possibly the availability of a self build selection of plots?

**1480852261**

The area for South West Yarm is opposite my home, which I purchased for the privacy and views. Opposite is a lovely wooded area where we see much wildlife. I oppose the development strongly. Green Lane is already a busy road, and Yarm itself is already full of traffic, often with long queues through the high street. Green Lane itself often floods when there is a lot of rain and the proposed land becomes very boggy. The green lane roundabout is very busy and it is hard to cross as a pedestrian with small children. More traffic will only make this worse. There has already been a large development approved at the Tall Trees surely this is enough for Yarm!

**1480994560**

isnt some land suggested possibly contaminated? & Ingleby has enough issues with the housing population already without adding to this!

**1481023025**

I have been looking to move to the Eaglescliffe/Yarm area for a number of years so I am pleased to see proposals for new build homes in the area. I believe that the Ingleby Barwick site has seen enough development. I would like to see residential developments far enough away from the railway lines to avoid disturbance.

**1481029771**

I think all houses should be placed in a single area; however, if this is not possible a large area should be used, such as Ingleby or Preston Farm, with smaller areas such as Wynyard filling the gaps. I am completely against any further development in Yarm

**1481058759**

Find it hard to suggest building when it doesn't affect me personally

**1481388119**

What is good about living in Stockton is it's clear 'sharp' boundaries of urbanisation then open countryside not straggled ribbon development for miles. Very hard to see how the road network would cope in places e.g. with 3120 houses on Yarm Back Lane - the mini-roundabouts at the A66 junction can't cope with the volume of traffic at peak times now, let alone with more housing. Yarm and Yarm Road traffic is bad enough already without adding more dwellings. Please look carefully at the centre of Stockton and immediate vicinity & do all you can to develop that for housing - it will revitalise the town. This has been done in Yarm so why not here?

**1483433027**

There are many 'gap sites' on the fringe of Stockton which could easily be developed, such as south of Preston Farm and west of Bishopsgarth and around Yarm Back Lane. As these are already urbanised, it will not have such a negative effect on the countryside, or the charm of small towns such as Yarm. Until the road and school system is improved in Ingleby Barwick then no new houses should be built there.

**1483469285**

Why can't estates where boarded up houses be used instead of green land. Leave Eaglescliffe and Yarm alone as we DO NOT want to end up like Ingleby Barwick.... Rows of houses behind Yarm Lane are empty, why are they not being re-built and added into this list???

**1483628240**

I thin if more houses are built around Yarm and Eaglescliffe, Yarm Hight street and the bridge will not cope. Please leave Durham lane alone its lovely as it is and is a haven for wildlife I think Harrogate lane would be the best and the least disruptive to peoples lives

**1484942780**

South West and East Yarm insufficient road capacity at Leven Bank and through Yarm which suffers from congestion already. Overdevelopment of the area, outside urban fence and loss of nature (See refusal of Yarm Grammar school nearby). Durham Lane Industrial Estate and Preston has the best infrastructure and opportunities.

**1485314974**

West Preston - seems a prime site for development - all or many houses could be built there Ingleby Barwick and Urray Nook, also seem prime sites All 'Wynyard' sites - prime site for more expensive developments in particular Suggest concentrating building in the above areas. Areas to avoid: Billingham Bottoms - flood risk to houses Yarm Back Lane - congestion and green belt issues. Road goes through a green belt, views enjoyed by both many residents and motorists. Housing development here would completely destroy this. Exits at either end of Yarm Back Lane are already congested at rush hours (with resulting delays exiting this road - up to 15-20 minute delays at times - plus knock-on effect delaying traffic exiting Darlington Road on to A66) - further housing would only exacerbate this to completely unacceptable levels. Harrowgate Lane - congestion and green belt issues - already significant congestion leaving Harrowgate Lane at Durham Road (Tesco) roundabout - this would be exacerbated to unacceptable levels by new development

**1486914000**

Yarm is over crowded and the road network around Yarm will simply not support more residents / cars, etc.

**1486935441**

I feel that Yarm is already too congested and with insufficient parking; additional properties would put additional pressure on the existing infrastructure and facilities.

**1487468997**

Billingham bottoms sometimes floods, wouldn't want to live there!

**1487517722**

The Land to the South of Preston Farm Industrial Estate has a potential figure of 1,140 new houses which I think is too many in what is currently a Green Wedge. If this amount could be reduced to 100 or 200 houses, there would be the potential to keep the open nature of the area.

**1487629430**

The Billingham Bottoms site is in a very delicate environmental place, it has a stream on either side, access to the site could cause even more problems at busy times or more traffic to be using roads that are unsuitable. Basic infrastructure is aged and adding more pressure to this system would be detrimental to the residents already there.

**1488884974**

Yarm Back Lane is traffic grid locked now and bottle necks onto the A66 to Mboro. Winter flooding occurs at South of this plot every year and will be forced to another location near by with all the additional footings for 3120 houses.

**1495176847**

There is plenty of ex brown field sites or sites next to existing housing without increasing the need for new infrastructure or reducing greenfield areas

**1495219198**

It seems odd to ask if we would like to see all 2,800 homes on one site when only 2 of the 16 suggested sites could accommodate this! I would challenge anybody that believes building new homes in Yarm is a good idea to drive from one end of the High Street to the other in less than 10 minutes at peak times - madness.

**1495396157**

Yarm sites are unsuitable due to currently highly congested highway network - even for buses.

**1495479263**

As we live on Leven Bank in Yarm we currently have 13,000 vehicles per day which use this road daily including HGV'S. The road on Leven Bank was never designed for this volume of traffic now let alone a further 3,120, houses which could be built on either side of Leven Bank. Vehicles consistently speed now with no enforcement any further increase in traffic volumes would cause a meltdown on this infrastructure. The speed limit now needs to be reduced to 30mph and a bypass put in place before any consideration is given to any development near Leven Bank as it is just a matter of time before we have a fatality.



**1495735309**

Yarm is already over stocked with housing and local roads / services cannot cope with the local population already.

**1496302112**

Smaller developments where the infrastructure is already in place would make it cheaper in the long term. People in Yarm tend to stay put therefore the schools etc. are becoming redundant i.e. Kirklevington Primary and Yarm itself stagnant. Children can not afford to live near their parents because the house prices are forced up by low availability.

**1496481562**

Billingham Bottoms - close to road/bus network, assuming any flooding can be solved Harrowgate Lane - bus/road system inadequate Land at IB - has reached saturation already Land at UN1 - inadequate road/bus system Land at UN2 - inadequate road/bus system Durham Lane IE - close to road system and key station Land East of Wynyard - close to road system Land to South of Preston Farm IE - close to bus/road system or walk to work at Preston Farm. North West Billingham - agree subject to a 'link in' to motorway system South West Yarm - road system totally inadequate, Yarm has 'gridlock' population South East Yarm - road system totally inadequate, Yarm has 'gridlock' population West Preston - close to road links, reduce number, don't want 'cramming' West Yarm - road system totally inadequate, Yarm has 'gridlock' population Wynyard Hall - limited number only, no cramming Wynyard Park - too far from road system Home numbers quoted per se are meaningless unless 'number per acre' is quoted. My understanding is that Roseworth was built 10 per acre. Hardwick 15 per acre and more on the more recent parts. Then we have the old Billingham Tech Site/Oxbridge Avenue which frankly smack of 'sardine cramming' - a disgrace. Not everyone wants or can be bothered with a garden. You need to consider modern terrace housing as per Dixon Street near Stockton Railway Station. There is no point wasting land on 'cement gardens'. Yarm Back Lane - South West Yarm - road system inadequate, too far from shopping

**1496525431**

Use brownfield sites only before any thoughts of using greenfield sites!! Wynyard - ask all of Wynyard residents on their view!

**1496530488**

You should use brownfield sites first even if they are more expensive to clean up! Agricultural land is too important to future generations to squander. Also, stop boarding up perfectly good houses and repair/maintain them as part of the housing stock. Wynyard - you should ask and listen to the people who live in this area

**1496536621**

Billingham Bottoms: 1) Wouldn't support remedial work to field - expensive to tax payer and will be very inconvenient to people living on Imperial Road and New Road 2) Concerns for extra traffic and access road. New Road recently became 30mph which no one currently sticks to anyway. 260 new homes means atleast 260 extra cars using Imperial and New Roads 3) Trees on perimeter of field will not be happy if these are removed. Lots of wildlife and also provides noise shelter from a19 4) Billingham can't really be expanded outwards anymore

**1496742979**

harrogate lane: I would hope they kept the very old hedges that run along the lane intact., or work with them. The traffic would be a concern as 2,470x1 car each home is very scary. Harrogate lane can be gridlocked even now at early evening times.

**1497500493**

Ingleby Barwick is already to big with inadequate schools and other facilities to support the existing residents.

**1498655857**

In planning the new housing areas, it is important to retain the green wedges between developments. Brownfield sites should be utilised for supporting office and manufacturing developments.

**1498790699**

From my understanding the majority of the sites apart from yarm back lane will not have a massive impact on existing residents. In terms of aesthetic impact. Building on the yarm back lane stockton will effect massively the existing houses along its boarder in hartburn/fairfield

**1498792714**

Bulidling houses on Yarm Backlane West Stockton would have massive aesthetic impact on the houses that border that land in Hartburn/Farifield.

**1498850464**

I am not in favour of Land at Ingleby Barwick for the following reasons. 1) Ingleby barwick will be at full capacity once the Rings and Broomhill have both been completed. 2) IB is full to capacity with Primary school children and a shortfall is predicted in the coming years. 3) IB also as only 1 sceondary school and currently busses off over 800 children and even if a new 600 place secondary school was built we would still have a short fall. 4) Traffic issues is a big concern even now so a development like this would bring IB to a stand still. 5) Public transport is a big issue with a lack of transport at present

**1499044501**

Considering all the traffic problems there are already in the Yarm area, surely these sites are only going to add to these especially if the sites around Eaglescliffe, Urlay Nook and Preston Farm are also being considered. The sites to the south of Yarm and at Ingleby Barwick are on a very important wildlife corridor. How much more green space do we have to lose around the south of the area - is the size of Ingleby Barwick not enough?

**1499350467**

It would have been really useful to have these indicated on a map. Although I would agree that Yarm is could really use additional affordable housing, I strongly feel that the towns infastructure (especially regarding traffic) will struggle to support this.

**1499446561**

People have to save a deposit and a deposit for a less desirable area is less than a nice area, so Billingham it is then.

**1499569683**

Spread the developments out, to give people choice.

**1500520464**

Existing 'villages' such as Wynyard should be left as such especially as the infrastructure will not cope with more traffic. Locations such as Ingleby Barwick have the capacity to meet additional traffic demands.

**1500581454**

Yarm High St is already heavily congested, don't make it worse by building more houses in the area e.g. at tall trees and other areas detailed above

**1500670780**

The A689 is an increasingly busy road and is already seriously congested particularly during busy periods when there can be long delays leading to further congestion on the A19. More housing in areas adjoining these roads are going to create more serious problems eventually leading to gridlock. The additional further development of Wynyard Villages and the Business Park already agreed will further compound the problems.

**1500737969**

The site at Harrowgate Lane is bordered by electricity transmission lines. In addition it would place housing in close proximity to large substation sites which are an essential part of the local infrastructure. Whilst this in itself poses no initial problems to CE Electric UK operations and the core energy supplies to the area, we feel that, due to the size of the substation site at this location, it would be inappropriate to build residential housing which could potentially suffer noise or visual amenity issues as a result of ongoing necessary operations at this site. CE Electric UK is of the view that, should development be proposed for this site, a reasonable piece of land should be left between the substation site and any proposed development.

**1500743409**

Many of the sites suggested are a long way away from areas where there will be potential jobs and infrastructure eg Wynyard has no schools, supermarket, doctors etc and no mainline employers

**1501227592**

Yarm cannot take anymore houses with the current infrastructure. All the proposed extra dwellings at the Tall Trees appear to have been forgotten on the plan.

**1501711792**

Yarm is already overloaded with traffic.

**1502961502**

Yarm does not have sufficient road capacity for any more houses

**1503013651**

these areas are currently farmland and should remain so. where ever possible only brownfield sites should be used. yarm already has planning permission for houses and flats at the Tall trees Hotel site and will struggle to cope with the extra traffic that will bring let alone another 1000 houses. numerous times a day the roads in and out of Yarm are grid locked.

**1503311727**

Ingleby barwick should be taken off the list as this area is already got to my houses and before long the will be know felids or green belt land for any of the residents to look at. The best thing the council did is turn down the planning permission for the building on the land near to tesco.

**1503860818**

In respect of any further developments in the Wynyard area the roads are not capable of carrying the extra traffic that would result.

**1504138427**

Yarm Back Lane is home to a wide variety of wildlife (deer, foxes, pheasant etc) and building on this site would destroy their habitat. The Hartburn/Fairfield area has already been extended several times, encroaching on more and more farmland and this is destroying both the area's heritage and aesthetics. Also, this road and the surrounding feeder roads already suffer from congestion at peak times and this would only be made worse by building on this site. There are insufficient schools, both primary and secondary, in the locality to accommodate the increased number of children 2800 homes would bring. Rather than extending this already overdeveloped area it would be better to extend a range of smaller areas or build on a new area like 'West Preston'.

**1504224534**

Yarm already troubled with too many cars

**1504807578**

Land East of Wynyard (280) I strongly disagree with due to the large number in this small area already. This will increase congestion further on an already strained road system.

**1504864795**

The land on yarm road separates Stockton from eaglescliffe and provides a green entry from the town to Preston park. It is a wildlife safe area with many species of protected animals using this area as their habitat. I would strongly oppose any change of land use from the current farm land to biilding this would destroy the last green area between Preston and stockton

**1504891675**

Wynyard has a severe lack of public transport so more houses here would mean a need for public transport also the A19/A689 junction needs upgrading to cope with extra traffic

**1508778587**

The council really needs to develop the inner town or brown field sites rather than eat away at the surrounding countryside. Start looking after the town which is becoming an eyesore with a large number of vacant properties all ready in disrepair

**1508801540**

Yarm and south Yarm has been destroyed by excessive housing. The A1044 carries well in excess of its original planned capacity, currently 13000 vehicles per day. More housing means more misery for people like me who live in this area. Wynyard and West Stockton have better access roads, or they will have if installed prior to land development.

**1508936698**

As I live on Harrowgate Lane, that is the site my concerns are about. We have already had new housing built on the Hardwick Estate which is adequate for this area. I think the area that is being put forward to be built on would be best left as a green area. Years ago the area was all green but then Tesco allowed to build, now housing is being proposed. Now there is a green feel to the area, a divide between villages i.e. Carlton and Thorpe. If housing is built it will be just like a big housing estate, no character. It would spoil the effect of the walkway that runs through the area at the minute, the wildlife that lives in the area, more and more green space is being used up. Also, on a financial note, the value of my house would go down considerably having houses stuck in front of me instead of the green fields at the present.

**1508946754**

To even consider that which would add to Yarm traffic would be irresponsible. All the above would unacceptable traffic volumes on totally unsuitable roads i.e. Harrowgate Lane/Darlington Back Lane/Yarm Back Lane/Durham Lane/A67 to Yarm. A Yarm by pass is absolutely essential. I have no doubt that this consultation will have no bearing on your decisions but will provide an out that you consulted.

**1508959265**

Wynyard has many unsold properties already and the character of the area would be damaged by further development

**1509022675**

No further houses should be built in the Wynyard area. Already Wynyard has been over-developed and it is not suitable area for more houses as it is not in keeping with the original plan for Wynyard as a small village. Furthermore, Wynyard already has traffic problems and more houses will create an increase in traffic and noise pollution. Wynyard is already having more developments such as schools and hotels which will just add to the problem and destroy village life. There are plenty more suitable areas to build more housing as Wynyard has no bus routes or immediate amenities available for residents. So I suggest strongly that the Council look to other areas for future development.

**1509083284**

To many houses at wynyard already, why would we want another Ingleby! Extend that site! The road infrastructure in wynyard would not cope and would be worse if hospital also built. There is a distinct lack of public transport for wynyard so the traffic would increase further. I chose to live here for the peace and quiet we already get traffic noise from increased use of the 689 we don't want more and don't want to live in a mega estate if I did I would have bought in a town!

**1509231245**

As a resident of Ingleby Barwick, for 18 years i feel qualified to comment on the proposed site, There is currently more new housing being developed in Ingleby Barwick, plus the extension to Tesco, when these planning applications went in part of the SBC report stated that the road infrastructure could not cope with the increase in traffic expected and to help solve the problem road improvements were needed (road widening, traffic lights, improvements to the Thornaby road/ A174 spur road junction). If more housing were to be built i can not see how the roads can be improved further, and therefore traffic chaos will ensue. Ingleby Barwick has very little in the way of amenities for the population it already has let alone the already permitted housing planned.(lack of school places for one) To even consider to put more housing in Ingleby Barwick is unbelievable. time to spread the load else where i think.

**1509314853**

Too many houses already in Ingleby Barwick, not enough facilities compared to other areas of the Borough. STOP BUILDING ON INGLEBY BARWICK we have had enough.

**1509831931**

Stockton has an enviable record of sustainability and leads the North East in recycling collection and exploitation. Tearing up green field land and adding massively to the council's carbon footprint, together with destroying biodiversity, would be an act of environmental vandalism. Brown field sites only should be considered for housing development.

**1509969325**

Stockton North Shore

**1510246519**

Wynyard sites a definite NO! The road congestion is already at breaking point and is already going to be made 10 times worse when the Hospital is finally built in addition to the Housing, Offices and Business Accommodation.

**1510425822**

Wynyard has few services to support the amount of houses proposed. There is no public transport link. There are only a few shops. There is no school or GP surgery. The A689 is already congested at rush hour, and the number of houses proposed would significantly worsen the problem. Wynyard Estate is an executive housing development. People often move into Wynyard because it is relatively small, quiet, and a safe place to bring up children. Building the amount of homes proposed would significantly alter this - the estate would be much larger and busier.

**1510964583**

Wynyard is growing too quickly. There are enough new properties. There are too many properties up for sale and new houses being built and not sold. The exclusivity of Wynyard is in fear of being eroded.

**1510998484**

There is already high levels of traffic on the roads surrounding Wynyard on a morning which at times cause a delay of half an hour, further houses would worsen this issue, along with the hospital which is already planned

**1511081664**

My choice involves minimal disruption to habitable area generally apart from Ingleby Barwick which is being built on all the time. Also some 'Brown Field' areas are to be redeveloped. Thought must go into the provision of social amenities for the new areas, and the access infrastructure e.g. around Yarm Railway station, and new schools for pupils e.g. N.W. Billingham. There is also the site of the demolished sport centre off the Norton Rd. and the renovation of the council estate which is mostly 'boarded up' at present, and also the old 'Hills' site just opposite.

**1511150167**

Wynyard is an exclusive development and is already at the point of over development. Property is more warranted within towns and nearer to amenities

**1512216171**

The road system would not cope with the extra vehicles given that each new house would probably have 2 or more cars.

**1512292274**

I think you are expanding in the wrong areas. The most attractive thing about the area is its surrounding countryside, please don't expand into it. There are plenty of Brown Field sites to develop on. Prime development land on the banks of the River Tees between Stockton and Middlesbrough are a prime example. Port Clarence is probably the one area in Stockton that is desperate for some new investment and new houses.

**1512587110**

Unable to comment on these [sites] but priority should be given to those areas within current development designations. Would not wish Wynyard to grow in scale as Ingleby Barwick. Nature preservation should be taken into account. Wynyard Hall Estate and Wynyard Park are currently outside the limits to development. If development does go ahead it should be in keeping with the village ethos.

**1512594857**

Section 102 of the draft NPPF states that LPAs should ensure that large landbanks bound up in very few sites do not stifle competition. It is my view that a combination of any of the above sites will do exactly that and stifle - or kill off - competition. The LPA, in order to conform with the NPPF must widen the scope for development by accepting small scale additions to villages and the prosperity of all parts of the Council area.

**1512605067**

West Preston - Far too many - no green belt left. Why can't villages be kept as villages there will be no greenbelt all areas from Stockton to Eaglescliffe will be joined as one. What about local crops, peoples livings, also there will be no wildlife what so ever. You are spoiling the whole area. Too many houses are being built already with the economic crisi already taking its toll who will buy them as young couples can't get a deposit saved as it is. There are plenty of houses in the surrounding areas to accommodate everyone. Also, what about the traffic affect on the roads, they are already conjested through Preston and Durham Lane.

**1512612479**

South West Yarm - enough West Yarm - enough My comment relates to Yarm only - the way things are going we will have Yarm joined up to smaller towns and villages in the not too distant future. Yarm, 'the jewel in the crown' quoted on many occassions by SBC will no longer exist. Keep the charm of Yarm or lose it.

**1513810369**

infrastructure cannot cope with traffic/parking etc

**1513815839**

TRAFFIC PROBLEMS INFRASTRUCTURE CANNOT COPE

**1513920884**

Residents on Ingleby Barwick are already struggling day to day with a lack of infrastructure and facilities, building even more houses would make life even harder for us. Please learn when to stop.

**1513973750**

There is no road or social network to support more houses at Wynyard.

**1514293657**

The transport and amenity infrastructure must be part of the planning and implementation process. In Ingleby the road/transport/amenity aspects have not been, are still not, adequate for the size of the development. I cannot see that Yarm can sustain much more development without a fundamental change in the road systems. Green Lane/Leven bank road and the High street could not in their current form sustain much more traffic and remain viable, especially given the potential peak time increase on all roads into and out of Yarm. Similarly the further increases in Ingleby development and I think Urray Nook could develop, but only if access to the A66 etc and an avoidance of Yarm was part of the project, because like it or not, cars and not other transport forms will cause access problems, and there isn't a viable alternative at present

**1515336369**

Wynyard Hall Estate - would spoil open aspect of Cricket Pitch Wynyard Park - openfield area - not really seen by present residents. Wynyard has only one small shop and a post box - not exactly services and facilities! It is one of a few exclusive housing areas in the north east and should remain so. Any development in the Wynyard Hall Estate area would involve road development and would ruin an area where residents from the whole of Wynyard come to walk dogs, allow children to play and enjoy the green space.

**1515339447**

Yarm can't take anymore housing until access through or ideally around Yarm High Street is sorted so that traffic flows freely at all times. You have to queue at most points in the day to get through and parking is atrocious. More people living in Yarm will only add to this issue. Please don't use public transport in the town as anyone who surveyed bus usage would quickly notice that the buses run half empty with the majority of residents being OAP's - not who I assume this new housing will be aimed at.

**1515380690**

Land East Wynyard Village, Wynyard Hall Estate, Wynyard Park - keep as an exclusive area. Wynyard sites should not be used. Wynyard should be kept as an exclusive development with maximum of 950 houses as initially agreed by SBC. It should not be allowed to end up like Ingleby Barwick. Suggest 1530 be built at the Ingleby Barwick site as it is already built on extensively. A new dedicated road to Wynyard Business Park onto the A19 may be needed, particularly if the new hospital goes ahead.

**1515387470**

Any additional housing to the south and west of yarm would increase the problems of traffic through Yarm. Before this housing is contemplated there should be a by pass for Yarm because many of these occupants would have to travel through Yarm for work and amenities.

**1515394763**

Wynyard sites - No facilities at Wynyard for what is there, never mind adding more Ingleby - uses what little free land there is

**1515398765**

Stockton on Tees has been ruined by poor planning decisions in the past. Years of history down the pan to build a carbunkle of a High Street without any vision and using the area's biggest asset - the river. One entrepreneur created from an idea a beautiful place to live, which is in danger of being over developed at a whim (develop the brownfield sites). And while the Council is on, please decide whose job it is to cut the grass on the roundabout. It's an accident waiting to happen - couldn't we have some nice plants and TLC or are we just treated like second class citizens paying the most rates in the area?

**1515793811**

Dont stop people doing good things wherever they might be. This local strategy plan should be flexible enough to accomodate sound ideas.

**1516538451**

Who would want to live near the Uraly Nook chemical business, or the electricity pylons around Stockton? Nobody! But because they are the easiest options for the people doing this plan, thats where we will get the homes. The council might wonder why we have such a low opinion of it. There are loads of better places for houses, but this would take initiative. Build new villages, extend the existing. Start a new town between stockton and darlington and make it the best place to live in the country. Please, no more of the same.

**1516549895**

If we have to have more houses at wynyard, they should be a mix of sizes. It is bad for stockton to push all the expensive homes to wynyard. It can only lead to the decline of the rest of the area. More nice houses everywhere. Less of the usual estates. How come there are no grand designs in our area.

**1516657431**

More building at Wynyard will spoil the existing housing. All householders paid high prices to live in a 'village' or with country outlook. Too much building is already damaging the area. There is no public transport for social housing; no schools or other amenities needed for higher housing; it is already difficult to travel allong the 689 to get to the A19 or A1 at peak times, often taking 30 mins to travel a few miles.

**1516694910**

CIL/106 money from more prosperous areas can be used for regeneration in disadvantaged areas.

**1516809624**

West Preston - cause major problems exiting and entering Elton Village YBL - cause major congestion on already busy road The development suggested at Yarm Back Lane and West Preston were to go ahead on the size proposed it would cause major congestion on the roundabout on the A66 near to Elton. Increased vehicle usage would increase pollution levels.

**1516825196**

Billingham Bottoms - Strongly disagree due to flooding problems

**1516834377**

Harrowgate Lane - This land is one the edge of an already densely populated area. Shouldn't be extended West Preston - area of this size could cause huge problems on traffic flow going towards Yarm - already busy road/ Yarm Back Lane - This land is on the edge of an already densely populated area. Shouldn't be extended

**1516844317**

Billingham Bottoms - this is a flood plain area Land East of Wynyard Village - will lose the character of Wolviston Area Wynyard Hall - could lose character of area Wynyard Park - could lose character of area Who will occupy this housing if no industry builds up?

**1516851201**

In considering any of the sites a key aspect must be to look at the basic infrastructure of roads and current traffic issues pertaining to those areas. If these areas cannot currently cope with traffic volumes then they cannot cope with more unless there is to be a significant investment in improvements. Some areas such as Ingleby Barwick have had investment to improve access roads and may be able to cope with further increased traffic but others have not. Can this additional investment be made?

**1517695507**

Over development of the unique Wynyard Housing Estate could destroy one of the primary incentives for executives to move to the region or invest their futures here. Over-developmet plays into the hands of the Northumbria/Newcastle region who continue to attract and retain their investment - dont let this happen. Keep at least one place that meets the needs of executives in Stockton...Wynyard !

**1517710444**

Even the sites you have in the list are too big. They will only produce more big ugly estates packed with identical houses. It is the easy option for the council to do it this way, and i understand why you would choose the larger sites approach, but would it not be beneficial to have lots of small developments across the area to enhance the character of the town. What about building on the edge of the town in small pockets, and on the edge of the villages in two's and three's.

**1517856674**

I do not believe that you should be going into the previously set green belt except where there has recently been ongoing developments, eg, Wynyard, Ingleby Barwick

**1518054967**

any land at wynyard should not be developed further as there is already a distinct lack of local ammenities for the number of households at present. ie there are lots of children but absolutley nothing for these children to do in local area.

**1518189521**

Wynyard is in danger of becoming nothing more than an ordinary housing estate - is that what Teesside needs when it is competing with other areas in the North East for inward investment and executive housing?



**1519952250**

Development should be focussed on sites that are already underway, but should not detract from the amenity of these sites. Minimum use of virgin land/undeveloped areas should be targeted to maintain as much green/agricultural land as possible. Focus on regeneration of old or derelict sites. Style of housing should reflect that already in place in any given area. Do not put high density housing close to low density housing and vice versa.

**1520223757**

Wynyard does not have the infrastructure-roads, facilities such as schools, library, park, bus route etc. People have decided to live in Wynyard due to the woodland and open space that surrounds the area. It would damage the original ethos of this village.

**1521037120**

More good quality houses across the area please. Self build are always a good idea.

**1521060356**

It is essential, in my opinion, to build better houses in small clusters across the area. The villages could expand by about 10 percent, without damaging the amenity of existing residents. The Nimby's do seem to affect the council's views and that is very wrong. They are always in the minority, I believe. We need more affordable housing as well.

**1521439228**

This exercise is a chance to improve the area. It would be unwise to focus all the quality development in Wynyard. I believe the council should encourage good homes everywhere in small estates. None of the sites on the list are small. The bigger the site, the lower the quality.

**1521464527**

If we could build housing estates - like Wynyard - across the borough would it not improve the town. Instead, we cram houses together in villages, instead of allowing a limited increase in their size. We build very awful big estates with rows of boxes all exactly the same. But we see individual well built houses here and there but never in enough quantities. It seems that the council and the planners are unable to deal with individuals and prefer to deal with the big developers. I don't think the council have any idea of how damaging this is to local businesses.

**1521476702**

Most of the sites you identify are simply the easy option - to make future decision making less difficult. I do understand that the council have a difficult job, but if they listened to good proposals they would gain more respect. The people think you don't really care. You always go with the Nimby view as well. They always want to stop everything. More nice houses in nice places. No more horrible estates.

**1521483467**

You have missed the chance to make the villages better. Some of the older villages could do with a freshen up with new homes. Not too many, but extra houses would mean the bus services and the small shops would have a better chance of surviving.

**1521540283**

Although I do not have any strong views on the list of sites, except Wynyard Park, I do think we could improve on the housing stock in many parts of the area: on the edge of villages and on the edge of Hartburn for example.

**1521924629**

I would like to build my own house, but need to stay near to Stockton because of my business. There is never any opportunity to do that in Stockton. I have had to look for another location for my business, in an area where I might have a better chance to achieve my ambitions.

**1521943620**

It might be appropriate to expand all the existing estates and villages by a small amount, to absorb some of the growth needed. Most of the sites on the list are very large, and usually that does not lead to the best solution. Leave Wynyard as it is please. If it gets bigger it will be spoilt.

**1521973080**

more housing needed in billingham for first time buyers similar to college gardens estate

**1521979651**

The old Westland School site at Mill Lane in Norton. Massive piece of land and has access off the green - would make a lovely little estate

**1521994717**

The sites at Harrowgate Lane and Yarm Back Lane would mean extending the built up area towards the villages extending the natural boundary of those areas on greenfield, undeveloped land which seems inappropriate and would require significant development in the road network in the area. This is a similar argument against using sites at Urray Nook. Using land South of Preston Farm Ind. Est would be preferable as this is undeveloped but not around existing housing, reasonable road network being close to A66 and the new road to Ingleby and it would help to complement the development at RiverView around Teesside Audi which is 'lost' and out on a limb at the moment. Creating new houses within Ingleby would take the estate up to a fairly natural boundary, possibly offering further development up to the A19 in the future. It is already a big housing estate with improving roads and other amenities.

**1522016959**

Kirklevington Village needs to be kept quite separate from Yarm.

**1522153325**

i hope the results of this consultation will not block common sense. In Long Newton and the other villages, people have applied to do sensible things and have been blocked by the council, who always support the parish councils - who never agree to anything. That isn't good for the area, i believe.

**1522180018**

create some larger sites and not multiple diddy ones

**1522474934**

Too many big sites. The smaller the housing estate, the better the council can control the quality, and the easier it would be to gradually meet demand.

**1522486212**

Wynyard is big enough. Let us have better housing in the other villages.

**1522569144**

I do not agree to the building of any further houses in both yarm or eaglescliffe

**1522581118**

I have lived in yarm for 40 years and I believe the village as it was has been destroyed by this council

**1522586159**

Most of the sites in the list are far too big. I would prefer to see small pockets of new housing in nice location, around the villages for example, but not at Wynayrd. There are enough big houses there already.

**1523037486**

I think south of the river has been over developed. Yarm is not viable, a, it is in danger of losing its unique qualities. b there is already too much traffic congestion in area. c erosion of green belt and strategic gap between Yarm & Kirklevington. c effect on wildlife corridor. Now is time to call a halt, we already have the largest housing estate in europe. I question the need for this increase in housing for such a small town of Stockton.No decisions should even be considered until the results of Boundary commission are made public.

**1523045527**

Local Amenities and Road Infrastructure Key to any future developments as well as the fundamental issue of "affordability" to allow individuals to get on the property ladder.

**1523053263**

Think that this amount of housing should be spread about. Also think that 10-15% of each site should be social housing because there is a desperate need for rented property in the current climate and 10-20% should be affordable, i.e. rent to buy.

**1523057819**

Wynyard Hall Estate - Poor Access. No Facilities. 40%+ increase in size. Wynyard cannot sustain current numbers of residents - there are v.limited resources and no public transport. Teesside is not a wealthy area - 300+ executive houses is NOT needed, any other type of housing does not fit the Wynyard Plan. A689 already a bottle neck. 300+houses = 600+ more cars!!!

**1523062856**

Concern about volume of traffic in relation to road infrastructure and also local facilities.

**1523075804**

We need a process that is flexible and allows the building of houses here and there. If things are too rigid the area will decline.

**1523076218**

Land South of Preston Farm Industrial Estate - completely opposed to the suggestion. The green wedge land should remain farmers land. West Preston - completely opposed to the suggestion. We need open space. Eaglescliffe is already heavily congested. I live at the bottom of Preston Lane and I purchased the property because of the open aspect of the farmers field. When I purchased the property I personally went into Stockton Council Planning Department to check if there was a possibility that the land in front of our property could be developed on and was told that this was a green wedge piece of land and therefore it was unlikely that planning approval would be granted. We need more open spaces between developments and not to build on any available piece of land there is.

**1523085893**

It has always been a puzzle to me why we have developed Wynyard. It is a nice place but it must have had a negative effect on the rest of Stockton and Billingham. We need more nice houses everywhere instead of creating more big ugly estates.

**1523097447**

Both Yarm Back Lane and West Preston roads are already congested at peak times. Also we in this area would like to keep our 'country' outlook - there is plenty of land nearer the town without spoiling the greenbelt - i.e. Ingleby Barwick spoiling the view at Preston Park.

**1523169435**

How many of these sites are green belt land? Are there any substantive plans to build on brown field sites?

**1523195035**

Land South of Preston Farm Industrial Estate - Its a conservation area with a medieval site on the land to the rear. It has the main gas line running under the land at the front.

**1523206279**

Billingham Bottoms - Flood Danger increases yearly, Flooding Danger.

Harrowgate Lane, West Stockton - Local Residents view more important.

Land at Ingleby Barwick - There has been enough boring estates built here.

Land at Urray Nook Sites 1 & 2 & Land at Durham Lane Industrial Estate - seems okay.

Land East of Wynyard Village - Again too near major roads - need to keep buffer area.

Land South of Preston Farm Industrial Estate - We need to keep that area green and open.

North West Billingham - Too near noisy polluting major roads.

South West Yarm - View of local residents most important.

South East Yarm, West Preston, West Yarm, Wynyard Hall Estate - seems okay but local residents view a priority

Wynyard Park - up to local residents.

Yarm Back Lane, West Stockton - it seems okay but its up to local residents.

Its time Councils built sensible homes for the elderly - not the vulnerable energy tiring bungalows. Look at retirement homes then think about what could be a living unit that would give a simpler life that is much more easily maintained than the family houses many of us occupy. The units would be terraced and surrounding a communal green area. The flats could be as simple as an en-suite bed/living room and a kitchen and/or some with a bedroom. They could have more than one storey for the not so elderly and some care and maintenance/security staff. But the elderly with their own homes could make the first batch self financing.

P.S. Should also be easier for elderly to be cared for longer in own homes.

**1523232450**

Billingham Bottoms & Harrowgate Lane, West Stockton - Good road links. Rail links infrastructure in place. Land at Ingleby Barwick - Traffic Congestion. Land at Durham Lane Industrial Estate - Good local facilities and road system and rail links. Land East of Wynyard Village - No facilities, i.e. schools, shops, road system needs work. Farm land. West Preston - Good road and rail links supporting facilities and schools. Wynyard Hall Estate & Wynyard Park - No schools, shops, playgrounds, no bus, road congestion, farmland. For social housing, not suitable as community charge and wynyard fees high and would have to be met from benefits. Wynyard does not have any essential services, i.e. schools, playgrounds, doctors, bus service, rail service. The land around Wynyard is farm land which will be vital in the future years as population gets large, people need more food and good farm land will be at a premium. To have a large development with social housing will cost the Council more in this area as they will have to provide transport build schools and essential services. The service charge for Wynyard will have to be met from benefits and also high council tax. The road system will have to be improved, if social housing is allowed we will require service from Police again added expense.

**1523261843**

Land south of Preston Farm is totally unsuitable due to gas, sewage and water pipes running underneath. Also area of architectural and environmental significance. Yarm and Eaglescliffe already congested, very little green space left. Villages - Q2 - Each situation needs to be considered individually.

**1523447756**

The council take no notice of the public, unless it suits there purposes.

**1523459966**

Just because a site is big enough to be a strategic development does not mean it is a good location even if services can be built. We have an existing service and support structure which could be enhanced if homes are built in the right place. Even the smaller villages could cope with a few more houses, and the edge of town could encroach into the countryside, but not near pylons or major roads. That doesnt make for a nice Stockton.

**1523756648**

I would like to see existing agricultural land on the outskirts of Hardwick, Bishopsgarth, Fairfield and Hartburn to be preserved. Housing development has already crossed over in to the Green Belt with the Blakeston Lane development which might lead to too much of our local countryside being used.

**1523834747**

Any site that would create additional traffic through Yarm, and to a lesser extent Eaglescliffe, is simply ludicrous.

**1524217141**

If you identify all the sites now, that will stop anybody doing anything else in other bits of Stockton. That isnt a good idea to me. Why does the council always want to resist everything.

**1524378809**

Bishopton, Stillington and Sedgfield, due to nicer areas appealing to countryside lovers. Who could not afford private housing, and it would keep the bus routes open and sustainable.

**1524806771**

I find it unbelievable that you would consider building this number of houses in Yarm, have you seen the traffic jams going into Yarm Hight Street recently? I accept some houses are necessary but nowhere near this number.

**1525608650**

It seems to me that a sensible strategy would be to utilise one of the larger sites, coupled with one or possibly two of the smaller sites available. Not being familiar with all of the sites mentioned my logic is based on the detail of the map provided within this document. The proposed sites of Harrogate Lane & Yarm Back Lane are adjacent to the areas of Hardwick, Fairfield, & Hartburn, established areas with established access roads, public transport, and amenities. The council should already be aware of how well these established areas meet the needs of the community, & therefore how or otherwise they would accommodate additional housing. Additional housing built adjacent to these areas would be able to take advantage of these facilities. Harrogate Lane & Yarm Back Lane, being larger sites, would also be better able to facilitate the council's policy of 15-20% of all new homes on major developments being affordable. However, I consider it unwise to overload any one established area with additional housing in one fell swoop. Division of the required number of houses to be built therefore, should be spread either between two of the larger sites or one large site & two smaller sites, thus avoiding overloading the existing system, while at the same time giving the council further options of gradual expansion of those larger sites in years to come. As stated, I am not familiar with many of the possible sites listed, basing my notion on the map provided, therefore my completion of Page 7 cannot be as positive or as accurate as I would prefer it to be. However, as a resident of several years, I am aware of the situation relating to Wynyard Village. Accepting that most residents' initial reaction to such plans would probably be hostile to such proposals relating to their particular place of residence, I have tried to view the proposal with a more open mind. While recognising that Wynyard Hall Estate, Wynyard Park, and Land East of Wynyard Village does have some access to the A689 & ultimately the A19(T), this access is limited, which is especially significant considering the constant high level of daily traffic. At Wynyard Village, tailbacks at the access to the A689 from the village occur frequently and unnecessary risks are taken by motorists. An increase in housing on the estate would only serve to exacerbate that situation & increase the risks. Furthermore, public transport & amenities are severely limited in the village & private transport is essential, especially to gain access to supermarket & other essential amenities lacking in the village. There is one further factor I would bring to your attention with regard to Wynyard Village, & that is the wildlife associated with Fannyâ€™s Glen, which includes amongst other species, bats and owls. Before moving to Wynyard Village, I lived on the Broadmeadows estate at East Herrington, Sunderland, where access out of the estate is onto the A690, which in turn leads to the A19(T). Amenities on the estate amounted to one, small General Dealers business (subsequently closed), while public transport was accessed on the A690. Vehicle access from the estate onto the A690 was difficult at any time due to the constant flow of traffic between Sunderland & Durham. Regardless of this, some years ago, in their wisdom, Sunderland council sold off land adjacent to the estate for private housing development, which had by necessity to use the access road from the estate onto the A690. To this day there are tailbacks of traffic trying to get out of the estate, & frequent risks taken by motorists turning onto the A690, from which accidents have occurred, all due to the increased volume of vehicles due to increased housing on the estate when other more sensible options were available at the time. Therefore, I am well aware of the potential to create such a similar situation at Wynyard Village.

**1525616831**

Land at Urray Nook - Site 1 - already passed as we know. Land at Durham Lane Industrial Estate - increase volume in traffic will block access to Yarm. West Preston - Durham Lane traffic would cut Elton unless some traffic controls were implemented. I am concerned that building 4150 at West Preston and 3120 homes at Yarm Back Lane will have a detrimental effect on Elton village. The village is located on the edge of Stockton and benefits from being a farming community. The village has some heritage including a 12th century church. If two estates are built near to Elton then it is likely that the community will be effected in terms of the volume of traffic, and the sense of isolation from town that many people prefer. Then a great concern would be that property prices would be effected with prices falling. I am not in favour of the numbers suggested for both West Preston and Yarm Back Lane.

**1525639386**

West Preston - totally object in a small village. Land attached to Moorhouse Estate, I totally object to being used, crime rate would rise and it is not visible. As a resident, along with others will do everything possible to object to such proposals. The land has been Green belt for many many years. There are far more practical and accommodating sites to use.

**1525648367**

I would suggest that these locations are not overly populated and would provide easy access to the arterial roads where many of the other locations are currently saturated with traffic.

**1525655448**

There is a balance to be struck here. Who would want to live near the Urray Nook chemical works? But, we do not need more executive housing in Wynyard or we will end up spoiling the rest of the area; it will be dumbed down effectively.

**1526625216**

West Preston - Enough for 30 years, provide access (new) from A66 and improve Yarm Back Lane. West Preston will cause least traffic to be using other roads in Stockton and the surrounding area.

**1526629082**

Harrowgate Lane, West Stockton - there is a secondary school there and near a large supermarket. Land at Ingleby Barwick - school could be built to accommodate existing children and extras. Yarm Back Lane, West Stockton - always understood part of this area was very wet. In general, smaller quantities of houses in several areas would allow them to benefit from existing facilities and would not give extra problems on the roads.

**1526701880**

Are the council just going to use this exercise to make it easier for them to refuse any good ideas that may come along in the future. That is what bureaucrats do isn't it.

**1526728707**

Ingleby Barwick is an urban community in itself striving for identity as such - it can take more housing in the area allotted, provided IB has the requisite services (school!). The fringes of Yarm should not be developed further if the remaining character of Yarm is to be maintained at all and greater traffic problems avoided. You should avoid adding to the sprawl of Preston Farm - this area has been developed to capacity in terms of its suburban/rural nature. By building here you are in danger of creating more urban sprawl along what used to be a semi-rural corridor and encroaching on the asset of Preston Hall and the vaguely rural areas around it. Adding to Stockton sprawl along Yarm Back Lane is less logical than continuing Ingleby Barwick expansion in an area that has no particular scenic aspects to recommend it and would not in itself represent sprawl. Uray Nook is more evidently sprawl than is Durham Lane Industrial Estate, although both will impinge on traffic congestion into Yarm. Basically, I am motivated by preventing further urban sprawl and retaining areas of natural interest or potential natural interest within the sprawl that has already taken place.

**1526734569**

I do not think it is wise to use green field farming land when I am sure there are plenty of other brown field sites in the region that could be used. At this rate of development in our country we will not have any countryside left to enjoy. If I wanted to live in a town surrounded by houses I would have moved to one.

**1527002725**

I'm a bit concerned about congestion on Yarm Road and the road between Tesco and the Cleveland bay already, and I'm concerned that any development in the Eaglescliffe/Egglescliffe area will only make this worse. I'm also concerned about Secondary school places in this area as there are already issues regarding this which would be made worse by more houses being built in this area.

**1527004275**

Ingleby Barwick is big enough. This will involve expenditure on other facilities as well as the housing.

**1527506394**

Spread the building about the district but keep the green areas between the areas. We need the green belts.

**1527540014**

Traffic congestion in Yarm will not allow for further housing in the area

**1527716725**

Traffic in the Yarm/Egglescliffe area is horrendous at the moment. Any further development and large number of new houses will only compound the problem. Traffic management must be seriously addressed before even modest developments go ahead in this area.

**1527822025**

Any extra housing anywhere near Yarm or Eaglescliffe is not sustainable as the road infrastructure in those areas will not support the extra traffic which would be generated. Yarm and near by parts of Eaglescliffe would become gridlocked due to the people living in those houses wanting to come into Yarm or pass through it. Until a method of bypassing Yarm is found no extra housing should be built in the Yarm / Eaglescliffe area at all, the traffic situation in yarm and Eaglescliffe is intorable as it is now.

**1527998340**

Close to the A19 for access / hopefully on the site on the new secondary school?

**1528041708**

My principal concern is the volume of traffic through Yarm.

**1528084744**

I would like to suggest the land to the North of Thorpe Thewles filling in between the A177 and the village road

**1528160251**

Many of the locations are not really suitable for housing. At Wynyard the sites are agricultural fields and the people there will be dead against expanding Wynyard. Also, Uraly Nook is where the big chemical plant is. Now that cant be a good area for new houses.

**1528544320**

Better houses on better designed estates, instead of more rows of boxes.

**1528653656**

As a council you have allowed over development at Ingleby Barwick. The infrastruture will not accomodate extra housing and I think it is time that the residents were given assurances that there will be no further development and other areas of stockton need to be utilised and developed

**1529597406**

For large-scale developments one needs to distinguish between factors (e.g. bus routes, shops, GP surgery) that will relatively easily adapt to suit the new demand and ones that are more intrinsic (major roads, schools) Ingleby Barwick will presumably have a new seconday school by 2021. It has good modern road links. For West Preston I cannot understand what is 'strategic' about this gap. For Harrowgate Lane and Yarm Back lane the road network was never designed and cannot be easily adapted, for any more traffic - it is already congested.

**1529620449**

Part of this land is hopefully to have a new school built on it which is much needed as there is a lack of school places in Ingleby Barwick already. There are new houses being built at the moment at The Rings which will mean even more children to be schooled. So please, no more building of houses at Ingleby Barwick.

**1529639939**

I cannot believe that you think building yet more houses in Ingleby Barwick and Yarm as a feasible solution. The infrastructure to support the existing housing is laughable yet all planners seem to be able to do is build build build - how many more houses are going up in Ingleby Barwick already and will be built before this timeline? How many more children do we want to transport out and through Yarm to schools? How many more hours should residents of Yarm and Ingleby Barwick spend queuing to go nowhere!!!!!! Leave Yarm and Ingleby Barwick alone - unless you are going to provide the infrastructure to support the building and I very much doubt that as it has not happened so far. We pay a parish precept for the pleasure of having no leisure facilities, not enough schools and queueing interminably - look elsewhere for your developments - we have had enough.

**1529677225**

The areas indicated for some of the sites may not in total be acceptable eg the west Stockton sites whilst acceptable should be reduced in extent.



**1529691060**

I live in Ingleby Barwick, the ruination of this 'village' over the last 10 years has been painful to see. The large majority of the problems on this estate (eg traffic, schooling) are simply down to the fact that there are way too many people living here relative to the supporting infrastructure - this was true 5 years ago nevermind now. None of this is accidental, SBC has caused it to happen. Sadly you cannot (or will not) undo what you have done - but please no more.

**1529756302**

Land at Urlay Nook - Sites 1 and 2 - Urban Sprawl, Traffic Congestion. South West Yarm, South East Yarm and West Yarm - Infrastructure of Yarm cannot support the population increase proposed.

**1529771231**

Wynard - Suggest the houses are going to turn out big & expensive. People need affordable housing around Â£100,000 and less not mansions. There are too many houses in Ingleby already - don't make the estate even more of a maze! There's nothing there either so if you're going to build there, build some more shops / a youth centre etc...

**1530035215**

People don't all want or need to live in the same place, there should be several sites. There is no point building low cost housing where there will be an impractical commute to work. Ingleby Barwick should only get bigger if it is given the facilities it requires - parks, schools etc. Development should be done in a way that minimises impacts (ecological and visual) on the rivers Tees and Leven (and other tributaries), we have a river to be proud of, let's not build houses too close to it. Development should be sympathetic to community ethos.

**1530203765**

More new stylish homes in Ragworth area

**1530329969**

I think it is a shame to use farmland for housing. I agree with the report that our farmland is not very useful for biodiversity but it is important that we do not lose our ability to feed ourselves.

**1531253876**

Yarm and its local traffic routes cannot cope with any more cars. New people living in this area will use Yarm High Street or Leven Bank which can't cope at current levels.

**1531904938**

I strongly disagree with any further development around the Kirklevington area. The existing infrastructure simply cannot sustain the increase in traffic, as a resident living on the roundabout at the intersection of Green Lane and the A67 I can assure you we require no further increase in the volume of traffic that would result from any development. I would also question the availability of services, the local schools are already over subscribed, the closest shopping facilities are situated in Yarm High Street which is already suffering from parking issues, have the existing drains been considered.....surface water already collects around the roads during a downpour. We don't want further development swamping Kirklevington or Yarm thank you.

**1531994698**

Whichever sites are chosen, it should not close the door to development in other parts of the area and villages.

**1532153824**

Access to Yarm Back Lane would be a nightmare - traffic already backs up down this road at rush hour traffic. It would not be ideal either to try and divert traffic thoroughfares through Fairfield - there are enough traffic issues on the estate. There are also flooding issues with this plot of land.

**1532175231**

We live in Yarm which already has huge traffic problems. The infrastructure does not exist to support this many new houses. Also Yarm could lose its quaintness and uniqueness if lots more houses were built.

**1532183994**

Land to the South of Preston Farm Industrial Estate & West Preston - Because it is agricultural land and a pleasant green wedge. West Yarm - Yarm is over developed.

**1532243780**

Do you think it would be better if all the new houses were built on one big site, or should we choose a number of smaller ones to add up to the total we need? - Ticked both use one large site for all the new houses and use a number of small ones to add up to tht total. Comment - Try and find a solution that improves areas and has minimal impact on existing residents in that area. Wynyard Hall Estate - Ridge & Furrow, Bats, Foxes, Owls. You're proposing to build on a field right outside my house. We don't have much of a garden, so any potential building work could be really close to the house. We're really concerned about loosing our privacy. We're very disappointed you did not write and let us know, it was only by chance that we found out about this. The field in question is within the area marked 'Wynyard Hall Estate'. Its an excellent habitat for nature. We regularly see birds of prey, owls, bats and foxes. Theres also an excellent example of ridge and furrow on the field. An ancient farming technique. It would be a shame to lose this forever.

**1532269360**

The road infrastructure around Eaglescliffe and Yarm cannot cope with any further traffic without detriment to area

**1532654921**

Ingleby Barwick is too big has it is making traffic difficult at times any more housing would make it impossilble

**1533096271**

There has already been a huge increas in traffic in the South and West Yarm areas. Any further housing developments will gridlock Yarm for most of every day and overlaod local services. Developments in these areas must not go ahead.

**1533106362**

It would be good to have a bit of green belt between individual towns within Stockton area to stop the area becoming a conurbation, preserve each area's 'individuality' and preserve some 'green space'. It's also important that each development include at least one local shop to stop people getting in their cars for a pint of milk and newspaper. The traffic along the A135 Yarm road is just insane and no more development should occur there until the traffic problems have been resolved (not easy I know). We should also encourage developers to have a number of affordable homes as the average house is out of reach for young families now and puts pressure on social housing.

**1533111178**

I live in Yarm, which does not mean that I have excluded all the Yarm sites from a NIMBY perspective. The current traffic flow is intolerable, adding more houses to the south of yarm on the scale proposed is simply ludicrous. I Strongly oppose building on a large scale in the Yarm area while the road network is as poor as it is. Smaller developements are a possibility but Yarm is gradually losing its charm as a small town.

**1533112935**

Land to the South of Preston Farm Industrial Estate - beautiful fields bordering onto cleveland way and nature reserve building here would be criminal! To build any development on the land south of Preston Farm Industrial Estate would be criminal. This area borders onto a wildlife park, the cleveland way and preston park. We see families of deer, badgers and foxes in these fields. Obviously these would be affected. These fields also create a natural and beautiful break to seperate the areas of Eaglescliffe/Preston and Stockton-on-Tees. Looking at the map there are other areas such a Harrogate Lane, Yarm Back Lane and Ingleby Barwick are far more suitable.

**1533114241**

Grove Stables Kirklevington Yarm YS15 9PY

**1533118171**

Land at Ingleby Barwick - Well developed and good facilities. Land at Durham Lane Industrial Estate - Traffic congestion will be worse than it already is. West Preston - Lack of facilities, traffic congestion are major problems. Wynyard Hall Estate - Big existing site and good road links. Yarm Back Lane, West Stockton - Access already congested at Elton roundabout. The lack of facilities and traffic congestion at Elton roundabout are major issues with regard to the proposed developments at Yarm Back Lane, West Preston and Durham Lane. Access to A66 east and Yarm/Eaglescliffe is already an issue at rush hour for residents of Elton.

**1533123651**

West Preston - Very convenient for A66, Large enough for all the development. All the choices will not encroach on existing communities and all possess the opportunity to build a "brand new community" for Teesside. All choices are located near main arterial roads. However, all choices are far enough away from existing housing to possibly dissuade present tenants wishing to move, just for the sake of moving to a "brand new" house and subsequently, starting on the wrong foot. Q: What vetting procedures will be adopted in order to prevent another large scale "no go area" being founded as already exists in large parts of Teesside!!

**1533133622**

Q2 comment - Use one large site for all new houses with community facilities developed to suit. Billingham Bottoms - Too wet. Harrowgate Lane, West Stockton - Road congestion. Land at Ingleby Barwick - Enough already. Land at Urray Nook Site 1 - Too close to that industry. Land at Urray Nook - Site 2 - A bit of the above. Land at Durham Lane Industrial Estate and land to the South of Preston Farm Industrial Estate - Probably ok. Land East of Wynyard Village - A road hotspot already. North West Billingham - A19 road noise excessive. South West Yarm, South East Yarm and West Yarm - Not until another river crossing to avoid Yarm. West Preston - A compact new development as the early Ingleby Barwick. Wynyard Hall Estate and Wynyard Park - A689 too congested there already. Yarm Back Lane, West Stockton - Too congested already. I would expect normal irregular infill sites to be judged on merit and not contrary to the suggestion of one integrated development.

**1533136939**

The key is also the affordability of the homes, the Yarm and Wynyard sites are great but I would imagine so would be the cost. Ultimately value for money in Ingleby Barwick at the beginning is what made it so attractive. That is what is needed to create a safe environment for families

**1533140360**

I live in Yarm - 1 mile from town centre and can only access the town on foot - why? No good bus service and poor car parking - what is the point in adding to this over congested town. Billingham and Stockton are town centres crying out for more customers and have good access from the north. This is where future development should be.

**1533385613**

All of the sites in and around Yarm/Eaglescliffe need to consider the increase in road traffic and the already congested roads in the area.

**1534111769**

I would suggest that you build houses in areas where the houses themselves will be affordable to first time buyers. Building houses in areas that will ensure that the price for the specific house is out of reach for most first time buyers means that you potentially will cause a bigger housing problem since these houses would potentially go to people moving into the area. This would not solve the goal of providing housing for local residents.

**1534171812**

Yarm is already far too congested and should be avoided at all costs

**1534397542**

There is insufficient infrastructure in Ingleby Barwick to support such large extensions of the existing residential areas.

**1534575979**

regarding the housing around Wynyard Village to allow more housing to this extent would be detrimental to the village life and its inhabitants there is insufficient infrastructure to sustain further development to this extent. West Preston Farm would enable the development to be planned and built which would take into account all the factors needed to make it a thriving community not a hotchpot of houses used as fill ins. The land at Ingleby Barwick would also be suitable because there is already a thriving community with suitable amenities and infrastructure to accommodate such further development.

**1534601121**

Road access and congestion for Harrogate & Yarm Back Lane's is already horrendous any additional traffic would grid lock the entire area, even if existing roads were improved it could not sustain in excess of 5000 additional properties. Additionally properties facing the open fields were purchased at a Â£'s premium for the privacy and views, property values would be severely affected if any housing and "low cost, affordable" housing in particular were to be erected on these sites.

**1535148963**

Traffic in Yarm is already very bad, Ingleby Barwick suffers from poor schools provision, and Durham lane should be kept for industrial use only

**1535285604**

Eaglescliffe, Yarm, Preston areas infrastructure is at breaking point and cannot take the increase in housing proposed

**1535334492**

Most agreed sites close to trunk roads. Yarm sites liable to increase already severe logistics/services congestion. Urray Nook could hinder airport development. Favour mix of all house/bungalow types as close to town centre access as possible.

**1535460747**

How can you justify social housing at Wynyard, given the high cost of land there? Road links on A689 are overstretched at present. Additional housing will mean less green space for residents. Hospital plans are still not confirmed. No LEA schools in the village or healthcare. No bus link.

**1535489958**

As a local resident of Eaglescliffe close to Allens West I feel although I do not object to new builds however what I do object to is for new housing in an area that cannot sustain the high level of traffic anticipated with new build here. Durham Lane is a B road and not capable of high levels of traffic, which in turn puts a burden onto Yarm where traffic is historically suffered with congestion,

**1535877890**

I'm happy for houses to be built in Yarm as long as the traffic problems are sorted. As it is traffic density does not encourage High Street shopping. If you drive, parking is difficult. If you walk, you breathe in fumes from standing traffic.

**1535896393**

Do you think it would be better if all the new houses were built on one big site, or should we choose a number of smaller ones to add up to the total we need? (Please tick the most relevant box) Mix of these and other options. Billingham Bottoms - Contrary to the Local Plan and in the green wedge. Harrowgate Lane West Stockton - Contrary to the Local Plan and outside the limits to development. Land at Ingleby Barwick - Contrary to the Local Plan and in the green wedge. Land at Urray Nook - Sites 1 & 2 - Includes agricultural land. Land East of Wynyard Village - Currently farm land. Land to the South of Preston Farm Industrial Estate - Contrary to the Local Plan within the Green Wedge and the River Tees Heritage Park. North West Billingham, South West Yarm, South East Yarm, West Yarm - Contrary to the Local Plan and outside the limits of development. West Preston - Contrary to Local Plan, outside limits to development and identified as community forest. Wynyard Hall Estate - Contrary to Local Plan, outside the limits to development and part is site of nature conservation importance. Wynyard Park - Identified in plan as employment land but is currently farm land. Yarm Back Lane, West Stockton - Contrary to Local Plan, outside the limits to development and identified as community forest. Site Comments Also see accompanying letter. Currently, over thirty million people in the United Kingdom are dependant on imported food for their survival at a time of declining world food security. In my opinion, planning policies and guidance which protect land that is suitable for food production should be given the highest priority in making planning decisions. If farm land that has previously been identified as employment land is now seen as surplus to requirements then this should be removed from the stock of identified development land. If developers insist in building on Greenfield sites then they should pay the full cost of returning an equal area of brownfield land to an agricultural condition. To avoid Greenfield development, consider expanding the Core Area to incorporate more brownfield sites. Development in and adjoining the River Tees Heritage Park should be particularly resisted as this prized landscape is important in off setting the perception of over development that many visitors have of the area. Villages Should villages be allowed to get bigger by building a smaller number of houses on land around the village? and also Should villages be allowed to get bigger by building houses on undeveloped land inside the village? Dependant on each individual proposal. Wynyard 'see comments on page 2' resist further development.

**1535917570**

Council housing should be spread out among all new developments and on sites as identified above. This ensures that all residents take pride for the area they live in following the 'Broken window theory'.

**1535918751**

There should be no further development which exacerbates the traffic (parking and throughflow) in Yarm.

**1535974836**

land behind tesco./ horse and jockey.

**1535976713**

Land South of Preston Farm Industrial Estate - will exacerbate current traffic problems - wildlife corridor to Tees, also. South West Yarm and South East Yarm - Wildlife corridor and greenbelt. Yarm already unable to cope with traffic, etc. West Yarm - Traffic and infrastructure unable to cope. Yarm too big now! Wynyard Hall Estate and Wynyard Park - Should be retained as wildlife rich green belt areas. Yarm Back Lane, West Stockton - Greenfield sites need to be preserved.

**1535977253**

I Believe the sites should be spread about the area to keep the rush hour traffic increase to a minimum, currently west stockton is congested for access to the A66, therefore more housing in this area will have a significant negative impact.

**1535982616**

There has to be better ares to build then in front of my home which i bought because of the location and view in front of my home. building new house will drop the value of my home and become hard to sell when the time is right. so i strongly disagree with any new delopment happening in front or rear of my home.

**1535990161**

Land at Ingleby Barwick - Where are the community centres/schools to go with it? South West Yarm, South East Yarm and West Yarm- Increase traffic in Yarm, using greenbelt, why? Land at Urray Nook Sites 1 and 2 & Land at Durham Lane Industrial Estate - Extra traffic into overloaded Yarm. Public transport - almost absent. Houses get built without community centres/ schools/ decent roads/ shops to go with them. This should be compulsory with any development.

**1536001967**

South West Yarm and South East Yarm - Too much congestion at peak times! In general choosing several smaller sites may help with traffic congestion at peak times. Minimal incursion into greenfield sites also a major consideration.

**1536013890**

Land at Ingleby Barwick - This development is quite big enough, the traffic there is already a problem. South West Yarm, South East Yarm and West Yarm - The roads around Yarm are a real bottle neck at the moment, more housing will only make the problem much worse. There is meant to be a gap of land between Yarm & Kirklevington, the proposed sites South & West of Yarm will make this 'gap' virtually disappear. The wildlife corridor to the A19 will be threatened. As I have mentioned above the road system could not cope with anymore traffic, the roads are not good enough for existing residents.

**1536026224**

Please no further development in Yarm which is already overdeveloped. The housing and over expansion of Yarm School is making the traffic situation and general amenity level in the town unsatisfactory for residents.

**1536026603**

South West Yarm & South East Yarm - This is in Kirklevington Parish - not Yarm. I am very concerned that housing development on the 2 sites in Kirklevington Parish will put at risk animal movement through the Strategic Wildlife Corridor and will erode the strategic gap between Yarm and Kirklevington Village. As indicated I am in favour of using small sites to meet housing needs but if large sites are required the ones ticked above would seem more appropriate (PS For returning the form it would have been helpful to have a postal address for Gloucester House.

**1536041568**

Billingham Bottoms - good road access. Harrowgate Lane, West Stockton - Small pockets, good access to shops. Land at Urray Nook Site 1 - Too big. Land at Urray Nook - Site 2 - Small. Land at Durham Lane Industrial Estate - Access to station and A66. Land East of Wynyard Village - Small development, good roads. Land to the South of Preston Farm Industrial Estate - Road network. North West Billingham - Good road network. South West Yarm and South East Yarm - High cost housing area and bottle neck in Yarm. West Preston - only small chunks. West Yarm - Greenfield traffic. Wynyard Hall Estate - 3 taxes. Wynyard Park - High cost housing. Yarm Back Lane, West Stockton - Congestion. In the West Preston area it should be small developments not linked to each other but to the two main roads. NEED for smaller affordable units close to good access to roads, schools, shops etc. Need to keep greenfield sites - protect the urban rural divide. Wynyard statements - balance. Q: Is the hospital going there?

**1536064645**

In terms of the 3 sites I have indicated 'strongly disagree' this was on the basis of :- 1) proposals would interfere/undermine the 'strategic gap'. 2) proposals would have significant impact on the wildlife corridor. 3) there are already insignificant school places available. 4) traffic congestion is currently huge problem in Yarm, such additional building would bring even more traffic to the roads causing chaos, but more importantly changes to pedestrians and cyclists etc. 5) In Yarm there is only one leisure facility - tennis club - there are no other facilities. 6) Loss of school playing fields would be additional issue.

**1536091590**

South East Yarm - Is there not to be a golf course on this site? A valuable public amenity. I can only write in generalities but I do believe that there should be a broad policy of directing developers to brownfield sites in the first instance. Instead of building over the countryside SBC should require any developers to examine all on yet undeveloped brownfield sites which could really benefit the community from being recovered and then developed. I am certain developers have at their disposal land ear-marked for housing but I seriously question there is a need for further green sites particularly as the demand for new housing is flat given the credit crunch is compounded by the almost impossible task of finding a mortgage.

**1536167893**

Where should new homes be built? Every effort should be made to keep any building within the already developed urban areas and brown field sites. There is also land already designated at Ingleby Barwick. On the map provided the least harmful new build areas look to be Harrogate Lane, Yarm Back Lane and West Preston. There is very little space between the south of Yarm and the County boundary. This should not be further built up. West, southwest and southeast Yarm is still perceived as having an essentially rural character and this depends on the preservation of the Strategic Gap/Green Wedge that separates it from the encroaching urbanisation of Yarm and Stockton. Stockton needs to preserve this area as it provides a choice of a different environment for people to live. The historic villages need to be kept within their village envelopes to preserve their separate identities. A relatively small number of new houses would have a disproportionate effect here. The proposed development area of west, southwest and southeast Yarm appears exactly coincident with both the local and strategic wildlife corridors and areas of biological interest that are of increasing importance as the Teesside conurbation expands. Not only do these connect the Leven and the Tees but also are part of the greater corridor between the North Yorkshire moors and the Pennines. Lip service has been paid to enhancing this over many planning years: it is past time something was done. The strategic gap and the wildlife corridors are already suffering from piece-meal erosion, e.g. train station, playing fields, golf course, building at the Tall Trees estate and at the prison. Development southwards needs to be firmly stopped at Green Lane, the Kirklevington and Castleavington Parish boundaries, to preserve the last bit of rural environment before the southern County boundary, otherwise the historic villages will be inexorably engulfed by urban sprawl. The roads are already inadequate and not capable of improvement. We are told that the demand for homes is well down, that banks will not fund developers and that mortgage applications are at an all time low. There is an over supply of apartments and developers are sitting on an enormous amount of land, much of it with planning permission. Is this expensive planning work really necessary in these austere times?

**1536278578**

Not able to comment on some sites (a map of sites would have been helpful) however the principle should be that wherever possible previously used land (eg old industrial spaces) should be re-used rather than greenfield (agricultural) sites. Traffic congestion, and facilities (eg shops, schools, availability of public transport and other amenities) should be considered, planned & developed before new housing is built.

**1536435199**

I do believe that one site would possibly be more future proof for expansion and that is why I have chosen the West Preston location. The location has road and rail links albeit a certain amount of upgrade and restructuring would no doubt be required. This site would have the space for the required amount of housing plus the scope for more as and when required and would also be non intrusive on other existing housing which is always controversial and confrontational with local residents. I thought there was more brown sites available for development, I understand the complexity and extra cost incurred but surely this land should be used first otherwise it will never be developed on and all the green areas will disappear or shrink as what happened to Ropner playing field!! I am somewhat biased because I live in Hayling way, Hartburn which backs onto Yarm Back Lane and I would be personally gutted if houses were built on this site, we have now enjoyed a number of years without having a pylon directly over our home so to have a house directly behind us would be devastating. People, the public generally believe that our voice means nothing when it comes to planning...I put it to you.....prove me wrong.

**1537182138**

It is clear that the road infra-structure on many of these sites struggle with the additional traffic created by the additional housing. It begs the question as to why green field sites are being used for development when so called brown field sites are available. Why is the area around Buchanan Street not included...Have you been there? It is a disgrace. Any development in or around Yarm must be a no-no because of the impact on the town of Yarm. It cannot cope now. It seems eminently clear to me that the new road connecting Ingleby Barwick to Stockton, the A66 and A19 was built for a reason. I am of the firm opinion that housing and light industrial estates should, as far as possible be kept separate. Planners, over the years have systematically destroyed Stockton

**1537201856**

When considering where to build new houses please can you consider the provision of facilities and infrastructure of the area and those surrounding it.

**1537230557**

I believe the villages should be allowed to expand - providing centres of community life allowing the development of shops, bank branches, post offices with a wide mix of local facilities.

**1537273224**

Sites for Yarm and Ingleby Barwick should not be used as the road network is not set up to cope with the vast increase in numbers of cars that would be caused. There are already huge queues to travel either through Yarm or Ingleby Barwick - specifically house building in Ingleby Barwick should have been stopped long before now as there has been a huge failing in providing adequate traffic management.

**1537288089**

Ingleby Barwick is already vast and it does not have the infrastructure including roads, schools ecto deal with anymore housing. There are a vast number of houses for sale on Ingleby Barwick and some have been on the market for over 3 years. If you stopped building on it people would be able to sell their houses as this would be the only way to live their. If we are so short on housing why aren't the houses selling?

**1537295267**

My concerns re: the above 3 sites indicated above are related to -: 1) Proposals would remove the strategic gap. 2) Negative impact on the natural habitat and the WILDLIFE CORRIDOR. 3) It would further impact on the already insufficient number of school places (esp. Primary Schools) available. 4) Significantly add to the major traffic congestion in and out of Yarm: safety issues for pedestrians around the Green Lane roundabout area, and danger to cyclists. 5) Loss of school playing fields. 6) Currently there is only one leisure facility in Yarm - how would this need be satisfied?

**1537310185**

South West Yarm and South East Yarm - Poor infrastructure already in this area would be overwhelmed. The areas 'South East Yarm' and 'South West Yarm' would overwhelm the road and education infrastructure as well as other local amenities. This needs to be changed before any further houses are built.

**1537322688**

Land East of Wynyard Village, Wynyard Hall Estate and Wynyard Park - Affordable housing only.

**1537335697**

Land at Ingleby Barwick - Already big. Why not "fill in the gap"? Land at Urray Nook Sites 1 and 2 and Land at Durham Lane Industrial Estate - Traffic through Eaglescliffe/Yarm already a problem. South West Yarm and South East Yarm - Poor road infrastructure. Bottle neck through Yarm. West Preston - Very large number proposed. My main concern is the infrastructure e.g. roads, sewerage, drainage. At the moment, getting through Yarm (especially at peak times) is a laborious process. More houses around Yarm would increase this problem. There would seem to be more scope for improving/adding to existing infrastructures in e.g. Wynyard area. Ingleby Barwick is already huge and presumably does have infrastructure that would relatively easily lend itself to more housing.

**1537358136**

Land at Ingleby Barwick - Strategic Highway? School Provision? South West Yarm and South East Yarm - Strategic Wildlife Corridor very important for joining Leven and Tees and beyond Greenbelt. Traffic on A67 and through Yarm already an issue.

**1537365280**

The sites I agree with would allow easy access to A66. Other sites would add to the already congested roads, especially Yarm and Ingleby Barwick.

**1537369532**

Harrowgate Lane, West Stockton - would prefer smaller sites to make total. Land at Ingleby Barwick - Infrastructure already developed and in place. Land at Urray Nook - Sites 1 and 2 - Recently developed area with access. Land at Durham Lane Industrial Estate - Reasonable prospect with local amenities and access. Land East of Wynyard Village - Impact on suburban village community and green belt. Land to the South of Preston Farm Industrial Estate - Arguably good use of urban space that has infrastructure, access and local amenities. North West Billingham - Impinging into greenbelt. Already congested. South West Yarm, South East Yarm and West Yarm - Already horrendously congested. West Preston and Yarm Back Lane, West Stockton - Huge impact on greenbelt and suburban area. If one larger site was the only option perhaps Harrogate Lane West is a reasonable option, however this main road is already heavily congested and would need to be revised. Wynyard Park development may require additional schooling/amenities. Good access but A19 busy. The West Preston and Yarm Back Lane, West Stockton proposals are major developments that would introduce major difficulties and complications. I strongly object to these.



**1537396006**

Land at Ingleby Barwick - Ingleby is too big as it is. South West Yarm, South East Yarm and West Yarm - Would cause traffic congestion. Yarm is a traffic nightmare and further building in Yarm area would make it worse. SW Yarm and SE Yarm are in a green belt and would affect the wildlife corridor. Also would put more traffic on green lane. It is important to maintain the strategic barrier between Yarm and Kirklevington parishes.

**1537405843**

In the areas ticked Strongly Disagree until such time as there are adequate roads to deal with the already traffic congestion problems no more housing should even be considered.

**1537437584**

South West Yarm and South East Yarm - Strategic wildlife corridor endangered. A larger development e.g. West Preston, Harrowgate Lane, Yarm Back Lane might be easier to create new road infrastructure that would be necessary. Further development at South East or South West Yarm would be on strategic wildlife corridor and so should not be permitted. There would also be an issue with increased traffic in an already congested area and erosion of the green belt between Yarm and Kirklevington village.

**1537449783**

Harrowgate Lane, West Stockton - If amenities provided on site and access route to A19.

**1537456859**

Land at Ingleby Barwick - Estate big enough already. South West Yarm and South East Yarm - Tall Trees development sufficient. West Yarm - Existing problems with traffic.

**1537551694**

Ingleby Barwick has far too many houses and no facilities as it is. No more building please

**1537735100**

The three Yarm sites are not suitable for development because: South East Yarm is already identified as the site for development as a golf course and swimming pool. These facilities are desperately needed by the existing community and are vital to provide equality across the borough. All other areas of the borough already have pools and golf courses. South West Yarm is identified in the strategic plan as GREEN BELT and must be kept that way. The green areas between Yarm and Kirklevington are crucial for the village to retain its identity. This area is important for wildlife and provides a welcome relief from the townscape. Marked walks are well used by people of all ages, helping develop healthy lifestyles and fitness. West Yarm should not be developed because the natural boundary of Yarm, ie. Worsall Road provides a clear identity for the end of development. The ongoing and growing traffic problems in and around Yarm should prevent all further building on green sites. There are already major problems in accessing the facilities in the town and with further planning permission already granted to develop the Tall Trees site this will add greatly to the problems. Kirklevington must be allowed to retain its village identity and all applications for the development of these identified sites should be refused.

**1537793413**

I would like to see the Tees corridor retained as a green wedge, as wide as possible. I would like as little farmland or other greenfield land as possible to be lost. I would like to see development on one side of the road only where a highway defines the town limits, eg South-West and South-East Yarm. I would like to see discrete settlements maintained and not joined up to the general mass of housing. I think that housing should be developed in as dense a manner as possible to avoid eating up all the countryside, even if this means reduced overlooking distances, etc.

**1537823596**

Houses should be built near existing new development or near or on industrial estates, if potential developers built they will charge a premium for housing with a "better postcode".

**1538353633**

My choices are based upon the ability of the local infrastructure (roads etc) to support the proposed developments and not on a "Not In My Back Yard" basis

**1538358122**

Land in North West Billingham should not be used as this will increase congestion and danger to children at school run time. Thames Road is already dangerous and extra housing would make the situation much worse. There is no mention of amenities, building large estates without amenities will only lead to issues of antisocial behaviour, so it is preferable to build smaller estates where existing amenities may be able to cope

**1538361571**

Billingham Bottoms, Land at Urray Nook Site 2, Last East of Wynyard Village, North West Billingham, South West Yarm, West Yarm and Wynyard Hall Estate - Smaller sites enable to blend with existing houses. Smaller grouping of properties will in my opinion come away from the 'council estate syndrome'. Smaller groups of affordable housing will blend more appropriately with surroundings (existing atmosphere and properties). My suggestion for Stillington. There is not enough affordable housing within the area. Younger couples need to go further a field to find housing, therefore villages stagnate. We need to keep a diversity of people within our village for survival and vibrancy. (Please see attached suggestion) Land Left Neglected for Years The old doctors surgery house and huge plot and would be ideal for building affordable housing on Messines Lane, Stillington, TS21. It is within the village that has amenities - Medical centre - Village Post Office. - Public transport into Stockton. - Nature Reserve. The Executors: Archers Law, Stockton Office. Tel: 01642 636500 Email: Enquiries@archerslaw.co.uk Contact: Nicola Dalzell - Associate. The grounds of the house have become totally neglected and looks like a jungle. The tree roots are or have fractured main drains and sewer. The trees have grown so tall they block light from surrounding properties and lean precariously into neighbouring properties and with Ivy taking over every bit of land. This land would be ideal for elderly persons Bungalows, especially near the Medical Centre or affordable starter homes for younger people. The site in question is up for sale within the hands of a lawyer who is dealing with the estate. At the moment it is a blight on the village and the surrounding properties and people having to pass this unpalatable sight. There are so many people wanting to be housed that I feel this neglected plot could be used and regenerated to fill this need. We need younger blood to keep our villages vibrant.

**1538367733**

Do you think it would be better if all the new houses were built on one big site, or should we choose a number of smaller ones to add up to the total we need? Comment - A large number of smaller ones. Billingham Bottoms - an unattractive location. Land at Ingleby Barwick - Already too many houses and very few facilities. South West Yarm - would involve building on an established wildlife corridor. Wynyard Park - Too isolated.

**1538367812**

I object to any building of houses where green belt farm land is being used for housing. I object to building any development which requires dependance on cars to get to school and work. Regeneration of land within towns and villages should take preference, especially if it means they are not reliant on cars. Social housing for young and old should be developed so public transport or safe cycling is available to them on their doorstep. We need to keep the traffic down on the roads not be adding to the volume by building large out of town developments

**1538367820**

I have only really disagreed with the Ingleby Barwick Plans as I live in this area. The traffic in IB is almost bearable now that the 1835 way is open but there are still tailbacks when trying to exit onto Thornaby Road which is where the traffic from this development will be focussed. I would object to extending IB any further as we do not yet know the impact on traffic from the new houses that are not yet built - approx 350 houses (Ringwood) and the remainder of Broomwood. Any further development is totally unacceptable in this location.

**1538371363**

No more traffic at South Yarm without improved roads. It is not even Yarm - it is Kirklevington. Green Corridor between Yarm & Kirklevington should be preserved.

**1538375133**

South West Yarm - Not Yarm - Kirklevington. South East Yarm - Prefer planning currently submitted. There needs to be a green space between Yarm and Kirklevington. Wildlife need to be considered. TRAFFIC at the top end of Yarm a major problem if South Yarm developed.

**1538393440**

Villages by definition are small communities if they are constantly expanded with new developments they cease to be a village. People who buy and live in a village do so by choice. If you want to live in a highly developed area then live in the centre of town. LEAVE OUR VILLAGE ALONE!!!

**1538396780**

Villages should remain as villages. Most people make a choice of living in a nice quiet community. To build more houses in or near a village would ruin this and before long our village would extend becoming a small town.

**1538399297**

Wherever new homes are built, we do not need any more ugly estates. Trying to proscribe the future in a local plan is fine, as long as it isn't so rigid that it resists any idea that makes good sense in parts of the area which may not be identified in the plan.

**1538399865**

Billingham Bottoms and North West Billingham - High levels of A19 traffic noise. West Yarm - New access roads to this area will be needed.

**1538410355**

We have completed the Questionnaire and wish to make the following comments: Sites We feel that using a number of small sites for new houses would allow for a mixture of properties across the Borough, which would give more choice in terms of type of housing and location. In terms of the individual sites, we would like to make the following comments, which reflect the way in which we have answered the questionnaire: Billingham Bottoms We feel that this site is unsuitable, due to its proximity to the A19 and believe that the area already suffers from flooding. Harrogate Lane/Yarm Back Lane, West Stockton We would support development on these sites as they are large enough to take further development and have good access in and out by roads. However, we would like to see the proposed number of houses reduced. Land at Ingleby Barwick We would not support further development here, unless the road infrastructure was improved and further community facilities were provided, including a secondary school. Land at Urray Nook Site 1 & 2 We would not support development here due to its location. Land at Durham Lane Industrial Estate We would support development in this area. Land East of Wynyard Village/Wynyard Hall Estate/Wynyard Park We would not support this development due to the sustainability of the area. For development to take place here, further community facilities (for example a village hall/community centre) and public transport would need to be provided. We would also have concerns regarding future development on the Wynyard Park site, such as the hospital and the affect that further traffic would have on access in and out of the area. Extensive development in the Wynyard area would also detract from the reasons which many people choose to live in this area. North West Billingham We would not support development here, due to the poor access. South West Year/South East Yarm/West Yarm We would not support development here, due to the impact on the wildlife corridor, farm land, lack of facilities and increased traffic with poor road access. Development here could also join these communities to become suburbs of Yarm or Ingleby Barwick, losing the areas village identity. West Preston We would support development on this site, but feel that the number of homes should be reduced and access to the A66 would need to see substantial improvement. General Comments of potential sites We feel that with most of the sites, new community facilities must be provided with any new housing developments. Road infrastructure and public transport must also be at the forefront of any decisions relating to housing development. All sites should provide different types of homes, whether it be size, style or tenure. Affordable housing should always be provided and this should be truly affordable, in line with local incomes, especially for young people and older people. Villages In terms of the questions related to development within the villages, we feel that this should only take place in the villages with the most facilities and services and that this should be delivered as part of the developer's commitment. In terms of the underdeveloped land with a village, we believe that this is possible and would support this, but that this needs to be considered very carefully, especially where land is at a premium. This could be an option for land to be purchased by the community under the 'Right to Buy' scheme within the Localism Bill. Wynyard Whilst we agree that future development should focus on offices and warehousing, we do not understand how using the land for logistics or manufacturing would cause less congestion? We would like to see future business development provide some smaller units, which would support the rural economy. If more homes were to be built in Wynyard we would support this being mixed in size and style, but with no further Executive Homes,. We would wish to see these being built in a style which was in keeping with other properties. However, if further properties were to be built, consideration needs to be given to the lack of public transport in the area.

**1538519838**

Ingleby barwick/west preston could easily link to major trunk roads reducing need for money spending on local infrastructure. Ingleby barwick is a developing area with new investments already considered eg more school places. Not sure why west preston a strategic gap -building here would affect few people. Harrogate lane/yarm back lane has already got congested roads especially at peak times. Cars regularly queue 15-20 minutes at junction with A66 and at t junction with sadberge road. Also roundabout to Tesco which these developments would also use and Sainsburys traffic lights are also already bottlenecks. New developments must plan for the impact on local services including roads. Need to consider factors that would adapt eg corner shops against ones that would struggle to change eg major roads

**1538626067**

Thames Road is a busy road during school term time and any increase in traffic would cause chaos and be a danger to school children. The proposed site is also adjacent to the A19 Cut and there is already strong objections in the area to the traffic surface noise.

**1538893325**

Really the majority of the houses should be built in Stockton Core Area to regenerate and breathe new life into Stockton Town Centre.

**1539169435**

Concerned about existing traffic black spots of Yarm and Wynyard.

**1539630892**

yes yet again you have seemed to of missed off thornaby what is it with our town you get your council tax from us who live their but wont build any council houses this is pathetic

**1539637166**

Billingham Bottoms - Prone to flooding, lots of work needed. Harrowgate Lane, West Stockton - More congestion. Land at Ingleby Barwick - The roads are alot better now. Land at Urray Nook Sites 1 & 2 and Land East of Wynyard Village - Some built. Land at Durham Lane Industrial Estate - Road congestion in both directions into Yarm & A66. Land to the South of Preston Farm Industrial Estate - near main roads in most directions ok. North West Billingham - near main roads ok. South West Yarm and South East Yarm - More traffic into Yarm onto A66. West Preston - Some on the Yarm Road side. None Durham Lane side. West Yarm - More traffic into Yarm. Wynyard Hall Estate & Wynyard Park - Ok. Yarm Back Lane, West Stockton - Road congestion in both directions including A66. Old used land should be used first. Greenbelt and ex Greenbelt land is for conserving wildlife and greenland, tress etc. Darlington Road gets congested now at peak times on to A66. If houses are built on the Yarm Back Lane site it will make things worse at both ends. If houses are built on the Durham Lane side of the West Preston site congestion will be bad at both ends of the road. But the railway could obstruct access to the Yarm Road for such a large site.

**1539676820**

West Preston - Working Farmland and Green Belt should not even be considered. The land of West Preston is working farm land and has been for years to many of our farms are disappearing as it is, it is also a green belt separating Eaglecliffe from Stockton. The said land is also surrounded by natural woods housing many wild animals, i.e. deers, pheasants, hares & many wild birds are returning to the area, what happens to them if these houses are built, where do they live then!! also the roads surrounding Eaglescliffe are very heavily congested as it is and could not sope with any more traffic, being in one of these jams can add up to 20 minutes + on your journey now without a possible 3,000 cars on these roads.

**1539788127**

One concern with a housing development in Yarm Back Lane is the detrimental effect that building would have on bird species such as Skylark, Grey Partridge, Lapwing and Yellowhammer which are currently found in that area. These species have been given "Red Status"™ making them species with high conservation priority in the UK, a contributing factor to their decline has been habitat loss. I have read a document on your website which reviews the results of an assessment made on the potential effects that proposed developments could have on areas such as the North York Moors but could not find any information on an environmental impact assessment with regards to the effect that building would have on the land the houses would actually be built on. If such an assessment has been made I would be very interested to hear about the findings. Another concern would be that the Yarm Back Lane development would increase congestion in an area that is already affected during peak times.

**1540040657**

100 new families on the North West Billingham proposed site would exacerbate the stop-start morning and afternoon traffic on an already extremely busy bottleneck (Thames Rd, Whitehouse Rd), and put pressure on schools.

**1540718128**

1 Before these sites could be considered adequate it is vital to address the issue of the Yarm High Street bottleneck. Also other roads are poor, namely the B1264 has a narrow bridge over the railway line and the A1044 road on either near the River Leven crossing would appear to be used to its capacity. 2 The use of green field sites is to be deplored. Efforts must be made to develop good quality high density housing on brown field sites.

**1540786641**

It is my opinion that building should take place primarily at brownfield sites or at sites that already have building going on. Building should not occur on greenbelt land, I myself live in North West Billingham and I would strongly object to the building of 100 houses in the area. This would ruin a popular walking, cycling & horse riding area. Development should go on in brown field sites within towns, such as the old Hills Doors site. We should be clearing up locations we have previously spoiled before we go on to build on pristine locations.

**1540820898**

The new houses should be built on old industrial sites so to redevelop the areas, it is no good extending towns or villages when there is land within the town that has old factory's or demolished factory's on which just look an eyesore to the surrounding areas. I also think that you should look at re-using empty properties first before building new ones. I was driving through Stockton and noticed that there is land at the side of Durham road by-pass, the land where the old wood working factory was on Norton road and the land where the Tiley sports centre was that was not on the list for new house's. These areas should be considered first. 1. Use up brown land within the town and 2. Regenerate the area with new houses.

**1540834579**

Those answered as 'Strongly Disagree' would impact too greatly on levels of traffic and are in no way practical sites for new housing.

**1541218861**

I would like to see a mixture of a number of small sites for the additional 2,800 homes in the area. By doing so there may be limited implications for increased infrastructure which would be problematic for some of the larger sites. This is why I disagree strongly with the proposal for Yarm Back Lane, West Stockton in particular as the proposed access (Yarm Back Lane) is already very busy throughout the working week and, at peak times, generates long traffic delays which stretch as far back as Fox's Farm from the North and to Rosedale House from the South (Access to the A66). In addition the distances to local schools do not seem to be accurate. For example Ian Ramsay School is 1.93Km by road from Surbiton Road. Surely the whole of the proposed site cannot therefore be within 2Km of this school. Similarly Bishopsgarth school is also greater than 2Km distance from parts of Surbiton Road. In addition I am unaware of a GP's surgery within 2 Km of the proposed site. I am presuming that you are referring to the ex Wellburn Road Surgery (approx 1.4Km from Surbiton Road). This is now only used as a dental surgery. Having read the Core Strategy Development Plan Document Review I feel that some sites lend themselves to development than others. By using a mixture of sites, people can choose where they live in relation to their workplace, local amenities and commercial centres.

**1541308528**

I have read your report and my views on the suitability of sites has been based on the criteria you have yourself identified as being important for the region. The current road system around the A689 struggles to cope during peak hours and any further relaxation of planning rules can only exacerbate this situation, Additional housing will add to the peak traffic problems as will office space as this additional traffic flow would occur at the same peak time. The development with the least impact would likely be Logistics as the flow would be staggered during the day. I believe that the Wynyard residential area should not be allowed to expand any further. The area identified by you is either (a) Agricultural land, which will become more important in the future for our country. (b) Woodland which is important to wildlife. There are many birds in these woods, as will be confirmed by the RSPB which conduct surveys in the woods. In addition there are owls and bats living in the woods. These must be protected. Your document states that the area includes a Parkland of Special Historic Interest ie. the woodland and as such no development should be considered at any time.

**1541763935**

Land East of Village Village - Ease of access to possible new areas of employment. West Preston - Least impact on existing housing, adjacent to main arterial roads. Wynyard Park - Ease of access to future employment site. Yarm Back Lane, West Stockton - Already heavily populated to the east of Back Lane. With reference to the proposed site of Yarm Back Lane, West Stockton. The residence's bordering on the edge of the proposed development have enjoyed open views over the land. If any development of this site it should concentrate to the west side of Yarm Back Lane. This still allowing the said residents access to open views and remain free from being overlooked and maintain a substantial green belt between existing development and new.

**1541782128**

West Preston - Too big, won't promote community interaction. I am a resident of Stillington which is a small village. In Messines Lane there is a big house surrounded by land. It has been for sale in excess of 3 years. It is overgrown, has been vandalised etc. Leaves from the vast amount of trees within the property are a hazard in the winter when they fall in road and cause a danger to pedestrians. Messines Lane is a direct route to the Medical Centre used by the elderly. This property could be demolished to make way for senior citizens accommodation sorely needed for Stillington's ageing population.

**1541793572**

Billingham Bottoms - Wildlife? Harrowgate Lane, West Stockton & Yarm Back Lane, West Stockton - Traffic congestion! Land at Ingleby Barwick - No school places. Land East of Wynyard Village - Schools? West Preston - Traffic congestion, schools.

**1541796490**

There should be a limit to the number of houses to the amount identified by the Council, even if this means that sites remain underdeveloped. The strategic gap between Yarm and Kirklevington should be maintained - further development would put a strain on the road network and adversely affect an important wildlife corridor.

**1541803276**

Billingham Bottoms - Scrub land with access. Harrowgate Lane, West Stockton & Uray Nook Sites 1 and 2 - Good access/less disruptive to existing residents. Land at Ingleby Barwick - Continuation of existing development. Land at Durham Lane Industrial Estate - Better left for industrial development. Land East of Wynyard Village & Land to the South of Preston Farm Industrial Estate - Agricultural land, good access. North West Billingham - Good access, no disruption to residents. South West Yarm, South East Yarm & West Yarm - Agricultural land, Traffic congestion. West Preston - Agricultural Land/No access/ Cables/ Gas Services. Wynyard Hall Estate - Forestry/Agricultural. Poor access residents. Wynyard Park - Agricultural land, good access. Yarm Back Lane, West Stockton - Agricultural land, 400 KW / 11 KW Services. Very disruptive to residents. Poor road access. I have tried to be as objective as possible. try no to use agricultural land as far as possible be less disruptive to existing residents, i.e. looking into their property, food, road access, services that are existing may have to be moved. Brownfield sites should be used and not agricultural land as we are told that food will be at a premium in the future and reduce the travelling for workers to their place of work.

**1541816392**

Yarm Back Lane combines all the best features for the plan. It is only a natural extension to the town, it is as close as possible to centres of employment, schools, medical facilities and shopping, etc. it has excellent road links and as a result of the development a much needed widening and straightening of Yarm Back Lane could be achieved. Of most significance is the possibility for a complete range of housing types on this site from sheltered housing to executive with local convenience facilities and sports and leisure. Should the site be considered not in its entirety (the land east of Yarm Back Lane is a substantial area in its own right), it may be considered along with a smaller site eg South West Yarm, or part of Harrowgate Lane. In the main Harrowgate Lane is not suitable as it provides a much needed lung for mainly the Hardwick area, itself benefiting from a much needed regeneration which in time should go further and make use of the (hopefully), open spaces of Harrowgate Lane.

**1541855273**

I think public transport should be an important consideration when planning houses as is access to schools, shops and services.

**1541857202**

more affordable housing and rented accommodation is required

**1541868463**

Land at Urray Nook Sites 1 and 2 - Too many houses - traffic issues! Land at Durham Lane Industrial Estate - Too many. Land to the South of Preston Farm Industrial Estate, West Preston and Yarm Back Lane, West Stockton - Far too many. South West Yarm - Too many issues, re schools, traffic, green wedge. West Yarm - Same comments as in other "Yarm" areas. Please consider the wildlife corridor (Worsall - Kirklevington). Green wedge between Yarm and Kirklevington should be left as it is Kirklevington is a village - not a town!! Also concerns re traffic issues - A67 already very busy & there are the considerable parking issues in Yarm.

**1541903450**

Yarm has major traffic problems now to add more housing would only compound an existing problem.

**1541945832**

I firmly believe money should be found to develop brown field sites and to use, where necessary, very small in-fill sites as close as possible to existing town centres. The major need seems to be for affordable housing - but this itself is no good unless other aspects of living in a particular location are also affordable and accessible - particularly public transport and services such as health centres and shops. We should avoid at ALL costs pushing the boundaries of development still further into hitherto undeveloped countryside. If a large edge-of-town site is necessary, what about the land between Thornaby and the Teesside Park shopping complex, or in the triangle of land between the southern edge of Hartburn and the A66?

**1541951099**

The current traffic congestion at busy times around Hartburn & ANY time in & out of Yarm is appalling. Unless a Yarm by-pass figures in the equation, increasing this problem makes little sense as most commuters will be using A66 / A19 access bottlenecks.

**1542088810**

Wynyard currently experiences severe traffic problems at peak times. Additional housing will increase these problems. The existing roads cannot cope with additional traffic created by hundreds of new houses feeding onto the A689. Additional development should only occur where the existing infrastructure can cope with additional traffic and where there are all the amenities that would be required for such new housing.

**1542121567**

I have looked at the environmental report/s. They give eg Wynyard Park low marks as there is no bus service but SW Yarm gets high marks as there is a bus service. In my opinion no-one in their right mind would even think that SW Yarm residents would use a bus service (and of course bus services could be introduced if there was sufficient housing). In my opinion the whole assessment is flawed and should be redone by someone outside of SBC and outside of SBC's favoured consultants.

**1542472958**

I was very excited to read in the local gossip magazine about potential plans to develop a public swimming pool complex along side a country club/golf course development. A local leisure centre is something that is really lacking in Yarm. Then I read about the same site being developed for houses. I believe that this land would be put to better use developing a leisure facility than more houses. If the land is swallowed up by 100% residential use then the opportunity to develop local services will be gone. In addition, I think it is undesirable to allow urban sprawl when plenty of infill sites are available. I also have concerns about increased traffic demands in an area that is already heavily congested.

**1543017259**

Land to South of Preston Farm - This site is too close to Preston Park. This will impact on existing wildlife in the surrounding area. This land also may have archaeological interest with early Anglo Saxon settlements sited within the area. This land along with West Preston also has a 600mm ST High Pressure Gas pipeline running through the middle, with no where to divert and a 30m safety zone either side of the pipe it would be waste of tax payers money to purchase land that would have a 60m strip of land that couldn't be effectively developed. The traffic problem would also be detrimental to the already congested Yarm Road.

**1543044238**

I would avoid building houses around Eaglescliffe for following reasons Roads to Yarm are already heavily congested; traffic delays are already longer than any other area in Teesside. Extra housing will geometrically increase this problem. Schools and services are already highly stretched in Eaglescliffe. The new factory on Durham Lane will make the situation worse. Yarm is one of the most picturesque and visited areas in Teesside. It would be a great shame to ruin the Yarm area with unnecessary housing development. Teesside

**1543065720**

I am making these comments not only on behalf of myself as a Yarm resident, but as secretary of Yarm Civic Society I have been tasked by the committee to object strongly to any further housing development in Yarm. As a society we believe that Yarm's infrastructure would struggle with even one of the identified developments. It would compromise the very unique and historic town that Yarm is as its roads and lack of parking could simply not cope with the increased amount of traffic.

**1543071624**

Billingham Bottoms - Ideal for roads infrastructure. Harrowgate Lane, West Stockton - Inadequate road infrastructure. Land at Ingleby Barwick - Good roads, modern town for schooling and access. Land at Urray Nook Sites 1 & 2 - Too far out. Land at Durham Lane Industrial Estate - Agree but may add to road congestion to Yarm. Land East of Wynyard Village - Good idea, close to A19. Land to the South of Preston Farm Industrial Estate - Would be ideal, as close to link roads (new). North West Billingham - Wouldn't affect anyone. West Preston - Too many new homes in this plan, bad for traffic. West Yarm - Small quantity should be ok. Wynyard Hall Estate & Wynyard Park - Ideal spot. Yarm Back Lane, West Stockton - Would cause too much traffic and would effect village life. The areas around Wynyard and South of Urray Nook sites would be ideal for more intense housing plans which could incorporate new road infrastructures, new schools within easy access as well as shops and medical establishments. Best to concentrate on 1 or 2 larger "townships" than burden/overload current inferior supported estates, and still maintaining - for those in villages - to be left to enjoy their village life as chosen.

**1543107346**

Have all brown field sites been considered?

**1543110524**

Do not believe any further housing is required in the Stockton area as there are currently many for sale which are not attracting any interest whatsoever. Current road structure would not support the quantity of housing suggested in this plan. Schools are not in place to adequately cover current housing so further development would increase the pressure on current facilities. There is talk of reducing hospital facilities north of Tees yet you are considering more housing which would put too great a load on the current bed capacity.

**1543115145**

I totally disagree with building council houses near Wynyard I think this land should be left unspoilt and left at nature land and not houses. Also I think it will deter people wanting to live in Wynyard village as it will take away from the exclusive feeling of buying a house there and also the secure feeling that goes with living there.

**1543137763**

The Yarm sites are one of the few place left in the borough that remotely looks rural and also links on to surrounding rural boroughs. Also there is the issue of the pylons if the sites are where I think they are.

**1543151070**

Yarm Back Lane would make traffic congestion horrific in an already "bottlenecked" area

**1543279543**

Housing should only be allowed on brownfield sites. There should be NO ALTERATIONS TO VILLAGE ENVELOPES PARTICULARLY MALTBY.



**1543299182**

Housing should only be allowed on brownfield sites. There should be NO EXTENSIONS TO VILLAGE ENVELOPES.

**1543361583**

If the total number of houses to be constructed are restricted to under 500 per area the required total can be achieved whilst also not overloading the roads schools etc in each area

**1543384989**

Sites where housing numbers are over 500 may make it difficult for existing residents in the immediate areas to accept. No more Ingelby Barwick type development please.

**1543385565**

Wynyard park is in the main commercial to build houses on the wynyard park estate would increase traffic to such a point that the A19 would become a car park.

**1543878535**

The changes in the general infrastructure that would be required eg road improvements would be too great for these sites - congestion is already an issue especially during peak times. Also the increase in capacity for the local schools which are already struggling with capacity and aging buildings would need to be addressed.

**1544410021**

We own a property which looks directly onto the open aspect categorised as 'South West Yarm 480'. We bought our home in November 2001 with knowledge of the covenant, and understood that this covenant would protect both the open aspect for which we paid a premium and our feeling of living in an exclusive, bespoke location. If we had any idea that this covenant might be dissolved to enable plans for a housing development, we would never have considered buying the property - especially at the price we paid. Not only would a housing development damage our views and potentially our privacy, it would certainly devalue our property and add unwanted congestion to the main road to the front of our property. The congestion issue would be further compounded by any development at the other two locations in Yarm.

**1544433433**

It is a designated green wedge between an industrial estate and residential housing. The congestion (which is already horrendous as peak times) would become a complete grid lock. The residents along Preston Lane who already have problems turning onto Yarm Road would find the whole process intolerable

**1544435972**

Development of these sites will damage the rural character of western stockton and would cause congestion on local road networks.

**1544438477**

Billingham Bottoms & North West Billingham - A19 cannot cope with its' traffic now at peak times. Land East of Wynyard Village & Wynyard Park - Traffic congestion. Wynyard Hall Estate - Lack of facilities and services. There is already traffic congestion around Wynyard area at peak times. Wynyard Village does not have the facilities or services for new housing. There is only one small shop, no bus service and a pub. Less facilities than some smaller villages have. I would be concerned regarding access to Wynyard Hall Estate site and the number of extra cars using the village roads.

**154443763**

Demand that strategic gaps and strategic wild life corridors as seen in the Tees Valley Structure Plan be maintained. South West Yarm & South East Yarm - (Kirklevington and Castleavington) There are 487 properties in the rural Parish. The development will destroy EN13. West Yarm - Part of Wild life Corridor ENV8 near ENV2 - Rural. Request a public notice of mis information!!!!!! Yarm South East and Yarm South West wrongly named and liable to cause confusion. A public notice should appear to ensure that people are not misguided. I refer to Kirklevington and Castleavington south of Green Lane. Protection of the limits to development EN13 (2008) were to be enhanced in future plans. The area is protected from development by ENV8 Strategic Wildlife Corridor and ENV15 Strategic Gap of the Tees Valley Structure Plan. Development will seriously damage farming and wildlife along the only continuous wildlife corridor in Stockton Borough. UNIQUE. Wynyard Wynyard was allowed to develop to provide jobs. Infrastructure was put in at the expense of utilities and rate payers for industry not to line the pockets of developers.

**1544453458**

Land at Ingleby Barwick - Ingleby is huge already & lacks facilities for existing residents. Land at Urray Nook Sites 1 & 2, Land at Durham Lane Industrial Estate, South East Yarm, South West Yarm and West Yarm - Yarm and routes into/out are already heavily congested with traffic. Any new housing can only make this worse!

Selective Housing Development on Land South of Preston Farm Industrial Estate. Under the current Government's agenda, housing provision is not just about housing numbers, albeit that providing sufficient houses in a timely fashion in order to address the serious gap between housing need and supply remains a fundamental objective. As important, is the need for development, whether housing, commercial or industrial, to contribute to economic recovery, a consideration of major significance within Tees Valley as a whole and Stockton Borough in particular. In reviewing land with housing potential, the Council should not only be aiming to identify sites capable of providing the additional houses required to close the gap caused by the poor house-building performance that has resulted from the economic downturn of recent years, but also be looking to diversify the housing offer, in particular investigating opportunities to provide for a style of housing that may not currently be represented in the major developments that have characterised the offer in the recent past. In addition, given what has been perhaps a disproportionate concentration in the recent past of housing development at Ingleby Barwick in particular, new sites should widen the distribution more towards Stockton, both to add to choice and to bolster the catchment of the struggling Stockton Town Centre. New housing sites are needed, unless increasing numbers of households are to be deprived of the opportunity of living in decent homes. However, sites that are allocated to create the much-needed accommodation should serve a number of purposes in addition to adding to housing stock numbers. They must make sense in terms of urban structure and functionality, urban design and amenity, and contribute to the sustainability of urban areas. New releases must also allow for imaginative responses to changing needs and to aspirations for a different form of housing provision. Housing provision tends to be dominated by the large scale development of fairly standard units. This is inevitable in the pursuit of volume provision to cater for increasing demand. To broaden the choice available to households, a variety of locations should be promoted offering opportunities for families to realise their particular aspirations, different in character from the houses on offer from the volume builders. In particular, sites should be identified which offer the chance for those who would prefer to live in somewhat more individual and distinct locations offering a high degree of amenity and a chance to stamp their own character on the houses provided. Such sites would have considerable value in terms of the local economy because it is just such sites to which entrepreneurs and industry leaders are likely to aspire. Although Wynyard has successfully provided a means of satisfying such aspirations, there is an unfortunate lack of sites throughout the Borough within which individual expression can be exercised. While it is expected that Wynyard will continue to perform its dominant role in catering for a particular element of the executive housing market, there is merit in broadening the distribution somewhat by providing alternative bespoke sites in quality locations. Land at Preston Farm between Preston Lane and the southern edge of Preston Farm Industrial Estate has particular potential in terms of high status housing provision in Stockton. Accepting the important value of this land in terms of the green wedge, it is considered that an element of quality housing could be permitted on part of the land without harm to the role and integrity of the wedge. Although the consultation document highlights the whole of this part of the green wedge for discussion, it is suggested that housing development across the whole area would not be desirable but that an allocation could be made adjacent to and west of the present Preston Farm complex. The scale of development would be dictated by the nature of the use made of the green wedge. If its use for agricultural purposes continues, then a site allowing for in the order 12-15 dwellings laid out and designed to reflect the feel of a rural hamlet already created by existing development based around the original farmhouse and outbuildings would be appropriate. Given its position within the urban area, agricultural operations in the green wedge are becoming increasingly difficult. If there was a willingness to permit the development of a larger number of houses, then this should be capable of generating sufficient income to fund the creation of a country park available to the wider public but still performing the essential function of the green wedge. A balance can be achieved between innovative new housing and open space, so as to create a bespoke housing complex complementary to an accessible public amenity. The review of the Core Strategy in relation to housing provision is timely, given the scale of the developing housing shortage. In due course it is hoped that the Spatial Strategy underpinning the Core Strategy will be re-assessed. The Spatial Strategy makes little reference to the need to provide new sites for housing development outside the central regeneration and redevelopment areas. Although there are existing housing allocations and planning permissions for housing elsewhere in the Borough, the focus of attention on some of the more run down parts of the borough, admittedly in an attempt to facilitate their improvement, neglects to identify that within the structure of the urban area are other areas in which select development on a modest scale could be encouraged. Such areas have the potential to benefit economic growth by providing quality housing of a type that is recognised to have a link with economic growth and development. The Spatial Strategy should be widened to include reference to the acceptability of sites outside the core area, which offer the prospect of innovative high quality modern housing. Such sites could include for a modest amount of development in particular green wedges where housing development could be permitted, sufficient in size to fund complementary country park or parkland treatment to the balance of the wedge, this to be dedicated for public and community use. Such an approach would open up public access to green wedges on the basis of limited development that would neither compromise the integrity of the green wedge nor its function in maintaining separation between settlements. Land at Preston Farm would present such an opportunity. Without a broader perspective on housing supply, the Borough is going to struggle to keep pace with the increasing demand for housing because so much new development is currently proposed in areas notoriously difficult to redevelop. In addition the context or setting of such sites will prejudice their appeal for households who have considerably higher aspirations for housing. The review suggests that the Council recognises that it must take a fresh look at the potential of controlled release of greenfield sites, and this should involve a re-appraisal of the role of green wedges.

**1544458321**

South West Yarm and South East Yarm - Road infrastructure cannot cope, keep green belt area. West Yarm - Road to Yarm not suitable. Yarm centre to congested.

**1544468308**

Yarm gets greatly congested by all the traffic passing through, it would be ludicrous to subject this area to more traffic.

**1544470880**

Traffic congestion entering Yarm is already at an unbearable level therefore any further housing in any area close to Yarm will only add to this.

**1544473548**

Yarm Back Lane, West Stockton - The road could not cope with excess traffic.

**1544477786**

Billingham Bottoms & Land at Ingleby Barwick - Ideal for Housing. Land to the South of Preston Farm Industrial Estate & West Preston - We need a green belt between Stockton & Eaglescliffe. We need to protect open spaces between towns/conurbations to protect the identity of areas. Building near Preston Farm would mean Stockton & Yarm were joined which would be criminal to both identities. Ingleby & Billingham are existing robust conurbations.

**1544481762**

South West Yarm and South East Yarm Kirklevington - Building here will breach the strategic gap between Yarm and Kirklevington. Stockton Council must respect the strategic gap between Yarm and Kirklevington. This must not be breached.

**1544487677**

South West Yarm and South East Yarm - This is Kirklevington - Building here will breach the strategic gap between Yarm and Kirklevington. It is imperative to protect the strategic gap between Yarm & Kirklevington in order to avoid urban sprawl and protect villages. Small communities work!!

**1544492451**

The large number of properties designated for Harrowgate Lane (2470) Yarm Back Lane (3120) & West Preston (4150) i.e. approx 9,800 is a concern due to the lack of local facilities and poor transport links. This should be protected as green belt.

**1544546354**

The road around the North west Billingham site near St Pauls and Northfield school is already heavily congested I suggest someone visits the area when the schools are finishing for the day to see the amount of traffic, if more houses are built this would obviously increase traffic and buses etc

**1544561476**

Areas such as Ingleby Barwick are already huge with very few community facilities. If you are considering a large site again I would prefer to see individual shops, an attempt to build a community, not a big supermarket and some takeaways. Housing is about community, row upon squashed row of houses doesn't make a community. I don't know the demographic of people who will need this new housing but surely places like Yarm, Ingleby, Urray Nook will need to be affordable, as would any site in Wynyard. Any development must have community facilities, and building on or right next to an industrial park or estate doesn't seem fair to the people you want to live there.

**1544634675**

Resultant increased traffic through Yarm would be intolerable.

**1544870206**

AS AT 1ST APRIL 2011 THERE WAS 2157 EMPTY PROPERTIES IN THE BOROUGH OF STOCKTON. THIS CLEARLY DEMONSTRATES WE DO NOT REQUIRE ADDITIONAL HOUSING. ALSO THERE IS ENOUGH BROWNFIELD SITES AVAILABLE TO MEET ANY PERCEIVED DEMAND AND ANY HOUSING SHOULD BE BUILT THERE. NO FURTHER GREENFIELD SITES SHOULD BE DEVELOPED. IF STOCKTON ALLOWS THIS THE SAME WILL HAPPEN TO HOUSING AREAS AS HAS BEEN ALLOWED TO HAPPEN IN STOCKTON HIGH STREET, WHICH HAS BECOME AN EYESORE AND IS RECOGNISED NATIONALLY IN THE BOTTOM 10 FOR PERCENTAGE OF SHOPS OCCUPIED. ONLY INSTEAD OF SHOPS EMPTY BLIGHTING AN AREA MORE HOUSING WILL BE STOOD EMPTY AND DERELICT. THE FACT THAT THERE WAS 2157 EMPTY HOMES IN STOCKTON AS AT 1ST APRIL 2011 SHOWS NO MORE HOUSING IS REQUIRED.

**1544907244**

None of the above sites impacts directly on Redmarshall Parish Boundaries

**1545011173**

Any development in the vicinity of Yarm will need a huge investment on infrastructure. There is only a single carriageway bridge into Yarm, creating enormous problems at various times of the day

**1545058933**

I wish to contest the building of large quantities of houses on a single site. I believe it to be detrimental to ecosystems, communities and the general infrastructure of the area. The area around Yarm Back Lane, for example, is one I am more familiar with: it is home to wild birds, stoats, foxes, rabbits and hedgehogs - just to name a few. Properties backing onto the field enjoy a fabulous view of greenery and gently rolling countryside. A large development would destroy this and potentially devalue properties which have already taken enough of a hit in recent years. Yarm Back Lane itself already has a tendency to become quite congested during peak times. An additional 3000+ homes would only exacerbate the problem.

**1545739687**

Traffic will always be an issue when development arises. The impact upon our small village and central Yarm is my greatest concern. The use of green sites is abhorrent to me as many villages seem to be converging with larger developments i.e. Ingleby Barwick. A more environmentally friendly alternative would be to use a brown site. Elton's traffic situation has already increased and rush hour periods are extremely hazardous when trying to exit at the roundabout. Any development increasing traffic flow near Elton and traversing into Yarm would be ludicrous judging by the amount of congestion that already exists. Most roads were not built to sustain the large increase of traffic resulting from any large development of housing sites. In my opinion traffic should be taken away from Yarm, Elton and the surrounding roads rather than increased. There are not enough major roads to cope with the mammoth increase in traffic. I am also concerned about the pollution levels and the increase in noise caused by an influx of yet more vehicles.

**1545743979**

congestion in and around yarm district is already a massive issue, not just for myself and my family but for all residents. We have lived here for all of 20 years and this problem has been on the increase for most of them. Looking at the plan of possible sites for new houses in my opinion is not only crazy but very inconsiderate to the people in and around yarm

**1545746134**

No village extensions

**1545769673**

The land at Ingleby Barwick is green wedge and provides the gap between Ingleby Barwick and the industrial estate.

**1545772575**

South West & South East Yarm - Extension of limits to development infringe into strategic gap. The proposed allocation of land at South West Yarm and South East Yarm, which should in fact be called Kirklevington and Castl eleveland. Goes against more than 30 years of planning policy. The proposed land will encroach into the Strategic Gap between Yarm and Kirklevington. It will encroach and damage the last Wild life Corridor south of the Tees. Recognised as such in the Tees Valley Structure Plan. It will threaten the livelihood of the last remaining farm directly associated with Kirklevington. The loss of the farm will continue to change the character of the village. The area between Kirklevington and Yarm is threaded with public footpaths. The footpaths are extensively used by the residents of South Yarm and Kirklevington and is an important leisure facility. Yarm School Sports Field will be lost. I assume the field will be relocated further into the Strategic Gap further damaging the separation between Yarm and Kirklevington. The Wild Life Corridor is an important habitat for deer, buzzards and even otter and is an important source of enjoyment for Kirklevington residents. It stretches from the Tees at Worsall to West Gill where it joins the Leven Valley.

**1545778178**

Volume of traffic - congestion over the bridge in Yarm due to so many cars - we are all on septic tanks in this area.

**1545782460**

Land East of Wynyard Village, Wynyard Hall Estate & Wynyard Park - Traffic flows onto A19 during school term time is already unacceptable. The proposed number of houses are far too many and will create chaos traffic conditions during rush hour traffic on A19 from Tees flyover to A689 and beyond.

**1545787389**

Land to the South of Preston Farm Industrial Estate & West Preston - Traffic already too heavy on Yarm Road.

**1545790409**

50% more agricultural land required. Do not use this for housing.

**1545793090**

We've lived in this house for 28 years with a lovely open view over the fields. We understood this area was greenbelt area.

**1545831250**

Please - try to utilise brown field sites wherever possible. We need all the green space we can get.

**1545834587**

Brownfield sites should be used up first - the longer they are left, the more costly it will be to deal with them later and the longer we will have to endure these eyesores. Greenfield sites should only be taken when all brownfield sites have been used up. Britain is almost a nation of fresh food importers - we need to be able to produce as much of our own food as possible which will also help to reduce our country's deficit. Furthermore, the greenfield sites consume a lot of carbon dioxide and help to reduce the amount of greenhouse gas - and we need to keep on doing so to help preserve our planet. Yarm Back Lane site is also habitat to species of newt, shrews, water voles, sparrowhawks and hares through to foxes and deer - these should be protected not evicted.

**1545871609**

The road structure south of yarm is already manic at times adding extra housing will make it worse

**1545886010**

The best sites for development would be the finishing off of the Surbiton Road wedge up to the back road, Wynard estate and Harrowgate Lane

**1545899982**

There is a real problem with the volume of traffic coming through hilton this would only increase, also the thoroughfare through yarm will be worse than it already is and there is definately a problem already and a danger to pedestrians especially children at school times.

**1546025726**

The areas around Yarm, Eaglescliffe and Ingleby Barwick are in areas where the schools are heavily oversubscribed, and would put even more pressure on a getting a school place. Those places also already have too many houses in the area. I strongly think outer Stockton/Wynyard areas are better.

**1546051863**

yarm back lane and haowgate lane is already a problem area for traffic, where as preston farm ind est and wynyard already have a very good infrastructure with regards to the road system secondly, i bought a house in hartburn, one of the main reasons for this was for the open space and view, including the wildlife such as the deer, to lose this would be unacceptable, as this would lead to a negative impact on my and my famalies life

**1546264124**

Main concern is increased traffic. Especially Yarm/Eaglescliffe areas.

**1546415622**

There is a significantly larger number of houses south of the A66 than to the north. There are only a small number of houses allocated to Billingham. Brownfield sites such as the North Shore, Portrack Lane and former Hills Door Factory, Norton Road should also be identified. These brownfield sites should not be disregarded on the grounds of the extra cost involved with decontamination. This could be shared between developers and public bodies. If additional greenfield land is made available for housing it will be very difficult to persuade developers to build on brownfield sites. The South of Preston Farm is within the Green Wedge. Sites for limited numbers of houses, particularly low cost, should be identified in the villages within the Borough. Many of the sites will require major upgrading of the highway network and other infrastructure and some will worsen existing traffic problems e.g. the Yarm High Street bottleneck.

**1546432286**

A lot of these areas Ingleby Barwick in particular already overcrowded, need infastucture to support such developments.

**1546557684**

Smaller numbers make it easier for new residents to be absorbed into local communities and are less likely to overload local services/roads/schools/hospitals etc.

**1546959726**

I agree that the loss of public investment required to redevelop Council sites identified means the Council can no longer rely on these sites to provide the new housing required. The proposed principle of flexibility is supported. I agree that the allocation of new housing should be on a combination of sites. I support the Council's assessment that it is reasonable to assume that some of the sites identified within the conurbation would provide the most sustainable options for development. I believe that the housing numbers mentioned are greatly underestimated. The 20% extra top up should be strengthened, perhaps even quantified as an extra amount using the Council's base line figures. More attention should be taken from the National Planning Policy framework where the "golden thread" (The Government's own words) of a presumption in favour of sustainable development. I believe that the Ingleby Barwick site is the best site for development for the following reasons:- 1. This site is the only one which is "fill in." the other sites take in land on the periphery. 2. There is an excellent road system around the site which is second to none. 3. There is already a good bus service to the Teesside Industrial Estate. 4. This site is relatively close to Thornaby's newly regenerated Town Centre. 5. This site was in the original plan conceived for the building of houses on Ingleby Barwick in a number of villages. This site was designated "Village 3" and was later deleted from the scheme. The reasoning being that sufficient housing were already being built, which is not now the case. 6. There will be much less objection to this site than others and much less impact on the immediate surroundings.

**1546965633**

The pressure of traffic and parking on Yarm is already too great. We were promised the development would never go beyond green lane due to this. Ingleby Barwick has already expanded too much to be a viable place to live.

**1546972747**

Are there going to be houses suitable for people who have acquired disability i.e. neurological and need sheltered facilities?

**1546978066**

Totally disagree with buildings on green field sites. Traffic congestion on Harrogate Lane and road across to Yarm is already dreadful at busy times. My understanding from reading about the housing situation is that there is enough brownfield land nationally to build three million new houses without using an acre of countryside. Locally I feel with these plans that there is grave danger of totally losing small villages and seeing them absorbed into the outskirts of Stockton. These villages are enjoyed not just by the people who have chosen to live in a village but by people from the wider area. Many of whom enjoy walking their dog, riding a bike or just enjoying a stroll in the countryside.

**1546985155**

This was kept very quiet, only by chance did I hear about this. Very disappointing.

**1546985567**

I must congratulate S.B.C. on their Planning for Housing Core Strategy Review, excellently prepared. However as can be common with such documents, it appears to have been prepared by a person or persons with a constrained remit, leading to in my opinion to a somewhat blinkered outlook and decisions which could be regarded as irresponsible when looking beyond the boundaries of the local authority. The document considers the opening up of land, between 2021 and 2028 for the possible construction of up to 2800 housing units, a laudable intention, but people need food in their mouths as well as a roof over their heads. From my knowledge of the area, the majority of the land being considered for housing development is or was agricultural land, which if utilised for housing cannot but reduce the food output of this area. We all know that the U.K. is a small densely populated country with an increasing population that has been, since around the time of the industrial revolution heavily dependant on food imports. It is accepted that globally, we are looking at a 50% increase in population inside the next 40 years with a 100% increase in food demand as the requirements and demand from the third world countries increases with their development. If you ask any housewife about food prices, whilst the availability is there, prices are spiraling for both home grown and imported food, a situation that the average family can only afford to continue for a finite time. It is becoming more and more important for this and future generations that the maximum utilisation is made of arable land and that home food production is optimised. The permanent removal of some of this land, when other options are available, cannot be construed in my opinion as other than a shortsighted and irresponsible decision. As one of Stockton's senior citizens, it is possible that I may not be around to witness the implementation of any decisions regarding this review, but I owe it to my children and to future generations to ensure my feelings are made plain to the decision makers and to do my best, if necessary beyond local level to ensure that an absolute minimum of productive land is lost. You may have realised from this statement that I am vehemently against, wherever alternatives are possible, any possible food productive land being allocated for housing or other development.



**1546997462**

Comment 1. Harrowgate Lane, West Stockton - Ideal site with good quality existing infrastructure and access to schools. Within walking distance of local facilities and linked with existing residential areas.

Comment 2. Land at Urlay Nook, site 1 - Site is likely to require work to improve links to existing infrastructure. Poor sustainability and further from local amenities than Urlay Nook site 2.

Comment 3. Land at Urlay Nook, site 2 - Site has better access to existing infrastructure than Urlay Nook site 1.

Comment 4. Land at Durham Lane Industrial Estate - Concerns re heavy industry to North of site and light industry to South of site, poor access to facilities and impact on traffic through to Yarm. Also imminent planning application to increase number of homes at Allen's West from 500 to 1000 would have a further cumulative impact on traffic and schools.

Comment 5. Land to the South of Preston Farm Industrial Estate - Concern re loss of green wedge and increased traffic through Yarm and Eaglescliffe.

Comment 6. South West Yarm, South East Yarm and West Yarm - Concerns re impact on traffic through Yarm and Eaglescliffe.

Comment 7. West Preston - Site is a long way from existing facilities. No sustainability, massive impact on traffic on Durham Lane, existing infrastructure could not cope.

Comment 8. Yarm Back Lane, West Stockton - Requires alternative provision for medium distance traffic, existing peak time traffic congestion at junction with Darlington Back Lane.

Comment 9. The Council think that it would be better to use one large site for all of the new houses, however, in agreeing with Harrowgate Lane it is appreciated that there would be a need for one large site and another or part of another, smaller site to make up the numbers required.

**1547005508**

Ideally and from a cost effective viewpoint it would seem preferable - to me - to build new housing developments adjacent to existing "newish" housing developments where existing facilities/amenities hopefully already exist and/or may be further developed to meet the increased demand of the additional housing/population.

**1547011713**

Access from Wynyard /A1 via A689 to A19 is already difficult at times. Any further development without another A19 junction would be very restricting for all A689 users.

**1547015257**

Land at Ingleby Barwick - Plenty of schools and already building there. Yarm Back Lane, West Stockton - Schools full and too much congestion on roads.

**1547016135**

I would like to express my concern over the proposed houses for North West Billingham. Living in the area there is a large amount of traffic already using the area which is only going to increase with more homes. School intake within the area are at an all time high new homes would also increase children having an impact on school.

**1547018648**

Land at Ingleby Barwick - Still building on grounds still plenty of greenspace. Why don't you remove unsightly council estates like you have on Swainby Road and re-develop them to give people better housing and clear up these areas.

**1547022122**

There would need to be a much improved transport service for most of these sites. What about the former Hills site on Norton Road

**1547022447**

The last time plans were for Yarm Back Lane the main access was to be via Symons Close, and as I live close to the site an increase of a great amount of traffic is not in the best interest of the cul de sac for the limited amount of traffic and peace and quiet, therefore I am against the development of such a large scale.

**1547029445**

Harrowgate Lane, West Stockton - natural extension - existing facilities. Land at Urray Nook - Sites 1 & 2 - Overload of Yarm area. Land at Durham Lane Industrial Estate - Remote from facilities and unsustainable. Land to the South of Preston Farm Industrial Estate - Loss of separation from Stockton. Loss of wildlife corridor. South East Yarm - Already has planning permission for golf course! West Preston - Poor access to adjacent residential areas. Wynyard Hall Estate & Wynyard Park - Attractive woodland/wildlife/woodland scarce in Cleveland. Yarm Back Lane, West Stockton - Adjacent to existing housing and so large it would attract shopping and schools in its own right.

## 1547060102

### General Observations.

The identification of additional land for new housing should not only be concerned with satisfying the need to make good the shortfall in housing numbers anticipated in the next 15 years or so. For many years, much of the housing for sale in Stockton-on-Tees Borough has been dominated by the single source of supply at Ingleby Barwick. There has, admittedly, been new housing built on redevelopment and market renewal sites, but in terms of adding to the overall housing stock, the main contribution has been from outside the town of Stockton. This has not only allowed the concentration of available housing land into the hands of a very limited number of developers, who have been able to control the release of the land to the market, but has also distorted housing markets and inhibited choice due to the general non-availability of alternative locations elsewhere in the Borough, particularly within Stockton.

A further down-side has been the limited positive impact of new housing on the economy of Stockton Town Centre. With the focus of provision mainly in the south-east of the Borough, there has been little incentive for new households to use Stockton High Street as their preferred shopping destination, the majority choosing to head towards Middlesbrough and Tees Valley Retail Park or outside Tees Valley to Darlington, Northallerton and Stokesley. The catchment of Stockton Town Centre has been poorly served by new development with the consequence that footfall along the High Street has fallen and the prosperity and viability of the Centre declined, to the point where over 27% of shops in the High Street are now vacant.

This needs to be given serious consideration in any decision over the future location of new housing development. There should be a positive move to allocate sites from which households may be more disposed to spend in Stockton Town Centre as the most accessible retail centre. This suggests that, perhaps with the exception of the very specific provision of executive housing at Wynyard, new housing should be favoured around and within Stockton itself so that the centre of gravity of housing provision moves more towards Stockton, and offers the prospect of increased spending in the High Street to the benefit of the Centre as a whole.

Selective demolition of certain areas of older, small, unpopular terraced houses close to the Centre and their replacement with contemporary homes was intended both to address housing market failure in parts of central Stockton, and also to help towards remedying the commercial decline of the Town Centre. This emphasis on the redevelopment of poor quality brownfield sites in unpopular locations has proved costly and, even where redevelopment has gone ahead, it has been at lower densities than the housing demolished, leading to a reduction in stock levels in the neighbourhoods involved. In addition, redevelopment schemes have generally not been populated by households with income levels sufficiently high to prompt improved retail performance in the High Street, even assuming a significant proportion of such households consider Stockton Town Centre to be their destination of choice for retail purchases. The need to give a vital stimulus to the Town Centre will not be achieved without attracting the spending power of higher income households, which are unlikely to be located on sites on the Town Centre fringe.

Recent regeneration initiatives have tended to stress the relationship between the economic prospects of a Region and the quality of available housing. One of the arguments for the poorer economic performance of Tees Valley is the dominance of extensive areas of unattractive, small terraced houses and large, monotonous estates of local authority housing which create a poor impression of the area. Although as indicated above, a number of initiatives have been promoted to try to remedy the impact of the worst of such housing on the image of the area, the fact remains that for the foreseeable future there will continue to be considerable concentrations of such housing, which will conceivably arrest potential economic growth.

To counter the effect that such housing has on the image of the area, the Council needs to allocate sites that have a genuine prospect of being developed for quality housing that will attract key players in developing industries to occupy homes in Stockton rather than commute in from more distant rural locations in North Yorkshire and South Durham. While the consultation report alludes to a shortage of housing in the later part of the Core Strategy period, more land should be brought forward for much earlier release so that its impact on the Town Centre economy and the delivery of houses will be more immediately felt. There is an urgency to the economic decline that suggests that more immediate action is needed than awaiting a future release of land.

### Potential Changes to Strategy for Providing Future Housing.

It is evident that the current strategy for providing for housing in the future has stalled because many allocated sites involve costly regeneration which in the

current economic climate is less likely to be achieved, with the prospect of substantial public subsidy proving increasingly remote. In order to address the problem this poses for the housing supply pipeline, it is necessary to change policy to recognise that the deficiency in supply will only be made good if a more positive view is taken of the potential of greenfield sites to contribute not only to providing additional numbers of houses but also to creating stimulating housing environments in which vibrant mixed communities can evolve and thrive without undue detriment to the environment.

The Council should, therefore, concentrate on providing additional housing on a range of sites that collectively offer the opportunity to strengthen the catchment of Stockton Town Centre, enable innovation and variety in house type and design, and assimilate well with surrounding development and, where housing on the urban fringe is involved, merge sensitively with the countryside beyond. Provision on a single large site should be avoided because this will limit choice, at the very least in relation to location. Although offering the potential for a range of varied housing solutions, a single large allocation would tend to skew the market, dominating supply and preventing locational choice and variety. It would be unlikely to serve all the needs of the various housing sub-markets in the Borough.

#### The Merits of Land at Harrowgate Lane.

Within the above context, land at Harrowgate Lane has much to commend it as a logical urban extension. In order to avoid an over-concentration of supply in a single location, however, the site should be limited to a core of land between the Mitre Public House and Letch Lane, this to be released in two phases, the first between the Mitre and Bishopsgarth School, and the second between Bishopsgarth School and Letch Lane. In the near term, the western edge of development need not extend to the pylon line suggested on the plan associated with the consultation document, an existing hedge presenting a feasible western limit and offering a basis for peripheral planting to screen and integrate the site with surrounding countryside, creating an attractive urban edge. However, land up to the pylons is readily developable and deliverable after stage one is completed.

Within the limit suggested above, the land west of Harrowgate Lane is on a scale that will allow a mix of housing to be provided, to meet the demands of a range of potential households in contemporary, well-designed and environmentally-friendly homes. When the prospects of new sites for housing are being considered, there is often concern that Greenfield locations will prove more attractive to investment and divert development energies and resources away from regeneration initiatives being promoted in less favoured parts of the urban area. The land at Harrowgate Lane should be seen as a complement to the work being undertaken in central Stockton, offering the prospect of housing that is unlikely to compete directly with that being provided in the regeneration areas. This will particularly be the case in relation to housing redevelopment progressing within the Hardwick housing estate to the north and east of the site, where former local authority-owned properties are being replaced with modern homes of a type and within a price range unlikely to be provided at Harrowgate Lane.

Development west of Harrowgate Lane represents a highly sustainable option, readily accessible from a number of directions, on foot, by car and using public transport, being situated on a principal distributor road, close to the local (and national) footpath and cycleway network and served by regular and frequent bus services. Penetration throughout the urban area is easily achieved from this location.

Although the location is accessible by the range of transport modes, many shopping, educational and recreational needs can be met locally with the presence of shops, schools, public houses and clubs in the vicinity, thus reducing the need for trips to more distant centres to meet daily requirements. Agricultural land at Harrowgate Lane is classified as Grade 3.3 and has been in continuous arable use. There will, therefore, be no loss of high-grade farmland or land of high environmental quality as a result of housing development. This site should be allocated for immediate development in order that its potential contribution to additional housing numbers and to the economy of the failing Town Centre are maximised.

#### SITE BY SITE ASSESSMENT

##### Billingham Bottoms

It is difficult to accept that this site is sustainably-located to nearby housing areas, being isolated by significant watercourses. In terms of urban structure and as an urban extension, the site has little to recommend it. Although the consultation report argues that there are services and facilities within walking distance, they are still at some distance from the site, which may be a disincentive to residents to use them in preference to more distant centres accessible by car.

##### Land at Ingleby Barwick.

While there may be factors in favour of developing this site, there should be concern over its inclusion because to do so will help perpetuate the imbalance in new housing provision between the south east of the Borough and particularly with the need for more housing in Stockton. Although adjacent to existing Ingleby Barwick housing, direct access to services and facilities within the existing estate will not be easy to achieve, necessitating circuitous trips on principal highways in order to satisfy essential daily needs. Development here will do little to aid High Street revitalisation.

#### Land at Uray Nook 1/Land at Uray Nook 2

Both sites would be unsuitable urban extensions, in real terms being at some distance from the true urban area. There is limited access to public transport and most trips will be by car, even with a number of elements such as the schools and shops scoring well on the sustainability assessment. It is inappropriate that this land should be suggested for early development when there are major perceived highway network implications that are unlikely to be resolved by planning network implications. The site is not large enough to generate capital to resolve the highways issues. There is little prospect that households in these locations will choose Stockton Town Centre as their destination of choice for shopping. The site would be better left for industrial purposes rather than as a more remote extension to the urban area.

#### Land at Durham Lane Industrial Estate.

Although it is within the limits to development, the site is sandwiched between two significant industrial areas, and is some way away from services. The site is not 'sustainable' in that it would require the duplication of existing infrastructure or long journeys to the existing facilities. The site is isolated and could possibly suffer from a lack of community identity. The site will be affected by capacity constraints at the Elton Interchange on the A66 which requires major improvement the costs of which are unlikely to be resolved by funding that could be generated by housing development through planning obligations.

#### Wynyard Hall Estate/Land East of Wynyard Village.

In order to improve the sustainability of the settlement to the south of the A689, there is logic in permitting high quality additional housing development that will generate funding to allow the provision of a wider range of community facilities at Wynyard and thereby reduce the number of trips to and from the village.

#### Land South of Preston Farm Industrial Estate.

There must be concerns over the release of this green wedge for housing purposes unless there is potential for speciality housing that will benefit from the setting and the work that has already been carried out at Preston Farm itself. A small number of high quality houses would add to choice in the Borough whilst preserving the identity of the separate communities.

#### North West Billingham.

Proximity to the A19 must be a concern in relation to creating a positive housing experience for residents in which traffic noise and pollution did not dominate. It also does not seem to relate particularly well to the structure of the wider Billingham town, being somewhat out on a limb and not readily accessible by public transport.

#### West Yarm/South West Yarm/South East Yarm.

It is difficult to conceive of these sites being allocated for future housing development given the daily chaotic state of the north and south approaches to Yarm Town Centre. The current traffic congestion cannot be other than made worse by the additional traffic that would be occasioned by further housing development. Given the difficulty of getting through the town, households are likely to be put off from heading towards Stockton to shop, preferring to aim towards Middlesbrough as a more convenient alternative.

#### West Preston.

Development in this location would be difficult without major improvements to the Elton Interchange. The site is remote Eaglescliffe and Stockton and therefore from services and facilities, is not well-served by public transport, and would be an over-concentration of housing in one location. The function of this extensive stretch of countryside should remain as a strategic gap between the two settlements.

Wynyard Park.

The focus of housing development at Wynyard should in the main continue to be the area to the south of the A689. The area should remain available predominantly for quality business development.

Yarm Back Lane

The land at Yarm Back Lane would be generally suitable for residential development, and part could contribute to the series of housing sites suggested above as the means to provide for a more balanced distribution of housing land. In the context of this distribution, however, and in a similar way to the sites at Harrowgate Lane, it would not be appropriate to allocate all the land indicated on the consultation document plan. To avoid the over-concentration of development on any one site, the western limit should be Yarm Back Lane itself. Although suitable for development as a modest urban extension, the site is not as ideally situated as Harrowgate Lane Land. Access to the site would inevitably be via Yarm Back Lane, which is used as something of a western 'ring road' to the Town and already experiences high volumes of traffic between the A66 Trunk Road and Darlington Back Lane. Both these junctions are subject to congestion and queuing vehicles, circumstances which are unlikely to be resolved without considerable investment in new highway infrastructure, the funding for which is unlikely to be generated from housing development. Due to its role as a ring road, vehicle speeds tend to be high along Yarm Back Lane, despite its sinuous nature. Considerable works will be required to limit traffic speeds to a point at which they will be compatible with safe and easy access to and from a substantial residential development. Whilst the site is contiguous with existing housing at the western edge of the Town, there is little opportunity to provide for inter-connectivity between the existing estates and the services and facilities they accommodate and new development on the Yarm Back Lane site. As a result, lengthy journeys would be necessary via Yarm Back Lane and Darlington Back Lane in the north and Darlington Road in the south in order for households to satisfy daily needs. Although there is a frequent bus route along Surbiton Road in the estate to the east of the site, it is difficult to gain access to this service without a significant detour.

#### **1547066973**

In an environment where Government at all levels is trying to discourage car use and has a preference for people to use public transport, it is not supportive of this concept to put more housing in places where it will be difficult for operators to provide public transport economically. Therefore increased congestion on feeder and distributor roads is an absolute certainty. Is this what you really want?

#### **1547078867**

I think rather than spreading Stockton's borders towards the outer villages, we should spread the villages (and hopefully their prosperity!) towards Stockton. People still see Norton as a very distinct village in Stockton, perhaps some opinion from Norton residents would be useful in working out how best to integrate Yarm, Wynyard and the western parishes into Stockton. They definitely need it as these are seen as areas for the rich only, this segregation based on wealth needs to end. Integration of social classes, ethnicities and age groups (which is often forgotten) is my number 1 consideration.

#### **1547112274**

West Yarm, South West Yarm, South East Yarm and Ingle Barwick Should not be built on as the roads in that area (in particular Low Lane) can't sensibly take more traffic. Ingleby Barwick is still growing and the roads are already chaotic at times.

#### **1547172945**

Harrowgate Lane, West Stockton & Yarm Back Lane, West Stockton - Natural Extension of Stockton. Land at Ingleby Barwick - Already too big. South West Yarm, South East Yarm and West Yarm - Need to maintain the gap between Yarm and Kirklevington. It is essential that the strategic gap between Yarm and Kirklevington is maintained. Erosion of the green belt, with its adverse affect on the wildlife corridor, must not be allowed to happen. There is already too much commuter traffic on Forest Lane, Kirklevington.

**1547185906**

Yarm is unable to cope with the existing traffic and efforts to remedy the problem have failed to permit additional housing in the area would therefore appear ill-concieved. Large sites would allow the council to ensure that the required infrastructure to support such a development is put in place as part of any planning application compared to the potential smaller developments are limited and would be inadequate. Large developments would allow the council to provide a mixture of affordable housing and higher priced housing and have more flexibility in ensuring any developments are sustainable and reduce the environmental impact. The council does not need to allow the maximum number of houses on a site therefore allowing a balance between sustainability and the environment to be achieved. Including South East Yarm may jeopardise the golf course/leisure centre development which has planning permission!

**1547210562**

Wynyard Park - new hospital will need local housing. I purchased my house on the sole reason of it overlooking a green belt area, bearing in mind the approved Teesside Structure Plan which "precludes residential development in West Stockton extending beyond the limits of the overhead power lines". Apart from devaluation of my/our property, I am sure this would have an impact on my health. Residents are being harassed yet again, despite the land being clearly marked as a green wedge in the County Structure Plan.

**1547227553**

Land should be chosen close to good open road access i.e. to A66 and A19 and in the case of South East and South Yarm the problems of traffic chaos getting through Yarm and tortuous Leven Bank and narrow road towards Talls Trees (where you have already over 100 dwellings agreed). The plus of West Stockton is the good road access plus access to railway at Allens West and Eaglescliffe, it is a big enough site to generate its own shopping precinct, community centre etc. Any development of the South East and South West Yarm sites will take away Yarm School Playing Fields, be either side of the Prison, effects the attractive Judges Hotel environment and presumably prevent the planned golf course and allocated communal sporting facilities.

**1547496074**

Yarm roads struggle to cope with the existing number of motorists. Even the smallest site ie West Yarm could provide upwards of 660 more cars. Yarm runs the risk of gridlock especially at peak times.

**1547562704**

As an owner of adjacent land to the Yarm Back Lane site I strongly disagree with the use of this greenfield land for residential development. The highways at and adjacent to Yarm Back Lane already struggle to cope with the current amount of traffic and queing on these highways is experienced regularly; therefore there is not the infrastructure to accomodate a residential development of any size. The residential areas of Hartburn/Fairfield is probably recognised as one of the best residential areas in Stockton to live and the fact my property backs on to greenfield land was a significant reason for me to move to this area of Stockton some seven years ago. As a resident I don't believe that an increase in residential properties in our area would bring any further benefits, especially when there are many other areas of Stockton that would benefit (Hardwick/Harrowgate Lane site) from a new residential development. The site of Yarm Back Lane is on the western greenfield fringe of the borough and I feel that the Council should not be looking to develop further west when there are already other sites (Land South of Preston Farm, Land at Ingleby Barwick, Land at Durham Lane, Billingham Bottoms and Wynyard) within the established boundaries of Stockton, which certainly need improving/regenerating.

**1548027143**

Building at Yarm Back Lane would be madness if the traffic infrastructure is not significantly upgraded to cope. Today, the junctions at both the A66 and Darlington Back Lane are choked at peak times and adding so many houses to this without making Yarm Back Lane a dual carriageway, and significantly upgrading the junction at both ends (e.g. turning the T-junction at Darlington Back Lane into a roundabout or adding peak-time traffic lights) would be foolish indeed. Also the area would need serving with an additional bus route and proper (preferably segregated, since this is new build) cycle lanes are required. Also, steps would need to be taken to prevent the flooding of the beck which passes under Surbiton Road. This has only just been sorted out and adding lots of houses and roads is likely to prevent surface runoff from going into the ground, and into the beck instead. In addition, such a building project would significantly alter the character of the area. We moved to Surbiton Road mainly for the view from the back of our house out over the fields and this would be lost by new building.

**1548171558**

are plans for new schools included in the potential new housing sites? Space for schools is desperately needed especially around Yarm and Ingleby do not swallow up all the land with houses. if houses are to be built inside village boundaries they should be for first time buyers and families to attract new life into villages. also it would be good for the developers to have to include play areas/parks on these sites to attract young people/families.

**1548218396**

smaller size developments provides greater choice of where to live.

**1548279641**

Dear Sir / madam, I have genuine concerns regarding the proposed development of the land at South West Yarm (480 houses). Please find below some information that I believe to be both relevant and significant towards any Stockton Borough Council decision on the strategic development potential of this land and its suitability for the construction of 480 houses as detailed within the Core Strategy Review. I am the owner of the property 2 Field View Mews, Green Lane, Yarm TS15 9EH which is one of four properties surrounding a Mews location directly bordering the land identified for the construction of 480 houses, along the North edge. All four properties are in a unique situation enjoying extensive south facing views across the countryside separating Kirklevington and Yarm. Indeed, in 2010 I have personally invested close to a six figure sum in my property to create a third story with Juliet balcony in order to capitalise and enjoy fully this rare outlook. When I purchased the property in December 2001, I was advised through my solicitor that this area of land is; 1)A Greenfield site outside of the Limits for Permitted Development 2)Subject to a legally binding covenant preventing development for a period of approx. 90 years 3)Part of the strategic belt of land separating the villages of Yarm and Kirklevington On this basis, I originally purchased and have subsequently developed my property in good faith, with a belief that Stockton Borough Council would honour any legally binding covenants and limits for permitted development associated with this land. As I am sure that you will recognise, development of this land to construct 480 houses as detailed within the Core Strategy Review for Planning for Housing will have a devastating impact on both the quality of life and property value that my family and I have worked tremendously hard over the years to attain. It is on this basis that I wish to make it abundantly clear that I vehemently oppose plans to develop this land for housing in order to retain its current status as the greenfield strategic belt between Kirklevington and Yarm. I would also like to inform you that I will be seeking legal advice on the matter and would be most grateful if you could contact me to advise on milestones and next steps in the process so that my case will be fully understood and recognised by all necessary parties. Yours Faithfully,  
Marek Pawlak



**1548322395**

Stockton-on-Tees Borough Council Core Strategy Review Development Plan Document: Issues and Options (June 2011). Response by Mr John Mason, 18A Braeside, Kirklevington Although the on-line questionnaire has been completed on Mr Mason's behalf, the following comments are directly in response to the questions raised in the Core Strategy Review draft. A paper submission of this note has been deposited at Gloucester House, incorporating a plan showing the location of the land proposed for housing development at Braeside, Kirklevington.

Question 1 - Do you agree that the Council can no longer rely on sites in the Core Area for new housing development between 2013 and 2028?

It is clear from proposed changes to national planning policy that the Government considers there to be a need for more houses to be provided, more quickly and in a more diverse range of locations. By the Council's own admission, the strategy contained in its Core Strategy has not proved to be sufficiently flexible to respond to changing circumstances, particularly, at this time, the prolonged economic downturn, and is thus serving the Borough's population poorly in relation to the supply of new homes. The Core Strategy review is welcomed as an opportunity to change the approach to housing provision, to allow for more creative solutions to the slow pace of housing provision in both urban and rural locations. In addition, the review will allow the Council to take account of the emerging Government commitment to ensuring that there is a suitable choice of locations for housing and to securing increased competition in the housing land market by making provision for an additional 20% of anticipated capacity, so that no one site dominates housing supply. Not only are the identified Core Area sites in the Core Strategy unable in the short term to provide the housing numbers originally anticipated, but they are also incapable of providing for the 20% additional allowance expected by the Government. It is inevitable that alternatives will need to be found unless the delivery of new homes is to be allowed to slip further.

Question 3 - Which of the following options for the distribution of new housing sites do you agree with?

- a) Concentrate new housing on a single large site with sufficient capacity to close the gap in the future supply of new homes independently
- b) Allocate new housing on a combination of sites

The option of concentrating development essentially into a single major site should be avoided. Doing so would re-create the situation that has arisen from development at Ingleby Barwick, the unfortunate locational imbalance that has for so long harmed the prosperity of Stockton. A range of sites offers flexibility, locational choice and the opportunity better to manage housing growth without the potential brake on development that could be exercised by a single site in a single ownership. Future housing provision should be on the basis of a combination of sites in both urban and rural locations.

Question 4 - Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

- a - All Villages
- b - Only the most sustainable villages
- c - No village extensions

Although it is accepted that the majority of provision will be made by a change in policy that promotes the release of a selection of medium-sized sites, preferably on greenfield sites on the edge of Stockton, there should be more scope for new housing in rural areas, especially in and around principal villages. Stockton Council's review of villages according to their 'sustainability' focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption was that trips by car to service centres outside villages where services may be absent was a 'bad thing' in terms of the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted. This has tended to reflect a limited perception of the role of the villages within the Borough. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties to particular rural communities. Such households have found access to housing in villages difficult because much of the housing stock has been bought by more affluent 'incomers', with house prices, over time, inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'. By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue

to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage. This can be achieved by allowing housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing. Such an approach is foreshadowed in the Government's draft National Planning Policy Framework which suggests that councils should be minded to provide for market housing in rural areas when this is part of development which includes a significant amount of affordable housing to meet the needs of local people. As part of a revised Core Strategy, the Council should therefore identify sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes. One such site, approximately 1 hectare in area, is available in Kirklevington, to the north of 18A Braeside This would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside.

**1548660099**

I strongly disagree with village extensions and ask for no development

**1548663465**

All reclaimed sites with the borough

**1548708027**

Infrastructure and services must be readily available. This is not the case in many instances, particularly for the sites south of Yarm.

**1548724618**

We still need green fields around. Building in smaller lots makes much more sense. Some places mentioned are already too big so spreading the total is better.

**1548724765**

I feel that there should be no substantial housing development that would impact on the already difficult traffic situation in Yarm. I am particularly in favour of using brown field sites

**1548728380**

Yarm High street is already congested every day. The High Street and other roads in/out of Yarm (near to the Shell roundabout) will not be able to withstand the extra traffic that will be caused by building on these sites around Yarm and there would be gridlock around these areas in peak traffic time, therefore these sites are not suitable.

**1548729177**

I strongly object to green field sites being used ahead of brown field sites. Any planning for housing must be mindful of the impact on animal and plant life

**1548731610**

It is a well known fact that Yarm High Street traffic is extremely slow and congested at most times of the day and especially at peak traffic times. Building on the sites around Yarm will only exacerbate this problem and cause a similar problem at the Shell roundabout, nr Kirklevington grange prison which will cause major problems for the residents. New houses were built at Kirklevington, near the Crown Pub a few years ago. A lot of these still appear to be empty as have for sale signs and 'to let' signs up most of the time, probably because they were built so close to the road (one house has already had a car driven into it!). If these are empty why is there a need to build more in the Yarm area?

**1548805203**

The above is a green wedge which maintains the distinction between countryside and built up areas. Ingleby Barwick is already almost joined with all surrounding towns and this site would just add to it.

**1548837882**

Any sites in or around the Yarm/Eaglescliffe area must not be considered without significant improvements to the local road network. Traffic congestion at peak times in these areas is amongst the worst in the Borough, yet little money has been spent in trying to alleviate this. In fact no new roads have been built in this area other than estate roads in the 25 years I've lived in the Borough. This is not just causing problems in Yarm High Street, but throughout the area. There is no telling where people moving into properties in the area will want to travel, so it doesn't just affect the roads in the immediate vicinity of any new development, but the whole locality. If the population grows, so will the traffic problems. There is little work in Yarm, other than retail on the High Street, so most people travel elsewhere to work. There is a good bus service to Stockton, but of course it's also affected by the congestion and is extremely slow at peak times. If you want to be anywhere else, the bus service is not good.

**1549199050**

Wynyard area is a green field site and additional housing would have a strongly negative environmental impact. 7. If more homes were built at Wynyard, what types of house should there be? Please tick as many options as you like below. - Not applicable, we do not want additional housing at Wynyard.

**1549247897**

Identity of villages must be maintained

**1549304332**

As an overall concern, traffic management and the demand on schools are key issues. With regard to the West of Stockton, the primary schools in the area are very well populated and there is little chance of increasing capacity on many if the existing school sites. It would be interesting to know if an assessment has been made of houses for sale in the areas to determine how many there are and how quickly they are being sold. By creating smaller housing "estates" this would seem to enable easier integration with the existing community and would have much less impact than allocating only 1 or 2 sites to accommodate the maximum number of houses being considered in one area. Lessons have to be learnt from the impact large housing developments in the Borough have had in terms of environment, traffic congestion and education - in particular the issues whereby developers do not have to make available as part of the development, sites for necessary new school provision schools when the cost of obtaining the land and subsequent building costs including associated highways issues fall to the Local Authority. With regard to the Yarm Back Lane West Stockton site - the main road is currently a direct access to the A66 and is particularly utilised by the Emergency Services to access incidents on the A66 - to redirect this road as an access/estate road to houses would have a detrimental effect on the ability of these services to respond.

**1549323206**

I appreciate that I am unaware of decisions behind the scenes which may affect these proposals however, it is clear that the road infra-structure and some of the schools near and on many of these sites will struggle with the additional traffic created by the extra housing. Yarm, Yarm Back Lane, Durham Lane and Harrogate Lane are the ones that jump to mind immediately. Any development in or around Yarm must be a no-no because of the impact on Yarm. It cannot cope now. It seems eminently clear to me that the new road connecting Ingleby Barwick to Stockton, the A66 and A19 was built for a reason. A good wide road that could deal with additional housing in Ingleby Barwick and west and south Preston. The proposals for Yarm Back Lane and Harrogate Lane, as well as others, are going to destroy arable land and take away green field sites. The junctions at either end of Yarm Back Lane and Durham Lane are currently bottlenecks and as such will be worse unless radical improvements to the junctions are made. Anyway why are green field sites being used for development when so called brown field sites are available. Have you been to certain parts of the town centre around Buchanan Street behind the new Aldi Store? It is a disgrace. Successive Councils should be ashamed of themselves as this area is appalling. Little wonder that it was used to film a World War 2 story. Councils should be ashamed of the demise of Stockton Town Centre. Planners, over the years have systematically destroyed Stockton and Councillors, over the years, have allowed it to happen. Hang your heads in shame. Is it not possible to build on these sites putting population back into the Town Centre and to encourage the owners of the buildings in and around Stockton Town Centre to make any possible or existing residential property above their commercial premises habitable? I am of the opinion that housing and light industrial estates should, as far as possible, be kept separate. Whatever happened to the proposals to build housing on the old Hills Joinery site on Norton Road? There is a vast swathe of land located between Norton Road and the Ring Road and a new Academy is in the plans on the old Tilery Sports Centre Site. I don't see any proposals for building on the Swainby Road site which is slowly being pulled down. All in all there must be better solutions to many of the proposals. A rethink should be on the agenda.

**1549388509**

Please see representation.

**1549396037**

Please see representation

**1549398515**

3 sites close to Yarm would cause further traffic chaos in town bottleneck, particularly as these are close to school sites raising safety issues to children walking to school. Would also have further adverse effect on Leven Bridge traffic.

**1549444484**

I believe the site at Wynyard Park should be restricted to 250 dwellings unless another access is provided onto the A19. I fully appreciate that the Council must determine a strategy to identify suitable sites for development but would suggest that we do not take the option of extending the current urban boundaries but look for ambitious plans that will benefit our communities and offer opportunities for sustainable design and environmentally friendly beneficial construction. Firstly I must object most strongly to increasing urban sprawl by suggesting sites at Yarm Back Lane, West Preston, Harrogate Lane, South West Yarm, Land South of Preston Farm Industrial Estate and Ingleby Barwick. These sites provide natural corridors for rural wild life and ensure that strategic gaps are maintained between identified communities. The remaining sites identified on your consultation map would provide the numbers of dwellings required (2840). One area that has not been included is the site of North Tees Hospital, which when available in 2016, following the development of the new hospital at Wynyard, will I suggest provide another suitable site for minimum of 500 homes, unless this has been included in development plans up to 2021. If it was accepted that 1000 dwellings could be built at Wynyard Park it may be possible to finance the construction of a new interchange and link road onto the A19, which would benefit the new hospital proposal and further development to the South of the A689. If 'green field' sites are considered desirable can I suggest that rather than just extend the current 'urban boundaries' that we look to develop an 'Eco-Village'. A development that can benefit from sustainable design and ground source power generation as well as travel planning that will not impact so severely on existing traffic congestion on town centre link roads. I have in mind the area to the North of the A66 up to Darlington Back Lane, utilising the new over pass at Longnewton as the main access. A suitable 'new village' with mixed dwelling design and community provision would be an attractive proposition for developers and I would suggest environmentalists also.

**1549456387**

Building this amount of houses on what should be a greenbelt is not a good idea, too much traffic added to an already overloaded road and bringing Ingleby Barwick too close to Maltby.

**1549463923**

Land at Ingleby Barwick - Already largest urban housing estate in Europe. Land to the South of Preston Farm Industrial Estate - Green wedge. South West Yarm, South East Yarm, West Preston & West Yarm - Protection of Green Wedge.

**1549481382**

Land at Ingleby Barwick - Already a very large housing estate. The present southern boundary (green wedge) should be adhered to in order to limit urban sprawl. Land to the South of Preston Farm Industrial Estate - Prefer it to remain as a green wedge area. To extend the south eastern limit of Ingleby Barwick with a further 945 houses would destroy the semi-rural nature of Maltby which I would rather see retained.

**1549494818**

Building nearly 1000 homes at Ingleby Barwick, so near to Maltby would destroy the rural community environment.

**1549503348**

Building 945 houses this close to Maltby would be criminal, devaluing properties in Maltby, and would take away the rural community that has taken a life time to build. Roads already up to capacity.

**1549516999**

I particularly disagree with extensive development in Eaglescliffe area as I feel the current transport and service infrastructure would not support this amount of development

**1549541071**

Areas in which I disagree/ strongly disagree are in relation to my opinion that I feel that the local transport routes and service infrastructure do not support this level of development - access onto Durham lane in particular - also primary schools would struggle to support. Access to Yarm/A66 is already congested at peak times. The building of a new manufacturing building on Durham lane also needs consideration with regards to Durham lane congestion.

**1549666770**

I am very concerned about the possible building sites at West Yarm, South West Yarm and South East Yarm as the area at the present time is a bottle neck for traffic throughout the day and especially at rush hours times am, pm as well as lunchtime. Yarm is a dormitory town and people travel to work. The road network cannot cope at present and an additional 3000 plus houses which will add to the grid lock of the area at certain times. It is very likely that each house will have 2 cars and if teenagers or older children are choosing to live at home for university or work etc there could be 3 to 4 cars per household and the road system cannot cope. Already to turn right onto Green Lane towards Ingleby you can sit in traffic for 5 to 10 mins and you need to take a chance when you can. Yarm frequently has 40 min tail backs from all sides and the road towards Leven Bank is very dangerous already for residents to cross to the shops and to walk to Yarm. The road between Ingleby and Yarm towards the A19 is used as a cut through and vice versa towards Middlesbrough and any additional traffic will overload the system. Leven Bank since it has been made narrower is a definite safety risk as lorries and buses do not give way to traffic and there are many potential accidents. Can a single lane bridge cope with additional traffic? The available building plots must take into account the ability of the area to cope with a growing population in people and traffic and Yarm cannot. Parking in Yarm is not satisfactory and local people find it difficult to access the facilities with and without additional numbers wanting to use their local shops the congestion will only increase.

**1549837273**

I live at Wynyard and we do not receive a free local newspaper. I do not buy a local newspaper. My local parish council did a leaflet drop to inform Wynyard residents of these proposals. If this had not happened I suspect that many of the residents of the village would not be aware. I think you should be using urban extensions in the main - there needs to be a mix of town and country in the borough. However, I would like to see a mix - not all built on one site, and also importantly taking into account infrastructure and facilities in surrounding areas

**1550111159**

For any of these sites to be developed we MUST ensure that there are sustainable travel links, i.e. a means by which people can safely and easily access schools, shops and local services on foot, by cycle and by public transport. To ignore this is divisive, and environmental madness

**1550948339**

Schools are already struggling to cope in Eaglescliffe, hence the recent debate about where to build a new school. So - building a large number of houses in this area would make the existing problems much worse. A better solution would be to either build the new homes near schools with spare capacity, or opt for a site which can include a new school. Otherwise we are going to end up with lots of families with no school to go to - not very "joined up", and not very sustainable if people have to drive for miles to the nearest available school / doctor / dentist places.

**1553368675**

The schools in Eaglescliffe are very good currently. Building hundreds of new homes in the Eaglescliffe area would threaten the current status and effectiveness of these schools. Unless of course new schools were also built to accommodate potentially hundreds of new children requiring school places in the area once these homes are built.

**1553455555**

I think it is important to spread the housing around the borough. However, I think that land at Wynyard should be used to develop new, affordable and exciting developments rather than bolt-on's to original estates. I think this would also be an important part of establishing the area around the new hospital.

**1553604202**

My concern is over the erosion of the green wedge committed to as part of the development of Ingleby Barwick. If development were to happen then a guarantee would need to be sort that there would be no development on the Maltby side.

**1553625011**

Harrowgate Lane, West Stockton - Not able to take more traffic. West Preston - capable to take more traffic. Yarm Back Lane, West Stockton - Too much traffic already. Yarm Back Lane, West Stockton, would be unsuitable. The traffic using Yarm Back Lane at present is enough. It would not be able to take anymore housing traffic. Surbiton Road has more than enough traffic and, dangerous now, without that being used as an option. We need to be left some green area.

**1553647339**

Traffic through Yarm at peak times is already at saturation point. Building South of Yarm or north towards Stockton would only aggravate an existing problem.

**1553659293**

Land to the South of Preston Farm Industrial Estate & West Preston - The proposed building of houses at the above sites should not be considered because of 3 reasons: 1. There is a wildlife conservation at rear of Preston Farm plus a medieval village ruins! 2. There is a major mains gas pipe in field opposite Preston Farm. 3. The A1035 road is already congested and could not cope with any more traffic. The land at both sites are also green 'wedges' so why don't the Council use other non green sites.

**1553673570**

Land to the South of Preston Farm Industrial Estate & West Preston - Any development on the above two sites would have a huge impact on wildlife. At the moment this 'green' wedge is one of the few remaining havens for wildlife left in the Borough. Any development would also generate too much traffic on an already congested Yarm Road. A further problem for development on these sites is the high pressure gas pipeline running through them. I would urge the Council to use as many 'brown' fields as possible and leave the borough as green as it can.

**1553687887**

Land to the South of Preston Farm Industrial Estate - Too built up. West Preston - A66 junction is already busy. Yarm Back Lane, West Stockton - congested traffic.

**1553711355**

Billingham Bottoms - Too near A19 and Industry. Harrowgate Lane, West Stockton - Harrowgate Lane will not take more traffic. North West Billingham - Too close to A19. South West Yarm, South East Yarm & West Yarm - Roads in Yarm cannot cope with more traffic. West Preston - need to move N.G high tension pylons first. Yarm Back Lane, West Stockton - Yarm Back Lane not suitable for more traffic and pylons west of road. In respect of Yarm Back Lane, no objections to building to east of Yarm Back Lane, but Hartburn residents already having a lot of problems getting onto Elton Interchange as Yarm Back Lane has too much priority and more traffic will make this even worse.

**1553744883**

Yarm Back Lane, West Stockton - A traffic blackspot at busy periods already - would become intolerable with a housing estate.

**1553754384**

Harrowgate Lane, West Stockton - Traffic problems very busy road already. Land at Ingleby Barwick - would work well - lots of new houses there - possible tower status. Yarm Back Lane, West Stockton - Again very heavy traffic on this road queues already at peak times.

**1553786609**

Billingham Bottoms - Very near A19 easy to connect. Harrowgate Lane, West Stockton - Will need better road layout. Land at Ingleby Barwick - Roads too congested. Land at Urray Nook Site 1 - Good link to Darlington. Speed restrictions required. Land at Urray Nook Site 2 - Good link to Darlington. Land at Durham Lane Industrial Estate - Easy access to A66. Land East of Wynyard Village, North West Billingham, Wynyard Hall Estate and Wynyard Park - Not familiar with area. Land to the South of Preston Farm Industrial Estate - Good roads in this part near A66. South West Yarm - Save green areas wildlife. Yarm is too congested. South East Yarm - Save green belt and wildlife. Yarm - Green Lane congested now. West Preston - Area close to A66 road. West Yarm - Traffic congestion and congestion of Yarm likely. Yarm Back Lane, West Stockton - New road layout will be required. Too much farmland and nature areas are being disturbed or damaged by buildings on or near some areas. What will be left for the next generation to learn and understand nature at its most natural.

**1554727564**

Billingham Bottoms - Subject to possible flooding. Land East of Wynyard Village - Possible conflict with industrial growth. North West Billingham - The site at N.W. Billingham would be suitable for building but I believe there are potential problems arising from an inadequate infrastructure. The site is already beside housing and school development which have transport and communication problems. Public transport at present is poor and the feeder roads of Whitehouse Road and Thames Road are regularly congested. Wolviston Mill Lane was cut and closed to traffic many years ago because of the proximity of St Paul's School and the potential danger of traffic to the children. Other schemes to develop this field in the past have been turned down for similar reasons. It does form part of the Green Wedge in this area, now only a remnant of what used to be the Green Belt separating Billingham from Wolviston and I believe that even as a WEDGE it still performs the original function of curtailing urban overspill in this area. Wynyard Hall Estate - Would appear to be natural development of village.

**1554734781**

West Preston - ticked both Agree and Disagree Wynyard Hall Estate and Wynyard Park - Providing there is sufficient placed in local schools or a new school is built.

**1554761086**

Building on the larger sites will need a lot of infrastructure which the developers are reluctant to afford.

**1554764294**

Billingham Bottoms - Land would need raising, beck and flood plain issues? Land at Durham Lane Industrial Estate - Industrial Estate? Land East of Wynyard Village - Greenland encroachment. North West Billingham - Encroachment on Greenland between Billingham and Wolviston. South West Yarm and South West Yarm - Road infrastructure not good enough to support extra traffic. West Preston - No viable exit at east end of site for traffic also H.V power lines cross site. Yarm Back Lane, West Stockton - Yarm Back Lane need to be rerouted at North End to feed into revised roundabout to replace existing roundabout at junction Darlington Back Lane.

**1554810881**

We suggest that the minimal number of sites are used i.e. I/Barwick 1530, Wynyard Park, Wynyard Hall Estate. Already with services.

**1554815906**

South West Yarm - Golf course planning application submitted on part of this? As a resident of Yarm it is my believe that Yarm is already built up enough, the number of cars on the road at both rush hours already back this up. As houses have been built the water pressure has dropped as properties have been joined to the existing network. If you build in Yarm both the road and water network will need to be updated and improved.

**1554833426**

I live in Eaglescliffe and work in Yarm - the congestion travelling into Yarm is already ridiculous. Building more houses in the Yarm, Preston and Urray Nook areas will have an impact on the roads. This is already noticeable since the new housing estates in the Urray Nook area have been built. There would have to be some massive improvements to the roads to enable this already over-built area to cope.

**1554872796**

Harrowgate Lane, West Stockton - Open land. Land at Ingleby Barwick - Already building houses over here. Land at Urray Nook Sites 1 and 2 - Free - good road links and facilities. Land East of Wynyard Village, Wynyard Hall Estate and Wynyard Park - Affordable housing required on site. Land to the South of Preston Farm Industrial Estate - Spacious. North West Billingham - Good road network. South West Yarm and South East Yarm - Good facilities and road network. West Preston - Another Ingleby Barwick? Yarm Back Lane, West Stockton - 1. Road network issues 2. Traffic congestion 3. Greenbelt Issues. 1. No details on building on outlying villages, norton or thornaby. 2. Possible new sites = old "Hills" land (off Norton Road) and old ICI offices at Billingham! and old Airfield estate, Thornaby also on the land that was the Tilery Sports Centre.

**1554900789**

South West Yarm and South East Yarm - Traffic through Yarm is terrible already - this would only make the problem worse.

**1554978195**

These all seem to be greenfield sites not owned by the council, the excuse of brownfield sites being too expensive to use needs better justification, this is an appalling waste of land.

**1555839307**

I think where possible boundaries like roads or river or rail should be observed or keep development to brownfield sites. At Yarm the transport links form boundaries and the suggested development sites would be the thin end of the wedge. The same applies to the Harrowgate Lane site in Stockton. On the other hand, the sites in Wynyard cluster along the road and so would have good transport links.



**1556165439**

CONSULTATION ON FUTURE HOUSING IN THE BILLINGHAM AREA DEVELOPMENT OF LAND IN NORTH WEST BILLINGHAM IMPACT ON INFRASTRUCTURE IN THE AREA Any development on this land would have major impact on the area, not least the infrastructure, ie Too much traffic for area/roads to cope with. Impact on Wynyard Road, Thames Road, Whitehouse Road, including all of Wolviston Court Estate and Warkworth Road. Wolviston Village would also be badly affected, with the likely scenario of an access road through the village. Surrounding roads in the area could not cope with the consequences of such a development. An existing example being Junction Road. Whilst initially application may be for 100 houses it would not stop there. The likely scenario is that once planning permission had been granted, a precedent would be set and a year or so later another application for a further 100 houses would be made and once again this would be passed until over a period of a few more years the probability of this turning into a possible 500 or more houses would be a likely reality. This would cause major problems in the area, as highlighted above. Another problem would be the impact on schools in the area. 500 houses equals 500 families! GREEN BELT LAND This is Green Belt land. A major impact on the area should any development take place is erosion of Green Belt land. In itself this is a good enough reason why development of this nature should not take place. (See Green Belt Issues under 'Campaign to Protect Rural England'). Briefly this is a campaign for strong government commitment to uphold existing policy and carry out urgent review of the latest threats to the green belt . . .

Brownfield sites: Develop brownfield sites before development of Green Belt areas. There are plenty of brownfield sites in the area, ie in and around the old ICI, Port Clarence etc. where development could take place before any consideration is given to building on Green Belt land.

HEALTH ISSUES It has already been proved that, because of the close proximity of the A19 and the noise and pollution that the traffic generates, health issues for some residents are already a major concern. This factor should not be overlooked when making any decisions re location. Re Development of Land in North West Billingham: Impact on Infrastructure in the Area Any development on this land would have major impact on the area, not least the infrastructure, ie Too much traffic for area/roads to cope with Impact on Wynyard Road, Thames Road, Whitehouse H Road, including all of Wolviston Court Estate and Warkworth Road. Wolviston Village would also be badly affected, with the likely scenario of an access road through the village. Surrounding roads in the area could not cope with the consequences of such a development, an existing example being Junction Road. Whilst initially application may be for 100 houses it would not stop there. The likely scenario is that once planning permission had been granted, a precedent would be set and a year or so later another application for a further 100 houses would be made and once again this would be passed until over a period of a few years the probability of this number turning into a possible 500 or so houses would be a likely reality. This would cause major problems in the area, as highlighted above. Another problem would be the impact on schools in the area. 500 houses equals 500 families! HEALTH ISSUES It has already been proved that, because of the close proximity of the A19 and the noise and pollution that the traffic generates, health issues for some residents living near to it, are already a major concern. The above site would be situated in close proximity to the A19. This factor should not be overlooked when making any decision re location. GREEN BELT LAND This is Green Belt Land. A major impact on the area should any development take place is erosion of Green Belt land. IN ITSELF THIS IS A GOOD ENOUGH REASON WHY DEVELOPMENT OF THIS NATURE SHOULD NOT TAKE PLACE. (See Green Belt Issues under 'Campaign to Protect Rural England') Briefly, this is a "campaign for strong government commitment to uphold existing policy and carry out urgent review of the latest threats to the green belt . . . " CONCLUSION: Brownfield sites: Develop brownfield sites before development of Green Belt areas. There are plenty of brownfield sites in an around the Stockton area, ie the old ICI area, Port Clarence etc. where development could take place before any consideration is given to building on Green Belt land.

**1556378553**

Our immediate concern is to protect the existing green belts & try to keep a limit to the already heavy traffic generated by the existing residents & the three schools in the area. Whitehouse Road is the main access road to Wolviston Road & town centre & is already experiences heavy traffic at certain times. We do not want a Norton/Junction Road situation here.

**1556380623**

I THINK INGLEBY BARWICK IS ALREADY OVER DEVELOPED AND MORE HOUSING WILL CAUSE EVEN MORE TRAFFIC PROBLEMS

**1556516500**

(1) Highways implications (2) environmental implications of noise from the A19. (3) very poor public transport links..

**1556950897**

Land at Urlay Nook Sites 1 and 2 - far too much traffic for roads. South West Yarm and South East Yarm -Kirklevington - This is green belt and it is not Yarm, far too many houses proposed compared to Wynyard. West Yarm - Greenbelt farm land. You should use land previously used for industry. Please do not use green belt land between Yarm and Kirklevington. Traffic around Yarm and roads are terrible both sides of Yarm. We have had so many houses built at Ingleby. You need to look at a new area where you are able to plan suitable roads. You could expand Ingleby and Wynyard where you are able to plan roads. We need car parks and leisure for Yarm NOT MORE HOUSES. 5. VILLAGES The Council's policy is that new houses should only be built in the villages with the most facilities and services, and none of the villages should be allowed to get any bigger by building on surrounding land. We want to see if people still agree with us. There is more information about planning for villages in the full 'Planning for Housing' document - you will be doing that by building Yarm/Kirklevington.

**1556970899**

I am currently strongly interested in buying a new home on Surbiton Road, adjacent to Yarm Back Lane. A major reason for choosing this house is the quiet location and the garden backing onto farmland. If a housing estate was built here and overlooked the garden, I would no longer wish to purchase the house and feel the property value would be vastly reduced.

**1556996372**

As Ingleby Barwick has proven, large estates need to be built where there is plenty of road access and public transport links. Yarm and Eaglescliffe cannot take away further development of land! also access to shops, schools etc need to be planned before houses are built!

**1557002886**

1. Greenfield sites should not be used while brownfield sites are available, whatever the difficulties. 2. The Yarm, Greenfield sites are also inappropriate because of the adverse affect they would have on already bad traffic hold-ups in the Spittal, High Street, Yarm Road and Urlay Nook Road, and on parking problems in Yarm.

**1557077289**

West Preston - Good communications. Does not unduly affect existing development. For many years, since Teesside Survey & Plan, this area has favoured compact urban development. This is preferable to encroaching on the countryside on the boundaries of existing developments.

**1557087280**

Having just moved back to the area after 25 years. I would have huge concerns but the effect that those proposed new homes on the edge of already heavily populated areas - access, infrastructure, drainage, facilities. I have noted the number of houses that are for sale/let. I feel that, careful thought needs to be put into this process. I don't feel that I can really comment on some of the other areas as I have at this time no real knowledge of the areas. Stockton has changed so much in the 25 years I have lived away some for the better some definitely not.

**1557100001**

Billingham Bottoms - Marshy! Harrowgate Lane, West Stockton - School, inc, in traffic. Land at Ingleby Barwick - Already too big. Land at Urlay Nook Site 1 - Polluted? Land at Urlay Nook Site 2 - Polluted. Land to the South of Preston Farm Industrial Estate - More erosion of greenbelt. West Preston - No to urban sprawl. West Yarm - More traffic? Wynyard Hall Estate - No or few existing services, e.g. bus. Yarm Back Lane, West Stockton - Poor access - already a high volume of traffic.

**1557111618**

Billingham Bottoms - Easy access to A19. Harrowgate Lane, West Stockton - Require good access roads for A66/ A19. South West Yarm and South East Yarm - Yarm is a bottle neck and further development should be avoided until an additional bridge across the Tees is provided. Yarm Back Lane, West Stockton - As for Harrowgate Lane site. Public Services - power/water etc readily available. A 'large site' for new homes will require its own infrastructure - schools, medical facilities, playing fields, roads, etc, and so avoid the mistakes of Ingleby Barwick. Using a number of small sites will give rise to possible overcrowding of existing facilities thus requiring comprehensive studies prior to planning permission being awarded. The most important question facing the authorities is long term unemployment prospects for residents already in the region. The answers will dictate both the type and number of new houses which will be required.

**1557204455**

I will object to Yarm Back Lane as my house backs onto the beck which will probably be used for surface water drainage putting my house at risk of flooding. I am also concerned that additional traffic will add to the traffic problems at each end of Yarm Back Lane at peak times.

**1557221123**

South West Yarm and South East Yarm - Disagree due to additional traffic and over population of existing housing, plus additional planning already agreed.

**1557232128**

Land East of Wynyard Village, Wynyard Hall Estate, Wynyard Park - We pay private fees to live here and average house is Â£600,000 pounds we do not want development and will use every means possible to stop it! As above, we pay Â£350 per year site fees, Â£250 council tax per month and alot of other taxes. We do not want this development. Land should be sold to Wynyard.

**1557251974**

North West Billingham - Most strongly oboject this. I live on Thames Road and with three schools in the area the traffic problem is horrendous at school times. We are literally prisoners in our own home due to the fact that we cannot drive out onto the road as no one will give way. I feel that more houses on the site proposed would only make this situation more unbearable. I really think that some consideration should be given to residents in this area.

**1557271860**

South West Yarm, South East Yarm and West Yarm - Already serious congestion in Yarm.

**1557282566**

The reason I strongly disagree is that we already have far too much traffic up and down Thames Road due to the two schools on Thames Road and also on Clifton Avenue. We continually have cars parked outside of our houses causing obstructions. I have already complained to the local police officer and enforcemen section. We already have accidents waiting to happen. More housing would make the situation far worse.

**1557294501**

Land at Urlay Nook Sites 1 and 2 - Already bad congestion. South West Yarm and South East Yarm - Yarm too congested as is. Queues, no parking. Green belt should be preserved. West Preston - Great site, lots of services, near to two main roads. West Yarm - Would have dramatic negative effect on own house, noise aesthetics. Yarm Back Lane, West Stockton - Great access to services, A66.

**1557308812**

Yarm Back Lane, West Stockton - Inadequate highway infrastructure. Present highway design on Yarm Back Lane is inadequate to cope with existing requirement. To incorporate change for a significant housing development would be too costly and possibly a burden on tax payer (also further community services may be required, e.g. shops, schools, etc). Greenfield development is not the way to go when brownfield sites are available.

**1557323629**

Billingham Bottoms - Small development - shouldn't cause too many problems/impacts. Land East of Wynyard Village - Small development, lessen impact on surrounding area. North West Billingham - Engulfing of Wolviston Village, traffic concerns and green belt. West Preston - Size of development. Greenfield site? Wynyard Park - volume of traffic on A19, A689 from 1000 more homes! Yarm Back Lane, West Stockton - Traffic concerns. Too big a development. Greenfield site? Avoid building on greenfield sites, and try to use up as much brownfield sites as possible, within and on the edge of towns. Allow small developments/ No expansion of villages - infill within villages of maybe up to 10 dwellings - must be in keeping with village surroundings. Small developments at Wynyard, as will lessen impact on environment and quality of life - perhaps more homes for elderly - bungalows, flats, Nursing homes etc, could be encouraged.

**1558266492**

Billingham Bottoms - Small development - few impacts or problems. Harrowgate Lane, West Stockton - Greenfield sites. Land at Ingleby Barwick - Housing Developments for elderly - growing elderly population. Land East of Wynyard Village - Could link Wynyard to rest of Teesside - engulf Wolviston village even more. Land to the South of Preston Farm Industrial Estate - Size of development may cause problems. North West Billingham - Small development - shouldn't cause to many impacts, i.e. traffic etc. South West Yarm and South East Yarm - Greenfield site. West Preston - Traffic concerns. Greenfield site mainly. West Yarm - Small development. Wynyard Hall Estate - Small development - build bungalows etc - moremix of house types. Wynyard Park - Same as above - starter homes. Yarm Back Lane, West Stockton - Size of development. Green field site. Traffic concerns. Urban Sprawl. Sites at Wynyard and Ingleby Barwick - - Maybe wise to build some bungalows to cater for ever growing elderly population - both of these housing estates mainly cater for families, 2/3 storey houses, which arent really suitable for elderly couples. - Also houses for young people/starter homes could be built at Wynyard. This would give a much needed mix of housing types for different age groups and incomes. Brownfield sites should be used up, before then moving onto Greenfield areas, in an attempt to reduce urban sprawl. - Another possible site could be land inbetween Hartburn and A66 - just north of your suggested site at "West Preston".

**1558290907**

Do you think it would be better if all the new houses were built on one big site, or should we choose a number of smaller ones to add up to the total we need? Please tick the most relevant box below. - Depends on site and borough infrastructure, roads etc. Land at Urray Nook Sites 1 and 2 - Requires significant improvement to Long Newton Lane. South West Yarm and South East Yarm - Yarm Bridge is a bottle neck!

**1558301357**

Land at Ingleby Barwick - Ingleby Infrastructure is already inadequate and cannot accomodate this development. Land at Urray Nook Sites 1 and 2 - Too close to airport flightpath and chemical works. South West Yarm - The impact of a Tall Trees development (approved already) will seriously agrivate infrastructure now. South East Yarm - This area was approved for a golf course and should not be changed. West Yarm - Yarm Infrastructure cannot accomodate this development without a western by-pass. Yarm and it's surrounding district is presently one of the North East's notorious bottle necks and without a western by pass, purely and simply cannot accomodate present developments. To consider these future ones as feasible is futile without major infrastructure investment. Additionally the proposed developments at Durham Lane Ind Est, South Preston Farm and West Preston will also adversely effect the district of Yarm, hence my disagreement.

**1558316588**

Do you think it would be better if all the new houses were built on one big site, or should we choose a number of smaller ones to add up to the total we need? Please tick the most relevant box below. - mainly. Billingham Bottoms - Local comments might disagree /or agree!! Harrowgate Lane, West Stockton - see notes. Land at Ingleby Barwick, Land at Urray Nook Sites 1 and 2 & Land at Durham Lane Industrial Estate - Highways network! Land East of Wynyard Village and Land to the South of Preston Farm Industrial Estate - Gap between Wynyard and Wolviston needs protecting. North West Billingham - Too close to Wynyard - needs gap maintaining. South West Yarm, South East Yarm, West Preston and West Yarm - 1) Highways overload. 2) Strategic gap between Yarm and Kirklevington. 3) Wildlife corridor. 4) Viability of farms. 5) relocation of sports grounds - using further green field. Wynyard Hall Estate - Keep executive - do not mix or further develop. Wynyard Park - Possible mixed - see notes. Yarm Back Lane, West Stockton - see notes on Wynyard. Notes Land at Yarm Back Lane has been talked about for a number of years but only the east side (nearer to present built environment). According to your map, which does not show roads very well, the proposed development land goes across the road to the east as well, this might be a step too far! Land at Harrogate Lane - around school could make up numbers to the amount required - adding to the revitalisation of Stockton. Should villages be allowed to get bigger by building houses on undeveloped land inside the village? - Only small infil - odd houses but character of village, e.g. large gardens need protecting.

**1558451220**

Stockton Town Centre will continue to decline if fewer people actually live in the town. I disagree with the emphasis on developing green field sites when there are so many available and well positioned in the main Stockton centre area. The area along the riverbank could provide good homes and upmarket condos. The UK needs greenfields to support agriculture, which is a great need, reduces dependance on imports and is much more environmentally friendly.

**1559128296**

North West Billingham. Stockton Council seems to be hell bent on building right up to all boundaries in Billingham and having allowed recent building on smaller pockets of green open space is creating an unhealthy and undesirable housing jungle. Billingham would struggle to cope, its roads and its schools would be bulging at the seams. If this development goes ahead there will be very little Green Belt between Billingham and Wolviston village, how long before the council sees fit to join the two together? Thus spoiling the environment for both communities. The proposed site is Green Belt land and should remain as such. The A19 :- Traffic on this road has greatly increased over the years, building so close to the noise and pollution it produces would be detrimental to the quality of life for residents. Billingham Bottoms:- Is not the land at Billingham Bottoms prone to flooding? making it impractical to build there. Insurance companies can be very picky about giving cover on properties in such locations. Stockton has plenty of land outside of Billingham which would cause less of an impact on existing communities and should be considered first.

**1561280647**

Core Strategy Development Plan Document Review â€” Page 19 North West Billingham 100 Site Description: Site is a 5 Hectare wedge shaped area of farm land lying to the north of Sandy Lane West. It forms the southern end of an area which extends as far north as the A689. It is bounded to the west by the A19 Bye-pass and Wolviston Mill Lane to the east. Beyond the lane are a junior and a senior school on Thames Road which is a continuation of Sandy Lane West eastwards. In the north east corner of this total area which is 7.5 times larger than the currently proposed 5 hectares lies Wolviston Village. A narrow single carriage-way road runs past Wolviston Duck Pond west towards Wynyard Hall and divides the greater area approximately in half just to the north of the proposed development. It would be extremely naïve of the reader not to expect this development to grow northwards at the discretion of the property developers, until prevented by the physical obstacles of the A689 and Wolviston Village. The roundabout on the A689 is already in place to meet the needs of this development. At present, it only provides access to the services area on the north side of the road, adjacent to the A19. There are two roads which serve the north west corner of Billingham, commonly referred to as Wolviston Court Estate. These were built in the 1950â€™s and intended to serve the access requirements for the estate as initially designed. Over the decades new areas of development have sprung up in the general area and the volume of traffic using Whitehouse Road and Thames Road has increased beyond all reasonable expectation. If this proposed 5 hectare development is allowed to go ahead and there is no reason to believe that it wonâ€™t, then the access road from the A689 roundabout to the north, will have to be the first stage in the development. Any attempt to enter that field from Thames Road/ Sandy Lane West will have to be totally opposed. If this development is allowed to proceed by accessing it from the southern end, the contractors will make no effort whatsoever to build a road through the whole area to connect to the A689 roundabout. All heavy construction plant will have to be taken into the site from this end as the bridge on the back road to the A177 is not strong enough to carry any weight. What is the location of the Gas, Water and Electricity mains? Are these service providers going to come along one after the other to dig up our already overcrowded streets to lay in new mains? When they do, will they forward plan to meet the requirements of the next and subsequent fazes of this bonanza? Will the developers build a footpath for all of the parents to walk their children to the schools next door or will it be expected that they will drive the kids those few yards and add to the congestion which already prevails on Thames Road? There are far more disadvantages of having a new housing development added to the top end of Wolviston Court than there are advantages, unless as previously stated, the development is accessed from the A689.

**1561285284**

Harrowgate Lane, West Stockton - Greenfield Site. Land at Durham Lane Industrial Estate - Brownfield Site.

**1562628444**

If any of the above sites are on green belt then they should not be favoured before brown belt land

**1563619065**

The infrastructure at Yarm cannot expand for geographical reasons and cannot provide employment opportunities so any new housing so new would house be for commuters. I believe this to be an outdated strategy and a new developments should be based on a viable infrastructure with housing schools employment and other public facilities.

**1564890439**

Concerned about too much traffic. Wynyard Woods is not able to accomodate extra traffic. Environmental concerns (local wildlife- deer etc)

1564988255

The owners of Tithebarn Land have submitted a formal Comment on the Issues and Options with the reasoning formalised by Mr M. Mealing. I write to further emphasise various considerations, and in particular to again make the case for land along Harrowgate Lane. I have promoted the land south of Letch Lane, north of the Mitre and east of the pylon line ever since the Stockton Borough Council (SBC) survey "New Life in the High Street" proved by straightforward deduction that residential development here was, and is, the only residential development which will aid the revitalisation of the High Street. The evidence given at the 2009 examination of SBC Local Development Framework (LDF) by the Home Builders Federation representatives, in particular the Persimmon executive, served to reinforce this. No other land promoted at that LDF examination, or in the 2010 Strategic Housing Land Availability Assessment (SHLAA) would either house people who would regard Stockton High Street as their main retail and personal business centre, or who would have the spending power to improve the retail offer. I can write that confidently having read SBC's analysis of the New Life in the High Street survey which SBC conducted to support their campaign to win City Challenge money to regenerate the High Street area. The one large housing allocation at Ingelby Barwick was a disastrous one for the prosperity of Stockton town centre. Because delivery was slow, some times at less than a quarter of the planned delivery, and taking more than twenty years longer than promised a very big percentage of SBC's housing allocation from Cleveland C.C., then the TVJSU, then the RSS, was tied up in sterile allocations resulting in the loss of the spin-off prosperity which comes with well sited development. No one who cares for the town would ever wish to see SBC tie up all its allocations or one site ever again. It's probable a wise thing not to have too many sites in the control of one builder ever again. I was invited to sum up the evidence presented to the 2009 Examination of SBC's LDF by the Inspector. Two points are worth reiterating:- 1. The planners have to work against national and RSS backgrounds. 2. The ODPM set a target of 4.4 million houses over twenty years. That is 74,000 houses per million of UK population. Stockton has about 180,000 people. Therefore a national average allocation would be 13,320 houses plus all of the connected investment and wealth creating opportunity. The RSS allocated us 6,885. Fortunately planners are no longer constrained by national and RSS targets. No doubt some councils in the over built south east will cut back, but SBC has the chance to ignore the undeveloped sites at Ingelby Barwick and go for growth and prosperity, allocating extra sites to aid the revitalisation of the High Street. At the point 3 above we see how the RSS had planned to condemn us to decline, by allocating us only 50% of our share. This gives a positive indication of the need for extra and early planning permissions, to redress the decline imposed on us by the RSS policy. Various SBC planners will have known this for years, and yet never been able to do anything about it. Another piece of really positive news for Stockton High Street prosperity was announced in the Budget Speech by the Chancellor. There is no longer a presumption in favour of brown field development. This means that SBC no longer have to give an over riding regard to brown field sites that have not been able to be regenerated by residential development during the recent housing booms, nor do they need to make allowance for brownfield sites which may appear during the plan period. This is fortunate, as the chance of public money to regenerate these has gone. Also the PFI money for knocking down schools and hospitals, creating brown field land, and building new ones, creating debts for our grand children, has gone. The Coalition Government has gone for a carrot and stick approach. The carrot is that for occupancies of new dwellings SBC will get the New Homes Bonus as well as the satisfaction of knowing that they are aiding the prosperity of the borough if the housing is allocated on the periphery of Stockton town and Norton. Probably all of the sites on your map are developable. There is no reason to suppose that any of them south of the A66 will be delivered any faster than Ingelby Barwick has been. None of them will contribute much to revitalising the High Street; going by your own survey about 8% of their retail spend would have been there before Teesside Park was built. As people will have to "get into the car" from all of these sites the proportion of their retail spend going into Stockton High Street will be far less than 8%. Sixteen hundred of these sites will serve to clog up the traffic flow around Yarm completely at busy times, making Stockton High Street even less likely as a shopping venue. Not sustainable. There is no reason to suppose that any of the Wynyard sites will aid Stockton High Street. What is certain is that nearly all journeys will be by car, be it going out for employment or the food and cleaners coming in. These sites will definitely add to the carbon foot print of the town, without revitalising the High Street. At Wynyard Hall Estate there is scope to add to the original concept of a regional executive area by allowing another 10 - 20 houses. At say £250k per site this should allow a margin to improve some infrastructure. It was a sad day for the site when the cheap houses were allowed. At the time I was building no houses as cheap as that; the best ones were hardly up to the spec, but were up to the price. Some extra houses there is reasonable; hundreds along the northern boundary of the borough will do almost nothing for the retailers in the High Street but will bump up the carbon footprint of the borough. Not sustainable, if they were sustainable they would be using already existing infrastructure, not crying out for more. One would not contemplate building an additional 150 houses at any of the other villages, so why 300 at Wynyard. I helped formulate regional NFU policy on building in villages and still think that the policy of the 90s was sound. That is, that low numbers of housing should be allowed in all villages every few years. This allows newcomers to be assimilated without creating too much of a "two communities" in the one village, it allows the chance for low cost housing as part of a deal, and also other community benefits. The Council will have to decide whether the New Homes Bonus goes to the village, the Borough, or is shared. I thought Billingham Bottoms was a green wedge area. I certainly thought it was idyllic when as a child I used to go there catching minnows and sticklebacks in a jam jar. A case could be made for some houses on the meadow land to the east of Yarm Back Lane if ever the proposition could be got past Natural England and the CPRE at a time in the future when the economy has recovered sufficiently to fund the highway infrastructure. Allocations made here could turn out to be very delayed in

delivery, to the detriment of the High Street. This leaves Harrogate Lane. The northern most section I have always thought would be better in commercial use; it would be a horrible place to live- sub station, pylons, roads, 24 hour super market. Phase 3 should be Letch Lane to the walk way and the western edge. At present these areas appear very rural, but would look a reasonable continuation after Phases 1 and 2. Phase 2 should be the walk way to the School. If it was built before Phase 1 (below) it would appear as more of an intrusion, whereas the land south of the school is just a continuation of the development as contemplated in SBC plans as far back as 1955. Phase 1 consists of Tithebarn Land, Coalgarth Land, the SBC's own 4.4 acres (wouldn't you feel guilty if front line services in the borough were cut and this land lay unused?) and any surplus school land. This is exactly what you need for housing delivery, New Homes Bonus and High Street revitalisation. To the planners This not part of my submission, unless your protocol demands that it be treated as such, but just as a point for you to consider. Rosemary Young said that it was not Ingelby Barwick that killed the High Street; it was Teesside Park. As you know, I disagree. I think the chronology supports my case, but I would like you to think of York. It is a unitary authority not so much bigger than SBC. It has massive out-of-town retail developments at the Designer Centre, Monks Cross and Clifton Moor parts 1 and 2 and six big supermarkets, five of them away from the town centre. It has suffered lots of industrial closures:- the railway and carriage works, sugar factory, Terrys, a lot of Nestle, printers. However, the principle retail areas of Coney Street and Parliament Street thrive. Those two streets will benefit a little from tourism, but the principle tourist area is near the Minster, Petergate, Stonegate, the Shambles. Over the years York has controlled housing development making it contiguous to the town. Development has occurred all round the town, but always with good public transport to the centre. There have been plenty of "villages" proposed, one of them on land belonging to the C of E, which was highly fancied when John Gummer was at Environment, but the Council have kept the town compact, with the exceptions of Wiggington and Haxby, which fortunately have several good commuter runs into the centre. Acomb, Fulford and Heslington are to York what Norton is to Stockton. There is no "Ingleby Barwick" or "Wynyard". Because the spending power has been kept around the town, the prosperity has been maintained. York, like Stockton, has not benefited from being a county administrative town. The town centre prosperity has been kept because of the compact nature of the residential areas and their proximity to that centre. The correct planning decisions were able to be made over the last forty years/since car ownership became common.

**0**

Don't know the area well enough to comment on specific plans BUT Stockton have not made effective decisions in the past with home building and local services. Their planning for schools and use of public places in this area (Yarm) has been appalling. We have only lived here for 2 years and compared to previous LAs the forward planning here seems seriously lacking.

**0**

not adding to traffic congestion

**0**

I dont feel I can comment as I dont live in the areas, the figures on the map are different to survey and there, the housing is ok but the infracture isn't there to support the housing.

**0**

Am not familiar with the stated sies.

**0**

More information are the properties private or privateand are people on housing waiting lists getting these houses, who would pay for them.

**5**

Think you should be using sites like North Shore sites. Leave the countryside as it should be

**6**

I do not feel that I have enough knowledge about the subject to give a considered opinion.

**15**

some sites seem to be big but not so many houses on for example Wynyard must be mansions.

**40**

D.T.V.A is in my oppinion the best place to create a development of housing and offices/warehouses. The airport is going downhill and all the new roads and other facilities are already in place.

**45**

feel that some of sites have to many houses. Wynyard Hall has lots of space build more there. Ingleby Barwick got too many already.

**46**

Ingleby Barwick - not enough facilities, schools, shops at moment, no buses on evening and none on a sunday. Why can't they build on sites that are already spoiled? and not on greenfield sites.

**48**

i am pleased that there are constulations

**53**

I dont agree with overbuilding and provide it doesnt intrude on the enviroment and area thats already there, and carefully planned

**55**

I think new houses should be built near local amenties, I also feel there are a lot of empty properties already in the borough that should be used up.

**58**

I think the council need to think about the facities to cater for the increase of the people within the preposed areas, plus considering the people already near theses areas.



**76**

Yarm is very congested so any development on the fringes would create intolerable delays over bridge and through High Street.

**100**

Don't know the other area's well so would not like to comment. However, Billingham Bottoms is like an extension to the nature reserve it is next to but thankfully hardly gets many visitors making it attractive to wildlife. We visit regularly and have seen kingfishers and many other bird life. This would be a great loss. Belle Vue, Norton Road should be considered as lots of houses are being demolished and the area is run down and needs new life bringing to it to change its reputation. Feel the council should not need to build so many homes as there are many homes empty in Teeside and many seem still in fair condition. Renovations and upgrades would be far better to rejuvenate communities rather than upset wildlife and residents by building in new areas.

**123**

I don't know most of these sites but I am strongly opposed to new builds on green sites when there is so much potential in brown sites round here

**133**

Building on South of Preston Farm Industrial Estate could possibly affect habitat of wildlife, and bird flights.

**135**

We need far more unique homes which demonstrate the area's success, but they should not be confined to Wynyard. We should allow the building of executive homes in groups across the area.

**137**

Most of the sites are in areas that most people would not choose to live, but will be forced to live by limited choice. The planners need to spread development across the borough in attractive locations where people would want to live. The areas, above, could be transformed into green belt/ ecological places for people to enjoy, and act as an attractive boundary to existing development. Having said that, there is absolutely no chance of the planners in Stockton taking any notice of anybody on anything if it makes life even a little challenging!!

**141**

I do not approve of huge new estates - problems of access, blobs on the landscapes. People need small intimate communities. Need a sense of belonging. All sites need to consider mixed needs housing.

**155**

Larger estates seem to be less quality houses, bigger estates seem to swallow up smaller areas and could end up like slums, Harrowgate I think is a good site but there are too many houses allocated to go on it. I feel more houses should be built at Wynyard and more industrial at West Preston. I feel with the bigger sites they may end up with traffic problems.

**162**

bon lea industrial estate

**167**

The best to live is to the west side, as in any part of world and country.

**169**

To be able to comment on the above I would need to know what arrangements are in place to provide the required infrastructure Schools Drs surgeries etc What would be the percentage of social Housing on each site

**172**

I believe land South of Preston Farm Industrial Estate to be on a flood plain. In view of global warming this would be in danger of flooding. I think smaller group of housing would be better than large.

**173**

NOT LIVED IN AREA FOR LONG SO DOESN'T FEEL IN A POSITION

**176**

Agree with most as long as the infrastructure is in place

**180**

I am unable to access the link to view the map of the above sites.

**193**

Volume of traffic on A19 doesn't need more housing near to A19 in Billingham

**194**

road systems to be put in place first before houses built - roads at Ingleby Barwick have caused problems. Need convenient transport service

**197**

Ingleby Barwick is already too large, wherever houses are built transport links MUST be improved especially buses!!

**208**

The sites I disagree with are those too close to a main motorway or river or railway line noise subsidence

**224**

I can't picture where most of these places are. Some points for and against would help me make a decision.

**237**

Traffic concerns of the new large housing developments are a worry

**246**

We seem to be building out of the area and neglecting the central Stockton area. There are so many boarded up houses and accommodation above shops appears neglected etc. Street houses that are not wanted should have two knocked into one to become large family homes rather than knocking them down entirely. We are losing history and character and keep building more large housing estates of modern non-descript houses. If shop units at the edges of the high street continue to remain empty (and let's face it companies are struggling to survive this economic climate) then convert them into residential use so that younger people trying to get on the property ladder could buy upper floors and disabled or elderly people can enjoy ground floor apartments with accessible high street living.

**247**

With every new house built there comes with it at least one car. Wynyard has a major dual carriage along side but still becomes congested at peak times, when you look at the houses suggested for Yarm/Urlaynook which are single carriageway and already have their own problems with traffic.

**254**

1. Development of urban brownfield sites which support an urban renaissance eg North Shore, Queens Park North, and other urban sites (potentially including North Tees Hospital if the insane politically-fudged move goes ahead) should not be undermined by over-development on large peripheral / greenfield sites, though I appreciate the approach of the current government is to make it easier for housebuilders to build on such sites. 2. Heavily car dependent areas like Ingleby Barwick and Wynyard in particular should not be subject to more massive development; priority needs to be given to sites in areas with existing services and spare social and physical infrastructure capacity with a particularly strong focus on the rail corridors to support sustainability objectives both from an environmental perspective and in the light of escalating fuel costs in the post-peak oil era. 3. Billingham Bottoms is not a good location for housing. 4. The Sites SW and W of Yarm are better than the one to the SE (not listed above). 5. The Ingleby Barwick site incorporates the Free School site doesn't it? Does this mean the rest of the land will be given up for housing to enable the school to go ahead? Alternatively, if the landowner thinks they can get residential value on all the site would this jeopardise the school proposal? 6. Any release of land at Preston Farm site should be modest and only for employment uses as this is a successful business area. 7. Harrogate Lane is a better site than Yarm Back Lane as the 'main' allocation. Partial development would suffice to make up the residual (1600 units) after the SW Yarm, Durham Lane and NW Billingham sites are taken into account. This would mean that the largest town in the Borough would receive an appropriate level of development and the extension might still be large enough to cross-fund regeneration in the urban core as required.

**277**

We have a shortage of housing both Social and Private, along with a large number of houses that are vacant or derelict

**287**

A need to conserve Green Belt land.

**305**

Wynyard has no bus service, dial a ride has been cut back

**306**

No solutions to this problem. Yarm bottle neck no more traffic already at stand still

**307**

Yarm & Eaglescliffe do not have the necessary amenities or access ways to support any more developments.

**323**

Ingleby Barwick should not build anymore! It has no community spirit, I couldn't even tell u the names of people who live on my street, as people move in and out so quickly! We have few community areas, lack large playing fields or community areas of any sorts. Roads are not wide enough, parking is horrific! and a growing problem with more and more new houses being built. By taking more green areas away Ingleby Barwick is becoming an overcrowded, ugly place to live.

**332**

dont need all these extra houses.

**335**

Ingleby Barwick needs more facilities rather than more houses

**346**

Yarm and surrounding area is already over populated and grid locked with traffic and more homes would impact severely on the character and prestige of the area

**352**

We need to expand but also need to maintain the rural feel wherever possible.

**361**

Yarm and Wynyard should not be considered due to traffic constraints. Only sites that have good sustainable travel should be considered.

**365**

Billingham Bottoms is too low and subject to flooding. Ingleby Barwick road infrastructure is diabolical. The disused industrial estate north of Eaglescliffe, more brown field sites should be used.

**388**

Ingleby Barwick has more than enough houses on the estate we do not need anymore.

**394**

My objection to the West Preston and Yarm Back Lane proposals is that they are too big. A small number of houses on those sites would be fine. Ingleby is also far too big already. For Wynyard, the first thing to build should be some services, there's not even a corner shop!

**446**

All good sites as long as the roads are suitable for access.

**455**

If any building of new houses in Ingleby Barwick would need to be very carefully considered, given the appalling traffic issues already in Ingleby Barwick at peak times.

**465**

Spread sites throughout borough next/near to existing mainroads/established services.

**473**

I would have some concerns about the Billingham Bottoms site due to the flooding issues in the area. In addition I would hope that the land acquisition would not affect the allotment holders in the area.

**475**

No suggestion, don't want to explain my choices.

**477**

Transport is key in new estates and even the introduction of 1825 Way does not stop traffic in Ingleby Barwick from often coming to a complete jam. Public transport providers are often reluctant to add new services and grants should be sought to encourage them to do so, noting the Council's good work supporting bus services already.

**478**

Ingleby Barwick needs some social facilities it is becoming an estate of houses only with lots of young families who have no youth centres. This could happen at Wynyard.

**484**

I've tried to equate the sites to where schools are available.

**490**

Transport through Yarm is a nightmare, and therefore unless a by-pass is built should be avoided at all costs!

**521**

Would be concerned about flooding at Billingham Bottoms.

**523**

Billingham Bottoms - subject to likely flooding - better kept to land reserved for natural conservation - already started as a project.

**542**

From attending various meetings and listening to people's view I feel Ingleby Barwick is already over crowded.

**1005**

New houses need to be mixed in to the present areas "... Brown site ..." reclaimed land. Wrong possible not on green field areas.

**1020**

As new hospital is still planned for Wynyard - why not put houses near it?

**1021**

Ingleby Barwick I feel provides far too much traffic at peak periods, any more traffic due to new houses would be a nightmare. A similar situation exists in the Yarm area. The Billingham?wolviston area's have much better access to main highways, A19 etc.

**1025**

More effort to refurbish the existing housing stock & avoid where possible building on open country

**1026**

I need much more detailed knowledge of the various sites to realistically discriminate between them. All superficially seem reasonable but decisions should include & reflect the likely demand for properties in the area.

**1027**

Traffic from Eaglescliffe via Yarm is at saturation point at present without additional housing.

**1032**

Harrowgate Lane and Yarm Back Lane would cause massive problems for traffic at rush hour. Yarm would also cause similar problems. Surely there must be more brownfieldsites available in the borough rather than use farm land.

**1033**

Yarm already over-crowded, traffic near gridlock. Billingham Bottoms liable to flooding.

**1038**

Eaglescliffe infrastructure - roads/ploice/schools, health is already streched and this high capacity density of housing will stretch resources past on acceptable limit. Mixed housing - types and ages gives rise to better communities - more integrated fewer problems - crime etc.

**1040**

Dear Sirs/Madam, I have declined to answer these questions as I do not have the necessary information or experience to say yes or no to these proposed developments. Other than W. SW. SE Yarm. The traffic chaos in getting through Yarm would be not acceptable.

**1045**

Smaller developments preferred, otherwise in effect a small town would be the outcome.

**1047**

The exact location is less important than the development value should occure to the community, i.e. the council so as to ease the council tax burden. Land owners could be invited to sell to the council, stating their price/acre (which may, of course be above agricultural value). The council buys the cheapest land offered, then sells it on with outline planning permission, so that the value of the planning permission, created by the community, occures to the community, rather than going into the private pockets of current landowners.

**1051**

Why do you insist on having Commercial Businesses mixed with ".." dwellings. Put all commercial properties on the Newport site and most the "... on the landscape to the same place. Planning seems to have with "... criteria in Stockton.

**1054**

Won't the houses at Billingham Bottoms be prone to flooding?

**1058**

B/ham Bottoms is a) noted for flooding b) is an ecology site c) near noisy A19. Ingelby Barwick is surely big enough!

**1061**

Not South of Preston Farm as need some green space between Stockton & Eaglescliffe + Yarm Road can't support more traffic.

**1062**

We're all NIMBY at some extent. I live in Oxbridge, but I value being quite close to the very prominent areas which define the current boundary of urban Stockton, within the locations I regularly travel - hence, the green fields at West Preston, Sch of Preston Form i.e, Yarm Back Lane and harrowgate Lane are all very precious and I'd hate to see them built on. Building on dormant ex-industrial land is great though. I've cited I.B as its such a large housing area/dent anyway, it nowadays seems an appropriate site. And developments at Wynyard Park and Wynyard Hall Est would suggest similar. I don't know the specific loations for the Yarm sites, hence don't feel I can really comment either way. You've missed South East Yarm (780 houses) off your list - i presume an oversight. If it was there my tick box would be "Neither agree nor disagree".

**1067**

I feel 3120 is far too many all on one site, more like a small town at the end of my road. Hope the few empty open field land not used.

**1075**

My concern for plans at Sites Preston & Durham Lane is the traffic congestion, already a major problem & lack of school places, surely Wynyard is open for more development. Yarm is already over developed.

**1087**

More houses at Ingelby Barwick would be woicrous. The facilities & roads are already inadequate for the residents, not enough schools or public transport already

**1088**

We seem to be using up all our green field sites and will end up with no spaces around our area.

**1090**

I would rather not comment on areas outside Yarm/Eaglescliffe

**1101**

I am surprised only only site within a towns boundary.

**1112**

I think Billingham Bottoms should be left as it is because of its theme park status.

**1117**

WOuld prefer to leave Billingham Bottoms left alone for wildlife area.

**1121**

Use old land already built on. Religious places should not take over houses but build on disused religious places. Keep the green spots green.

**1122**

I prefer the developments to the adjacent to main access roads that currently exist to ease future traffic congestion. These access roads will need parallel improvement in line with the housing development constructions.

**1126**

Houses are needed in all areas. Billingham Bottoms - would this land be good enough? Aren't there enough houses in Ingelby Barwick already (but private), the property guide always has lots of properties there for sale already. I think some sites might be too far from town (because I don't drive) for people to live there.

**1129**

1. Haverton Hill/Port Clarence areas 2. Portrack areas Because - why put big council house areas next to decent housing areas.

**1131**

1) Billingham Bottoms potential to flood 2) Ingelby Barwick already too big 3) Yarm Back Lane - 3120 far too many

**1133**

I think when housing development is being considered they should take into account public transport which would enable people living there, access to main town: and other important facilities this should help local shops etc.

**1134**

Where I have disagreed I am concerned about access + impact on existing area which are already congested

**1139**

Difficult to give unbiased answers as we do not live anywhere near these sites

**1143**

Villages should be left as they are. The public need some open spaces and peaceful places to visit. This country is far too small for the population we have. At present we seem to have houses and flats going up everywhere. Of course we all know there is a housing shortage. Also unemployment is also very high here. Which makes me wonder why so many properties are being built. I suspect it could be to house people from other parts of the country that have more population than we have in this area. We also have many properties in the towns that are run-down. Surely it would be sensible to update them rather than take up more green spaces.

**1150**

Why not build on grown field sites more?

**1153**

Numbers on map do not agree with those in questionnaire. South East Yarm not listed. Suggested building site at Port Clarence. N.B. The person added South East Yarm (780) - Slightly agree to question 24.

**1159**

I feel all the green areas are disappearing & it would be nice to keep some.

**1162**

Billingham Bottoms has flooded in recent years

**1163**

I think the impact on traffic congestion is a major issue. Access to public transport & cycle paths need to be considered from the outset & pedestrian crossing points/".." paving

**1165**

All sites seem feasible and all are well spread out throughout the borough.

**1169**

Yes Dovecot St I would and about Doovecto St I am disabled and if anybody lock after me they have to sleep on the floor

**1178**

Expansion in any of the areas need to have good road communities "unreadable" some new developments that only have one entrance/exitdevelopments

**1179**

People next to the chosen sites should be consulted

**1181**

Can't answer any of these as the map isn't accessible from the web address given.

**1185**

Moving out of town takes traders away. Why should Wynyard get all new development

**1191**

I feel the perimeter of Stockton the outer ring road should not be built on until all brown field and other sites have been completed.

**1198**

Developments of much over 1000 houses would be too large and cause traffic chaos.

**1199**

1. Smaller developments allow a variety of solutions/prices/types of housing but all must be low carbon. 2. More single storey (bungalows) for older people to stay in the community and not in care.

**1200**

Distributing over several sites could be beneficial to traffic flow & perhaps negate the need for a new school or new infrastructure.

**1222**

Taking away countryside to provide new housing in certain areas is not eco friendly.

**1225**

Spreading housing beyond Back Lane at Yarm will "unreadable" up all land & A19 for future development. We also need to retain green wedges between our areas "unreadable" choice of smaller plots for development

**1228**

Yarm is already congested - new build would make the problem worse

**1235**

As you can see, I strongly disagree with any additional building of residential housing in the Yarm/Eaglescliffe area. Yarm is now at bursting point. There no potential sites for car parking or schools.

**1239**

No opinion on sites

**1241**

No opinion

**1247**

I believe Yarm is overpopulated and should not allow any increase in housing in its immediate area. It suffers already from traffic congestion and shortage of parking.



**1253**

Concerns re ecology eg Billingham Bottoms. Big sites create too much pressure on local services/schools etc.

**1263**

Ingelby Barwick is already too large, too few facilities, not just for children but all ages, particularly OAP's. The pubs are aimed at football fans + young people. it is not safe to venture aout at night due to groups of teenagers - more houses will exaceibate the problems - see the council policy - I.B. has no facilities.

**1268**

The Ingelby Barwick site should be used for a school or schools also we should be looking to develop within the town itself

**1269**

The current boundry of Stockton at Hartburn/Fairfield/Harrowgate Lane must be maintained

**1274**

Stockton Council housing (as was) pulled hundreds of houses down (they didn't need them) Why not build on those sites! Or has the land been sold to private developers???

**1278**

Any housing build up in or near Yarm would in my opinion need major road improvements (i.e.) new bridge over Tees.

**1281**

I cannot believe a long term option being considered is to develop housing on the scale of Ingelby Barwick in the "... Preston. Land South of Preston Farm Industrial Estate would be totally inappropriate for housing development given the aims and objectives of the Tees Heritage Park & also Preston Park itself. The scale of the West Preston site building on agricultural land which should be green wedge is unacceptable.

**1284**

Billingham Bottoms - flood risk? Yarm/Eaglescliffe - traffic problems. South of Preston Farm ind. est - lots of green wedge

**1285**

Not sufficiently familiar with the proposed sites. Yarm traffic major problem.

**1287**

Sites South and West of Yarm and Ingelby Barwick should not be developed as the road infrastructure in this area is already saturated with the traffic from Ingelby Barwick with no major road improvement having been done

**1289**

Does not concern me. Depends on "kind" peoples. Too many "unsuitables" coming here, lowering the tone. No need for this! Other places.

**1291**

I'm oled enough to remember Wynyard as it used to be!! Are more houses needed there!?

**1293**

Could on area of Thorpe Thewles & Whitton not be included in the numbers. There seems to be room for development there.

**1295**

What about Dovecote Street and the side streets. Where half have been demolished the rest are standing get Stockton sorted first.

**1313**

I feel that if houses are needed then they should be built. However, very old and run down houses must be demolished and new ones built to replace them too!

**1318**

Hills/Norton Road site? This site is perfect redevelopment site, room for hundreds of houses, new location, most importantly it is within walking distance of Stockton town centre. The majority of these sites are creating "urban sprawl". A lot of the sites will need bus (expensive) services for people to shop or get to work, or yet more private transport. There is a danger that these new estates will become inward looking i.e. shopping, entertainment, services etc. further diluting foot "..." in the town centre.

**1324**

Hill's old site, Norton Road

**1346**

Yarm is already extremely congested. ANY further house building around Yarm would make this problem much worse.

**1347**

Yarm/Urlay Nook - more housing will inevitably lead to more congestion in Yarm High Street and its approach roads

**1354**

Some of the areas already have problems selling properties & would also add to traffic congestion in known blackspots.

**1363**

Cowpen Bewley, Wolviston, Durham road Stockton

**1364**

Present nature sites + sites of beauty should be preserved as such, for example - in London we have the "green belt" which means we have a place to escape to. Don't take this off locals who have neither the transport or the money to head out to Roseberry Topping etc.

**1377**

Some of the suggestions are too remote or traffic congestion i.e. urlay Nook & Ingelby I personally wouldn't want to live on Preston Farm industrial estate.

**1384**

1) Yarm is a bottleneck that has been saturated by over development and is a traffic nightmare 2) More brown field sites should be developed 3) Affordable housing or social housing should be our priority

**1389**

Billingham Bottoms - this used to be a "flood area", how has that been justified

**1395**

Ingelby Barwick urgently needs to get it's schools, roads & youth provision sorted out before another brick is laid for another house "..." now.

**1398**

Housing is desperately needed. Affordable and social housing, not just executive accommodation no-one can afford and is left vacant & useless. Moving money around does not help the people needing a roof over their heads.

**1401**

I strongly disagree with building on Billingham Bottoms. As a Stockton council resident I have experienced my home being flooded twice internally and the threat of flooding on many occasions. Historically the area was boggy prior to development and without sufficient drainage installed I would not wish this situation on anyone else.

**1407**

Has the probability of flooding been taken into account at all proposed sites

**1411**

Personally, from a Yarm residents perspective Yarm has more pressing needs other than more housing.

**1415**

Why was the "Billingham House" housing plans rejected@ There are new houses built on the old golf course which are just as close to the chemical works...

**1427**

Affordable terraced houses should be built to allow more new buyers to get on property market

**1429**

Billingham Bottoms is known for flooding. Yarm is also on floodplain

**1430**

The council seems to have done well to cover the sites, which they have chosen on the map.

**1441**

I based my answers on my perception of possible traffic congestion. Wouldn't Billingham Bottoms be at risk of flooding?

**1442**

To develop Wynyard further means building a school as well as we in the village are losing valuable school places.

**1449**

Both sites have easy access to A66 and possible work areas. One large estate (mixed housing) possible shops and amenities for support of extra population. Area for further expansion available.

**1460**

It is essential that where new building takes place extra amenities are provided to serve the increased population. In the past this has failed to be the case, resulting in large soulless estates which became a breeding ground for social discontent, particularly amongst young people.

**1472**

Ingelby Barwick is already too big & has few facilities & services.

**1482**

West Preston (4150) too much congestions and transport would have to be vastly improved. Land of Preston Farm (1140) means only green belt left between Stockton & Yarm will disappear and transport and congestion problems.

**1483**

If Victoria Estate is gone how many houses are going to be built on the site?

**1484**

Wynyard site should be more affordable. Ingelby barwick should not have anymore houses, especially not on the Green Belt surrounding Ingelby - already too many houses, poor schooling facilities and infrastructure for the current size, this should be resolved before even considering to extend.

**1486**

Council houses & private houses should be kept well apart with no mix on any site. More private houses will bring more people into area & provide more rate income. Site at Hills or near Norton Rd not mentioned.

**1495**

No bus service to Wynyard!

**1500**

My preference goes to sites which will not create or worsen road communication (as would happen in Yarm) and could have built in bus routes to central Stockton including evenings (help to revive Stockton Town Centre)

**1507**

No more houses on Ingleby Barwick.

**1512**

Surely the council should be looking to develop on brown field sites, close to public transport and amenities not on Yarm Back Lane where there is poor access and it is agricultural land!!

**1518**

Is B'ham Bottom suitable for housing? Houses at Yarm will add to congestion. In some cases the sites "...". This should not happen. "..."

**1523**

None

**1528**

**Respondents to the Regeneration and Environment Local Development Document  
Preferred Options Consultation**

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21 Individual	66 Mobile Operators Association
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38 Individual	83 Individual
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40 Individual	85 The Steele Family
41 Individual	86 Individual
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92 Individual	140 Individual
93 Individual	141 Individual
94 Individual	142 Individual
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99 Individual	147 Tees Valley Biodiversity Partnership
100 Individual	148 Mr I Snowdon
101 Individual	149 Mr Tom Howson
102 Individual	150 INEOS
103 Individual	151 The Peel Group
104 National Grid	152 RSPB
105 Hartlepool Borough Council	153 Prism Planning
106 Individual	154 Individual
107 Individual	155 Individual
108 Individual	156 Cllr Rigg, SBC
109 Individual	157 Individual
110 Individual	158 Individual
111 Individual	159 Friends of Tees Heritage Park
112 Individual	160 Tithebarn Land
113 Individual	161 Tithebarn Land
114 Individual	162 Middlesbrough Council
115 Individual	163 Homes and Communities Agency
116 Individual	164 The Cooperative Group
117 Individual	165 Individual
118 Individual	166 Mr John Mason
119 Individual	167 Individual
120 Individual	168 Individual
121 Individual	169 Bellway Homes
122 Individual	170 GMI Holdings Ltd
123 Individual	171 Tablerone Ltd
124 Individual	172 Individual
125 Individual	173 Individual
126 Individual	174 Individual
127 Individual	175 Individual
128 Elizabeth Wright and Alexandra Farrington	176 Individual
129 Individual	177 Individual
130 Individual	178 Individual
131 Individual	179 Individual
132 Individual	180 Individual
133 Individual	181 Individual
134 Darlington Borough Council	182 Individual
135 Individual	183 Individual
136 Mr P Baker	184 Individual
137 Individual	185 Individual
138 Individual	186 Individual
139 Individual	187 Letch Lane Residents

188 Individual	235 Individual
189 Individual	236 Individual
190 Individual	237 Individual
191 Individual	238 Individual
192 CPRE Stockton District	239 Individual
193 Taylor Wimpey UK Ltd	240 Individual
194 Natural England	241 Individual
195 The Church Commissioners for England	242 Individual
196 Mr S Singh	243 Individual
197 Hellens Group	244 Individual
198 Durham County Council	245 Individual
199 Taylor Wimpey/West Raynham Developments	246 Individual
200 Teviot Way Investments Ltd	247 Individual
201 Theakston Estates	248 Individual
202 WT Elstob & Son	249 Individual
203 Mr Matthew Hall	250 Individual
204 Cameron Hall Developments Ltd	251 Individual
205 Partner Construction	252 Individual
206 Duell Partners	253 Redcar and Cleveland Borough Council
207 Asda Stores Ltd	254 Individual
208 Individual	255 Individual
209 Taylor Wimpey and Barratt Homes	256 Individual
210 Taylor Wimpey	257 Individual
211 English Heritage	258 Tees Valley Wildlife Trust
212 Individual	259 Individual
213 Individual	260 Individual
214 Individual	261 Individual
215 Individual	262 Individual
216 Individual	263 Individual
217 Individual	264 Kirklevington Property Co Ltd
218 Individual	265 Tees Valley Local Access Forum
219 Individual	266 Individual
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225 Individual	272 Individual
226 Individual	273 Individual
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233 Individual	280 Individual
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283 Individual  
284 Individual  
285 Individual  
286 Individual  
287 Individual  
288 Canal & River Trust  
289 Persimmon Homes & Yuill Homes  
290 Individual  
291 Individual  
292 Individual  
293 Environment Agency  
294 Individual  
295 Individual  
296 Individual  
297 Individual  
298 Individual  
299 Individual  
300 Individual  
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308 Individual  
309 Individual  
310 Ingleby Barwick Town Council  
311 Wynyard Park Ltd  
312 Highways Agency  
313 Taylor Wimpey North Yorkshire  
(Roundhill)  
314 England and Lyle on behalf of Mr D  
Holmes  
315 Bennet  
316 Egglecliffe & Egglecliffe Parish  
Council  
317 Appletons Chartered Surveyors  
318 Individual  
319 Individual  
320 Individual  
321 Individual  
322 Individual  
323 Individual  
324 Individual  
325 Individual  
326 Individual  
327 Individual  
328 Individual  
329 Individual  
330 Individual  
331 AG Lathe  
332 Northern Power Grid  
333 Health and Safety Executive  
30120 Individual



## 1 Individual

H1b - Urlay Nook	1/1: I strongly object to the current crop of planning applications made (or recently approved) in and around Yarm (namely 12/0980/OUT Morley Carr Farm, Green Lane Playing Fields, Mount Leven Farm, Allens West) due to the impact any consent granted would have upon the town's infrastructure, schools, traffic, appeal of the town, parking, child safety (i.e. increased traffic), environment, and impact that the extent/quantity of the proposed additional housing would mean Yarm would effectively become a suburban sprawl affecting house prices and general standard of living in the town. Yarm is one of the few successes on Teesside why spoil this with these proposals ?
H1i - West Yarm	
SP2 - Housing Spatial Strategy	Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper. The potential impact upon house prices is not a material planning consideration and cannot be addressed through the Regeneration and Environment Local Plan.
H1i - West Yarm	1/2: Further to the recent articles in the local press I'd like to raise my objections to the following 4 planning applications: 1. Morley Carr Farm (on Green Lane), 2. Urlay Nook Road, 3. Allens West, 4. Mount Leven Farm. The principle reasons for objections are as follows;
H1j - South West Yarm	1. The additional traffic and congestion will place undue pressure on the infrastructure of Yarm and there are insufficient plans in place to address this issue after having read the report (the proposed alterations are pitiful)
H1b - Urlay Nook	2. The increased burden on the successful schools in the area and the development of more affordable housing will mean the standard of schools will degenerate (Egglecliffe and Conyers) - the current school capacity will simply not cope 3. The drastic increase in road traffic will put our children in more danger in and around Yarm and there appears to be no plans to introduce speed restrictions etc 4. Yarm is one of the success stories of the area and this will affect parking, house prices, and desirability to live here 5. There has been limited consultation with the residents and this is unacceptable as most people in Yarm cannot attend debates at short notice and at obscure times due to work commitments
	Council Response: The statutory consultation period is six weeks. The Council's consultation programme for the Preferred Options was eight weeks. It was an extensive programme that included a number of consultation events. Local media and town and parish councils were notified of the programme well in advance. Other comments are noted and addressed in the Yarm and Kirklevington Topic Paper. However, proposals for development at Allens West and Mount Leven Farm were submitted as individual planning applications. Both applications have been approved and the Allens West commitment has been re-affirmed in the New Housing Sites Policy in the Regeneration and Environment Local Plan. The potential impact upon house prices is not a material planning consideration and cannot be addressed through the Regeneration and Environment Local Plan.

## 2 Individual

H1i - West Yarm	2/1: I am a resident of Yarm. I object strongly to the proposed possible re designation of land surrounding Yarm and currently greenfield sites to become building development land.
H1j - South West Yarm	Currently the various townships in the Stockton Borough can be distinguished (just) one from another and the green wedges separate the communities. Yarm currently has natural boundaries formed by Green Lane, the A1044 and the river. Yarm is already 'under siege' from various developers wishing to build about 2000 houses and join Yarm to Ingleby Barwick, Egglecliffe, Worsall and Kirklevington.  Not only will this destroy valuable farming land, it will also destroy the historic character of Yarm with vast swathes of inappropriate suburban housing sprawl. The current infrastructure cannot cope with existing traffic at peak times, let alone the traffic that will be generated by another 4000 cars. Most of the proposed housing is 'executive' detached homes. Such residents usually run 2 cars and sometimes even more where adult children are still at home. Even in the proposed retirement village most residents are likely to run cars for many years. The sop offered in the form of parking in Egglecliffe and by Yarm station might just help current parking problems it won't do anything for the massive increase in cars that would happen should these developments be allowed to go ahead. Where are all the people able to afford such expensive homes on expensive land to come from? Where are they to work? How does this help first time buyers get on the housing ladder or those who need social housing? Why are you not concentrating on the man eyesore brown field sites that exist in the borough, the development of which would improve the life and environment for Stockton residents and with cheaper land prices provide much needed affordable housing?  Currently many children are bussed from Ingleby Barwick to Conyers and Egglecliffe schools and even if the proposed Free School goes ahead IB will still need places outside their town. Are you proposing to bus IB kids to unpopular Stockton schools? What does all this extra traffic do for the environment?

I know myself being a walker, that there are bats and deer in the Leven Valley. My husband regularly sees deer on his way to work in the early hours. I have seen the unfortunately rare Yellowhammers and hares in the fields between Yarm and Kirklevington. Even in our own garden we get bird and mammal visitors, including bats, owls, birds of prey and woodpeckers and 20 or so other bird species that must rely on the close proximity of neighbouring fields and woods to survive.

Yarm was known as a pleasant place to live if you could cope with the awful traffic and parking problems. Why are you trying to destroy this? Is it spite because Yarm doesn't usually return Labour councillors? The wealthier people who support many of the current independent and diverse Yarm shops may well move to more tranquil pastures and Yarm will have yet another semi - derelict high street and a glut of not easily saleable houses when you have finally destroyed the very things that make people actually want to live in Yarm.

Council Response: Comments regarding farmland, the character of Yarm, traffic, loss of greenfield land and previously developed land as an alternative, loss of wildlife habitat and impact on biodiversity are addressed in the Yarm and Kirklevington Topic Paper. Comments regarding housing need and demand addressed in the Housing Need and Demand paper.

The retirement village and the Free School and 350 houses were not allocations in the Preferred Options. Both proposals have now been granted planning permission, the latter by the Secretary of State following an appeal against the refusal of planning permission. The planning permission for 350 houses with a Free School has been re-affirmed in the Regeneration and Environment Local Plan. There were opportunities to comment on both applications as part of the planning application process.

All housing developments of 15 dwellings or more have to provide affordable housing within a target range of 15-20% unless robust evidence is provided to support a lower rate than the standard target. This assists first time buyers get on the housing ladder or those who need social housing by providing affordable homes to meet their needs.

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### 3 Individual

H1j - South West Yarm

3/1: I live in Latimer close yarm and I strongly appose plans to build new homes at Morley farm. I feel that Stockton council is trying to turn Yarm into an Ingleby Barwick housing estate. If I wanted to live in a place like that I would have moved house already.

H1i - West Yarm

yarm is a beautiful town and does not deserve to be ruined by new homes and social housing.the roads infrastructure could not possibly cope with anymore early morning or tea time congestion and I should know as I take my life into my hands every day being a school crossing patroller.

Please think before you intend to ruin the everyday lives of us town folk, and think of the fabulous wildlife that we have on our doorstep.what Stockton borough council intend to do is a crying shame.

Council Response: Comments concerning traffic, character of Yarm and, wildlife are addressed in the Yarm and Kirklevington Topic Paper.

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### 4 Individual

H1i - West Yarm

4/1: I am writing after reading councillors in the Gossip Mag; about Green Light for Yarm Housing Developments. I have lived at the above address for 40 years and the traffic has got worse. Nothing seems to help, also the parking in Yarm High Street. Has no one any common sense. When homes are built, people and cars move in.

H1j - South West Yarm

Ingleby Barwick is a massive housing development. Lots and lots of houses up for sale. When this development started locals were forgotten, making pressure on Yarm. Nothing seems to be planned ahead, taking families into consideration. Ingleby Barwick soon got their road bypass put in, but Yarm have still to have one after 40 years of build up of traffic. The old skip yard would have been a really good all-day car park in Yarm, so people could visit and have lunch as well as look round the shops. But no one looked ahead. All these new building developments in Yarm and Eaglescliffe will be a nightmare. Not just on traffic and parking, but also doctor's surgeries and overcrowded schools. As for Leven Bank development, do you know the accidents that happen there, causing more traffic problems. Please, please look ahead. Someone needs to see common sense and get priorities right. I live in hope.

Council Response: Comments regarding traffic, parking, health and education provision are addressed in the Yarm and Kirklevington Topic Paper.

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### 5 Kirklevington and Castlelevington Parish Plan Committee

5/1: (The Kirklevington and Castlelevington Parish Plan was submitted as a representation to the consultation). Pages 22, 23 and 24 of the Plan reads as follows: -

The local planning authority, Stockton-on-Tees Borough Council, has published its Core Strategy Development Plan Document, adopted in March 2010. For the present this is the main document in the Local Development Framework, essentially the planning framework for future development within the Borough.

For the Parish of Kirklevington one of the most relevant policies is Policy No 7 which states that there is no site allocation for houses in the rural parts of the Borough.

Within the Parish, Kirklevington village has a defined village boundary (the Village Envelope) and outside of the boundary the Strategic Gap between Yarm and Kirklevington is identified. A separate Green Strategy document also endorses the importance of the Wildlife Corridor which is on the periphery of the village.

However, the Building Homes for the Future document recently published by the government has led Stockton-on-Tees planners to review some of the sites on the edge of existing urban development for potential housing development. Three of those sites are between Yarm and Kirklevington and another is on the west side of Yarm towards Worsall. Consultation has been carried out with all residents on these sites and at the time of compiling this Community Plan Stockton planners are expected to issue their 'preferred options' document in June-July 2012. This document will contain the sites that the planners consider merit serious consideration for future development. The sites in and around our area may be included.

Feedback from questionnaires.

Responses indicated strongly that any erosion be resisted. Extra traffic generated from further development was also a concern as this would add to traffic congestion in Yarm and on the A67 through Kirklevington. If any of the sites are included in the 'preferred options' document, urgent attention will be required by the Parish Council and the community if the Strategic Gap is to remain and the village's fragile infrastructure and the surrounding farm land protected.

The Parish is now the only area within the Borough that allows large mammals to pass unhindered from the Tees to the Leven Valley through the Wildlife Corridor, and hence from the Pennines to the North Lancashire Moors from the busy A19. The circuitous route of Saltergill beck which passes through the ancient forestland the unstable ground at the valley sides with its close proximity to West Gill and the Leven Valley makes this area a diverse habitat sustaining native wildlife. Kirklevington village has two ponds where great crested newts 9a species protected by European legislation) are breeding and is a site of Local Nature Conservation Interest. Bird life to be found in the Parish includes common buzzards, possibly a European goshawk, common quail, two owl species and a good range of farm and woodland species.

There was much interest in the questionnaires in the preservation of the Parish's ancient woodlands, the Wildlife Corridor and local rights of way for walkers.

Typical quotes from the questionnaire in relation to the Strategic Gap included:-

'A must'

'Essential if the village is to survive and not become just another extension of Yarm'

'Essential to keep the village as a separate entity'.

On new development respondents felt strongly that this should be within the village boundary, and be limited to small infill development in keeping with the surrounding buildings.

Typical comments on new developments included "Only within village boundary" ' Preserve village envelope'

The general consensus of the survey showed little support for different types of housing, e.g. 'affordable' or homes for the elderly.

Typical quotes included 'Better near town centres, not in a country village' 'Concerned more housing would make more traffic problems' 'Village is big enough'.

Actions to be taken

Parish Council to support retention of the Strategic Gap between Yarm and Kirklevington

Parish Council to object strongly to any erosion of the Strategic Gap between Yarm and Kirklevington and the Wildlife Corridor in any future planning document from

Stockton Council  
Parish Council to consider carefully any 'infill' planning application to ascertain suitability in the context of the surrounding buildings.  
Parish Council to oppose any change to the Village Envelope.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

## 6 Individual

H1b - Urlay Nook 6/1: I am writing in reference to the above. As a resident of Stockton-on-Tees Borough for nearly 16 years, I am horrified at the proposed level of house building for our borough, especially in the Yarm and Eaglescliffe area. This is based on the following areas:

H1i - West Yarm 1)Insufficient Primary and Secondary School provision for the Eaglescliffe area.  
H1j - South West Yarm There are currently only 5 free places in the Primary schools. Even with the proposed expansion of Junction Farm School, this will never accommodate the children from 843 houses on Allens West and 570 houses on Urlay Nook. The expansion of places at All Saints, Ingleby Barwick and the potential development of the Free School, would only generate 200 places in Eggescliffe Comprehensive. This again will be insufficient to meet the demand from the new housing should planning be granted at Urlay Nook also. The Free School, if granted planning, will not be open until September 2014 so cannot be included in the argument for current supply of schooling. People may want to move to Eaglescliffe currently to take advantage of the good quality of educational establishments available. If there is a shortage of places available and no guarantee to be able to get your children into these schools due to demand outstripping supply, this will no longer attract people to this area. We would therefore be making the building of this number of houses economically unsustainable, where supply of housing will outstrip demand. It also would not result in a full integration with the existing community and the delivery of sustainable communities as per your Core Strategy Policy (CS1). Finally, who will fund the expansion of Junction Farm? It is my understanding that no money will be offered up front from the developer of Allens West (only piecemeal as the houses are finished at certain stages of the build process) and that the Council has a significant shortfall of funds to carry out the work themselves. You cannot build the houses prior to the infrastructure being in place. This is not creating a sustainable community and again contradicts your policy aims.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

H1b - Urlay Nook 6/2: 2)Insufficient places in doctors and dentists.  
H1i - West Yarm This was brought to your attention at the Consultation for Allens West, yet you still allowed the planning permission for 843 houses. If the doctors cannot accommodate 843 new homes, how can they then take on another 570? This would have a serious detrimental effect on appointment waiting times (which are already considerable).  
H1j - South West Yarm Why should existing residents be impacted on in this way? This again highlights that this level of planned development would not result in a full integration with the existing community nor would it deliver a sustainable community.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

H1b - Urlay Nook 6/3: 3)Road networks  
H1i - West Yarm The road networks cannot sustain the volume of traffic as it is. Your Council Highways Department have confirmed as much in your consultation document regarding the need to mitigate the significant issues regarding the local road network and car parking in Yarm. There are regularly queues of traffic on Urlay Nook Road (approaching Tescos Roundabout), on Durham Lane (approaching Tescos roundabout), outside of Eggescliffe Comprehensive and down into Yarm, at the traffic lights at the Cleveland Bay Public House and when entering , travelling through and exiting Yarm High Street. I have identified many pinch points here, many of which cannot be altered to accommodate the significant increase in traffic that will be generated by 843 houses at Allens West, 570 houses at Urlay Nook, Morley Carr Farm (300+ houses), Yarm Playing Fields (700+), the retirement village (300+ houses), plans for housing at Tall Tress and additional houses on Yarm High Street. All of the potential developments have to be treated as one when considering the impact on traffic congestion. You cannot carry out a traffic survey for one site e.g. Urlay Nook and not take into consideration Allens West Traffic also. Both sites will converge onto Tescos roundabout. Both sites will access Yarm using the same already traffic congested roads. You say yourselves that "any new development should take their potential impact on local and strategic road networks into account". Please do not bury your heads over the traffic problems that already exist around Yarm and Eaglescliffe. They will not go away but will get significantly worse if you let this amount of housing go ahead.

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper

H1b - Urlay Nook	6/4: 4)Air Pollution.
H1i - West Yarm	<p>Under Air Quality Legislation, you need to aim to protect human health and the environment and that pollutant emissions into the atmosphere are not released at concentrations that would seriously damage our health and our environment. As detailed above, any increase of potential traffic to this degree will automatically result in a significant increase in Nitrogen Dioxide. When the air monitor was in Yarm High Street until 2008, it registered levels that bounced around the maximum acceptable level of Nitrogen Dioxide. The air quality will drop even further should we allow this level of housing development and the subsequent increase in traffic flow through these areas. The traffic is at a regular standstill now outside of the Comprehensive in Eaglescliffe. Are we really happy to let our children breath in these high levels of pollutants? The position of the monitor at the Comprehensive is not at an optimum point to accurately measure levels of pollutants currently so this cannot be used as a justification to increase traffic levels significantly. The new development therefore does not take into account the amenity of the existing community and adversely affects our amenity with regards to air and noise pollution generated by the increase in traffic.</p> <p>Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper</p>
H1j - South West Yarm	
H1b - Urlay Nook	
H1i - West Yarm	<p>6/5: 5)Use of Green Field sites for development</p> <p>The areas (excluding Allens West) are all on Greenfield/agricultural land, which under your own Environment Protection and Enhancement section of your document, you are aiming to protect. Development of these areas is contrary to National Policy (and your own) that stresses the need to redevelop/regenerate brown field sites. In your document, under Core area sites, you state the development sites should be “the most sustainable sites in accordance with CS2 which states that priority will be given to previously developed land within the core area”. Within your Spatial Strategy (Core Strategy 2010) you say that your aim is to support disadvantaged communities. This is meant to be your key aim alongside your regeneration objectives. It is my understanding that there are several such sites in our borough but it is actually the developers who are against developing these as their perception is that the Greenfield sites are the more financially lucrative. They do not want to pay the cost of clearing Brownfield sites and you are not prepared to help fund this. Therefore, they are reluctant to develop the areas that in essence should be the priority for development. I also understand that it would be more financially lucrative for the Borough Council to develop Greenfield sites as the reimbursement from the Government (x 6 years of Council Tax per new home built) to yourselves coupled with the council tax from the new homes which predominantly are larger executive homes will boost the Council coffers. However, let us not lose sight of what we are trying to achieve - affordable housing (which it will not be in these more “lucrative” areas); regeneration of areas -none of the Yarm and Eaglescliffe proposed housing, with the exception of Allens West, is on brown field sites</p> <p>Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites. The Strategic Housing Land Availability Assessment shows that there is not sufficient brownfield land in the Borough that meets the tests of suitability, availability and achievability. The Council has therefore had to identify greenfield sites to meet the housing requirement to 2030.</p>
H1j - South West Yarm	
SP2 - Housing Spatial Strategy	
H1b - Urlay Nook	
H1i - West Yarm	6/6: 6)Economic Sustainability
H1j - South West Yarm	<p>The granting of planning permission for this level of additional housing is not by any stretch economically sustainable. It will have a negative impact on house prices due to the oversupply of similar types and size of homes in one small area and will ultimately result in a potential 20% fall in house prices. This is not representing the community as a whole. Why should the current residents, who have paid you council tax for many years, suffer the brunt of the over development of a beautiful area?</p> <p>Council Response: The potential impact upon house prices is not a material planning consideration and cannot be addressed through the Regeneration and Environment Local Plan.</p>
H1b - Urlay Nook	
H1b - Urlay Nook	6/7: 7)Urban Sprawl
H1j - South West Yarm	<p>Can we as a borough not accept that we do not have to over support the shortfall in the Tees Valley area? Why are we taking on around 50% of the necessary building for the Tees Valley area? Please tell me this is not based around rebates that you will receive from the Government? I am sure that in its current state, people do want to live in Yarm and Eaglescliffe but ask them again when we have just become the next Ingleby Barwick, where houses are sitting empty and house prices have plummeted, there is insufficient schooling, increased air pollution and social problems. Who then will rush to buy a house in our once wonderful community?</p> <p>Council Response: The housing requirement that is being planned for is for the Borough of Stockton-on-Tees. It does not relate to any shortfall elsewhere in the Tees Valley</p>
H1i - West Yarm	

or to rebates from the Government.

Consultation

6/8: 8)Planning Permission Applications during consultation

What also is confusing is why you are allowing developers to submit planning permissions for the areas mentioned in your document e.g. Taylor Wimpey for Morley Carr Farm: Bellway for Yarm Playing Fields; and Taylor Wimpey who is just about to submit an application for Urray Nook, when you have supposedly yet to agree your policies moving forward. Why have a public consultation on housing and potential development sites? If you truly wanted to listen to the views of the local community and council tax payer, you would suspend all applications for planning permissions until after the consultation period.

Council Response: The Council does not have any lawful authority to refuse to accept planning applications subject to the necessary application fee being paid.

H1b - Urray Nook

6/9: 9)Phased Development?

H2 - Housing Phasing and Implementation

Urray Nook for example, is one of your “phased” potential development sites. You do not see the need for this development to start until 2017/18. Yet Taylor Wimpey is planning to submit an application for 160 houses, probably this month. You clearly state in your document that “in addition to the need to ensure a continuous supply 5 year supply of housing, phasing is also needed to ensure that market capacity is not exceeded. Phasing is also required in order to co-ordinate with the provision of any necessary supporting infrastructure such as improvements to the road networks and additional educational provision”. Why do you state one thing and then are actually doing the complete opposite in allowing the developers to ignore all that you are putting in place. We do not have the infrastructure in Eaglescliffe to support Taylor Wimpey’s 160 house application never mind the 843 on Allens West.

Council Response: The Council cannot refuse to accept planning applications subject to the necessary application fee being paid and required information being provided.

H1b - Urray Nook

6/10: 10)Buffer

H1i - West Yarm

H1j - South West Yarm

H2 - Housing Phasing and Implementation

H1 - Housing Allocations

Also, in your document you state that you feel the need to build over and above the 5% ceiling of additional housing that the government has set “the council does not regard the additional 5% as a ceiling and wishes to plan for higher delivery in order to ensure that housing need and demand are fully met”. This seems ludicrous. Why would you build houses beyond the perceived need? I can only hope again that this is not based purely on financial rebates? The current first time buyers are struggling to get onto the property ladder until they are in their mid thirties. We are currently building houses and planning houses for the children who are currently aged 5. They will, if at all, not get onto the property ladder until they are in their mid forties. Who can even guarantee that they will remain in Stockton-on-Tees let alone the North East? Who can guarantee that there will be employment here for them in 30 years time? What are we doing building houses and planning developments on a “stick a finger in the air and guess what the housing demand/situation maybe in Yarm and Eaglescliffe in 30 years time”. Why are we potentially going to destroy areas of natural beauty and farmland on a whim? Point 5 of Regeneration and Environment LDD Policy H2 states that land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan period. You have clearly identified in your document that Urray Nook will only need 25 houses to be built between 2017/18 yet Taylor Wimpey are applying for 160 houses in one go. That to me is clearly more than 20% especially when you take into account Allens West also. Also in your own Core Development Document you identified that prior to the planning for Allens West being past that should 500 houses be granted permission for that site that this would significantly reduce the need for more housing in Eaglescliffe? Why the complete u-turn on your own policy? I put it to you that rebates and potential council tax yields are the driving force here not the actual needs of the local community.

Council Response: Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic Paper. Comments regarding housing delivery including the provision of headroom in the housing numbers are also addressed in the Housing Need and Demand Topic Paper. The Council is seeking to ensure that house building is not unduly constrained during periods when the housing market is strong and can therefore, support higher building rates. This will help to compensate for periods when the housing market is not as strong. Clearly it is not possible to have a precise knowledge of what employment opportunities there will be in the future. However, it is clear that the expectation of national planning policy is for Councils to plan positively on the assumption that there will be economic growth. This is reflected in the Tees Valley Strategic Economic Plan prepared by Tees Valley Unlimited on behalf of the Tees Valley authorities. The driving force for this approach is national planning policy and the need to meet the Borough’s housing requirement.

H1b - Urray Nook

6/11: 11)Affordable housing

This needs to be built in appropriate areas e.g. central to town centres and amenities where a car is not an essential requirement for transport. Urray Nook is too far away from local amenities. There will be no such thing as affordable Urray Nook as it is being classed as an executive development.–How affordable is affordable when it is

H3 - Housing Mix and Affordable Housing provision

on an executive estate?

Council Response: The Council is committed to achieving mixed, sustainable communities and this includes seeking to ensure that affordable housing is included as part of housing schemes consistent with adopted Core Strategy Policy CS8 and with the Affordable Housing Provision Policy in the Publication version of the Regeneration and Environment Local Plan.

H1b - Urlay Nook

6/12: 12) Natural Habitats

Consultation

Certain sites that have been suggested for development are areas of outstanding beauty with protected species on them. The fields at Urlay Nook, for example have Great Crested Newts breeding grounds there and the extensive drainage that will be needed to develop this site will seriously disturb these newts. The newts are a protected species and as such an alternative development site should be considered by the Planning Department prior to any planning permission being granted.

From the detail in this response I am sure that you can tell how disappointed I am with the Consultation document. It seems to say one thing regarding housing and yet, as a Planning Department, you are doing the opposite e.g. not developing brown field sites before Greenfield. Also I cannot stress how inappropriate it is to carry on allowing developers to submit planning applications for housing when you are carrying out a period of public consultation. You are doing everything the wrong way round. Developers are all trying to secure planning permission for Green field sites. That all should be put on hold until the public has their say as to whether we agree to green field being developed when brown field sites are more than available.

Council Response: Comments noted. With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

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## 7 Individual

H1k - Wynyard Masterplan

7/1: Wynyard expansion should require A19 road surface noise improvement.

H1l - Wynyard Village

Council Response: Planning law and national planning policy is clear that mitigation should be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. It is envisaged that the noise issues regarding the concrete surfaced section of the A19 will not make development envisaged at Wynyard unacceptable. It is unlikely that the development will directly deliver the improvement requested, as the proposal will only be designed to upgrade highway infrastructure required to satisfactorily access the development.

EMP3 - Key Employment at Wynyard Park

H1m - Wynyard Park

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## 8 Individual

H1i - West Yarm

8/1: I do not support the inclusion of the West and South West sites in the Yarm area. Yarm cannot cope with further traffic due to the lack of infrastructure both in the Town Centre and on surrounding roads. There are also problems with the likes of water pressure and electrical supplies throughout the Yarm area. There are waiting lists currently at local medical centres. The S/W Yarm site is in the 'buffer' zone between Yarm and Kirklevington and this area needs protecting otherwise in future years this area will be built up all the way up to Kirklevington. Extra traffic from these sites may well use Forest Lane and Picton Long Lane as 'rat runs' to beat the queues on Green Lane Yarm. Mitigating measures that may be introduced will further the 'urban' nature of the area such as reducing the rural feel of Crossroads roundabout etc

H1j - South West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

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## 9 Individual

H1i - West Yarm

9/1: Policy H1h and H1i. Concerning housing development in Yarm. I should like to oppose any scheme for housing development in this area for reasons outlined in your document but primarily because of the strain on infrastructure and resourcing. Anyone who has queued in the traffic which is Yarm high street must say NO to this latest business venture.

H1j - South West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

## 10 Keep Eaglescliffe Special

### H1b - Urlay Nook

10/1: We are writing in the hope that you may be able to assist us. We are a group of local residents who work as part of the wider community to try to minimise the impact that housing development has on our local area. One area of focus is environmental and natural habitats.

It has been brought to our attention that there are discussions around developing a Greenfield/agricultural area of natural habitat and beauty at Urlay Nook, Eaglescliffe, Stockton-on-Tees TS16. The intention is to build up to 570 houses on this open landscape. Planning for phase 1 of the development has yet to be applied for and we are led to believe that it will be submitted in August 2012.

This land is near to the former Elementis Ecology site. The site will need extensive drainage work to allow the development to go ahead. We have had confirmed today that the fields that they are looking to develop have Great Crested newts on site and that the drainage work would majorly disturb the newts. It is understood that the site has been designated for its population of great crested newts *Triturus cristatus*. EcoNorth have recently carried out great crested newt surveys on a number of water bodies/ways within 100m of the proposed development site and identified a great crested newt breeding population here. It is our understanding that they are a widely protected species due to their decline in numbers and that their distribution is patchy. Nationally the species is threatened. The decline is due to loss of habitat, especially the infilling of ponds and the disturbance to and the destroying of their natural habitats. It is our understanding that Great Crested Newts are fully protected by law.

Great crested newts are fully protected under UK and European legislation:

- Bern Convention 1979: Appendix III
- Wildlife & Countryside Act (as Amended) 1981: Schedule 5
- EC Habitats Directive 1992: Annex II and IV
- Conservation (Natural Habitats etc.) Regulations 1994: Schedule 2
- Countryside Rights of Way Act 2000 (CRoW 2000)

Great crested newts are listed on Schedule 5 of the Wildlife & Countryside Act 1981

- Section 9(4) makes it an offence to intentionally damage, destroy, obstruct access to, any structure or place which great crested newts use for shelter or protection. It is also an offence to intentionally disturb them while occupying a structure or place which it uses for that purpose i.e. their breeding ground and natural habitat
- Their inclusion on Schedule 2 of the Conservation Regulations 1994 affords great crested newts extra protection by also making it an offence under Regulation 39(1) to deliberately capture, kill or disturb great crested newts or to deliberately take or destroy their eggs, or damage or destroy a breeding site or resting place. Regulation 39(2) makes it an offence to keep, or transport, or exchange great crested newts or any part or thing derived from them. Paragraphs 39(1) and 39(2) apply to all stages of their life cycle.

This level of legal protection allows areas to be designated as Sites of Special Scientific Interest (SSSI) and/or Special Areas of Conservation (SAC) for the presence of great crested newts. These designations bring legal restrictions to the management and operations that can occur in such sites, to help conserve the great crested newt and the specific habitats it requires.

To that end, we would like to designate Urlay Nook as one of these Sites of Specific Scientific Interest.

We understand that it is best if great crested newts and their habitats are protected before planning permission has been given for development of a site and to that end we intend to inform the following organisations of the threat to the Great Crested Newt on this site –Stockton-on-Tees Planning Authority, Wildlife Trust, DEFRA, Natural England.

We understand that these organisations will ensure that appropriate surveys are licensed to establish the status of newts on the site and that alternatives to the proposed development are considered as part of the planning process.

We wish to avoid at all costs the translocation of the newts to another suitable site as translocations are not always successful and the methods are costly in both time and money.

We would appreciate your help on this. As you can see time is of the essence. If we do not act quickly yet more natural habitats for the Great Crested Newt will be permanently destroyed.

Thank you in advance for your assistance on this. Should this letter not have reached the relevant department, please can I ask that you forward it on my behalf. Thank you again.

Council Response: Responsibility for the designation of SSSIs rests with Natural England and the Council is unable to assist with requests to designate a site. However, the Council is aware of the protected species issues within the area and this issue was considered within the planning application process for Phase 1 of Urlay Nook. Any



further proposals for development on the site will be required to submit a protected species survey and, if necessary, propose mitigation measures.

## 11 Marine Management Organisation

SP1 - Presumption in favour of sustainable development

11/1: Policy SP1 (p11) - We support this policy in favour of sustainable development.

Council Response: Support welcomed.

EMP6 - Port and River Based Uses

11/2: Policy EMP6 (p60) - We were pleased to see a policy specifically relating to port and river uses. We would recommend an additional point at the end stating that developers will need to meet the regulatory requirements of the Marine Management Organisation, for example the Marine and Coastal Access Act 2009 and Marine Plans (or the Marine Policy Statement where Marine Plans do not currently exist) in relation to waterfront development below the mean high water springs mark.

Council Response: Comments noted. Amendments have been made to the document.

PF3 - Bowesfield Marina

11/3: Paragraph 7.34 (p98) discusses the proposals in policy PF3 regarding Bowesfield Marina. We would recommend the addition of text to outline that the proposed marine development would need to comply with the Marine Works (Environmental Impact Assessment) Regulations 2007 and the licensing requirements of the Marine and Coastal Access Act 2009 administered by the MMO.

Council Response: Discussions with the MMO have identified that the site is not on the tidal stretch of the River Tees. The MMO have confirmed that this development is not subject to any regulations administered by the MMO.

11/4: Section 9 'Environmental Protection and Enhancement', paragraph 9.36 (p152) – We were pleased to see reference Marine and Coastal Access Act (2009) and IFCAs in this paragraph.

Council Response: Support welcomed.

11/5: Finally, please be aware that any developments taking place below the mean high water springs mark or in any tidal river to the extent of the tidal influence may require a marine licence from MMO. Please visit the MMO website for more details <http://marinemanagement.org.uk/licensing/index.htm>

Council Response: Comments noted.

## 12 Individual

H1j - South West Yarm

12/1: I totally object to the southern extension of the limit to development at Green Lane (south of Yarm). This was never on the table when first consultation took place. Already there are planning proposals for this land. Data for anticipated new housing and associated jobs is at best flimsy and at worst unsubstantiated.

Council Response: The Issues and Options consultation identified the Land South of Green Lane (South West Yarm) site as one of the options. Comments regarding housing need and demand are addressed in the Housing Need and Demand topic paper.

## 13 Individual

Consultation

13/1: Why not have a venue centrally situated with 'Passing Trade'?  
Are our views taken seriously?  
The pollution issue?

Council Response: In order to publicise the preferred options draft of the Regeneration and Environment LDD, the Council has undertaken a number of drop-in sessions around the Borough in a variety of locations. This comment was received at the Egglecliffe Community Centre drop-in session, which was the closest community facility available for hire to the Uray Nook housing site. Drop-in sessions were also held at other locations as near to housing sites as possible, with two drop-in sessions held at Stockton Central Library.

All comments submitted to the consultation are analysed. The considerations raised are then assessed. The selection of sites in the document involves balancing public opinion, national planning policy and technical evidence.

Pollution is part of the assessment of policies undertaken through the Sustainability Appraisal and Habitats Regulations Assessment. It is envisaged that any pollution

issues associated with particular developments will be dealt with, including mitigation where necessary, at the planning application stage. Planning law and national planning policy is clear that any mitigation should be necessary to make development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

#### 14 Individual

14/1: Eggescliffe Village is split between 4 maps so Conservation Area is not given due prominence. Conservation area boundary is too faint and is of lesser significance than the character area boundary.

Council Response: Comment noted. The representation of 'conservation areas' will be amended to ensure that they are easily identifiable and given more prominence on the policies map.

#### 15 Individual

H1b - Urlay Nook

15/1: This planned development will, undoubtedly, have a massive negative effect on the already saturated road network around Eggescliffe and Road. The 'wooly' token mention of cycle lanes and public transport are meaningless as there is no room for such facilities.

Council Response: With regards to development at Eggescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

H1b - Urlay Nook

15/2: I can see no specific mention of investment to provide extra provision of the increased number of school places.

Council Response: With regards to development at Eggescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

15/3: With regards to development at Eggescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

Council Response: These comments are addressed within the Urlay Nook Topic Paper.

#### 16 Individual

H1b - Urlay Nook

16/1: I wish to object to the planning proposals for 570 residential homes at Urlay Nook. With the proposed development of 845 homes at Allens West now going ahead, a full evaluation of the impact of these homes on the community in Eggescliffe should be undertaken, once these have been built, before any further expansion plans are approved. The current road, shops and school infrastructure in Eggescliffe cannot currently cope with the existing number of residential homes, and in my opinion it would be extremely foolish to approve yet more homes on our small community until the problems with the existing infrastructure have been rectified.

Council Response: With regards to development at Eggescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft of the Regeneration and Environment Local Plan.

H1b - Urlay Nook

16/2: Shops – there is only one small parade of shops in Eggescliffe and one small supermarket (Tesco). The parade of shops has burnt down and it is not certain at this stage whether the site will be redeveloped. Access to the supermarket is often difficult, due to the heavy build up of traffic at the roundabout.

Council Response: Comments relating to infrastructure in Eggescliffe are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.

H1b - Urlay Nook

16/3: Roads – the existing road infrastructure around Durham Lane and Urlay Nook Road cannot cope with the current amount of traffic, usually trying to pass through

Yarm. I am aware that there are plans for additional parking in Yarm, but the majority of this traffic is trying to get through Yarm. On some days the traffic backs up all the way past Allens West station and to the Allens West site, so it will be interesting what it will look like when the additional 845 homes are built there. There are also no road crossing points along Urlay Nook Road for children accessing Egglecliffe school.

Council Response: Comments relating to infrastructure in Eaglescliffe are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.

H1b - Urlay Nook

16/4: Schools – Egglecliffe school is currently full and cannot cope with the number of existing secondary school age children. Despite only living a quarter of a mile from the school, my eldest daughter was denied access to the school and after appealing was turned down on the basis that the school was full. No alternative was offered by Stockton Council and so she has to travel to Darlington each day to attend school. Stockton Councillors should be ashamed that despite approving yet more housing for Egglecliffe, a neighbouring council has to provide schooling for children residing in Egglecliffe, as Stockton cannot cope. Any planning proposals must also include plans to significantly increase the number of school places in Egglecliffe.

Council Response: Comments relating to infrastructure in Eaglescliffe are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.

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### 17 Individual

H1b - Urlay Nook

17/1: I wish to post my objection to the amount of proposed new housing for Yarm and Egglecliffe. Yarm cannot cope with any more traffic, especially of upward of over 1000 new dwellings. The traffic situation in the 3 entrances to Yarm High Street is diabolic currently and will surely gridlock if these houses are built. Build on brownfield sites, not greenfield, if brownfield sites were the only ones that are on offer, the building industry will take those sites. The whole ambience of Yarm will change if these developments continue. Put the people of Yarm and Egglecliffe first and save our environment.

H1i - West Yarm

H1j - South West Yarm

Council Response: Comments regarding traffic, brownfield sites and the character of Yarm are addressed in the Yarm and Kirklevington Topic Paper. With regards to development at Egglecliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

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### 18 Individual

H1i - West Yarm

18/1: Having been resident in Yarm for over 30yrs I am disappointed that Stockton Council seem to be ignoring the needs of the current population. There are no facilities for the young people of the area eg as in Stokesley a small leisure facility as all such facilities are in private clubs, the road infrastructure worsens daily with some residents being prisoners in their own home at certain times of the day, parking in Yarm has always been difficult, local bus services are poor. So I feel that to allow more building in the area would have a detrimental effect on all current residents.

H1j - South West Yarm

Council Response: Comments regarding traffic and parking are addressed in the Yarm and Kirklevington Topic Paper .

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### 19 Individual

H1i - West Yarm

19/1: I would like to register my objection to development within Yarm, due to concerns of extra traffic delays in Yarm, and removal of the green belt with its associated impact on quality of life, and wildlife. I find the statement "Advice from the Highways Agency is that development of sites in Yarm would be unlikely to have a significant effect on the Strategic Road Network" to be highly dubious, and ask what that specific advice was, and on what grounds was made? I recall a traffic survey being mounted in the housing estates around Yarm on a quiet Saturday morning, was it this? I would call for a full traffic impact report on the proposed developments, to be conducted during the working week in school term time and at peak times of 8am to 9am and 3.30pm to 6pm. Yarm is a natural bottle neck due to its location within the meander of the river, it is physically limited in size and has already been developed beyond its comfortable limits. If there is to be further development in and around Yarm then a new road bridge must be built over the river by passing the high street. Otherwise any new development must only take place within close proximity to the main arterial routes of the A19 and A66. I therefore object to any further development of Yarm due to the negative impact this would have on the road network, causing difficulty in being able to travel around the area, thus negatively impacting on the quality of life of Yarm residents including myself. Which I believe is grounds for objection under the localism bill.

H1j - South West Yarm

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper .

## 20 Individual

H1i - West Yarm

20/1: i wish to lodge my objection to the proposed development at morley carr farm worsall road yarm. I relocated to this area as I wanted to live in a semi rural area, had I wanted to live in an urban area I would have done so. Yarm has a uniqueness although only 10 miles from Middlesbrough it feels like a million miles, we love our area , I walk as a method of keeping fit and often along worsall road I would hate for it to be just another concrete jungle . areas such as yarm are rare , please don't spoil them

Council Response: Comments regarding the desirability of Yarm as a place to live are addressed in the Yarm and Kirklevington Topic Paper .

## 21 Individual

H1i - West Yarm

21/1: my husband has lived in yarm almost all of his 47 years and I too have been happy to relocate here we need to express our views of horror at ALL of the proposed building and development plans for the yarm area. yarm doesn't need, want or could cope with any further houses(the traffic would be horrendous and the schools would not be able to cope and the loss of our beautiful countryside) please consider the views of current yarm residents before going ahead

H1j - South West Yarm

Council Response: Comments regarding traffic and education provision are addressed in the Yarm and Kirklevington Topic Paper .

## 22 Individual

H1i - West Yarm

22/1: Policies H1i & j - despite the statements 8.92 & 8.106, it appears that these have no standing with regards to the proposals. It is impossible to see how remodelling a roundabout will improve traffic flows through Yarm, as the congestion is in the town centre. The strategy appears to be dependent on the existing rail service via Yarm station. There is no proposal to include this in the Tees Metro / Light Railway plans. Commuter trains only run hourly - they need to run every 10 - 15 minutes at peak times for this to be an effective alternative to using the car. There is also no connection to Eaglescliffe, and you have to change to get to Darlington - crazy! I am also concerned that the policies identified above appear to be moulded around giving preference to proposals made by Yarm School ( Policy H1j-3). The policies do not appear to take into account the number of 4+ bedroomed properties in single occupancy or newly retired that will be coming on the market in the next 10 years, or sooner. There are already many of these properties currently on the market - many vacant that cannot be sold. It is pointless building more.

H1j - South West Yarm

Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper .

Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic Paper.

## 23 Individual

H1i - West Yarm

23/1: I would like to voice my concerns and objections to some of the proposals for additional residential dwellings built in the Yarm area (ref H1i & H1j on your map) My husband and i moved to Yarm just 6 years ago, we moved here for 1 reason, the small, quaint and semi-rural location it is situated in. The proposals to build an additional 1000+ homes surrounding our estate is seriously giving us concern to the extent we are now proposing to leave Yarm and locate elsewhere. It will only take a couple of hundred like-minded residents to do the same and Yarm will end up with empty homes just ripe for Landlords to sweep up properties and place tenants in them - the community spirit in Yarm will then be lost for good. Do SBC really want this as a lasting legacy for Yarm, the supposed 'jewel in the crown' of the area? Please think before you proceed with these plans, take a look at our neighbours in North Yorkshire and celebrate the quaint towns and preserve them.

H1j - South West Yarm

Council Response: Comments regarding the desirability of Yarm as a place to live are addressed in the Yarm and Kirklevington Topic Paper

## 24 Individual

H1i - West Yarm

24/1: I strongly object to the proposals for further development of Yarm. It will totally destroy our beautiful town of Yarm. We do not want anymore traffic going through Yarm as it is bad enough already, congested!

H1j - South West Yarm

Council Response: Comments regarding traffic and the desirability of Yarm as a place to live are addressed in the Yarm and Kirklevington Topic Paper

## 25 Individual

H1i - West Yarm 25/1: How can these proposed residential developments be even considered when the traffic situation in yarm at present is so dire.I am considering moving from yarm due to traffic congestion spoiling everyones quality of life.Wake up everyone and stop this situation from getting any worse!

H1j - South West Yarm Council Response: Concerns regarding traffic are noted and are considered within the Yarm and Kirklevington Topic Paper

## 26 Individual

H1i - West Yarm 26/1: Yarm simply could not cope with more housing. Traffic already is frequently at a standstill, where would everybody park? Also the old MOD site at Eaglescliffe is already scheduled for housing development.

H1j - South West Yarm Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper .

## 27 Individual

H1i - West Yarm 27/1: I am sure you will have already been made aware of the traffic problem pollution and noise pollution in addition to the destruction of a prime area of countryside in the pursuit of profit by a here today gone tomorrow developer, and the benefits the (private) school will receive to help improve the education of the fee paying rich elite.

H1j - South West Yarm Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper

H1i - West Yarm 27/2: Also there is the problem of education and health care, having recently found it almost impossible to obtain a doctor's appointment, the burden on the practice will be intolerable.

H1j - South West Yarm Council Response: Comments regarding health and education provision are addressed in the Yarm and Kirklevington Topic Paper

H1i - West Yarm 27/3: Secondly my current property is up for sale and I am certain both developments are putting off potential purchasers as many have mentioned this and no doubt like many of my neighbours I am concerned of the potential effect this is having on house prices. It is with a heavy heart that should I sell my home I have absolutely no plans whatsoever to remain in Yarm and the main reason for this is the potential development which will ruin a much loved town. I wonder how many other long term residents feel the same way as I? I believe also the law states that any developer must make a certain percentage of properties available for the government first buy scheme, and I wonder what sort of people would purchase these houses, perhaps housing associations who would move in problem families and drug dealers as per Ingleby Barwick?, in fact should these developments go ahead Yarm will become another Ingleby Toytown, a sole less mass full of strangers. Thank you for listening to my objections and finally if you hear any reports of strange noises from Yarm Cemetery then that will be my great uncle turning in his grave!

H1j - South West Yarm Council Response: The effect of new housing development on house prices is not a planning issue. Comments regarding the character of Yarm and affordable housing are addressed in the Yarm and Kirklevington Topic Paper .

H1i - West Yarm 27/4: Re Morley Carr Farm and the Yarm school potential development sites I have a personal interest in both of these sites as my great uncle used to own the land opposite the Yarm School playing field site on which Conyers school is built. In addition my father built a property in which I lived that directly faces onto the playing fields. This land was originally sold to the council on the understanding there would be no housing development on the Conyers site and that only a school would be built. Now I hear there could be a development of 500 homes on the playing field site, I note though there have been rumours of this for over 10 years, but only now could this become a dreadful reality. Fortunately I have now moved to the Layfield estate and would no longer have to endure being overlooked by an entire housing estate. Unfortunately the purchasers of my old house will have to endure this and I am sure will have their own objections to make.

H1j - South West Yarm Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

## 28 Individual

H1j - South West Yarm 28/1: I object to the proposed development of Morley Carr Farm for the building of houses. There are surely enough houses in Stockton Borough, when taking into consideration all the development at Ingleby Barwick. Who is going to live in all these houses? Whilst Yarm is a lovely place to live, its infrastructure, and in particular its traffic, cannot sustain any more development.

H1i - West Yarm Council Response: Comments relating to the desirability of Yarm as a place to live and traffic are noted and addressed within the Yarm and Kirklevington Topic Paper . Comments relating to the housing requirement are noted and addressed within the Housing Need and Demand topic paper.

## 29 Individual

H1i - West Yarm	29/1: Developments of West Yarm and South West Yarm will have an adverse impact on traffic. The road infrastructure will be unable to cope with further traffic congestion and that Yarm does not have the capacity to accommodate the vehicles arising from more housing.
H1j - South West Yarm	Council Response: Comments relating to traffic are noted and addressed within the Yarm and Kirklevington Topic Paper .

## 30 Individual

H1b - Urlay Nook	<p>30/1: Schools;- Durham Lane Primary is already at capacity. Junction Farn Primary has agreed to increase capacity by 1 class per year group, total 180 places. Egglecliffe Comprehensive is also oversubscribed. Where are all of the new children going to school?</p> <p>Council Response: Comments relating to infrastructure in Eaglescliffe are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.</p>
H1b - Urlay Nook	<p>30/2: Roads. Current roads have already reached or exceeded capacity. As there are very few job opportunities in the area most people commute. How will the existing road structure accommodate an additional 3000 cars during rush hours morning and afternoon. Currently at various times of day it is already nearly impossible to drive to Yarm, the jewel. Traffic queues from Yarm Bridge upto Allens West, past the roundabout at Tesco's or along Yarm Road. There are also major queues at the junction of Durham Lane with the A66 at Elton. Once you get into the system there is no escape. A new road system is desperately required before any further developments.</p> <p>Council Response: Comments relating to infrastructure in Eaglescliffe are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.</p>
H1b - Urlay Nook	<p>30/3: Environment; Every time there is any reasonable amount of rain my garden floods upto a level of approximately 6". The gardens drain towards Egglecliffe School field. The fields where the housing is proposed already flood. Where is all additional surface water going to go? my garden?</p> <p>Council Response: Comments relating to flooding and drainage are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.</p>
H1b - Urlay Nook	<p>30/4: I would like to object to the development at Urlay Nook on the following grounds;- No consideration has been given to improving local infrastructure before any development. Along with the already existing planning approval for 160 houses this is an additional 500+ houses. In addition there is planning approval for 850+ houses at Allens West, total approx 1500 houses. By the amount of development already agreed and proposed for Egglecliffe and Yarm, approximately 4000+ houses the quality of life for existing residents will change dramatically unless infrastructure issues are resolved. New Schools New Roads, to let traffic get away from the area or into Yarm. Environment. Avoid the very serious threat of flooding.</p> <p>Council Response: The Objection is noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.</p>

## 31 Individual

H1i - West Yarm	<p>31/1: Morley Carr Farm App No 12/0980/OUT There can be no justifiable reason for this Application for 350 - 400 Dwellings to be approved. The area is currently rural and picturesque and an area I use regularly for walking. The effect of approving this Application will further increase the unbearable traffic problems we encounter in trying to get into or through Yarm Town Centre. The current Traffic and Parking problems will be greatly exacerbated with the extra Traffic movements that this Application will bring. Any Development which adds to the current Traffic problems in Yarm MUST not be approved because it is we, the regular residents and users of Yarm who will be inconvenienced and it will also significantly deter Visitors from outside the Area to come and use Yarm.</p> <p>Council Response: Comments regarding the Morley Carr Farm planning application and traffic are addressed in the Yarm and Kirklevington Topic Paper .</p>
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## 32 Individual

H1i - West Yarm 32/1: Morley Carr Farm App No 12/0980/OUT There can be no justifiable reason for this Application for 350 - 400 Dwellings to be approved. The area is currently rural and picturesque and an area I use regularly for walking. The effect of approving this Application will further increase the unbearable traffic problems we encounter in trying to get into or through Yarm Town Centre. The current Traffic and Parking problems will be greatly exacerbated with the extra Traffic movements that this Application will bring. Any Development which adds to the current Traffic problems in Yarm MUST not be approved because it is we, the regular residents and users of Yarm who will be inconvenienced and it will also significantly deter Visitors from outside the Area to come and use Yarm.  
 - Impact over Leven valley and current road widening that would be required over the bridge at the bottom of the valley. How much more traffic can that bridge take?  
 Council Response: Comments regarding the Morley Carr Farm planning application and traffic are addressed in the Yarm and Kirklevington Topic Paper .

**33 Individual**

H1i - West Yarm 33/1: - Longer term Impact to local businesses on Yarm High Street which will become a no go zone from a customer point of view due to congestion. One thing nobody wants to see is any more charity shops on the high street. - Already a lack of parking in the high street before further development begins. What will be the situation with a potential 2000+ cars coming through a small town centre and trying to park their cars?  
 H1j - South West Yarm

Council Response: Comments relating to the impact upon local business are noted and the comments relating to highway infrastructure are addressed within the Yarm and Kirklevington Topic Paper.

H1b - Urlay Nook 33/2: - A lack of local amenities such as schools and doctors in what would be proposed to be a very busy town - Impact to wildlife in the surrounding area in particular the area in the Leven Valley.  
 H1b - Urlay Nook

Council Response: The comments are noted and considered within the Yarm and Kirklevington Topic Paper.

H1i - West Yarm  
 H1j - South West Yarm  
 H1b - Urlay Nook 33/3: - Increased environmental costs and impacts caused by use of energy resources and pollution caused by increased traffic.

Council Response: Comments relating to the use of energy resources are noted and concerns regarding pollution are addressed within the Yarm and Kirklevington Topic Paper.

H1i - West Yarm  
 H1j - South West Yarm  
 H1b - Urlay Nook 33/4: - Impact to surrounding countryside and wildlife for all the proposed developments. In summary I don't believe that enough consideration has been given to some key factors for the proposed developments in the Yarm area.  
 H1i - West Yarm

Council Response: These comments are considered within the Yarm and Kirklevington Topic Paper.

H1j - South West Yarm  
 H1b - Urlay Nook 33/5: My comments are regarding all the proposed building applications that have been submitted around the yarm and egglescliffe areas. Key objections are based on the following : - From reading the applications there has been absolutely no provision for increased road infrastructure to get through the "nightmare" that is already Yarm high street. I have no objection to anyone building in Yarm/Egglescliffe if the road infrastructure is in place currently I have seen nothing that proposes such a development to cope with the increased number of vehicles for both areas. The most important one for me being the lack of highway provision given to the plans. This would particularly apply to Leven Bank, and some way of avoiding the town centre of Yarm rather than just having 1 road through the town - a bypass would have to be built.  
 H1i - West Yarm  
 H1j - South West Yarm

Council Response: Comments relating to highways infrastructure are noted and addressed within the Yarm and Kirklevington Topic Paper. With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

**34 Individual**

H1i - West Yarm	34/1: We object strongly to this proposal as the current infrastructure is struggling to cope without the increased pressure this development will place on it.
H1j - South West Yarm	Council Response: Comments relating to infrastructure are noted and addressed in the Yarm and Kirklevington Topic Paper .

### 35 Individual

35/1: Two separate comments put in to Survey Monkey

Ref - 1949685124

I object to Yarm schools proposal to replace the Green Lane Playing fields to opposite the River Tees in the parish of Egglecliffe. The reason is that this is agricultural land and the development will impinge upon the Tees Heritage Park which has lottery funding to develop and improve it, and thus will destroy habitats of wildlife and also destroy the walking, cycling, horseriding and visual amenities which are for the pleasure of the people of Yarm.

Council Response: Comments relating to the planning application to develop land north of the River Tees, Tees Heritage Park and wildlife are addressed within the Yarm and Kirklevington Topic Paper .

H1i - West Yarm	35/2: Two separate comments put in to Survey Monkey
H1j - South West Yarm	Ref - 1949701750

I object to the proposal to the proposal to the Morley Farm proposal for 350-400 dwellings because this will impact on the wildlife corridor which has existed for hundreds of years. I also object to the Mount Leven Farm for the same reason and also the impact this will have on the Leven Valley. I also object to the proposal to build on the Green lane playing fields since this is within the Kirklevington environs and will impact to the detriment of the Wildlife corridor which has been in existence for hundreds of years.

Council Response: Comments relating to planning applications and the impact on the wildlife corridor are addressed in the Yarm and Kirklevington Topic Paper .

### 36 Individual

H1i - West Yarm	36/1: I do not believe that any more planning permission should be granted for houses in and around the Yarm and Eaglescliffe areas until the local road network has been looked at. The traffic into Yarm in all directions is already appalling and building more houses would make this situation worse.
H1j - South West Yarm	Council Response: Comments relating to highway infrastructure are noted and addressed within the Yarm and Kirklevington Topic Paper. With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Uray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Uray Nook allocation has not been included within the Publication Draft.
H1b - Uray Nook	

### 37 Individual

H1b - Uray Nook	37/1: The Yarm area is already a transport nightmare where it can take 30 minutes to travel through Yarm at peak times already without the addition of traffic that would come with these developments. Leven Bank closures during the last few years because of accidents and bridge repair works created terrible problems for residents of the area which will only get worse if there are the massive increases in traffic that the proposed developments would cause. The railway bridge at Yarm Station with single traffic flow is not designed for the increase in traffic that the proposals will create. The Shell roundabout on Thirsk Road/Green Lane in Yarm has huge queues at peak times now which are already causing traffic chaos at some times. The development proposals will cause this to be a permanent fixture for residents.
H1j - South West Yarm	
H1i - West Yarm	Council Response: Comments relating to highway infrastructure are noted and addressed within the Yarm and Kirklevington Topic Paper.

H1b - Uray Nook	37/2: I wish to object to the development plan proposals to allow housing development on green field areas surrounding Yarm. There are plenty of brownfield locations across the borough that developers should be persuaded to use by sbc before taking green belt land for the developers to make money from. It is unacceptable that the green belt status of land be overturned just because developers prefer to build on it rather than brownfield sites. This goes against all government policies since the 1947 Town and Countryside Act surely. I have always believed that Green Belt land was safe from development because no authority would be short sighted enough to overturn
H1i - West Yarm	



H1j - South West Yarm

it's status. I am very surprised that the current council members would allow this to happen.

Council Response: Green Belt is a national designation; there are no areas of Green Belt within Stockton on Tees of the wider Tees Valley. However, comments relating to the use of greenfield land and brownfield alternatives are addressed within the Yarm and Kirklevington Topic Paper.

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### 38 Individual

H1i - West Yarm

38/1: Yarm is without any real public services such as a park or leisure facilities and I feel that the continual attack on Yarm is a political move on the soft underbelly of Yarm.

H1j - South West Yarm

Council Response: The comments do not relate to any policies in the Regeneration and Environment Preferred Options document

H1i - West Yarm

38/2: I am sure that there are plenty of brownfield sites in Stockton that can be used to develop housing that will not affect Yarm as will these proposed developments.

H1j - South West Yarm

Council Response: Comments regarding brownfield sites are addressed in the Yarm and Kirklevington Topic Paper .

H1i - West Yarm

38/3: I would like to register my objection to the planned development of over 1000 homes to the south of Yarm as publicised recently.

H1j - South West Yarm

I have lived in the Yarm/Eaglescliffe area since 1983, some 39 years and as any resident knows the traffic situation on the A67 into Yarm from the North, West and South is fraught with delays at busy time of the day.

SP2 - Housing Spatial Strategy

I now live on Leven Park at 1 Carpenter Close and regularly have difficulties in leaving home to access Green Lane from Kirk Road, especially as the current speed limit is 50mph. At school times in the morning I can wait 20mins to exit and it will take me another 20-30 minutes to get to the High Street.

It is very obvious to any planner and councillor that the infrastructure in Yarm just cannot cope with the additional traffic that will be generated by over 1000 additional properties.

The proposal by Yarm GS, one of the main causes of the traffic congestion on The Spital to create a Car Park behind the Blue Bell is not really well thought out as the already congested junction at the Cleveland bay will see even more traffic. Whereas I agree that improved car parking in Yarm is required I am convinced that this is not the location. A road bridge over the river behind Stricklands would make more sense.

Has the Council undertaken traffic studies and assessed the impact of additional traffic generated by these proposed developments in Yarm?

With the introduction of Car Parking fees in Yarm these proposed developments to the south with the increased traffic will no doubt have a significant impact on the businesses in the High Street.

Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper.

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### 39 Individual

H1b - Urlay Nook

39/1: How do you see Yarm and Eaglescliffe in 2021?

H1j - South West Yarm

If the plans go ahead to develop all the sites around Yarm and Eaglescliffe without changes in the infrastructure then there will be no distinguishing between Yarm, Ingleby Barwick, Worsall, Kirklevington & Eaglescliffe. There will also be traffic chaos into and out of Yarm. If the developments go ahead there should be another road bridge over the Tees to by-pass Yarm. Stockton Council should insist on this before granting any further development.

H1i - West Yarm

Council Response: Comments relating to highways infrastructure are noted and are addressed within the Yarm and Urlay Nook Topic Papers.

H1b - Urlay Nook

39/2: The LDS states that the plan will cover the built up area of Yarm and Eaglescliffe. Are there any particular places that should or should not be included? Please draw your preferred boundary on the map of Yarm and Eaglescliffe overleaf.

H1i - West Yarm

All the existing brownfield sites in SBC should be developed first. Further destruction of farmland should be avoided.

Council Response: Comments relating to greenfield development and agricultural land are addressed within the Yarm and Kirlvington Topic Paper.

H1j - South West Yarm

39/3: How could Yarm and Eaglescliffe be developed as tourist destinations?

Yarm should remain as it is - an excellent market town and remain on the fringe of other tourist attractions like Yorkshire Dales, North Yorks Moors, Teesdale Way, Cleveland Way etc.

Council Response: Comment noted

39/4: What tourism facilities should be promoted and where?

None.

Council Response: Comment noted

39/5: What type of housing will be needed over the coming years?

None in Yarm / Eaglescliffe - brownfield sites should be developed first

Council Response: Comments regarding brownfield sites are addressed in the Yarm and Kirlvington Topic Paper.

39/6: Where should new residential development be situated?

Existing brownfield sites.

Council Response: Comments regarding brownfield sites are addressed in the Yarm and Kirlvington Topic Paper.

39/7: How can Yarm's role as a commercial centre be strengthened?

Yarm is a market town with excellent shops, restaurants, bars and other small businesses, including finance, law, estate agents. It is fine as it is.

We do not want another 'Stockton High Street' debacle.

Council Response: Comment noted

39/8: How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?

By less development of large properties into appartments.

Council Response: Comments noted

39/9: What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?

Volume of cars, car parking, large juggernauts, large traffic jams

Council Response: Comments regarding traffic are addressed in the Yarm and Kirlvington Topic Paper.

39/10: What changes should be made to car parking in Yarm and Eaglescliffe?

Yarm Needs a long stay car park

Council Response: Comment noted

39/11: How can public transport be improved?

Public transport is ok

Council Response: Comment noted

39/12: What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?

There are hazards in Yarm High Street for pedestrians and cyclists where people park on both sides of the High Street.

Council Response: Comment noted

39/13: Is the provision of open space in Yarm and Eaglescliffe sufficient?

Yes

Council Response: Comment noted

39/14: Could access to open spaces be improved?

No comment.

Council Response: Noted

39/15: Do some places need increased or better recreation facilities? Are some facilities under used?

Yarm should have had a swimming pool many years ago?

Council Response: Comment noted

39/16: What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?

No further development until a new by-pass \*(bridge over river) is built.

Council Response: Comment noted

39/17: Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?

Existing brownfield sites - encouraged

Greenfield sites - discouraged.

Council Response: Comments regarding brownfield sites are addressed in the Yarm and Kirklevington Topic Paper.

39/18: Are there any other key issues you feel should be considered in preparing the YEAPP?

I object to the proposed redesignation of land. Stockton Council should not meddle in Yarm High Street. Their track record regarding Stockton speaks for itself.

I object to the destroying the character of Yarm and associated farmland.

How will existing schools cope with proposed developments.

#### 40 Individual

H1i - West Yarm	40/1: The proposed developments for additional housing at : Moreley Carr Farm, Yarm Playing Fields, Mount Leven Farm are unnecessary and will destroy the unique nature of Yarm. If , these developments go ahead the town's traffic problems with become even more problematic. Yarm will end up a suburb of Stockton and will loose its identity and if this was the case I and many others will have little choice but to live elsewhere. Yarm has more than ample housing
H1j - South West Yarm	
SP2 - Housing Spatial Strategy	
SP4 - Green Wedge	Council Response: Comments regarding planning applications, traffic and the character of Yarm are addressed in the Yarm and Kirklevington Topic Paper .

#### 41 Individual

H1i - West Yarm	41/1: I wish to express my views regarding the proposed developments in Yarm and Egglecliffe. Although I fully understand and appreciate we need to increase housing which will in turn help local business's, the number of proposed developments is just ridiculous. The traffic and parking in Yarm is currently almost at breaking point and that's before what has already been approved is built (Urlay Nook). My main issue though is with the mount leven farm development. Building on an old MOD site is one thing but building on an area of the Teesside heritage park is another. Leven bank is dangerous at times and Yarm will just end up being attached to Ingelby Barwick, we need to draw the line somewhere (if mr Majid is so 'concerned' about the community why doesn't he build his retirement village on his talls trees development we he can't sell!)
H1j - South West Yarm	
SP4 - Green Wedge	
	Council Response: Comments regarding traffic, Tees Heritage Park and the Mount Leven retirement village planning application are addressed in the Yarm and Kirklevington Topic Paper . With regards to development at Egglecliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

#### 42 Individual

H1b - Urlay Nook	42/1: We strongly OBJECT to the lack of consultation in the proposed development of the Greenfield sites in Egglecliffe and in particular Urlay Nook. Local views are being overlooked.
	The planned greenfield developments will not be economically, environmentally and socially sustainable so therefore are in breach of the National Policy Planning Framework. Brown field sites should be developed first but public views are being ignored.
	A more informed decision should be made on the probable over development of the local green field sites and not the knee jerk decision enabling developers to make quick money.
	Council Response: The objection is noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential allocation has not been included within the Publication Draft.

#### 43 Individual

H1i - West Yarm	43/1: NO MORE HOUSES.
H1j - South West Yarm	Council Response: Comments noted.
H1b - Urlay Nook	43/2: Stop trying to ruin Yarm and Egglecliffe. I have lived here all my life and getting around the area by road is a joke. Even after midnight, we get traffic jams in Yarm.
H1i - West Yarm	Council Response: Comments relating to highway infrastructure are addressed within the Yarm and Kirklevington Topic Paper.

44 Individual

H1j - South West Yarm

44/1: Anyone living in the Yarm area is well aware of the existing traffic problems at certain times of the day. It is, surely, an inescapable fact that an additional 1,035 homes will simply exacerbate the problem and make the quality of life, and local travel, intolerable for local residents wishing to use all of the facilities in Yarm?

H1b - Urlay Nook

H1i - West Yarm

In addition to the actual travel problems, there is the question of car parking. Car parking spaces behind the Blue Bell will not solve the problem, and would only make things worse. That is a really busy stretch of road at any time. Imagine cars trying to cross the traffic stream in order to enter/leave the car park?

H1 - Housing Allocations

Council Response: Comments regarding traffic and parking are addressed in the Yarm and Kirklevington Topic Paper.

H1 - Housing Allocations

44/2: Where is the evidence that an additional 1,035 houses are needed in the Yarm area? This is an ill-conceived scheme which appears to have been based more upon raising revenues for Stockton BC rather than serving the needs of Council Tax paying local residents, to whom the council owes a clear Duty of Care. Duty of Care must include the rejection of any proposed development which would make worse the daily lives of local residents. As a final point, I would be very interested to learn how many of those on the 'development committee' actually live in the Yarm area?

Council Response: Comments regarding the need and demand for housing are addressed in the Housing Need and Demand Topic Paper

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45 Individual

H1i - West Yarm

45/1: I strongly object to the proposal to include Yarm School Site and Morley Carr Farm in this plan.

The main reasons are:-

I have seen no sensible case for the very large new house build proposed for the Yarm area.

The proposal for the replacement playing fields for Yarm School is on Tees Heritage Site, whose status should be protected.

Road traffic, already a major problem in through the town will become much worse, especially at peak times when all the "new residents" travel to and from places of employment/education etc. I foresee mayhem at the one lane bridge in the middle of the potential proposal.

I do not believe that facilities local facilities such as NHS and education would cope.

Ian Forman, Kirklevington.

Council Response: Comments regarding Tees Heritage Park, traffic, education and health provision are addressed in the Yarm and Kirklevington Topic Paper . Comments regarding housing need and demand in the Yarm area are addressed in the Housing Need and Demand Topic Paper.

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46 Individual

H1b - Urlay Nook

H1i - West Yarm

H1j - South West Yarm

46/1: I have lived in Yarm for all of my life and feel the current proposals will greatly affect the area in more negative ways than positive. Very simply even though I personally do not drive and increase in traffic would be a disaster. I rely on buses which will no doubt get stuck in heavy traffic. My partner already has to set off much earlier than is need to get to work because of current traffic levels so and increase would be a nightmare. I feel buses and traffic delays could effect peoples working life and home life. As for the general area Yarm has high values and is a beautiful area to live in. The Tees Heritage Park project will be greatly effected yet is something money has been pumped into and something I feel is important for the area.

ENV1 - Green Infrastructure

Council Response: Comments regarding traffic, the character of Yarm and Tees Heritage Park are addressed in the Yarm and Kirklevington Topic Paper

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47 Individual

H1b - Urlay Nook	47/1: I would like to object to the proposals for more houses in the Yarm area. I have lived in Yarm all my life and have a local business. I think the traffic in to yarm is already a complete nightmare and if you let all these houses go ahead it will be unbareable. Yarm is a lovely place to live and will no doubt be spoit by more homes. we need to keep the land we have and not turn it into somewhere like Ingleby Barwick where houses have been built on every scrap of land. please don't let developers spoil yarm!
H1j - South West Yarm	
H1i - West Yarm	Council Response: Comments regarding traffic and the character of Yarm are addressed within the Yarm and Kirklevington Topic Paper .

#### 48 Individual

ENV1 - Green Infrastructure	48/1: Throughout the enviromental section (policies ENV1,ENV3) it states "Protecting and enhancing the green spaces/countryside is a key". Yet clearly a number of the sites ride roughshod over these fine words, particularly Mount Leven Farm, the River Tees Corridor and the Yarm Rural Fringe. Clearly your written words are at odds with your plans. Soon you will turn Yarm into part of that sprawling connerbation that is Ingleby Barwick. Itself should have had green areas but they have long since been swallowed up by uncontrolled development and greedy developers.DON'T DO THE SAME TO YARM.
ENV3 - Local Sites	
H1i - West Yarm	Council Response: Comments regarding limits to development are addressed in the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	
H1i - West Yarm	48/2: As a resident of Yarm I wish to make the following general comments specific to Yarm. Throughout the document you make reference to the views of the people. In respect to Yarm, these almost in their entirety relate to the fact that the infrastructure of Yarm, roads and parking in particular are already overstretched and causing serious problems to the people of Yarm. That said there is no serious attempt to address how you will deal with problems, in fact it is swept under the carpet. You need to address this issue, it will not go away. Yarm cannot accomodate another 3000+cars. Most of the people moving into the new housing developments will be commuters and will need to use their cars. It will surely make Yarm an undesirable place to live and will in all likelihood kill off the high street businesses through a lack of parking spaces. ADDRESS THIS PROBLEM SERIOUSLY, IT WON'T GO AWAY.
H1j - South West Yarm	Council Response: Comments regarding traffic and parking are addressed in the Yarm and Kirklevington Topic Paper .

#### 49 Individual

SP2 - Housing Spatial Strategy	49/1: I object to the content of the proposed Regeneration and Environment Local Development Document on the following grounds. 1 The original survey is flawed because it is based on a partial survey, I certainly never saw a survey document. 2 On 27th March 2012 the Minister of State in presenting the National Planning Policy Framework said a) objective is to put unprecedented power in the hands of the community to shape the places in which they live. b) Too many of our natural habitats have been degraded and nature driven out c)makes it clear that relevant policies - such as those protecting the Green Belt ..... cannot be overridden by the presumption d)Makes explicit what was always implicit that Council's policies must encourage brownfield sites to be brought back into use. 3 The Chairman and Chief Planning Officer making statements to the media to the effect that Developers don't want to build on brownfield sites. This attitude encourages developers to look at greenfield sites without regard to views of communities which will adversely affected by such proposals.
	Council Response: In order for the LDD to be found to be sound when it is examined in public by a Planning Inspector (on behalf of the Secretary of State), it must be in conformity with national policy, including the National Planning Policy Framework. Being in conformity with the NPPF involves balancing a number of different factors and the Council is endeavoring to achieve this whilst taking account local circumstances into account.
	The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.
	Each year the Council updates a study called the Strategic Housing Land Availability Assessment (SHLAA). The update is incorporated in the Authority Monitoring Report. The SHLAA is a technical background paper that forms part of the evidence base for the Regeneration and Environment Local Plan by identifying potential housing sites. The sites are then assessed within a framework of their suitability, availability and achievability for housing development. The SHLAA shows that we do not have sufficient brownfield land that is suitable, available or achievable in the period up to 2030 to meet our housing requirement. Therefore greenfield sites have had to be identified to meet the housing requirement.

## 50 Individual

H1i - West Yarm	50/1: I am appalled to hear that today Stockton's Planning Committee approved the proposed Morley Carr housing development in Yarm, a direct contradiction of the currently applicable Core Strategy Development Plan 2010 (which does not envisage or sanction development of this site). I presume this breach of your own policy will be subject to legal challenge, or to reconsideration by the Committee, the Head of Planning or the Chief Executive.
HE1 - Historic Landscape	
ENV2 - Urban Open Space And Local Green Space	I wish to comment on this document, at this, its public consultation phase. I am disturbed by several related aspects of the document, all concerning future housing development proposals. Specifically the document: -does not appear to give enough emphasis to the maintenance of Green Belts and Local Green Spaces -pays little attention to the Tees Heritage Park, for which (in contrast) the Council has previously given some support -proposes housing developments in West Yarm and South-West Yarm on current greenfield sites, in defiance of stated national and local guidelines to preferentially develop brownfield sites and in breach of the National Policy Planning Framework -gives undue emphasis to developments in the southern parts of the borough (particularly Yarm and Eaglescliffe), an area already suffering severe road traffic problems and pressure on local services -gives no detail on how the Council intends to maintain (never mind to enhance) the character of one of the Borough's "jewel-in-the-crown" Conservation Areas (Eggescliffe Village), nor how the council will preserve its setting.
ENV1 - Green Infrastructure	Council Response: Planning decisions are made in accordance with the development plan, unless material considerations indicate otherwise. Details of policy and material considerations which inform decisions made by Planning Committee can be found in the officer's report relating to the application and the minutes of Planning Committee where applicable. Development has now begun at the site referred to and the allocation has therefore been removed from the publication draft of the Regeneration and Environment Local Plan.  The Publication draft of the RELP contains an Environmental Protection and Enhancement section, which includes a number of policies relating to the local environment within the Borough. Although Stockton-on-Tees does not contain any nationally designated Green Belt, it does contain locally designated green wedges and other open spaces which have been protected from most types of development by policies in the plan. Policy ENV3 also recognises the Tees Heritage Park and supports a number of associated proposals.  In response to comments, further policy has been introduced regarding the protection and enhancement of the historic environment.  Comments regarding the need and demand for housing are addressed in the Housing Need and Demand Topic Paper, whilst issues relating to the Yarm area have been explored through the Yarm and Kirklevington Topic Paper.

## 51 Individual

H1i - West Yarm	51/1: I have great concern and object to the planned housing strategies and developments in both the West Yarm and South West Yarm areas. The impact upon the infrastructure of the community of Yarm will be extreme in terms of : - the increased traffic congestion caused by the increase in vehicles from the residential developments. Traffic congestion is already severe. - increased stress on the access to public facilities and shopping neither of which can support such proposed developments - a negative impact on the environment and wildlife within the Yarm area - serious safety issues for schools where significantly increased residential traffic will impact on pupil safety. Especially at the already congested drop off and pick up times and the increased traffic flow on main roads where many pupils need to cross to access school. -vehicular movement for residents across Yarm will be restricted severely by the increased traffic locally.
H1j - South West Yarm	Council Response: Comments regarding traffic and wildlife are addressed in the Yarm and Kirklevington Topic Paper .

## 52 Individual

H1g - Harrowgate Lane	52/1: Following my conversation yesterday with a planning officer and research via your web site relating to the proposed Housing Development off Harrowgate Lane, it appears that you have not considered the impact of the housing development on the existing residents of Letch Lane. The proposed development will impact our properties with the development wrapping around Letch Lane.
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Has Stockton Planning considered a landscaping buffer between the existing properties and any new development? Also is it your intention in conjunction with the national grid to relocate the overhead power lines that drape across the proposed development.

Council Response: A planning application at Summerville Farm has been approved subject to the signing of a s106 agreement. The development of the wider proposed allocation will be delivered in accordance with a Development Framework Document which is currently under preparation.

H1g - Harrowgate Lane

52/2: Submitted online 31 August 2012: I am currently a home owner on Letch Lane. The proposed housing development will have a major impact on myself, my family and my neighbours. The proposed development will wrap around our current properties with what appears to be no thought for all the current home owners of Letch Lane. Can you please provide information relating to the proposed buffer of the development and our current properties. We (Home Owners of Letch Lane) intend to form a residents committee to object to the development.

Council Response: A planning application at Summerville Farm has been approved subject to the signing of a s106 agreement. The development of the wider proposed allocation will be delivered in accordance with a Development Framework Document which is currently under preparation.

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### 53 Individual

H1i - West Yarm

53/1: I have great concerns regarding the increase in traffic surrounding Yarm and through Yarm High Street with the increase in houses and the subsequent increase in cars this will generate.

H1j - South West Yarm

Council Response: Comment regarding traffic is addressed in the Yarm and Kirklevington Topic Paper.

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### 54 Individual

H1b - Urlay Nook

54/1: I have great concerns about housing on these sites. Many bottle necks with traffic in and out of Yarm. Affects to the wildlife in the close area in and around Pit Wood. Many deer and Woodpecker in these areas also other sensitive wildlife.

H1i - West Yarm

Council Response: Comments are considered in the Yarm and Kirklevington topic paper.

H1j - South West Yarm

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### 55 Individual

H1j - South West Yarm

55/0: South West Yarm

8.101 The possibility of 750 homes being built on Yarm School playing Fields would also have a huge detrimental impact on traffic flow through Yarm. Impact on health facilities, availability of schools places.

Council Response: Comments regarding traffic, health and education provision are addressed in the Yarm and Kirklevington Topic Paper .

H1i - West Yarm

55/1: West Yarm

8.86 Land is for agricultural use - not for housing. This is a Green Belt area. High pressure gas pipeline exploded over 40 years ago. I was living in Kirklevington and the noise woke up the whole village. Surely this is a high risk health and safety issue both during excavation and for residents living close to such a danger.

8.88 Fatality occurred on Everingham Road next to Layfield School RTA. Fatality occurred on Worsall Road [...] just before dip in the road - a small boy was killed crossing the road RTA. Severe traffic congestion on all roads surrounding the site, Everingham, Worsall, Green Lane. H&S issues leading to emissions from cars.

8.89 Inadequate infrastructure. Schools at capacity, doctors surgery full.

8.95. Surely Yarm and proposed new housing doesn't come under 'regeneration and revitalisation of disadvantaged areas'. Yarm need to be protected as a historic, unique town. Brownfield sites within the Borough must be built on before any greenfield site is considered around Yarm, Kirklevington, Eaglescliffe and Urlay Nook.

Council Response: Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic Paper. Green Belt is a national designation. There are no areas of Green Belt within Stockton-on-Tees or the wider Tees Valley area. Stockton-on-Tees has a local Green Wedge designation, which is intended to prevent the coalescence of communities and maintain their individual identities. Comments regarding agricultural land, brownfield sites, health and education provision and traffic are addressed in the Yarm and Kirklevington Topic Paper .



**56 Individual**

H1i - West Yarm 56/1: I object to the development of Hi simply because at present Yarm is a very congested town to live in. Any extra housing would simply increase the pressure of access and have a detrimental impact on the residents of Yarm.  
Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

**57 Morley Carr Farm Action Group**

H1i - West Yarm 57/1: Morely Farm Yarm cannot sustain more and more houses. Disagree with further building anymore housing etc.  
Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

**58 Individual**

H1i - West Yarm 58/1: The traffic in Yarm is already at saturation point. The survey carried out on traffic volume was carried out by the developers Taylor Wimpey - how fair is this?  
How can a consultation period be completely disregarded by Stockton Council?  
H1j - South West Yarm Why hasn't there been any consideration of the houses already granted permission and the future congestion of the roads.  
Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

**59 Individual**

H1b - Urlay Nook 59/1: The traffic is too bad as it is. There is no way if in an emergency that the correct services would be able to get there throught the town centre. Building another 2,000 houses would potentially put another 4,000 cars on the road. I think you are making an extremely bad decision. Outrageous.  
H1i - West Yarm Council Response: Comments are noted and concerns relating to highways infrastructure are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

**60 Individual**

H1b - Urlay Nook 60/1: There should be no building on greenfield sites until all brownfield sites are exhausted.  
H1j - South West Yarm There should be no further building in the Yarm/Eaglescliffe/Kirklevington areas until the traffic cingestion and parking problems in Yarm/Eaglescliffe are resolved. The traffic queues in Yarm and Eaglescliffe are currently the worst in Teesside.  
H1i - West Yarm Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

SP2 - Housing Spatial Strategy

**61 Individual**

H1i - West Yarm 61/1: The pressure on the infrastructure of Yarm has already reached bursting point. It will be totally impossible for emergency services to respond effectively to reach their destinations in adequate time. It already takes 45 minutes to go through the High Street at peak times. How can an application for planning permission be passed when the impact on infrastructure has not been adequately surveyed? How can school/childcare provision be expected to respond at the drop of a hat? Why have the builders done the survey? Surely the survey should be done by a neutral body - unfortunately the local authority have already demonstrated which side of the fence they fall.  
Council Response: The Council will liaise with the emergency services regarding future housing development in order to assist the emergency services to plan their service provision. Comments regarding the impact of development on the local highway infrastructure noted and addressed in the Yarm and Kirklevington Topic Paper .

**62 Individual**

H1j - South West Yarm

62/1: The proposals for the six developments (Tall Trees, Morley Carr, Yarm Station West, Yarm Station East, South West Yarm and Mount Leven) will require significant changes and improvements to the B1264 Green Lane. This 3.5 mile stretch of Green Lane currently has 8no major T Junctions, 1no round about and 1no set of single way lights. These are at Glaisdale Road, Kirk Road, Kirklevington Prison, A167 Thrisk Road, Conyers School In, Conyers School Out, Yarm Station Lights, Yarm Station Car Park, Davenport Road, Allerton Balk, Tall Trees Hotel. This does not include commercial property junctions (Yarm Cottages, Britains Garage, Wycliffe Court, and Prestons Transport). Nor does it include at least 20 no private property entrances. The proposed six developments will add at least a further 8no junctions onto the same stretch of road. These include 1no at Morely Carr Farm, 2 no west of Yarm Station, 2 no East of Yarm Station, 2 no South West Yarm, 1 no at Mount Leven. This does not include any entrances into the proposed park and ride facility that has mysteriously disappeared off the current proposed plan. This total number of junctions, etc, exceeds the parameters needed to implement the dualling of Green Lane, over the 3.5 mile stretch.

H1i - West Yarm

My concern is not for the proposed developments, but that Stockton Council will not consider the full consequences for all of these developments before allowing individual developments to go ahead. As they have done with Tall Trees and Morely Carr. If Stockton Council does not get each developer to fund their 'fair share' of the cost of these necessary improvements then the Stockton tax payer will have to fund any bill to alleviate the increased gridlock that will ensue. My other major concern is that any protest group would be able to put in a legal challenge to Stockton Council (not the developer) for not fulfilling its mandatory duty to maintain reasonable traffic flows and necessary safety measures. Again the cost of dealing with this sort of judicial review would again fall on Stockton's tax payers.

Get the infrastructure parameters in place before you consider any more developments. Stockton Council do not have a good record in this. Sooner or later a protest group will bite back, in my opinion justifiably. I would recommend that a Principal Officer from Stockton Council's Highways dept is present at the next public meeting. If nothing else, he can explain why some of the new junctions (that I think are dangerous) are being allowed.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 63 Individual

H1i - West Yarm

63/1: H1i - West Yarm, H1j - South West Yarm, H1h - Land East of Yarm Back Lane.

H1j - South West Yarm

The same criticisms apply to one degree or another in relation to all these developments:

H1h - Land East of Yarm Back Lane

- 1 Loss of open spaces
- 2 Traffic problems from congestion to gridlock
- 3 Strain on the existing infrastructure: sewage, power supplies, refuse collection
- 4 The questionable 'need' for houses on the proposed sites. What about the streets of empty houses to the north of Yarm Lane, Stockton.

Council Response: The Yarm and Yarm Back Lane housing allocations involve the loss of greenfield land but they do not involve the loss of designated open space. The need to allocate greenfield sites is outlined in the Housing Site Selection Topic Paper. Northumbrian Water is a consultee and sites are not allocated unless water supply and sewerage disposal capacity issues are fully taken into consideration. Comments regarding traffic have been taken into account and detailed assessments undertaken - these issues are addressed in the Yarm and Kirklevington Topic Paper. Comments regarding housing need and demand, including empty homes are addressed in the Housing Need and Demand Topic Paper.

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### 64 Individual

H1h - Land East of Yarm Back Lane

64/1: These developments would put an intolerable strain on traffic, schools and local health care facilities. We were told at today's consultation that developers would be obliged to provide adequate access and additional school places if necessary. This seems to be unlikely in view of the Ingleby Barwick development where similar promises were made re schools and access but these did not materialise until several years later. I do not believe that all these extra dwellings are necessary, as witnessed by many new homes and flats standing empty. This concentrated development in a small town where already people make a point of avoiding coming here due to the notorious traffic congestion has to be a very ill-considered plan.

H1j - South West Yarm

H1i - West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 65 Individual

## H1 - Housing Allocations

### SP2 - Housing Spatial Strategy

65/1: We would prefer to see some of the regeneration and new homes bonus money spent on making brownfield sites in central Stockton suitable for housing, rather than 'urban sprawl' devouring greenfield sites and farmland.

Council Response: The Council continues to support the development of brownfield land and the Regeneration and Environment Local Plan includes policies to encourage the use of these sites where there is a realistic prospect that they will come forward. However, there is a need to identify further land to meet the Borough's housing requirement.

65/2: The present road infrastructure cannot sustain continued development. This could be ameliorated by smarter planning of the road infrastructure. For example, at the Tesco roundabout in Eaglescliffe, traffic is held up frequently by vehicles intending to take right and left turns. However, there is basically only one approach lane. Differentiation into appropriate lanes could ease delay and mean that vehicles could effect a turn without waiting for people in front to clear the approach lane. Further lane markings could also facilitate vehicle flows.

Council Response: Comments noted. Concerns regarding the local highway network are valid and have been explored through the determination of planning applications and the allocation of sites.

65/3: The increase in traffic in the Yarm/Eglescliffe area will inevitably lead to an increase in pollution, which is already at its limits.

Council Response: Pollution is part of the assessment of policies undertaken through the Sustainability Appraisal and Habitats Regulations Assessment. It is envisaged that any pollution issues associated with particular developments will be dealt with, including mitigation where necessary, at the planning application stage. Planning law and national planning policy is clear that any mitigation should be necessary to make development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

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## 66 Mobile Operators Association

### New Policy

66/1: We would take this opportunity however to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Plan. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services." Paragraph 43 confirms that "in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also "aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."

Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (2002). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.

As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that within the Local Plan there should be a concise and flexible telecommunications policy contained within one of the statutory Documents. We suggest that it is contained in the Regeneration and Environment Local Development Document. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;

"Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii)if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii)if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv)If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would consider it appropriate to introduce the policy and we would suggest the following;

“Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Council Response: Comments are noted. A telecommunications policy has been included within the publication draft..

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## 67 Individual

H1j - South West Yarm

67/1: Yarm School Playing Fields, Green Lane Yarm - I object to this development. The proposed development in conjunction with the other confirmed or pending schemes in the area will impose strain on local amenities - schools, shops jobs and roads for which there are no proposed solutions. Jobs cannot be sourced in the immediate area therefore population for this and other schemes will be obliged to fan out from the area to travel to and from other workplaces.

In every direction there are significant bottle necks such as Kirklevington (speed limit introduced for safety reasons, North in Yarm High Street and Bridge, East of Leven Bank and Bridge, light controlled bridge at Yarm Station. No solution to these traffic problems exists or is proposed.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper. The site allocation at South West Yarm allocated as a commitment in the Publication draft does not include Yarm School Playing Fields.

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## 68 Individual

H1i - West Yarm

H1j - South West Yarm

68/1: Policy H1i - West Yarm - I oppose this proposal. The development is at odds with the Localism Bill since Yarm residents oppose the development. The proposal is unsuitable on the grounds of adverse effect on Yarm residents' current rights to access in a reasonable the highway network. This development will cause unreasonable disadvantage to current residents and their ability to access the road system in a manner with current practice. I oppose the proposal since it brings no recreational or environmental benefit to Yarm simply more houses. In my assessment, the Council have acted illegally to grant planning permission for the development ahead of the consultaion, illegally by sanctioning building on green space and by failing to take due account of Yarm residents under the Localism Bill. Policy H1j-South West Yarm - I oppose this policy proposal. The proposal fails on accounts of Local sustainability and quality of life. It fails to give due regards to existing rights of Yarm residents to freely access the road network. It will have a negative impact on access to services and resources such as medical facilities and will have a prejudicial effects on existin g residents. The proposalL is on green space providing buffer against systematic encroachment of the urban area to Kirklevington. The proposal is possibly in violation of limitations and restrictions placed on Yarm school on purchase of this land which limits to recreational or agricultural use. The linkage to school field development on the egglescliffe side on the river is significant environmental degradation and represents substantial damage to the nature of the River Tees vista and a loss of a unique environmental lanadscape. The environmental implications are significant to Teesside in general with the loss of an area of substantial natural value and replacement by development.

## 69 Individual

SP2 - Housing Spatial Strategy

69/1: Your development proposals for the West side of the Borough (south Yarm / Kirklevington) are unreasonable. No consideration has been given to a balanced view to redevelopment. Existing infrastructure is unable to cope at present. Yarm is a difficult town to get through at anytime.

No redevelopment is shown for the north of the Borough. No cycleway route exist at all from Green Lane towards Ingleby Barwick and further to the east.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

## 70 Individual

H1b - Urray Nook

H1g - Harrowgate Lane

H1h - Land East of Yarm Back Lane

70/1: [Quotes NPPF: Ministerial Forward, final three paragraphs] The role of communities in NPPF is abundantly clear and the intention of LDD is to create a document that has neighbourhood and community support. It is also abundantly clear that SBC consultation exercise is not achieving the required support either at public consultation meetings or in written submissions.

LDD policies H1b, year 17-18 (12/2047/OUT), H1i, year 16-17, (12/0980/OUT) and H1j, year 19-20, (12/1990/EIS) together with (11/2482/EIS) have raised considerable concern amongst communities inhabitants, mainly arising from the proposed huge percentage increase in size of affected communities, without any provision of off development new infrastructure to mitigate the affects of development, particularly on an already congested road network, for which contributors offer photographic and anecdotal evidence.

SBC leadership, both members and officers are unable to quell this concern. Only reassurances heard are superficial statements that the road network is coping and can cope with these proposed developments. This unsatisfactory situation cannot be allowed to continue to SBC leadership adopting LDD, without having even attempting to quell public concern.

SBC will have the results of public consultation exercise, which should not exclude community responses to planning applications.

Policies H1b & H1J have attracted concerns - [lists names of respondents to planning applications]

Council Response: A series of consultation drop in events was held throughout the Borough during the consultation period, allowing the public to discuss the document with representatives of the Planning Service. All comments submitted to the consultation have analysed and the concerns raised assessed, however the selection of site allocations in the document is a balance of public opinion, national planning policy and technical evidence.

H1d - Blakeston School

70/2: H1d - Blakeston School - I have grave reservations about proposed housing developments, which will affect the A19 Norton to Yarm route, crossing A66 at Elton, via Ring Road / Station Road / Junction Road / Harrowgate Lane / Darlington Back Lane / Yarm Back Lane, which is effectively an outer ring road. Junction Road is already heavily used with congestion, noise and noxious pollution affecting what used to be and still should be a quiet residential area. None of the Eaglescliffe, Hartburn or Harrowgate Lane housing proposals should be proceeded with until there is an effective road network plan, which protects Junction Road from being part of the effective outer ring road.

Council Response: The highways implications of all site allocations have been assessed as part of the site selection and evidence gathering process.

70/3: Housing development on the site of the closed Blakeston School should not be permitted. This site should be retained for solely sports and recreation. Encouraging proposals that include the 40 houses whilst retaining the built sports facilities appears a non starter as the built sports facilities are on the wrong side of the school buildings, which are to be demolished. Equivocation seems to be SBC position, which may suggest eventual to abandonment of this initial idea and a resort to housing development of the whole site, which may have a domino effect on Roseworth Club and Jewsons sites. SBC should go ahead with the new entrance between the two existing sports buildings by taking up the Section 106 Agreement monies, £97000, offered by Owens / Barratt. Not taking up this £97000 is incomprehensible.

Council Response: Comments noted. The merger of Blakeston School and Norton School has resulted in the formation of the North Shore Academy in a new purpose built facility at the former Tilery Sports Centre, which includes built sports facilities. The built sports facilities at the former Blakeston School site are therefore no longer required.

Part of the site has been allocated for housing to contribute to meeting the Borough's housing need. A proportion of the remainder of the site will be retained as open space whilst a further section has been safeguarded for the provision of a cemetery and crematorium.

70/4: I find the whole 5/10/15/whatever years planning rather communistic in its approach. SHLAA Final Report February 2012 is also a document that needs publicity and more public involvement on this or future steering groups whose representatives are committing the public to views that extend to 2029.

Council Response: Comments noted. The Strategic Housing Land Availability Assessment (SHLAA) is a technical evidence base document which is conducted in accordance with national and regional guidance and is available on the Council's website.

70/5: Quotes from 72 Infrastructure Strategy, highlighting typographical error.

Council Response: Comments noted. This typographical error will be corrected in later revisions of the Infrastructure Strategy.

## 71 Individual

H1b - Urlay Nook

H1h - Land East of Yarm Back Lane

H1g - Harrowgate Lane

H1d - Blakeston School

71/1: I have grave reservations about proposed housing developments, which will affect the A19 Norton to Yarm route, crossing A66 at Elton, via Ring Road / Station Road / Junction Road / Harrowgate Lane / Darlington Back Lane / Yarm Back Lane, which is effectively an outer ring road. Junction Road is already heavily used with congestion, noise and noxious pollution affecting what used to be and still should be a quiet residential area. None of the Eaglescliffe, Hartburn or Harrowgate Lane housing proposals should be proceeded with until there is an effective road network plan, which protects Junction Road from being part of the effective outer ring road.

Council Response: The highways implications of all site allocations have been assessed as part of the site selection and evidence gathering process.

71/2: Housing development on the site of the closed Blakeston School should not be permitted. This site should be retained for solely sports and recreation. Encouraging proposals that include the 40 houses whilst retaining the built sports facilities appears a non starter as the built sports facilities are on the wrong side of the school buildings, which are to be demolished. Equivocation seems to be SBC position, which may suggest eventual to abandonment of this initial idea and a resort to housing development of the whole site, which may have a domino effect on Roseworth Club and Jewsons sites. SBC should go ahead with the new entrance between the two existing sports buildings by taking up the Section 106 Agreement monies, £97000, offered by Owens / Barratt. Not taking up this £97000 is incomprehensible.

Council Response: Comments noted. The merger of Blakeston School and Norton School has resulted in the formation of the North Shore Academy in a new purpose built facility at the former Tilery Sports Centre, which includes built sports facilities. The built sports facilities at the former Blakeston School site are therefore no longer required. Part of the site has been allocated for housing to contribute to meeting the Borough's housing need. A proportion of the remainder of the site will be retained as open space whilst a further section has been safeguarded for the provision of a cemetery and crematorium.

## 72 Individual

H1 - Housing Allocations

H1i - West Yarm

H1j - South West Yarm

72/1: I attended a Preferred Options Consultation drop in session at Layfield School, Yarm on Tuesday 28 August at which I was provided with a Frequently Asked Questions document. Under the question 'Why are Yarm and Eaglescliffe being chosen for all of this development' the Council provide the following response.... "The Preferred Options identifies 12 housing allocations sites for a total of 6,950 dwellings. Of these sites, 3 are located within Yarm and Eaglescliffe and they provide 1605 dwellings, or 23% of the total allocated"..... To a lay person such as myself I assumed this was the total number of houses proposed for Yarm and Eaglescliffe however on speaking to one of the Planning Officers present it became apparent the numbers quoted do not include developments where planning permission has already been granted, e.g. Allens West (850), Tall Trees (140) and possibly Morley Carr Farm (350). Although assured by the Officer there was no intention to mislead I believe the figures given are misleading and for transparency should be amended to give an indication of the proposed/potential total build for the Yarm and Eaglescliffe area and for the rest of the Borough. I believe the Frequently Asked Questions document should be amended at the earliest opportunity in order to prevent any misrepresentation at future drop in sessions or when providing information to the wider public.

Further to the above the figure of 23% of the total allocated is given in relation to Yarm and Eaglescliffe. Does the figure remain 23% when those sites already given planning permission are added, and secondly what percentage of housing within the Borough is presently located within Yarm and Eaglescliffe? If it is less than 23% should the allocation of future developments not be in proportion to housing already provided thereby making best use of the current infrastructure including roads, schools, doctor's surgeries, dentists etc.

Council Response: The Frequently Asked Questions document was clear in referring to the housing allocations identified in the Preferred Options document. The Preferred Options document did not reference developments where planning permission has already been granted and so it was considered clear that they not included in the figure

for allocations.

72/2: The proposals for Yarm and Eaglescliffe are in conflict with the Council's commitment to maintain the limits to development and protect green wedges which builds on the spatial strategy in the Councils Core Strategy. In respect of traffic related matters. The Frequently Asked Questions document acknowledges concerns regarding the local highway network are valid and will be explored. Why then was planning permission given for Morley Carr Farm prior to the publication stage in 2013? In addition it was clear on speaking to Planning Officers they had no knowledge of the on going issues in respect of parking and associated issues relating to Yarm. Surely the Council has a duty to ensure all matters relating to future developments are looked at in the round and that Officers are aware of all pertinent facts.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

### 73 Individual

H1j - South West Yarm

73/1: Yarm's road infrastructure and available parking is incapable of coping with the current level of housing so it is envisaged that any additional housing on the scale proposed would significantly exacerbate an already identified problem. Similarly, the core facilities are incapable of meeting the needs of new residents: schools, lack of leisure facilities and erratic public transport e.g. bus services are either too many at once or none at all. The current level of countryside has adapted to existing buildings and it would be criminal to create a concrete ghetto affecting wildlife and agricultural land which is mature and well adapted. Finally, given the area and the need for low cost housing, it is clear the developers are seeking to cash in on Yarm's name and will clearly seek to maximise the return on their investment thereby clearly by passing the need for starter homes for first time buyers. I therefore totally object to the propose developments for South West Yarm and ask the Council to reject this plan.

Council Response: All housing developments of 15 dwellings or more have to provide affordable housing within a target range of 15-20% unless robust evidence is provided to support a lower rate than the standard target. This assists first time buyers get on the housing ladder or those who need social housing by providing affordable homes to meet their needs. Other comments are noted and addressed in the Yarm and Kirklevington Topic Paper

### 74 Individual

H1i - West Yarm

H1j - South West Yarm

74/1: My main concern is the amount of traffic that would be going through Yarm and other parking as it is difficult now. There would be at least two cars per household if the housing was passed.

Green Lane Kirklevington is a green wedge, it is outside the limits of development also when my son went to the Grammar school our project was for each parent to pay so much to purchase the field in Green Lane.

Council Response: Comments regarding the traffic issue are noted and addressed in the Yarm and Kirklevington Topic Paper .

It is acknowledged that the South West Yarm site is currently outside of the Limits to Development but it is not Green Wedge. If the draft South West Yarm allocation is carried forward to the adopted Regeneration and Environment LDD then the Limits to Development would be amended to be consistent with this.

### 75 Individual

H1i - West Yarm

H1j - South West Yarm

75/1: West Yarm / South West Yarm. Why include Morley Carr Farm when already approved. Yarm does have a traffic problem. Yarm does not have the infrastructure to support new housing. Why issue a LDD document to regenerate Stockton when all SBC want to do is destroy Yarm. SBC are not listening to the residents of Yarm. SBC are only interested in obtaining Council Tax from residents of Yarm. Why are you not building in other areas. The LDD is a complete waste of time.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

### 76 Individual

H1i - West Yarm

H1j - South West Yarm

76/1: West Yarm South West Yarm  
-Why include Morley Carr Farm when already approved?  
-Yarm already has an alarming volume of heavy traffic which is a major problem  
- The infrastructure is not designed to cope with additional houses in the Yarm area.

- Why issue an LDD document to reference Stockton when Stockton Council want to destroy Yarm?
- Stockton Council are clearly not listening to residents of Yarm
- Yarm doctors is already struggling with current patience intake and additional housing will make this worse
- Housing on Morley carr Farm site only granted for Council Tax benefits.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

### 77 Individual

H1i - West Yarm

77/1: West Yarm/South West Yarm. Why include Morley Carr Farm when already approved. Yarm does have a traffic problem. Yarm does not have the infrastructure to support new housing. Why issue a LDD document to regenerate Stockton when all SBC want to do is destroy Yarm. SBC are not listening to the residents of Yarm. SBC are only interested in obtaining Council Tax from residents of Yarm. Why are you not building in other areas. Yarm medical centre already struggling to cope with patients on list.

H1j - South West Yarm

Council Response: Policy H1 in the Regeneration and Environment Local Plan sets out the draft housing allocations and these include sites in other areas, as well as Yarm. Comments regarding traffic noted and addressed in the Yarm and Kirklevington Topic Paper .

### 78 Individual

H1i - West Yarm

78/1: West Yarm / South West Yarm. Why include Morley Carr Farm when already approved. Yarm does have a traffic problem. Yarm does not have the infrastructure to support new housing. Why issue a LDD document to regenerate Stockton when all SBC want to do is destroy Yarm. SBC are not listening to the residents of Yarm. SBC are only interested in obtaining Council Tax from residents of Yarm. Why are you not building in other areas. Yarm medical centre already struggling to cope with patients on list.

H1j - South West Yarm

Council Response: Policy H1 in the Regeneration and Environment Local Plan sets out the draft housing allocations and these include sites in other areas, as well as Yarm. Comments regarding traffic noted and addressed in the Yarm and Kirklevington Topic Paper .

### 79 Individual

H1j - South West Yarm

79/1: The details we have been given are very confusing - no plan seems to be available, that common sense regarding the

1. Congestion of the roads, the narrow road over the railway line, the bends near prison and road roundabout (near BP garage)

2. Also indirect flooding at the Old Scool Worsall from Saltergill Beck and Picton Stell

3. Damage to wildlife corridor

4. Poor medical facilities no drop in centre / leisure / sports facility - it is all in places in Stockton / Billingham / Thornaby - surely these factors are important for quality of life and more houses are not [...needed..]

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

### 80 Individual

SP2 - Housing Spatial Strategy

80/1: Need for extra housing largely met by recent approval given for Morley Carr site housing development

H1 - Housing Allocations

Council Response: The planning permission for residential development at Morley Carr Farm will make a contribution to meeting housing need but it will not largely meet it.

80/2: Unsustainable - residents of development would be commuters using motor cars as there is no new jobs in the immediate area!

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper



80/3: Buffer zone 'ineffective - fencing already along railway line and around detention centre - corridor and buffer zone already comprised by these fences

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

80/4: Local wildlife corridor - EC and UK government support those corridors as a means of ensuring biodiversity and species movement. SBC also supports local biodiversity programme - yet concept of these corridors is removed from planning - totally illogical and lacking evidence!

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

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### 81 Individual

H1i - West Yarm 81/1: I would like to object to the current planning applications as all the sites lie outside the current limits of development. In particular the Green Lane site would narrow the strategic gap, disrupt the wildlife corridor increase volume of traffic.

H1j - South West Yarm

The local infrastructure will be unable to cope with the scale of the development. Why not use our brownfield sites and cause less disruption.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 82 Individual

SP2 - Housing Spatial Strategy

82/1: Poor judgement has been used on the need to build on green areas when Stockton have so many brownfield sites available and a need to improve Stockton is crucial not to create the damage in Yarm. Regeneration of food growing areas is vital also and housing will not be reversed in the green areas. The infrastructure of Yarm is close to collapse already increase in houses increase of cars etc in a natural bottle neck. A lack of jobs in the area and access to them has not been taken into account. Yarm is a specialist area of shops. The wildlife will not be replaced if building is allowed.

H1i - West Yarm

H1j - South West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 83 Individual

H1i - West Yarm 83/1: I object to these proposals I am concerned about the provision of emergency services as there will be additional need for a larger population. The greater congestion will make the emergency response times longer. See p.126 preferred options para 8.93 re: Morley Carr Farm. I am also concerned about the wildlife corridor being compromised.

H1j - South West Yarm

Council Response: The Council will liaise with the emergency services regarding future housing development in order to assist the emergency services to plan their service provision. Comments regarding the wildlife corridor noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 84 The Garden Centre Group

84/1: We write on behalf of our client, The Garden Centre Group, to submit representations towards the Regeneration and Environment Local Development Document (LDD), Preferred Options, August 2012. The Regeneration and Environment LDD will contain the Planning Policies which will shape development across Stockton on Tees until 2029.

#### The Site

Our client is keen to promote their site for retail and/or employment use. The site is currently occupied by a Garden Centre, which is part of the Wyevale Garden Centre chain but the site may become available at some point in the plan period. The site is located on the outskirts of Stockton on Tees, north of the market town of Yarm. Access to the site is off Yarm Road, the A135 which provides access to Yarm and also links to the A66 to the immediate north. The site is located in a mixed use area, adjacent to Preston Farm Industrial Estate, with other employment, retail and leisure uses all within walking distance.

The site is unallocated in the current Local Plan but is located within the built up area, adjoining the Cleveland Community Forest. The site comprises of a purpose built steel portal frame construction with glass elevations and Perspex roof. The total floor space of the site comprises of 71,719 sq ft with 150 car parking spaces provided on a large area of hard standing. A site location plan is enclosed.

## Representations

These representations consider the policies and proposals contained in the Regeneration and Environment LDD Preferred Options and also add further comments regarding our client's site and the soundness of the document in relation to the Government's National Planning Policy Framework (NPPF).

## Planning Policy Framework

The NPPF contains key guidance in terms of planning for future development and the examination of Local Plans. Set out below is a brief summary of key policies contained in the NPPF which are of relevance to this representation:-

- The NPPF meets a clear direction to support sustainable development, Paragraph 14 states 'at the heart of the NPPF is a presumption in favour of sustainable development'. For plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of their area and have sufficient flexibility to adopt to rapid change.
- The NPPF also advises that policies and Local Plans shall follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.
- For the Local Plan to pass the test of soundness at Examination in Public (EiP), Paragraph 182 of the NPPF states clear criteria, which needs to be fulfilled:
  - o Positively prepared - achieve sustainable development;
  - o Justify - should be the most appropriate strategy effective;
  - o Be deliverable;
  - o Be consistent with National Policy.
- Local Plans should plan positively for development and allocate sites to promote development and flexible use of land (Paragraph 153).
- Planning should, according to Paragraph 17, proactively drive and support sustainable economic development to deliver the homes, business and industrial units that the country needs. Every effort should be made to respond positively for growth.
- Another guiding principle set out at Paragraph 17 includes the need for effective use of land by re-using land that has been previously developed (i.e. brownfield land) and the promotion of mixed use developments.
- In relation to employment allocations, Paragraph 22 advises that policies should avoid the need for long term protection of employment use where there is no reasonable prospect of a site being used for that purpose.

Council Response: Comments noted.

## SP1 - Presumption in favour of sustainable development

### 84/2: Regeneration and Environment LDD Policies and Proposals

Strategic Policy SP1, Presumption in favour of sustainable development is supported as a general principle guiding development. We do consider this policy could further be enhanced by adding reference to the need for the plan to be able to adapt and respond to market changes over the Plan Period and this may mean allowing alternative uses on sites that are allocated for other uses in the Plan. Including a reference to this in Policy SP1 would ensure more flexibility, which in turn enhances deliverability.

Council Response: Policy SP1 is a standard policy which is recommended for inclusion in documents by central Government and the Planning Inspectorate. The Council does not intend to change the wording of this policy

## SP3 - Limits to Development

84/3: Strategic Policy SP3, Limits to development refers to development outside settlement limits. Whilst we accept this as a general approach, reference should also be provided to existing development sites outside the settlement limit, which may be redeveloped over the Plan Period. The redevelopment of existing brownfield sites should they become vacant should be a priority for the Local Plan, in accordance with the NPPF. We also suggest that limits to development are drawn around existing development limits to ensure developed sites nearby existing settlements are included.

Council Response: The limits to development provide a break between the urban and rural area. Including sites outside the urban area, which have no relation to the towns and villages in the Borough, would result in undesirable development in the open countryside. It is noted that the site referred to in the representation is located within the limits to development

84/4: In relation to Section 5, the Economy, we support the use of the Council's Employment Land Portfolio and Employment Land Review as an evidence base to support the proposed Policies and Proposals. We add that it is imperative that this evidence base is kept up to date if the Plan is to respond to market need over the Plan Period. There needs to be a mechanism to allow alternative use (where sustainable) if the evidence base indicates an oversupply. We support the general principles of identifying

the three Enterprise Zones within Stockton on Tees but add that other sites and areas should not be overlooked where they can also offer suitable sites for employment related uses.

The Employment Land Review, which comprises a key part of the evidence base for this LDD found that there was an oversupply of employment land. We therefore generally support the balanced employment land portfolio suggested as part of Policy EMP 1, General Employment Land. We do however consider more flexibility should be added to these allocations to again recognise the need for the Plan Period to respond to market conditions over the entire Plan Period. We therefore suggest that any employment related policies acknowledges that non traditional employment resources such as care homes and retail can generate a significant number of jobs. As such, non traditional employment uses should be supported by this policy in the locations identified. Where there is little market interest in traditional and non traditional employment resources, the Policy Framework should be flexible enough to allow alternative uses to be developed. If it can be demonstrated that the site is no longer attractive for employment uses or that there is sufficient employment land available to the market then the Council should be willing to consider alternative uses. This may be more achievable through the allocation of more mixed use sites.

Council Response: The employment land review identified a balanced portfolio of employment sites. In addition since the employment land review the Council has deallocated several employment sites which have further reduced the supply of employment sites. The Council is of the view that Preston Farm is one of the best industrial estates in the Borough and should be retained in this use during the plan period. If circumstances change, there is sufficient provision in the policy CS4.10 and the NPPF to release any sites from employment use.

#### EMP2 - Principal Office Locations

84/5: Policy EMP2, Principal Office Locations identifies specific sites for office (B1a) development which would be considered as appropriate providing there are no available or suitable sites within the existing town or district centres. This approach follows that set out in the NPPF, and is therefore considered to be consistent with national policy. Following the identified principal office locations, mixed use sites and then sites on the edge of mixed use sites will be favoured for office development. If there are no sites available in these locations, such as a suitable, available or viable in these locations the Council will direct proposals for office development to existing industrial/business parks at Wynyard Park, Preston Farm, Portrack Interchange, Bowesfield North and Teesside Industrial Estate.

We suggest the Council considers identifying these areas such as Preston Farm, as Mixed Use allocations which means they would then be capable of delivering a range of employment, retail and leisure needs. This would ensure the plan has sufficient capacity to respond to market conditions over the Plan Period, and hopefully ensure that previously developed sites remain in use. This approach would be consistent with the NPPF and meet the tests of 'soundness'.

Council Response: The Council intends to focus retail and leisure development in the defined town centre. Promoting mixed use allocations on all industrial estates would provide more land than required to meet local needs. Allocating the industrial estates mentioned in the Principal Office Locations policy would be a significant departure from this strategy.

However, given proposed changes to the GPDO and the fact that business parks have previously been successful in accommodating some large scale office development, the Council has amended the policy to identify strategically important secondary office areas that are sustainable out-of-centre locations where office development will be preferred when there are no sequentially preferable locations. This designation only applies for office development and not other town centre uses. Furthermore, there is no evidence that there is a need for the level of leisure and retail which would be required to develop these sites.

#### TC4 - New Town Centre Uses

84/6: Policy TC4, New Town Centre Uses relates to retail, bank and building societies, food and drink, offices, hotels and leisure facilities. This policy sets out sequential tests for town centre development as per the guidance contained within the NPPF. The policy advises that if it can be demonstrated that there are no suitable or available sites within existing centres preference will be given to other locations including, edge of town centre/district/local centres, principal office locations or in out of centre locations well served by choice of means of transport. We support this as a general approach but again suggest further flexibility could be added by identifying the principal office locations as mixed use designations. This would provide additional certainty for developers who might look to deliver a mixed use scheme including some retail development alongside offices/employment uses.

Council Response: The Council's strategy for office development promotes this use town centres and locations considered to be sustainable locations for office development. However, given proposed changes to the GPDO and the fact that business parks have previously been successful in accommodating some large scale office development, the Council has amended the policy to identify strategically important secondary office areas that are sustainable out-of-centre locations where office development will be preferred when there are no sequentially preferable locations. This designation only applies for office development and not other town centre uses. Furthermore, there is no evidence that there is a need for the level of leisure and retail which would be required to develop these sites.

TC9 Small-scale retail and ancillary uses

84/7: Policy TC9, Small Scale Retail and ancillary uses relates to small scale retail uses (i.e. under 150 sq m) and ancillary uses. The Policy states that support would be given to proposals which provide ancillary facilities to an existing commercial or tourism facility. In order to be considered ancillary facilities, the Policy states that proposals for town centre uses should demonstrate that development is necessary to support the sustainable operation of the main development. We consider this Policy is too rigid in its approach, and the criteria suggested should be removed from the Policy. If the ancillary use is contributing to the existing business use, and does not conflict with the general principles of delivering sustainable development, it should be supported.

Council Response: Comments noted. Policy on small scale retail uses has been amended.

84/8: Summary

Whilst we generally support the approach of the Environment and Regeneration LDD Preferred Options, we consider the detail of the policies and allocations could be amended to enhance flexibility. The NPPF clearly states that there should be a presumption in favour of sustainable development and that the Plan needs to plan positively for flexible uses of land. Rigid tests should not be set for alternative uses unless they are required by the NPPF. We consider it would be more appropriate if employment/office allocations are identified as mixed use areas. This would allow the market to drive forward development and enhance the overall deliverability of the plan.

We also request that our client's site is identified as part of a Mixed Use allocation which adjoins Preston Farm. This would allow sites to be redeveloped for alternative uses more rapidly, securing the long term use and viability of brownfield land and contributing to the deliverability of sustainable development.

We would welcome the opportunity to discuss this in more detail and be involved in the ongoing consultation process in due course. I trust you find these comments useful. If you have any queries, please do not hesitate to contact me.

Council Response: General support is welcomed. The respondent seeks a mixed use allocation for retail and or employment use. Given the commercial nature of the area development in the B2 or B8 use class would generally be supported by these policies. The policies in the plan may support office development, subject to there being no sequentially preferable alternative. Given, the number of office consents available, it is considered that there is no need to identify the site as an office location. The merits of any proposals for retail development on the site would be considered against national planning policies taking in to account the impact on the town centres hierarchy.

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85 The Steele Family

H1g - Harrowgate Lane

85/1: Introduction

We act on behalf of the Steele family, who own part of the land off Harrowgate Lane, West Stockton (please see the attached location plan for reference). On behalf of our client, we fully support the Council's decision to acknowledge the land off Harrowgate Lane as suitable, available and deliverable for housing in the 2011 SHLAA and as part of the Preferred Option development site H1g.

We support the suggestion of an urban extension off Harrowgate Lane, West Stockton (Site H1g), as the most appropriate development site to achieve the shortfall in housing development. This site is the most sustainable parcel of land when compared against all other sites identified in the Borough. (Please refer to the accompanying Sustainability Appraisal (July 2012) for further details).

Although our clients are happy to pursue development on their land individually, they are willing to work in partnership with the adjacent landowners to create and deliver a comprehensive urban extension to the west of Stockton. We would be happy to meet with the relevant planning officers to discuss this in further detail, particularly with regard to the preparation of the proposed masterplan.

Council Response: Comments noted. The Council are supportive of the site coming forward as a comprehensive masterplanned urban extension. Joint working between the Council, landowners and developers is progressing.

SP1 - Presumption in favour of sustainable development

85/2: Spatial Policy SP1 - Presumption in favour of Sustainable Development

We fully support Policy SP1 as it seeks to plan positively for growth in line with the requirements of the NPPF.

Council Response: Comments noted.

SP2 - Housing Spatial Strategy

85/3: Strategic Policy SP2 - Housing Spatial Strategy

We support, in principle, Policy SP2. There is adequate flexibility within the policy to address development needs should delays occur in delivering alternative sites, e.g. previously developed sites, a number of which are economically unviable at the current time.

The consultation document identifies a need to deliver 555 dwellings per year. This figure has been based upon an up to date assessment of population, household formation and economic forecasting.

We recognise that a buffer of 5% is suggested as the benchmark for the maintenance of a 'rolling' 5 year supply of deliverable housing land. However, although paragraph 2.6 of the consultation document states that this will not be regarded as a ceiling for the supply of deliverable housing land in order to ensure other objectives are met, we question whether the Council should actually be providing a 20% buffer for their 5 year housing land supply. Due to previous policy restraints, it is considered that the Council has persistently under delivered leading to a considerable shortfall of housing in the Borough.

Since the Core Strategy Review Issues and Options consultation document, the housing delivery gap has increased from 2,800 dwellings to about 4,670 dwellings. Following this, a 20% buffer should be set to ensure the document complies with paragraph 47 of the NPPF. This will provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for housing land.

The Council wish to plan for higher delivery to ensure that housing need and demand are fully met and that its aspirations for economic growth are delivered.

We welcome this approach but it is essential that Policy SP2 and its justification make reference to the need for Stockton Borough to ensure the provision of a 5 year deliverable housing land supply, plus an additional 20% buffer to allow for choice and competition in the market.

#### Housing Requirements

Sites within the conurbation are proposed to deliver 1,200 dwellings during the plan period. However, due to viability issues associated with Brownfield sites, we consider it unlikely that all of these sites will be deliverable during the plan period and therefore will not help to address the housing need for the Borough. On this basis, the council should not rely too heavily on these sites coming forward before 2029.

More reliance should therefore be placed on the sites adjacent to the conurbation. We therefore fully support the future development of the site off Harrowgate Lane (Site H1g).

We note at paragraph 2.18 of the consultation document that the Council states that the land off Harrowgate Lane has the potential to contribute to the needs identified in the TVSHMA 2012. However, this site should not be the only site identified to address the need for affordable housing. Stockton Borough should seek to 'strike a balance' between the level of contribution to ensure sustainable development and the realities of economic viability. Reference should be made to the Local Housing Delivery Group (Viability Testing Local Plans, June 2012) document and paragraphs 173 and 174 of the NPPF.

Notwithstanding this, land off Harrowgate Lane is an essential development site to help address housing need within the Borough and our client fully supports this site coming forward for development during this plan period. As stated in the publication 'Best Practice in Urban Extensions and New Settlements' (CLG 2007), urban extensions provide opportunities for concentrated rather than sprawling development. By virtue of their scale, and if carefully designed and developed to produce integrated, 'holistic' settlements, this site (Site H1g) can encourage and accommodate highly sustainable patterns of living.

Council Response: Comments regarding housing delivery are noted and are addressed in the housing delivery section of the Housing Need and Demand Topic Paper.

Comments regarding not placing too much reliance on the delivery of sites in the conurbation noted. It is considered that the approach to housing delivery builds in considerable flexibility.

Comments supporting the allocation for housing of the Harrowgate Lane site noted and welcomed.

All of the housing allocations will be expected to contribute towards affordable housing provision consistent with the Affordable Housing Provision Policy in the Regeneration and Environment Local Plan; subject to the viability considerations stated in the policy.

### SP3 - Limits to Development

#### 85/4: Spatial Policy SP3 - Limits to Development

We support the inclusion of site H1g within the Development Limits of Stockton. This designation therefore needs to be changed and mapped in line with the preferred option for housing development.

Council Response: Comments noted. The limits to development are to be amended to include all sites being taken forward within the Regeneration and Environment Local Plan.

### SL1: Development and Amenity

#### 85/5: Policy SL1 - Development and Amenity

We support, in principle, Policy SL1. It is vital that new development does not have an adverse impact on existing neighbouring residents in respect of material considerations.

Council Response: Comments noted

### H1 - Housing Allocations

#### 85/6: Policy H1 - Housing Allocations

As the housing requirement over the plan period is 8,250 dwellings (without taking into account the potential 20% buffer for 5 year housing land supply), there is a need for several Greenfield sites to be allocated for development.

We fully support the identification of site H1g 'Harrowgate Lane' to be allocated primarily for residential use for approximately 2500 dwellings and we would like to work closely and in partnership with the Council to support and help deliver sustainable development on this land.

Council Response: Comments noted

### H2 - Housing Phasing and Implementation

#### 85/7: Policy H2 - Housing Phasing and Implementation

We acknowledge the need for land to be phased to ensure delivery and release of land is not sporadic, particularly with regard to the large urban extensions such as Harrowgate Lane, and so that the Council can maintain a 5 year housing land supply.

However, due to the current undersupply, it is considered that the phasing suggested should not be as restrictive as set out on page 106 of the consultation document. There is a clear need for housing to be delivered, and in respect of the housing delivery gap which has increased from 2,800 dwellings to about 4,670 dwellings, development should be supported earlier than suggested.

We therefore request that as landowners our clients are kept involved in the preparation of a masterplan and the phasing associated with it. We would welcome further discussions with the Council in due course regarding this element of the plan.

Council Response: A Development Framework Document is under preparation for the site and this will include a phasing plan for the site. A Development Framework Document is under preparation for the site and this will include a phasing plan for the site. The Housing Phasing and Implementation Policy in the Preferred Options document has not been carried forward to the Publication Draft.

### H1g - Harrowgate Lane

#### 85/8: Site H1g - Harrowgate Lane, West Stockton

The site is located west of the built up area of Stockton and is immediately adjacent and well related to existing residential development. As noted in the 2010 and 2011 SHLAA update, the site is within 2 km of the Principal town centre of Stockton with its wide range of local services and facilities including shops, secondary schools (the site surrounds Bishopsgarth Secondary School) and the North Tees Hospital, by sustainable means of transport. In addition, the site is located on a Core Bus Route. The proximity to the existing residential area and to the Principal Town of Stockton suggests that the site can be considered to be a sustainable site for future development.

As set out in the accompanying Sustainability Appraisal (July 2012), the land off Harrowgate Lane is the most sustainable development site to accommodate the level of housing necessary to address the current shortfall. In comparison with the other sites which have been assessed as part of this consultation document, we consider that Harrowgate Lane is the most suitable site to achieve the objectives set out in the consultation document, i.e. addressing housing need and demand in a suitable and sustainable location. We therefore fully support the identification of Harrowgate Lane as a preferred development site for the accommodation of approximately 2500 dwellings and that the site meets all the objectives set out in the Spatial Strategy.

In addition, it is considered that the future development of Harrowgate Lane will help facilitate the redevelopment of the High Newham Court Shopping Centre.

Our clients own part of the site to the south (please see the attached location plan for reference). Although our clients are happy to pursue development on their land individually, they are willing to work in partnership with the adjacent landowners to create and deliver a carefully planned comprehensive urban extension to the west of Stockton. We would be happy to meet with the relevant planning officers to discuss this in further detail and wish to be fully involved during the preparation of a comprehensive masterplan detailing design, access arrangements, and development phasing.

Harrowgate Lane will help promote and deliver a sustainable community.

Council Response: Comments noted. The Council are supportive of the site coming forward as a comprehensive masterplanned urban extension. Joint working between the Council, landowners and developers is progressing.

H3 - Housing Mix and Affordable Housing provision

85/9: Policy H3 - Housing Mix and Affordable Housing Provision

Providing a good mix of dwelling types is important and the TVSHMA will provide up to date evidence as to what type of dwelling is in demand following annual monitoring and update reports. We therefore support, in principle, Policy H3.

However, we cannot fully agree with the approach to defining a level of affordable housing provision within Policy H3. Firstly, the requirement for affordable housing within each of the settlements needs to be clearly defined as a target, rather than as a minimum figure. The viability and deliverability of housing sites is critical to ensuring long term sustainable communities that meet the needs of both existing and future residents. In specifying a minimum figure, the Council will inevitably fail to deliver adequate housing through the application of inflexible and onerous requirements contrary to the NPPF (paragraphs 173 and 174).

While we acknowledge a need to provide a level of affordable housing as part of any large residential development, a realistic assessment of viability is vital to ensure ongoing supply of crucial new housing. There is likely to be a high level of onerous S106 obligations in relation to utility capacity and road infrastructure and we would seek a more realistic target to enable delivery.

Notwithstanding this, we do support the opportunity for developers to demonstrate viability assessments to enable flexibility with regard to affordable housing provision.

Council Response: Comments noted. All of the housing allocations will be expected to contribute towards affordable housing provision consistent with the Affordable Housing Provision Policy in the Regeneration and Environment Local Plan, subject to the viability considerations stated in the policy. Comments regarding affordable housing are responded to in the affordable housing section of the Housing Need and Demand Topic Paper.

H1g - Harrogate Lane

85/10: Conclusion

Our clients would like to work closely and in partnership with the Council to support and help deliver sustainable development on the land west of Harrogate Lane. We would welcome an opportunity to discuss this site in greater detail with the relevant Planning Officers, in due course, particularly with regard to the preparation of the masterplan which is proposed for Site H1g.

We should be pleased if the above comments would be taken into account during the preparation of the Local Plan and would ask that we are kept informed of all future consultations during the Plan process.

Council Response: Comments noted. The Council are supportive of the site coming forward as a comprehensive masterplanned urban extension. Joint working between the Council, landowners and developers is progressing.

## 86 Individual

SP2 - Housing Spatial Strategy

86/1: These comments refer to the area immediately behind Arrathorne Road and up to Darlington Back Lane. Particularly in times of economic downturn politicians- who generally take the short term/tenure of office view- are frequently tempted by often false promise which regeneration may bring. Destroying the countryside is not the way for sustained prosperity.

RG1 - Regeneration and Gateway Sites

Developers should be made to build on Brown Field sites where they will probably have to work a little harder for their considerable profits. Building on Green Field sites is an easy option for the developers with less preparatory/clean-up/disposal work. Should local councils later require the use of said land rejected by developers in preference

to the Green Field sites then this is one 'missed opportunity' leaving them with potentially huge costs at tax payer's expense which could have been quite easily avoided! Pandering to the predictable avarice/profit margins of developers is not the way forward. Affordable housing should exhaust all land closest to the city centre. Clearance of derelict/abandoned sites should be a priority in the community where lower income families have all local facilities on their doorstep with less reliance on transport (both public and private).

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that there is not do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and the Council has therefore identified greenfield sites to meet the housing requirement.

H1h - Land East of Yarm Back Lane

86/2: Traffic - These comments refer to the area immediately behind Arrathorne Road and up to Darlington Back Lane.

Traffic congestion at peak times during the working week are already at unacceptable levels. Darlington, Birkdale, Upsall, Fairfield roads and beyond already experience unacceptable levels of traffic scrambling for access to and from the A66/Eglescliffe intersection. This according to one of your representatives is not your problem but one for the traffic department.. ...! I thought that a rather 'head in the sand' response to a very serious question. Has the Traffic Department been consulted? Has the Traffic Department agreed in principle to SBC 'Preferred Options' or will it be a fait accompli? The planned development in Yarm which has been put on 'hold' pending further investigation causes considerable worry. Should objections to the regeneration of Yarm fail and the development succeed then all the additional traffic from the Yarm area will not disperse through Yarm but through Eaglescliffe and further congestion will result at the A66 Eaglescliffe intersection exacerbating an already traffic bottleneck.

Council Response: 12.Concerns regarding the local highway network are valid have been explored before the Regeneration and Environment Local Plan progressed to the Publication stage. At the publication stage the Council's Infrastructure Strategy and Schedule identifies what additional infrastructure will be required to deliver the site allocations.

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### 87 Individual

SP2 - Housing Spatial Strategy

SP4 - Green Wedge

87/1: New housing developments should be built using brownfield areas rather than greenfield countryside. Before they are agreed, the areas should have :- - Sustainable roads and transport system. - They should also have an Infrastructure to support the development. - They should improve the living environment for all people, including people who are already living in that area, not make it worse ! - Maintain the historic values of places like Yarm, and not destroy them. Green wedges between housing areas should be protected. - More starter homes for young people to get a start in owning property in more economical areas. Local residents should be listened to, instead of being ignored ! This consultation is not properly communicated, 90% of people do not know about it !

Council Response: Comments noted. The statutory consultation period is six weeks. The Council's consultation programme for the Regeneration and Environment LDD was eight weeks. It was an extensive programme that included a number of consultation events. Local media and town and parish councils were notified of the programme well in advance. Other comments are noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 88 Individual

H1j - South West Yarm

88/1: I object strongly to the proposed building developments in South West Yarm and the proposed school playing field development in Eggescliffe for the following reasons: It will increase the pressure on the existing infrastructure i.e. further congestion in Yarm High Street; it will increase air pollution due to extra traffic; it will aggravate already limited parking in the High Street; and disrupt bus timetables. In relation to Kirklevington, the south west development will double the size of the Parish, increase traffic flow on the A67 (an already dangerous/accident prone road) and compounding the problem of extra traffic using Forest Lane which is already a rat run for commuter traffic. The proposed south west building developments will narrow the strategic gap between Yarm and Kirklevington, thus having a disruptive effect on the existing wild-life corridor. I expect my views to be taken into consideration.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

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### 89 Individual



89/1: In general I find it hard to believe that being only a few miles from Ingleby Barwick, the largest housing development in the whole of Europe, the Yarm area is still expected to provide sites for yet more housing. More specifically I would strongly oppose more development around the Yarm area as the current road network simply cannot support the amount of extra traffic. Yarm High Street is already an horrendous bottleneck at almost any time of day. The junction of Forest Lane with the A67 leading to/from the A19 is very hazzardous, especially during the morning rush hour and Leven Bank, incorporating the narrow bridge, is not designed for heavy traffic especially in winter. Yarm already has a severe parking problem and the prospect of adding more potential shoppers may well have the opposite effect and be the death of The High Street as people actually seek to avoid it. The last decade has seen Britain suffering unprecedented flooding, much of which is caused by over development of open space which currently provides natural drainage. More should be done to redevelop existing brownfield sites to avoid this. Living in Kirklevington, if I were to adopt a NIMBY approach my main objection would be to plans for the Yarm School playing fields area to the south of Green Lane but I believe very strongly that any further development anywhere in the Yarm area would have a knock-on effect and be to the detriment of all residents of this area generally. I am appalled at the recent planning applications which have already been granted and would beg you not to consider allowing yet more.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

## 90 Individual

H1j - South West Yarm

90/1: I object strongly to the proposed building developments in South West Yarm and the proposed school playing field development in Egglecliffe for the following reasons: It will increase the pressure on the existing infrastructure i.e. further congestion in Yarm High Street; it will increase air pollution due to extra traffic; it will aggravate already limited parking in the High Street; and disrupt bus timetables. In relation to Kirklevington, the south west development will double the size of the Parish, increase traffic flow on the A67 (an already dangerous/accident prone road) and compounding the problem of extra traffic using Forest Lane which is already a rat run for commuter traffic. The proposed south west building developments will narrow the strategic gap between Yarm and Kirklevington thus having a disruptive effect on the existing wild-life corridor. I hope my views will be taken into consideration.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

## 91 Individual

SP2 - Housing Spatial Strategy

H1i - West Yarm

91/1: My concerns are that Stockton Planning Department appear to be taking the easy option of planning for development of Green Wedge and Green Field sites as opposed to the large areas of Brown Field sites in the centre of the town. The Green Field sites are all on the outer boundaries of the borough. We are going to be left with a Doughnut Town - nothing in the middle. The excuse that developers do not want to build in towns should not be accepted. The Council should be telling the developers where there can build and not the other way round. In the case of Yarm, the already agreed Marley Carr site is a travesty of true democracy. How can approval have been granted when the so called consultation exercise is still in progress? Also the consultation document agrees that the traffic situation in Yarm 'is an issue'. Good, I am glad that is appreciated. BUT it then goes on to say that the additional houses agreed will not make it worse. This was backed up by the Traffic/Road Engineer who, at the Morley Carr meeting, was heard to mutter - 'The serious traffic situation in Yarm is a myth' - some myth when it can take you up to 40 minutes to pass through Yarm High Street in the morning!! Any further housing in Yarm will be completely unsustainable. The road system will completely seize up. The narrow bridges at Leven Bank, Yarm Station and the main A67 bridge over the Tees at Cleveland Bay will all bottleneck. Enough is enough.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

## 92 Individual

New Policy

H1i - West Yarm

H1j - South West Yarm

H1b - Urray Nook

92/1: After consideration we have no particular objection to the development of the three sites proposed for Yarm, except for reservations as follows: Access particularly at peak Periods, your document is somewhat 'vague' on this point. Increased local population stretching further the already virtually non-existent local amenities. Conyers School already accepts Ingleby Barwick overflow can it also support the proposed expanded population? We do wonder why Stockton Council are intent on expanding the developed boundaries from the edges; when there are tracts of land such as the area west of the railway by the Moorhouse Estate bounded by the A66 to the north and Durham Lane to the west, your maps 19 & 20. A large area which does not really qualify as a 'Green Wedge'? We would be interested in your comments.

Council Response: For a response to the Yarm specific issues, please see the Yarm and Kirklevington Topic Paper . For a response concerning the land at West Preston please the Housing Site Selection Topic Paper.

## 93 Individual

93/1: Sustainable Transport South West Yarm there is a proposal for 735 dwellings whilst Morley Carr to the South East has at present an application for 350 dwelling. This area had two sites under SHLAA both for 400 and will eventually be built upon with these two proposals being capable of producing 1600 dwellings. Further east we have approved planning permission for 250 dwellings which could easily be increased when building actually begins. Adjacent to this is a brownfield site namely Saltergill School which could take a further 100 dwellings Further west we have a proposal for 350 retirement bungalows and a 100 bed nursing home. In neighbouring ward we have an approved 80 caravan site plus a new Free School proposal that must afford the developer and owner of the land the right to build 250 dwellings In another neighbouring ward we have an approved planning proposal for over 800 dwellings plus a proposal to build another 500. 2000 dwellings in Yarm alone could produce 4000+ vehicles Eaglescliffe 1300 could produce a further 2600 and Ingleby Barwick with already 9000 dwellings could produce a further 600 vehicles which would be very close to Yarm boundary and add to the undoubted congestion that would be to the detriment to the quality of life that we should all expect. SBC officers have suggested widening of junctions to alleviate the traffic congestion. Producing more footpaths and cycle routes and bus routes. In the past lip service has been paid to these facilities to attract government funding for new bus shelters but none have alleviated our current traffic congestion in peak times,.

BUS ROUTE At Christmas or other public holidays the bus is held up getting into Yarm as the road is not wide enough to accommodate the bus lane from the Eaglescliffe traffic lights through Yarm This results in three buses arriving at the same time and travellers having to wait in the bus shelters for sometimes an hour.

Should all of the proposed building take place the extra traffic would cause the bus to be gridlocked along with all cars wishing to travel through or to Yarm

CYCLE PATHS All of our cycles paths are dangerous one wobble and the motor car could kill the cyclist. Accidents have occurred but no fatalities to date. However, if residents increase dramatically as they will more cyclist could be nose to tail waiting with the traffic to get out of our promised widened junctions.

JUNCTIONS Worsall Road can go left and right there is no straight on If the junction is widened to two streams right and left there is not room to provide two lanes into Yarm or two lanes up The Spital and I cannot see the advantage of this as it will be a total waste of money and an excuse for allowing this scale of development to go ahead. Green Lane junction could be widened but again there is no room for two lane either to the left or right. Green Lane also has a narrow bridge with traffic lights widening at one side may be possible but not at the other side. Our roads are too narrow to accommodate the extra traffic all of this development will generate. Our traffic congestion is sometimes impossible now if this goes ahead our lives will be unbearable and our present good bus service will not be able to bypass waiting traffic as our roads will not accommodate a bus lane along side of traffic running in both directions. Yarm and Eaglescliffe train stations will need extra land for parking motor cars.

ENVIRONMENT Yarm has suffered from pollution for many years and if this extra traffic is allowed it will not only be an economy hazard but a health hazard with the greatest strength of the pollution being at pushchair level. We have recently been looking forward to the pleasure of meandering along the Tees River banks in the Tees Heritage Park and we now find that in exchange for school playing fields in South West Yarm being put forward for a 735 dwellings the playing fields are being proposed across the river from the school onto Egglescliffe parish land where the Tees Heritage Park has been supported by Stockton Borough Council. Are we to be deprived of this unique opportunity. The extensive plan for playing field up to the River Leven will be detrimental to our hopes for a quiet day in the countryside by the side or the river with the opportunity to quietly watch our wildlife in their natural habitat. National and Local Planning Frameworks are supposed to be organised to give us a better quality of life but this overdevelopment will make our lives intollerable.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

## 94 Individual

94/0: I dislike going all Victor Meldrew so my positive suggestion is that you encourage regeneration of inner-town sites, with sensible town planning good use can be made of existing facilities and features, open spaces can be provided and the existing countryside can be left just as it is. Residents in the new town centre housing will have access to rail/bus transport and the river can be featured as an leisure asset.

Council Response: Whilst the Council encourages the regeneration of Town Centre and cornurbation sites, it is not possible to rely upon their delivery. This is partly due to current economic circumstances but also site specific issues such as availability, flood risk and the potential for contamination as well as reductions in the overall public funds to support regeneration schemes. Given the emphasis in national policy on housing delivery it is not realistic to rely on these sites as a key element of meeting the housing requirement.

H1b - Urlay Nook

94/1: I realise this will do little good but I wish to add my name/address to the very long list of people who think that your plans for housing, both approved and under consideration, for the Yarm/Eaglescliffe area misguided. You really should listen to what our elected representatives are telling you, however it is clear from media reports that you do not listen!

H1i - West Yarm

H1j - South West Yarm

The current volume of traffic that must cross the only bridge over the River Tees in Yarm already causes chaos many times per day. Additions to local housing, without the

provision of another river crossing, will only exacerbate this problem.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

## 95 Individual

SP1 - Presumption in favour of sustainable development

95/1: SPATIAL STRATEGY SP1 states “work proactively ..... to secure developments that improve economic, social and environmental conditions in the area” Awarding planning consent for housing at Yarm would be in contradiction of the above because: 1Yarm has no room for economic development. 2Yarm has no room for any social amenities. 3Further housing in Yarm will damage farming land, add to air pollution and create traffic jams in an overused infrastructure.

H1i - West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

SP2 - Housing Spatial Strategy

95/2: SP2 states deliver regeneration objectives and support disadvantaged communities with an appropriate and aspirational housing mix. Yarm cannot supply the above as there is no land for regeneration. Adding a fringe of development to Yarm is not providing an area of housing mix. Stockton has previously developed land within the core area.

H1i - West Yarm

Council Response: It is acknowledged that development of the Yarm housing allocations will not deliver regeneration objectives or support disadvantaged communities. However, they will assist in meeting the housing need and demand identified in the Tees Valley Strategic Housing Market Assessment and deliver sustainable communities with an appropriate and aspirational housing mix.

H1j - South West Yarm

Comment regarding previously developed land within the Core Area is noted and addressed within the Yarm and Kirklevington Topic Paper .

SP4 - Green Wedge

95/3: SP4 states “Within Green Wedges, the Council will support 'Tourism, which requires such a location'. This is a contradiction in terms. Tourism is an industry and is inappropriate in a Green Wedge.

Council Response: There are certain tourist activities which are required to be in such a location and which are acceptable provided they do not conflict with the function of Green Wedge

T1 - Footpaths, Cycle Routes and Bridleways

95/4: SUSTAINABLE TRANSPORT Policy T1 Footpaths, Cycle Routes and Bridleways Unless cycle routes are continuous and do not suddenly stop at roundabouts etc. they are a waste of resources. There is no room for bridleways in an urban area.

Council Response: Comments noted

T2 - Tees Valley Metro

95/5: Policy T2 - Tees Valley Metro This will only replace and update an existing service.

Council Response: Comments noted

T3 - Tees Valley Bus Network Improvements

95/6: Policy T3 - Tees Valley Bus Network Improvements Efforts should be made to deliver public transport to areas where it does not exist.

Council Response: Comments noted

EMP1 - General Employment Land

95/7: THE ECONOMY Policy EMP1 - General Employment Land No sites are allocated to Yarm, so it follows that no housing development should happen there.

H1i - West Yarm

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

EMP3 - Key Employment at Wynyard Park

95/8: Policy EMP3 - Key Employment at Wynyard Park Wynyard has everything to offer. Housing in Yarm is not applicable to this area.

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper

H1i - West Yarm

H1j - South West Yarm

H1 - Housing Allocations	95/9: HOUSING Policy H1 - Housing Allocations (i)West Yarm High quality landscaping does not alter the fact that the Morley Carr Farm development is extending the urban fringe and does not address any of the problems referred to in the document. (j)South West Yarm Once again high quality landscaping does not address the problems of Yarm infrastructure. Cycle lanes will only add to the transport problems along with the 700 or so extra cars on can expect from 735 homes. Your document already acknowledges this is commuter country, because Yarm cannot provide employment.
H1i - West Yarm	
H1j - South West Yarm	Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper
H2 - Housing Phasing and Implementation	95/10: Policy H2 - Housing Phasing and Implementation Throughout the policy Yarm is only mentioned for housing development. This is inappropriate considering its lack of amenities and already high population for an area its size. Yarm provides an extremely attractive entry to Teesside from the South and should be protected.
H1i - West Yarm	Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.
H1j - South West Yarm	
H3 - Housing Mix and Affordable Housing provision	95/11: Policy H3 - Housing Mix and Affordable Housing provision Stockton is North of the Tees. Your document identifies ample opportunities for all between Stockton High Street and Wynyard, so why involve Yarm in something that is inappropriate.
	Council Response: Both the Housing Mix Policy and the Affordable Housing Provision Policy in the Publication version of the Regeneration and Environment Local Plan are Boroughwide policies.
ENV3 - Local Sites	95/12: ENVIRONMENTAL PROTECTION AND ENHANCEMENT Policy ENV3 - Local Sites Your document clearly shows that alternatives to Yarm are available.
	Council Response: Comments noted

#### 96 Individual

H1j - South West Yarm	96/1: South West Yarm I strongly object to the proposed building of hundreds of new homes in the yarm and kirklevington district. The road system is already overcrowded especially during school term times. The green belt / wildlife corridor will dissappear and the quality of life for residents and wildlife will be damaged forever. Surely there are other brown field sites available in the borough without distroying the little green spaces with housing which are left.
	Council Response: Please see Yarm and Kirklevington Topic Paper .

#### 97 Individual

H1j - South West Yarm	97/1: I refer to the South West Yarm Planning applications. I object on the grounds that the roads are already congested - it took me nearly half an hour to get from Kirklevington to Eaglescliffe Medical Centre at 8.45 on Wednesday this week. Yarm Medical Centre is already not taking new patients. Primary schools - Yarm already has over 400 pupils and Levendale is full. Where will the new places come from? Green Lane at the station is a single carriage road so will become extremely congested - have traffic surveys been done at peak hours, and not just from 10am to 3pm as was done at Eaglescliffe? The Mount Leven Farm proposal will have a detrimental effect on wildlife, and also to the Tees Heritage Park project, as will the Yarm School playing fields development if they are allowed to re-site on agricultural land.
ENV1 - Green Infrastructure	Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper .

#### 98 Individual

H1j - South West Yarm	98/1: South West Yarm, This site should not be considered for housing development for the following reasons. 1 The development is outside the limits of development as defined in the Council's Core Strategy 2010. 2 The development will be in the strategic gap between Yarm and Kirklevington as defined in the CCS 2010. 3) The development although in flood risk 1 will directly in pact on an area in flood risk 3 affecting one dwelling and 3 bridges. ( environmental agency ) 4) The existing sewage network is inadequate to cope with the proposed development. ( Water Authority ). 5) The site is in a rural and not urban development and as such should fall under Strategic Policy SP3 limits to development. (LDD preferred options ) 6) The existing Green Infrastructure Corridor will be extensively damaged and its nature will be changed. This corridor forms part of the greater Tees Valley Corridor and connects two parts of North Yorkshire ( Worsall and the Leven valley). This corridor should be classified as primary importance and not secondary. This corridor is the only remaing viable route between the Tees and the Leven. All other routes have been severely damaged. Policy ENV1. The proposed development will not repair or enhance the existing landscape. The development will damage the natural and existing contours and
ENV1 - Green Infrastructure	
SP2 - Housing Spatial Strategy	

will result in the loss of trees which is the important nature of the corridor and destroy important field patterns. 7) The development will lead to greater traffic and coupled with other approved and pending developments in Yarm will lead to greater traffic congestion in Yarm High Street. ( See Yarm Car Parking Report commissioned by SBC). 8) According to the preferred options document the site should be sequentially selected. there are more appropriate sites within the Borough and thus should be considered before this one. 9) The Parish of Kirklevington and Kirkleavington has a rich history and this site will be developed on an historic parkland Kirklevington Hall now Judges. The natural environment was noted by Reverend Graves in his History of Cleveland in 1803. The area was also a possible battle field site and Limton Dyke and Howden Dyke form the Northern Boundary of the site.

Council Response: Northumbrian Water is a consultee and sites are not allocated unless water supply and sewerage disposal capacity issues are fully taken into consideration. Comments regarding parking, Limits to Development, Strategic Gap, flood risk, Green Infrastructure/Wildlife Corridor and impact on landscape are noted and addressed in the the Yarm and Kirklevington Topic Paper .

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### 99 Individual

H1i - West Yarm

99/1: After visiting the consultation at Layfield school I was very disappointed that the CONSULTATION ! was just about letting the residents of Yarm know what was planned in our historic market town. Lots of residents felt that at no point were any residents considered as to what the area needs, and what the extra traffic would do to gridlock Yarm. The Tees Heritage Park would be greatly damaged with the disruption of wildlife. I am sure Stockton Borough has more than enough brownfield sites to build on that would regenerate areas that are in for more need. Please leave Yarm and Eaglescliffe as it should be. Historic Market Town

H1j - South West Yarm

H1 - Housing Allocations

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

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### 100 Individual

H1i - West Yarm

100/1: Housing proposals for Yarm Area

H1j - South West Yarm

The plan overall appears to neglect the impact of large housing proposals on the transport infrastructure and the effect on neighbouring boroughs.

This is particularly apparent in the Yarm area which is already suffering from transport congestion. Unless new roads are provided the proposed development will cause traffic problems for Ingleby Barwick and Acklam as well as Yarm and South Stockton.

The proposed houses are outside the existing development boundaries suggesting that the plans are being disregarded. There is also no provision for green wedge between Yarm and Kirklevington to alleviate some of the urban sprawl.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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### 101 Individual

HE2 - Character Areas

101/1: I would like to support the proposed policy to maintain these character areas and resist garden development.

Council Response: Support comments noted

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### 102 Individual

HE2 - Character Areas

102/1: I would like to support the proposed policy to maintain these character areas and resist garden development.

Council Response: Support comments noted

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### 103 Individual

103/1: I wish to express my objection to the many plans for developing the Yarm area currently under review by Stockton Borough Council, in particular the planned development submitted on behalf of Yarm School to develop the riverside opposite their present site. This area is an integral part of the Tees Heritage Park stretching from Stockton through to Yarm, and serves many valuable functions from bird and animal habitats to just the sheer pleasure that many people enjoy simply having it there, remembering that it is supported by our local taxes and lottery funding to benefit local people of all ages. To lose a very valuable section of this for Yarm School to construct 24 playing fields and associated facilities, plus a bridge, will remove a special section of the Tees Heritage Park from the very people it is designed for and make

it available for only the privileged few.

Council Response: Comments regarding Tees Heritage Park and the planning application to develop land north of the River Tees are noted and addressed within the Yarm and Kirklevington Topic Paper .

## 104 National Grid

104/1: National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

### Overview - National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

### Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

### Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

### Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of

England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

#### National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;
- site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;
- and use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;
- any policies relating to the diverting or undergrounding of overhead transmission lines;
- other policies relating to infrastructure or utility provision;
- policies relating to development in the countryside;
- landscape policies; and
- waste and mineral plans.

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

#### National Grid infrastructure within Stockton-on-Tees Borough Council's administrative area

##### Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Stockton-on-Tees Borough Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- 4VC line - 400kV route from Norton substation in Stockton to Osbaldwick substation in York
- 4TF line - 275/400kV route from Hawthorn Pit substation in Durham to Norton substation in Stockton
- XC line - 275kV route from Spennymoor substation in Durham to Norton substation in Stockton
- YYJ/N line - 400kV route from Saltholme substation in Stockton to Norton substation in Stockton
- ZZA line - 275kV route from the 4TH line in Hartlepool to Lackenby substation in Redcar and Cleveland via Saltholme substation in Stockton

The following substations are also located within the administrative area of Stockton Borough Council:

- Norton substation - 400kV, 275kV & 132kV

-Saltholme substation - 275kV

National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Stockton Borough Council:

Ref: Pipeline

FM06: Little Burdon to Billingham ICI

FM06: Elton to Pickering

FM06/13: Cowpen Bewley to Teeside Terminal

FM13: Bishop Auckland to Yafforth

National Grid has provided information in relation to gas transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Electricity and Gas Distribution

Northern Power Grid owns and operates the local electricity distribution network in Stockton-on-Tees Borough Council's administrative area.

Northern Gas Networks owns and operates the local gas distribution network in Stockton-on-Tees Borough Council's administrative area.

Contact details for Northern Power Grid and Northern Gas Networks can be found on the Energy Networks website: [www.energynetworks.org](http://www.energynetworks.org)

Specific Comments

Norton Substation

The following sites are identified on the policies map for housing allocation adjacent to National Grid's Norton substation:

-Policy H1g - Harrowgate Lane

While National Grid does not object to future development in the area surrounding the substation site, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Norton substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Stockton and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.

Overhead Electricity Transmission

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft, are crossed by or located within close proximity



to National Grid's high voltage overhead electricity transmission lines:

- Policy H1g - Harrowgate Lane (site crossed)
- Policy H1J - South West Yarm (site in close proximity)

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:  
[www.nationalgrid.com/uk/senseofplace](http://www.nationalgrid.com/uk/senseofplace)

Further information regarding development near overhead lines and substations is available here:  
[http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl\\_final/pdf/brochure.htm](http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm)

#### Underground Electricity Transmission Cables

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft are crossed by or located within close proximity to National Grid's high voltage underground electricity transmission cables:

- Policy H1d - Blakeston School (site in close proximity)
- Policy H1g - Harrowgate Lane (site crossed)

Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times

The information supplied is given in good faith and only as a <sup>690</sup>guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The

physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).

The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance HS(G)47 'Avoiding Danger From Underground Services' and all relevant site staff should make sure that they are both aware of and understand this guidance.

Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.

If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.

The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.

#### Gas Transmission

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft are crossed by or located within close proximity to National Grid's high pressure underground gas transmission pipelines:

- Policy EMP1 - General Employment Land (site in close proximity)
- Policy EMP3 - Key Employment at Wynyard Park (site crossed)
- Policy EMP4 (1b/1c) - Process Industries Sites (site in close proximity)
- Policy H11 - West Yarm (site in close proximity)

The pipelines forms an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ. Our pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. We require that no permanent structures are built over or under pipelines or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

-Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties  
<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

-Gas Transmission Underground Pipelines - Guidance <http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gasguidance.htm>

Should these sites be taken forward as development sites in the future, the developers should be made aware of the above issues.

#### Recommendations for the Local Development Document

Although National Grid does not object in principle to policy allocating land for development within the Borough at any of the locations listed, the above issues should be

taken into consideration and reflected in the document.

#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database

Council Response: Comments noted. The Council will ensure that the issues identified regarding proposed allocations will be taken into consideration and reflected in the document where necessary. Any masterplans produced will ensure the issues identified are addressed.

104/2: National Grid infrastructure within Stockton-on-Tees Borough Council's administrative area

#### Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Stockton-on-Tees Borough Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- 4VC line - 400kV route from Norton substation in Stockton to Osbaldwick substation in York
- 4TF line - 275/400kV route from Hawthorn Pit substation in Durham to Norton substation in Stockton
- XC line - 275kV route from Spennymoor substation in Durham to Norton substation in Stockton
- YYJ/N line - 400kV route from Saltholme substation in Stockton to Norton substation in Stockton
- ZZA line - 275kV route from the 4TH line in Hartlepool to Lackenby substation in Redcar and Cleveland via Saltholme substation in Stockton

The following substations are also located within the administrative area of Stockton Borough Council:

- Norton substation - 400kV, 275kV & 132kV
- Saltholme substation - 275kV

National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

#### Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Stockton Borough Council:

Ref: Pipeline  
FM06: Little Burdon to Billingham ICI  
FM06: Elton to Pickering

FM06/13: Cowpen Bewley to Teeside Terminal  
FM13: Bishop Auckland to Yafforth

National Grid has provided information in relation to gas transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:

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Electricity and Gas Distribution

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Contact details for Northern Power Grid and Northern Gas Networks can be found on the Energy Networks website: [www.energynetworks.org](http://www.energynetworks.org)

Council Response: Comments noted

H1g - Harrowgate Lane

104/3: Norton Substation

The following sites are identified on the policies map for housing allocation adjacent to National Grid's Norton substation:

-Policy H1g - Harrowgate Lane

While National Grid does not object to future development in the area surrounding the substation site, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Norton substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Stockton and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.

Council Response: Comments noted

H1g - Harrowgate Lane

104/4: Overhead Electricity Transmission

H1j - South West Yarm

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft, are crossed by or located within close proximity to National Grid's high voltage overhead electricity transmission lines:

-Policy H1g - Harrowgate Lane (site crossed)

-Policy H1J - South West Yarm (site in close proximity)

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as

part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:  
[www.nationalgrid.com/uk/senseofplace](http://www.nationalgrid.com/uk/senseofplace)

Further information regarding development near overhead lines and substations is available here:  
[http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl\\_final/pdf/brochure.htm](http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm)

Council Response: Comments noted. At detailed design/masterplanning stage the comments made and documents referenced will help inform proposals for the development of the sites.

H1d - Blakeston School

104/5: Underground Electricity Transmission Cables

H1g - Harrowgate Lane

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft are crossed by or located within close proximity to National Grid's high voltage underground electricity transmission cables:

- Policy H1d - Blakeston School (site in close proximity)
- Policy H1g - Harrowgate Lane (site crossed)

Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times

The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).

The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance HS(G)47 'Avoiding Danger From Underground Services' and all relevant site staff should make sure that they are both aware of and understand this guidance.

Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.

If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.

The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.

#### Gas Transmission

The following sites identified as potential development sites in the Local Development Document Preferred Options Draft are crossed by or located within close proximity to National Grid's high pressure underground gas transmission pipelines:

- Policy EMP1 - General Employment Land (site in close proximity)
- Policy EMP3 - Key Employment at Wynyard Park (site crossed)
- Policy EMP4 (1b/1c) - Process Industries Sites (site in close proximity)
- Policy H11 - West Yarm (site in close proximity)

The pipelines forms an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ. Our pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. We require that no permanent structures are built over or under pipelines or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

-Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties  
<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

-Gas Transmission Underground Pipelines - Guidance <http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gasguidance.htm>

Should these sites be taken forward as development sites in the future, the developers should be made aware of the above issues.

#### Recommendations for the Local Development Document

Although National Grid does not object in principle to policy allocating land for development within the Borough at any of the locations listed, the above issues should be taken into consideration and reflected in the document.

Council Response: The comments made are noted and will inform masterplanning of the sites. Consideration of National Grid's high pressure underground gas transmission pipelines will be a key consideration as part of planning applications and ongoing dialogue with developers and landowners.

104/6: National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database

Council Response: Comments noted

## 105 Hartlepool Borough Council

H1m - Wynyard Park

EMP3 - Key Employment at Wynyard Park

105/0: Policy EMP3 - Key Employment at Wynyard Park

Some of the land identified at this site as a potential allocation is already committed as it has planning permission or has already been developed (i.e. the Clipper Logistics base). All committed or developed land should not be included as a potential allocation and to ensure soundness this needs to be reflected in the policy wording and stated quantum's.

Council Response: Comments noted. The Clipper development has now been completed and will be removed from the proposals map.

105/1: Hartlepool recognises the important cross boundary issues relating to the Wynyard area in relation to housing and employment allocations and the strategic road network. Hartlepool also acknowledges the engagement that has taken place between Stockton Borough Council and Hartlepool Borough Council under the Duty to co-operate whilst developing the Local Plans for both boroughs.

Council Response: Acknowledgement of the co-operation between the two Councils is noted and welcomed. Since the preferred options consultations a number of planning applications have been permitted in the Wynyard area, both within Stockton on Tees Borough and Hartlepool Borough, which have involved significant co-operation on highways and ecological issues. Further details are provided in the Wynyard Topic Paper.

H1m - Wynyard Park

105/2: Hartlepool Borough Council has major concerns regarding elements of the housing chapter of the Regeneration and Environment Local Development Document and would like to make the following specific objections:

Objection 1 Policy H1m - Wynyard Park

Hartlepool would like to object to this proposed allocation on the grounds of numbers, house types and the subsequent potential detrimental effect on housing markets and proposed allocated sites in Hartlepool and Stockton-on-Tees. Hartlepool Borough Council and Stockton-on-Tees have for many years maintained a policy position, through their development plans, that the Wynyard area caters for the sub-regional market need for executive homes. This strategy was founded on a sound evidence base. The most recent Tees Valley Strategic Housing Market Assessment (2012) identifies Wynyard as an existing area of executive housing and reinforces its future role as an area to provide executive housing to meet a regional and sub regional executive housing demand and need.

This proposed allocation is a step change in policy as it is allocating 1,000 mid range family homes. Hartlepool have concerns that the numbers and house type of this allocation, unlike the smaller proposed allocations in Hartlepool and Stockton for executive homes, will compete with the more sustainable proposed allocations in Hartlepool and the main towns in Stockton-on-Tees Borough for more general housing. In this respect Hartlepool Borough Council consider this to be a fundamental shift from the spatial strategy of Stockton's adopted Core Strategy which focused development on the main towns to encourage regeneration and where a high level of services currently exist. Hartlepool Borough Council believes this allocation has the potential to undermine future housing delivery at the key sustainable strategic south western extension at Hartlepool and other key sites in the central Hartlepool. The requirement within the Plan to require affordable housing on this site could also have significant detrimental impacts on housing regeneration schemes within Hartlepool.

Council Response: Responses to this issue is dealt with in the Wynyard topic paper.

H1l - Wynyard Village

105/3: Objection 2 Policy H1L - Wynyard Village

Hartlepool recognises the need for more executive homes in the Tees Valley and fully supports the principle of more executive homes at Wynyard Village. However Hartlepool Borough Council has concerns over the loss of woodland and the effect on the landscape character of this historic parkland area and object to the allocation at Black Squares Wood on this basis.

The proposal would see a narrow perimeter of woodland retained around the housing but, in practice, the effects of wind throw would cause much of those woodland strips to be lost and in effect it would likely result in the removal of the entire woodland.

Although the woodland currently comprises pine plantation of around 40-50 years of age, the site has a much longer history as woodland. It is acknowledged that as this isn't an ancient woodland site and doesn't currently have a sufficiently diverse ground flora for it to qualify as a Local Wildlife Site, nevertheless it is mature woodland and as such is an important habitat feature both of itself and as an ecological corridor between surrounding woodlands.

Black Squares Wood is also a very significant landscape feature. It adjoins historic parkland but, more importantly, provides an appropriately rural backdrop to the Castle Eden Walkway, which is part of Wynyard Woodland Park, perhaps, the subregion's most popular country park and a key recreational route, being part of Sustrans Cycle Route No 1. The proposal could alter the impression of visitors from that of walking in the countryside to walking alongside a housing estate.

It is worth noting that Hartlepool Borough Council amended the boundaries of its housing allocation for the farmland immediately north of Black Squares so as to draw it further back from the Castle Eden Walkway to try and retain a sense of rural location.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## Infrastructure Strategy

### 105/5: Public Transport and the road network at Wynyard

The Road network and particularly the A19/A689 interchange is a major concern at the present time and is highlighted as needing improvements within the Tees Valley AAP. Any developments occurring within this vicinity should be contributing towards these improvements. Public Transport is also a key challenge for both Boroughs as currently there is no public transport provision in the Wynyard area. It is important that development proposals at Wynyard contribute to setting up a viable public transport link as well as footpath and cycleways that link the various elements of Wynyard as well as to other parts of Stockton and Hartlepool Boroughs.

### Infrastructure Strategy

In the Transport section it is recommended that stronger reference to the A689/A19 highway network improvements is made.

Page 72 of the Infrastructure Strategy notes that a 'new roundabout will be required on the A689 which would be in Hartlepool and could be achieved as part of wider development including Hartlepool'. Hartlepool Borough Council have concerns that this is the first time that this has come to our attention and subsequently has not been considered by our Infrastructure Plan or Local Plan.

Page 72 of the Infrastructure Strategy, the references to local highway network improvements for Wynyard relate to sites to the south of Yarm and not Wynyard.

### Housing Numbers in policy H1 and other policies

The housing numbers identified in policy H1 do not correspond to the individual H1 policies and the Infrastructure Plan. The Norton School is an example of this none conformity.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

### 105/6: Summary

Apart from the specific objections detailed above Hartlepool Borough Council supports the overall aims of this critical document that will ensure the prosperity of Stockton on Tees and have wider benefits to its neighbours including the Borough of Hartlepool. Hartlepool Borough Council is fully committed to working with its neighbouring authorities and will continue the regular engagement at a range of levels that meets to duty to cooperate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 106 Individual

### H1i - West Yarm

106/1: I firmly, really and truly believe Yarm, Eaglescliffe and Ingleby Barwick do not need more houses. I have lived here for the whole of my life (36 years) and it is changing for the worse. There are far more houses now, not enough schools where they need to be, traffic issues, even shopping issues etc. Yarm used to be a fairly exclusive and expensive place to live with Yarm Road having beautiful Victorian houses etc, now these are being demolished for flats or new houses. It has to stop, and as for more houses at Urray Nook, has anyone from the council tried to get past Egglecliffe School from Urray Nook from about 3pm onwards Mon to Fri, it's horrific, traffic is

### H1j - South West Yarm



stacked back. Time to stop and let us keep the small bits of green we have left!!

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper.

### 107 Individual

107/1: Yarm School Playing Fields Green Lane - proposal for 500 dwellings. I am making an objection to this on the grounds of the consequential relocation of the playing fields on land across the River Tees from Yarm School.

This would reduce the quality of the environment along the Tees, reducing substantially the amenity value of the area for the general public and restricting the open space that currently exists. The infrastructure that currently serves the Green Lane area (roads, drainage, sewage and electricity supply) are inadequate to cope with the increased number of dwellings. The financial burden of remedying this situation would fall on SBC and its council tax payers which is unnecessary and unfair.

Yarm School proposal to relocate the Green Lane Playing Fields to opposite the main school ,across the River Tees, in the parish of Egglecliffe. The view to Egglecliffe from Yarm is an important component of the natural beauty of the Tees Heritage Park in the Yarm area. It helps to make Yarm one of the most desirable living areas under the care of Stockton Borough Council and should be preserved. The historic contours of the land would be damaged and destroyed by the Playing Field development. SBC have for some years supported the Tees Heritage Park, which provide quiet walks and sympathetic artistic attractions along the river bank. The proposed developments are contrary to these environmental facilities. The Tees Heritage Park project has secured lottery funding of over £700,000 and the proposed developments are contrary to the aims of the project for which the funding was granted. •The visual, auditory and aesthetic experiences to be currently enjoyed along the river banks would be severely impaired or destroyed. Light pollution from floodlit playing fields would create an unnecessary nuisance. Construction of a footbridge from Yarm School to the proposed playing fields would disrupt the natural vistas of the Tees. Viewing the recently completed building developments from the Egglecliffe river bank, the retaining wall constructions bordering the river, present an ugly boundary to the school which is unsympathetic to the rest of the river banks and detract from their natural beauty, lacking any provision for wildlife. If a similar standard of environmental insensitivity were to accompany the building of a sports pavilion and the playing field developments, then a unique area of natural beauty would be destroyed. This would be to the detriment of Yarm as a town and Stockton as a Borough Council

Council Response: Comments regarding Tees Heritage Park and proposed development sites to the north of the Tees at Yarm are noted and addressed in the Yarm and Kirklevington Topic Paper. Infrastructure providers, including water, sewage and energy provision are routinely consulted on the Local Plan and give advice on guidance on the infrastructure capacity and any improvements required to facilitate development.

### 108 Individual

108/1: The proposed developments at Urlay Nook and Allens West will impact on the traffic volumes using Long Newton Lane between these developments and Long Newton, accessing the A66. This road is currently rated for national speed limit and is not of suitable standard to accept any significant increase in traffic volumes travelling at such a speed, especially as it is increasingly being used by pedestrians, equestrians and cyclists for leisure purposes associated with the Community Forest. There is no specific proposal within the plan to accommodate the increased traffic volumes which these developments will attract to ensure a safe and satisfactory ability for all to use the local road network.

Council Response: Comments are noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

### 109 Individual

109/1: Having visiting one of your 'drop in' sessions I would comment that this is a totally ill thought of plan. Considering all the proposed sites for housing it is obvious that the infrastructure of the proposed areas is not good enough to serve the current tenants of the general areas and will not sustain the huge influx that you predict. As a Hartburn resident, my main concern is for the site adjacent to Surbitan Road. This is a prime agricultural site and Yarm Back Lane is not capable of dealing with current traffic levels, never mind a huge increase if the development ever goes ahead. This is true for the whole of the Yarm Area and it was madness to grant permission for the old MOD site to be developed as proposed. We listened to the big plans for North Shore and still await the development of this site and as you explain in your document, there is little chance of North Shore ever being developed fully. You as a Council have shown little forward planning in the North Shore development and you now prove your inability with these latest schemes.

Council Response: To see how the Yarm Back Lane site has been assessed refer to the Housing Site Selection Paper. For issues concerning housing development in Yarm see the Yarm and Kirklevington Topic Paper.

### 110 Individual

H1j - South West Yarm

110/1: Policy H1j - South West Yarm I wish to object to proposals for 735 additional homes in South West Yarm. My main reason is that traffic generated by these additional houses will put completely unreasonable pressure on the local road network, with consequent implications for road safety as well as massive inconvenience. There is only one crossing of the River Tees in the area and the main road through Yarm is already extremely congested. Paragraph 8.93 states that "initial and immediate concerns in respect of local highway capacity restrict the contribution of this site (H1i - West Yarm) to around 300 dwellings." If this is so, it is surely a contradiction to add another 735 dwellings on a roughly adjacent site, feeding into exactly the same highways.

H1i - West Yarm

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

### 111 Individual

H1j - South West Yarm

111/1: Policy H1j - South West Yarm I wish to object to proposals for 735 additional homes in South West Yarm. My main reason is my concern about the extra traffic that will be generated by the extra houses. Increasingly, even outside peak hours, Yarm is often a bottleneck. Paragraph 8.93 states the the West Yarm site has been restricted because of the traffic problem. How, therefore, can an extra 735 houses in the same area not make the traffic problem far, far worse? More and more areas are being overtaken by housing development. I am concerned that surrounding villages will lose their identity and merge into one large estate.

H1i - West Yarm

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

### 112 Individual

HE2 - Character Areas

112/1: HE2 10.31, I would like support the proposed policy, especially oversize back garden developments.

Council Response: Support comments noted

### 113 Individual

H1h - Land East of Yarm Back Lane

113/1: We object to the proposed development on Yarm back road. Our reasons are. 1. where will all the traffic be directed. Surbiton Road is already a problem and has had to be calmed and there is a proposal to reduce Yarm back Road to 50 miles per hour I presume this is because of current problems and not just preparing for the development. 2.Surbiton Road has a lot of elderly people our parents being 2 of them more traffic makes it more dangerous for them to cross the road safely. 3. Will there be a greenbelt left if the proposal goes ahead for the people who currently back on to the fields as after having open aspects for over 30 years for most people this will be a very big change in lifestyle especially for the elderly who have been there since the houses were built. 4. Will the people backing onto the fields be given an option if the devleopment goes ahead to purchase some of the land before the developer? 5. Will the residents of Surbiton Road who back nto the fields be able to request that only bungalows are behind them and not 3 storey houses which are the fashion at the moment.

Council Response: The need for traffic calming measues on Surbiton Road was determined independently of the proposed development. The Borough does not have any Green Belt. Green Belt are nationally designated areas. None have been designated in the Tees Valley. Whether the landowner would be willing to sell land adjacent to the existing settlement to homeowners is not a planning issue. The design and layout will need to provide adequate amenity and privacy for existing and future residents. To see how the site has been assessed refer to the Housing Site Selection Topic Paper.

### 114 Individual

H1j - South West Yarm

114/1: This response refers to Section 8 of the Preferred Options draft, specifically to the paragraphs referring to the proposed housing development in what is incorrectly referred to as South West Yarm (currently the Yarm School playing fields). This site is not part of Yarm but falls within Kirklevington Parish and if allowed to proceeed will irrevocably damage the character and environment of the Parish. The Strategic Gap between Kirklevington Parish and Yarm, which has been essential in protecting the rural nature of the Parish with its important wildlife corridor, will be so reduced as to be non-effective if this development goes ahead. Additionally, the extra traffic generated by over 700 new homes will seriously add to existing traffic congestion in the area and will inevitably lead to complete gridlock at busy periods. No amount of cosmetic traffic amelioration measures will be able to deal with this. Developer-led policies such as this can only result in lasting damage to the environment. I therefore

H1i - West Yarm

wish to OBJECT to the inclusion of this site in the Preferred Options document and urge the Council to rethink its approach and return to a genuinely planning-led housing strategy.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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### 115 Individual

H1j - South West Yarm

115/1: Both myself and my wife strongly object to "up to 735 dwellings" being constructed on the green-field site directly behind our house for the following reasons:  
1. We purchased our property as a rural dwelling with an open outlook onto fields (hence the name of the mews 'field view'). Losing the field to such a development will not only affect our personal view of our property but it will also significantly lower the market value - especially as it utilises a septic tank, which is normal for rural properties, but highly undesirable for estate properties, which will have huge implications to saleability!

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

115/2: 2. The proposed trees immediately behind our garden will block out a high proportion of light from our south facing garden - a major reason why we purchased the house in the first place.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

115/3: 3. Green Lane is already struggling to cope with the volume of traffic during peak times, and with the Tall Trees and Morley Carr developments alone, there will be a huge bottleneck in an area where hundreds of children are dropped off and picked up from school each day. The road simply cannot cope with the such a huge additional volume of traffic - especially at peak times where there will be serious safety concerns for the students at Conyers school.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

115/4: 4. Yarm is a small and attractive market town with a narrow, old fashioned high street. This exponential expansion will mean that Yarm will lose the character current residents have paid a premium for, and will become yet another faceless, characterless large town that is too large to be quaint and too small to be significant. As a resident of Yarm both myself and my wife chose to live here because we wanted the friendly and exclusive culture a small market town offers, rather than the anonymous culture of large towns and cities.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

115/5: 5. Offering greenbelt to developers because they don't want to develop brown field sites is much like offering a child a cream cake because they don't want to eat their vegetables! If you forbid development on greenbelt sites, developers will have no choice but to develop brown field sites, thereby not only preserving premium greenbelt land, but also improving unsightly brown field sites. They will only be prepared for their margins to be squeezed if they are not offered a choice!

Council Response: Comments are noted. Green Belt is a national designation and there are no areas of Green Belt within Stockton Borough or the wider Tees Valley area. Stockton-on-Tees has a local Green Wedge designation, which is intended to prevent the coalescence of communities and maintain their individual identities. However, comments relating to the development of greenfield land have been addressed within the Yarm and Kirklevington Topic Paper.

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### 116 Individual

H1j - South West Yarm

116/1: Proposed Mount Leven Valley Planning Application 12/1546/OUT. I object to the proposed developments based on inadequate infrastructure, schooling, policing, transport links, notably Leven Bank, and encroachment into wildlife habitation. Morley Carr Planning Application 12/0980/OUT. I object to the proposed developments based on inadequate infrastructure, schooling, policing, transport links, notably Leven Bank, and encroachment into wildlife habitation. Egglecliffe Village Arable Field. Planning Application 12/1595/EIS. I object to the proposed developments based on inadequate infrastructure, schooling, policing, transport links, notably Leven Bank, and encroachment into wildlife habitation.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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### 117 Individual

H1i - West Yarm  
H1j - South West Yarm

117/1: Sir, I strongly object to any and all housing development on any and all greenfield sites. I most particularly object to greenfield development in the Yarm area. Due to the present over development of the local area in general, Yarm is a nightmare to negotiate at most times and particularly in the morning and early evening. I have lived in Yarm for the last 30 years having moved up here after service in the british army, I visited the area and liked it so much I decided that on retirement to move here, I was really impressed by the open countryside and beautiful scenery it had to offer. Of course I could have chosen to go live in a town, (like Stockton) or even stayed in London were I spent most of my service, or even back to the city of my birth. But as I say I liked Yarm and its people so here I am. I don't want to live in a town or city or a sprawling housing estate which it appears you are planning. ie another Ingleby Barwick.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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**118 Individual**

H1j - South West Yarm  
H1i - West Yarm

118/1: I am extremely concerded with the proposed developments in the Yarm area. I see on a daily bases the struggles that motorists have both parking and driving through Yarm. Proposed parking over the river would be of little us as most cars would have to pass through Yarm to access the proposed car park. Yarm has few faciilities, despite contributing large council tax revenues. The proposed development will forever remove such sites from our area which could be developed when funding becomes available.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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**119 Individual**

H1i - West Yarm  
H1j - South West Yarm

119/1: I object to the proposed new housing developments for the Yarm and Eaglescliffe area. I am concerned that if the approval is given for the thousands of new homes currently proposed for Yarm and Eaglescliffe, it would lead to more traffic congestion, increased air pollution, a burden on infrastructure including schools, doctors and dentists as well as having an environmental impact. Over development will cause serious irreconcilable damage to the community of Yarm and Eaglescliffe. We should not be allowing urban sprawl onto Greenfield sites, when more suitable brownfield sites are available.

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper. A Development Framework Document is under preparation for the site and this will include a phasing plan for the site. The Housing Phasing and Implementation Policy in the Preferred Options document has not been carried forward to the Publication Draft.

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**120 Individual**

H1i - West Yarm  
H1j - South West Yarm

120/1: Present plan appear to take no account of traffic congestion through Yarm. It is already at peak times approaching gridlock,parking in High St is already inadequate and current proposals will stifle Yarm to death. They are just not feasible

Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper

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**121 Individual**

H1j - South West Yarm

121/1: We wish to register our objection to the following redevelopment plans for Yarm: Mount Leven retirement village 12/1546/OUT & Yarm school playing fields/Bellway homes Green Lane 12/1990/EIS. Our objection to both proposals is in relation to the traffic situation that would arise at the "Shell garage roundabout" that would, on school days turn into a gridlock situation as the extra volume of traffic queing traffic would be intolerable.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

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**122 Individual**

H1i - West Yarm  
H1j - South West Yarm

122/1: In relation to housing and as a resident of Yarm for the last 21 years I have seen an increase in traffic in getting in and through Yarm High Street, Thirsk Road and Green Lane to mention just a few. Therefore I believe any further planning applications for more housing should be rejected. The development on Morley Carr Farm, The Tall Trees and the MOD site at Allens West are more than enough for Yarm to cope with in terms of traffic congestion and anything else that comes with such big housing developments. Yarm is a historic market town and should remain that way and not be choked with more traffic. As it is - there are massive queues of traffic both on Thirsk Road leading into Yarm and also on the other side of the river coming into Yarm. I believe the infrastructure is not strong enough to take more traffic and wildlife habitats

will be irretrievably damaged. No more houses to be built in Yarm.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

### 123 Individual

H1i - West Yarm  
H1j - South West Yarm

123/1: Morley Carr Planning Development I object strongly to the above planned development, Stockton Council has rode rough shod over the opinions and statements made by the Yarm Residents. We can not sustain any more traffic in the town, the roads were not designed for the amount of cars this development is going to create, Yarm is a bottle neck as it is, Stockton Council is out to wreck the town as they did to Stockton Hlgh Street years ago, it is going to end up like Ingleby Barwick a soulless community, in fact just an extension of Ingleby Barwick. This application has been rushed through it makes people wonder who is going to benefit from this, not Yarm residents or the public services which will be stretched to the utmost.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

### 124 Individual

H1j - South West Yarm  
H1i - West Yarm

124/1: I objec to the inclusion of all developments in Yarm for new dwellings on Morley Carr farmland, The Mount Leven Retirement Village, and Yarm School's playing fields on Green Lane. The reasons for my objections are a) The lack of infrastructure to support a higher population, especially in terms of access to doctors at the Medical Centre. b) The bottleneck already existing for traffic trying to get through Yarm to go to Stockton or Darlington, which will be exacerbated. c) The increased demand on existing parking within Yarm for people visiting banks and shops which will cause worse bottlenecks in the High Street.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

### 125 Individual

HE2 - Character Areas

125/1: I agree, a good policy. We are in danger of losing the character of many of our towns and villages.

Council Response: Support comments noted

### 126 Individual

H1j - South West Yarm  
SP4 - Green Wedge

126/1: I strongly disagree with the proposal to develop the existing yarm school playing fields location, as your spatial strategy states "The Council will maintain the limits and protect the Green Wedges". This development is opposing this protection.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1i - West Yarm  
H1j - South West Yarm

126/2: Yarm as a destination or travelling beyond is a problem now as parking is limited. This development along with the Morley Carr Farm project will cause further traffic tail backs and further driver frustration.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

### 127 Individual

H1j - South West Yarm  
H1b - Urlay Nook

127/1: I object to the following planning applications: Morley Carr, 12/0980/OUT, Mount Leven Retirement Village 12/1990/EIS, Egglecliffe Village Arable Field 12/1595/EIS, Urlay Nook, 12/2047/OUT.

My reason being the infrastructure will not support all of this development. We shall be grid locked.

H1i - West Yarm

Council Response: Comments noted and addressed in the Yarm Topic Paper. A Development Framework Document is under preparation for the site and this will include a phasing plan for the site. The Housing Phasing and Implementation Policy in the Preferred Options document has not been carried forward to the Publication Draft.

### 128 Elizabeth Wright and Alexandra Farrington

H2 - Housing Phasing and Implementation

128/0: Policy H2 – Indicative Phasing Table

It is noted that the Proposed Phasing Table suggests Yarm Back Lane (east) delivering 100 houses per annum from 2019/2020. The respondents suggest the development be phased to start before 2019 / 2020 and if needed the estimated annual phasing rate reduced such that the site would deliver its total yield by 2029. As detailed in the response to Policy H1, the respondents consider the total yield should be increased to approximately 990 dwellings, that number including the potential contribution site 80 could make.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan. For further comments regarding housing delivery, see the housing delivery section of the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

128/2: Para 2.12

It is stated that the 'Preferred Option' is to use the Spatial Strategy set out in the original Core Strategy. Para 2.12 goes on to state that 'it is acknowledged that this approach will not provide sufficient dwellings to meet the Borough's identified need'. NPPF para 47 requires LPAs to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. That being the case the respondents consider there is a need for the Spatial Strategy to evolve such that sufficient housing can be delivered to meet the Borough's identified need.

Council Response: The Housing Spatial Strategy in the Publication version of the Regeneration and Environment Local Plan has evolved to ensure that there will be enough deliverable housing sites to meet the Borough's housing requirement.

H1 - Housing Allocations

128/3: Para 2.19

The respondents ask that the site allocated under policy H1h be expanded to include SHLAA site 80. Reasons for this request are detailed later in this submission.

H1h - Land East of Yarm Back Lane

Policy H1

The respondents ask that the site allocated under policy H1h be expanded to include SHLAA site 80. SHLAA site 80 measures approximately 1.5 hectares and has a capacity of approximately 45 dwellings. The inclusion of SHLAA site 80 within the proposed allocation would result in 43.5 hectares of land allocated (42 + 1.5) and the approximate capacity increased to approximately 990 dwellings (945 + 45).

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

H1 - Housing Allocations

128/5: Policy H1h

Land at Yarm Back Lane, site 119, is assessed in the SHLAA as being Suitable, Available and Achievable. Policy H1h proposes the allocation of a portion of SHLAA site 119 to the east of Yarm Back Lane for housing development. On the Proposals Map the area proposed is annotated H1i instead of H1h and this is presumed to be an anomaly.

H1h - Land East of Yarm Back Lane

The respondents support the allocation detailed in policy H1h but consider the allocation should be expanded to include SHLAA site 80, Land to the North of Southlands, Yarm Back Lane.

SHLAA site 80 is assessed in the SHLAA as being Available and Achievable. In relation to Suitability, the SHLAA finding is that 'the site is not suitable in isolation as it is detached from the urban area. However the site forms part of site 119 which is suitable'.

The respondents consider the proposed allocation in policy H1h constitutes a material change in circumstances and in the context of its allocation site 80 is suitable for housing development. The respondents ask that the area allocated under H1h be extended to include SHLAA site 80. The inclusion of the SHLAA site 80 is justified and sound for reasons including that benefits from robust and defensible boundaries and that its capacity is modest in the context of the overall number of dwellings.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

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129 Individual

H1j - South West Yarm

129/1: I object to these developments because:

The application appears to be developer led. This would cause erosion of farm land- flooding and drainage issues including effect on surrounding area and neighbouring parishes. Will more than double the size of the Parish. Will destroy nature of the village. Traffic congestion. Effect on wildlife corridor. Pressure on existing infrastructure i.e health, schools and access to nearest post office in Yarm.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

## 130 Individual

TC1 - Stockton Town Centre Improvements

130/1: Thank you for sharing this document with us. We are supportive of the main policies within it, particularly with regard to town centre regeneration and the development of a Tees Valley Metro system.

TC2 – Sites for major new retail and town centre use development

Council Response: Comment noted

TC3 - Stockton Town Centre Primary Shopping Area

TC4 - New Town Centre Uses

TC5 - Stockton Town Centre Evening Economy

T2 - Tees Valley Metro

TC5 - Stockton Town Centre Evening Economy

130/2: Policy TC5, Town Centre evening economy. We warmly welcome points 4 and 5.

Council Response: Comment noted and welcomed

H4 - Care Homes and Housing for Older People

130/3: Policy H4 Care Homes and Housing for older people (8.161-163). The ongoing under-occupancy rate is clearly having an impact on the viability of a number of homes and it appears that owners are responding by applying to convert them into flats/apartments. We have had two applications in the Grangefield ward in the last six months. There is a danger that such developments will change the character of established residential areas and we would ask that planners and social care take a proactive and strategic approach to this and in particular discuss with owners alternative uses. For example the likely need for supported and group living accommodation for people with learning difficulties likely to arise from the review of the learning disabilities service.

Council Response: Comment noted. The policy has been incorporated within the Housing Mix Policy in the Publication Draft.

HE2 - Character Areas

130/4: Policy HE-2 Character Area

We would request that the following are considered for designation as character areas.

- 1.The Avenue and adjacent roads (Claremont Gardens, Fencote Gardens, Aldborough Close, Albert Road, Fane Close, Westerleigh Avenue). This area, though containing a variety of housing types, is characterised by high quality individual design, large gardens and a secluded, self-contained atmosphere that should be protected.
2. Fairfield Road between its junction with The Avenue and Oxbridge Lane and Green Lane from its junction with Oxbridge Lane and Greens Valley Drive. Taken together, the houses on these two stretches of well-used road present a uniform and distinctive appearance which substantially enhances the street scene.

Council Response: The 'Townscape Character Areas in Stockton-on-Tees Borough' report outlines the methodology for selecting Character Areas as allocated within Policy HE2 of the Regeneration and Environment LDD preferred options:

There are a number of areas within the Borough that have a distinctive character and sense of place. These areas are those which are well established have a mature quality and identity that sets them apart from the rest of the urban environment and where the fabric of what has made them special has not been fundamentally eroded. At present there is no recognition or protection of their local distinctiveness.

The Townscape Character Areas vary in size owing to the diverse nature of development in Stockton. Generally these areas are of pre-war and inter-war housing characterised by large family houses and set in a spacious plots of mature gardens and specimen trees. Other areas have also been identified as having special character owing to their townscape character or unique historic character.

The areas of land identified for inclusion are not considered to meet the above criteria and have therefore not been taken forward as allocations. The following provides justification:

- The Avenue and (adjacent roads): A number of large detached properties are evident on the 1898-99 basemap, specifically to the south west of The Avenue and along Fairfield Road. However, the majority of development has occurred in the post War period which has completed the street scene. There has also been a considerable amount of back land and tandem development; as well as the demolition of 1 The Avenue and replacement by a flatted development. Given the nature of development along the Avenue and adjacent roads it is not considered that there is a character sufficient enough that sets the area apart.
- Fairfield Road (between The Avenue and Oxbridge Lane) and Green Lane (between Oxbridge Lane and Greens Valley Drive): development is entirely post War being characterised predominantly by semi detached dwellings to the east side of the road and detached properties to the west. Whilst these properties have an identifiable character they are not of a 'mature quality and identity that sets them apart from the rest of the urban environment'.

### 131 Individual

131/1: My brother and I own a 1/2 acre piece of land on the Darlington Road Hartburn, in the H1i area designated in the LDD document. Our mother bought the land many years ago and we now feel ready to sell the land when it is granted planning since neither of us wish to build on it ourselves. Rather than selling as a spot development, we would prefer to sell to a larger responsible developer interested in the area if at all possible, and in this way our land could be better used to help conform to the design criteria established by the LDD.

Council Response: Comment noted

### 132 Individual

SP1 - Presumption in favour of sustainable development

132/1: Strategic policy SP1

1 ...and to secure developments that improve economic, social and environmental conditions in the area. I object to the policy in that I do not feel that it would improve any of the stated conditions.

Council Response: The inclusion of the policy is a national requirement

SP2 - Housing Spatial Strategy

132/2: The Housing Spatial Policy

H1i - West Yarm

2.5 "The housing requirement stated in the adopted Core Strategy for the period 2004 to 2024 is 11,140 dwellings to 2024. This is an average of 555 dwellings per year (figure rounded). I object to the fact that there are three approved developments in Yarm and Eaglescliffe for 1338 dwellings. How on earth does that equate to 555 dwellings per year for the whole of Stockton? Notwithstanding these developments there are three other proposed developments for a total of 1635 dwellings and a retirement village and care home.

H1j - South West Yarm

H1b - Urray Nook

Council Response: Comments noted. Housing need and demand by area is discussed in the Housing Need and Demand Topic Paper.

SP2 - Housing Spatial Strategy

132/3:

Issues and Options consultation: You told us

H1i - West Yarm

2.7 Points to consider include:

H1j - South West Yarm

Integration with the existing community and the delivery of sustainability.

H1b - Urray Nook

I object to the belief that this would be sustainable for Yarm, Preston and Eaglescliffe as Yarm High Street is frequently a bottleneck for traffic now.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper



SP2 - Housing Spatial Strategy

132/4:  
Strategic Policy SP2

H1i - West Yarm

A site selection hierarchy:

H1j - South West Yarm

- The Wider Conurbation “priority given to sites that support regeneration”
- Adjacent to the Conurbation. Does Yarm need to continually increase in size?

Council Response: Sites adjacent to the conurbation have been identified in order to meet the housing requirement

SP2 - Housing Spatial Strategy

132/5: The Housing Requirement

H1 - Housing Allocations

2.13 “The CSR Issues and Options Consultation document identified a housing delivery gap of 2800 houses. It has become apparent that the housing delivery gap has increased to about 4670 dwellings. 1138 houses already passed for Yarm and Eaglescliffe!

Council Response: Comments noted

H1 - Housing Allocations

132/6: Sites adjacent to the Conurbation of Yarm

H1i - West Yarm

The CSR Issues and Options Document

H1j - South West Yarm

Development of these sites would not meet regeneration objectives or support disadvantaged communities. However, the TVSHMA 2012 identifies an annual requirement of 97 affordable dwellings in the Yarm, Preston and Eaglescliffe housing subdivision. It shows that demand exceeds supply with some pressure on stock of 4+ bedroom and detached properties and bungalows. The TVSHMA that it will have a role in response to the need for diversification and expansion of the sub region’s economy and in contributing towards achieving wider population and economic growth objectives. Sites adjacent to the Yarm conurbation are likely to prove particularly attractive within the context of contributing towards executive housing provision.

The council’s team have identified that there are significant issues regarding the local road network and parking in Yarm Town Centre that would need to be mitigated. Given the high land values at Yarm it is anticipated that the Yarm sites will be deliverable within a highways context. (What does this mean?) It is therefore proposed to allocate land at West Yarm for 300 dwellings and land at South West Yarm for 735 dwellings.

Council Response: Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper. Comments regarding Yarm noted and addressed in the Yarm and Kirklevington Topic Paper

SP4 - Green Wedge

132/7: The Green Wedge

Why do the Council have to designate the green wedges to be removed from the limits to development when they are already designated? Yarm for example used to be a small town and is continuing incessantly to increase in size.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

H1i - West Yarm

132/8: Limits to development

H1j - South West Yarm

Option 3. I object to Yarm not maintaining its existing limits to development circumstances due to its’ history and growth since 1984 and before.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

SP3 - Limits to Development

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### 133 Individual

H1j - South West Yarm

133/0: Regeneration and Environment Local Development Document: Preferred Options

I object to the land south of Green Lane being cited in the above document as a preferred option. My reasons are the same as those given above.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

133/1: Planning Application Number 12/1990/EIS - Land South of Green Lane.

I object to the planning application for the following reasons:

I do not believe there is the housing demand around Yarm to justify this level of development and the whole process appears to be developer led.

Council Response: Comments regarding development in Yarm noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

133/2: The land south of Green Lane is part of the parish of Kirklevington and not Yarm. This proposed development will destroy the nature of our rural community, erode the farm land and is outside of the limits to development. It will in fact more than double the size of the parish of Kirklevington, which is a village with a great deal of history, and result in erosion of the Strategic Gap resulting in urban sprawl.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

133/3: There will be a catastrophic effect on the wild life corridor which extends from the Pennines to the North Yorkshire Moors. This corridor comes into Stockton Borough Council's domain for a very limited distance but would affect mammals that have been using it for a very long time.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

133/4: The development of the area would result in flooding and drainage issues, including effecting the surrounding area and neighbouring parishes who are not part of Stockton but North Yorkshire.

The traffic congestion, and parking in Yarm is already a serious problem and adding the proposed development would only add to this problem. People will avoid Yarm High Street and will shop elsewhere e.g. Northallerton and Stokesley resulting in the business community in Yarm suffering. People from Kirklevington and surrounding villages will not transfer their shopping habits to Stockton as they are more familiar with rural communities.

There is congestion on routes to and from the A19, Ingleby Barwick, Yarm, Kirklevington and adjoining parishes using the A67, Low Lane, Green Lane, and Thirsk Road. The traffic at peak times is a nightmare and there only needs to be an accident on the A19 and the whole area is gridlocked for hours at a time.

There is single carriage traffic and traffic lights on the bridge over the railway line on Green Lane, which will be a total bottle neck should this development go ahead. Any access to the development from the A67 would be extremely dangerous given the nature of that road limited visibility.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

133/5: The infrastructure is already under pressure. Anyone moving into Yarm at the moment cannot register at the medical centre but is referred to Eaglescliffe where planning permission has already been granted for 850 homes. The provision of school places would also be a significant issues.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

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## 134 Darlington Borough Council

SL2 - Renewable Energy Generation

EMP7 - Airport Related Uses

134/0: Policy EMP 7

The Council has an interest in Durham Tees Valley Airport and is aware that options to sustain the airport as a commercially viable operation are currently being considered. The adopted Darlington Core Strategy identifies the airport as having a key role in the economic growth of the region and as a sub-regional gateway. Its role as an economic driver and the need to co-ordinate growth and development there are identified as cross boundary issues. The Council would therefore wish to be involved in finalising Policy EMP7, should there be any significant changes, to ensure that it adequately accommodates appropriate development necessary to sustain the viability of the Airport.

Council Response: Comments noted. In the context of the 'duty to co-operate', officers from Stockton Borough Council and Darlington Borough Council have held a

discussion to address this and the other issues raised by this representation and the DTVA Masterplan. Further discussions would be welcomed should DBC officers have any further issues they wish to raise or wish to discuss these issues further.

## SP2 - Housing Spatial Strategy

### H1 - Housing Allocations

#### 134/1: Policy SP2: Housing Spatial Strategy and Policy H1: Housing Allocations

The Council would welcome the opportunity to discuss the amount of new housing and the distribution of new housing proposed across Stockton Borough. This is because the proposed housing sites at West Stockton and Eaglescliffe (H1b, g and h), capable of delivering an estimated 3985 dwellings, are all within easy commuting distance of existing and proposed employment areas on the eastern side of Darlington along the primary road network, and if subdued economic and housing market conditions continue, could potentially affect the delivery of areas identified in the adopted Darlington Core Strategy for future housing development, particularly at the Eastern Urban Fringe.

Council Response: Comments noted. In the context of the 'duty to 'co-operate', officers from Stockton Borough Council and Darlington Borough Council have held a discussion to address this and the other issues raised by this representation. Further discussions would be welcomed should DBC officers have any further issues they wish to raise or wish to discuss these issues further.

#### 134/2: Para 4.8-4.11

The Council supports the approach taken to allocating sites for wind farm development. The cumulative impact of renewable energy generation proposals, particularly wind power, across a wider landscape area encompassing parts of Stockton Borough and Durham County is a cross boundary issue identified in the adopted Darlington Core Strategy.

Council Response: Comments noted. In the context of the 'duty to 'co-operate', officers from Stockton Borough Council and Darlington Borough Council have held a discussion to address this and the other issues raised by this representation. Further discussions would be welcomed should DBC officers have any further issues they wish to raise or wish to discuss these issues further.

## ENV1 - Green Infrastructure

#### 134/3: Policy ENV1

The Council supports the approach taken in Policy ENV1 - Green Infrastructure, to deliver a strategic approach to green infrastructure which includes strategic river corridors, such as the River Tees, that crosses the Darlington-Stockton boundary. Maintaining and enhancing green infrastructure of sub-regional significance is a cross boundary issue identified in the adopted Darlington Core Strategy.

Council Response: Comments noted. In the context of the 'duty to 'co-operate', officers from Stockton Borough Council and Darlington Borough Council have held a discussion to address this and the other issues raised by this representation. Further discussions would be welcomed should DBC officers have any further issues they wish to raise or wish to discuss these issues further.

## HE4 - Stockton and Darlington Railway

#### 134/5: Policy HE4, Stockton and Darlington Railway

The Council supports the approach in this policy, which recognises and will help to safeguard an important historic feature that extends into Darlington Borough. It will complement the policy approach that is being developed in Darlington, through the emerging Making and Growing Places Development Plan Document.

Council Response: Comments noted. In the context of the 'duty to 'co-operate', officers from Stockton Borough Council and Darlington Borough Council have held a discussion to address this and the other issues raised by this representation. Further discussions would be welcomed should DBC officers have any further issues they wish to raise or wish to discuss these issues further.

## 135 Individual

### SP2 - Housing Spatial Strategy

#### 135/1: Housing Numbers

We have concerns regarding the calculation of the housing projections identified within the LDD. The Core Strategy housing consultation document estimated that 2,800 new homes would be required over the plan period. However, in paragraph 2.13 of the LDD the Council states that they consider that existing planning permissions may not be delivered within the plan period and therefore state that the housing requirement is now 4,670 units. In the next section the Council appear to contradict this stating that they have a good record of delivering planning permissions which are in turn built in a timely fashion. In paragraph 2.16 the LDD states that the Council has allocated 6,950 homes to meet their aspirations for the growth of Stockton. The justification for the increase in housing numbers is absent from the LDD. It is therefore considered that the figure of 6,950 is an arbitrary figure which has been added to try to justify the proposed sites and units within the LDD.

Council Response: Comments noted and addressed in the housing delivery section of the Regeneration and Environment Local Plan

It is noted that the above site is one of the key allocations for new development and that it is proposed to provide 945 homes and associated highway and environmental works. We strongly object to the inclusion of this site for the reasons detailed below:

The inclusion of this site in the LDD is contrary to draft policy SP2 of the LDD which advocates a sequential approach to site selection with the emphasis on previously developed sites and those which are a priority for regeneration. The site at Yarm Back Lane is a greenfield site which is currently in agricultural use. The site is therefore not classified as previously developed. Similarly, the site is adjacent to an affluent housing area and would not create a regeneration opportunity.

□ The proposed development site is an attractive green space and should be valued for its own sake. The government recognises the importance of green lungs in the National Planning Policy Framework which the LDD should be in accordance with.

It does not appear that any traffic surveys have been undertaken to consider whether Yarm Back Lane could accommodate traffic movements from an additional 945 homes. If such a survey had been undertaken it would demonstrate that the road is extremely busy at peak times with traffic often stretching back over 300 yards from the main junctions. The proposed amendments to reduce traffic speed to 40mph and reconfigure the road which would only exacerbate the existing traffic congestion. It is also noted that the Highways Agency has raised significant concerns about the reconfiguration of the interchange at Elton which would be required to accommodate this level of development. It is considered that the level of infrastructure works required for this proposed development are so significant that they could render the delivery of the site completely unviable.

The draft proposals hint at a possible infrastructure link to Surbiton Road. This is also a very busy road which has extensive traffic calming. There is simply not capacity for an access of this nature. The accompanying text to the draft allocation notes that the site is not within a flood risk area but does have local watercourses which would be retained. However, the watercourses frequently overflow in heavy rain and cause localised flooding. Indeed, Yarm Back Lane has been flooded on many occasions. The Environment Agency does not record and make reference to localised flooding within its flood zone projections but the Council should take this into consideration.

In seeking to justify the inclusion of this site in the draft policy document the Council suggest that it would be a good location for the inclusion of allotments. This seems to be a very weak argument for a new housing development and it is considered that the Council could readily provide allotments on their own landholdings and lease them to those who wish to use them if required.

#### Conclusions

It is therefore considered that the Council should review their housing figures as currently there is no justification for the proposed level of units to be allocated within the LDD. The Council should also explain in detail their rationale for an increase in the allocations from 2,800 to 6,960, an increase of over 4,000 units. The housing figures should also consider the number of empty homes across the borough which are available for sale or rent and factor those into their calculations.

It is also considered that the inclusion of the site to the East of Yarm Back Lane as a housing allocation is contrary to draft policy SP2, as the site is greenfield and the area is not in need of regeneration. Stockton has plenty of brownfield sites to develop in accordance with policy SP2 and the inclusion of this site in the LDD is therefore wholly unnecessary. It is also considered that the infrastructure requirements for such a development including major works to the A66 would render such a scheme unviable. It is therefore requested that draft allocation H1h be removed from the draft policy document.

Council Response: The inclusion of the Yarm Back Lane site as a proposed housing allocation is not contrary to draft Strategic Policy SP2 - The Spatial Strategy. The policy prioritises previously developed land in the Core Area and then the wider conurbation. However, the housing requirement cannot be met from these two tiers. For this reason the search for housing sites has been extended to the next tier - sites adjacent to the conurbation. For a full discussion of why the site has been selected see the Housing Site Selection Topic Paper.

The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

Concerns regarding the local highway network are valid have been explored before the Regeneration and Environment Local Plan progressed to the Publication stage. At the publication stage the Council's Infrastructure Strategy and Schedule identifies what additional infrastructure will be required to deliver the site allocations.

## 136 Mr P Baker

Appendix 3: The Hierarchy of Sustainability in the Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 Update Report

136/1: Land to the north and west of Carlton, SHLAA site 25.

An amended and reduced site area for this site was submitted to the SHLAA 2011 consultation. It is noted from the report that the LPA found this revised site suitable for housing development in their assessment summary. The site extended to 2.6 hectares which was put forward in whole or part for residential development. Based on a 50 – 75 percent utilisation rate in accordance with para 8.2 of the Tees Valley SHLAA implementation guide, at a density of 30 dwellings to the hectare this would suggest 39 – 59 dwellings. A copy of the submitted plan is attached for ease of reference.

Para 2.9

Mr Baker supports the classification of Carlton as a Tier 2 Settlement in the Rural Area, Appendix 3. Mr Baker additionally supports the proposal not to permit infill development in Tier 3 and Tier 4 Settlements, it must be sound to focus development in the Rural Area to the larger settlements, the Tier 1 and Tier 2 Villages with a greater range of services and facilities.

Mr Baker considers that a greater amount of development than 'infill' should be permitted by the Plan in Tier 1 and Tier 2 Villages and considers this is a matter which goes to the soundness of the Plan.

Para 2.11

The numbers of responses supporting house building in the villages is noted, about 200 answering yes and 500 specifically yes in relation to supporting house building in the more sustainable villages of which Carlton is an example. Whilst it is acknowledged that a lesser number of respondees, 400 responded in the negative, future housing development in the villages is a spatial decision which needs to be informed by evidence.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper.

Support for the classification of Carlton as a Tier 2 Settlement noted

Concur that the distribution of housing is a spatial decision that must be supported by robust evidence

## H1 - Housing Allocations

136/2: SP2

NPPF para 159 states amongst other things LPAs should prepare a Strategic Housing Market Assessment to assess their full housing needs. Para 159 further requires that the SHMA identifies the scale and mix of housing and range of tenures that the local population is likely to need over the plan period. NPPF para 47 requires that LPAs should 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the Framework'. The requirements are therefore;

- 1) assess the need,
- 2) deliver the full need.

The only circumstances where the full need is not to be met is where the LPA can demonstrate that to do so would be inconsistent with the policies set out in the NPPF. According to Table 3.8 of the Stockton on Tees 2010 Rural Housing Needs Assessment, the affordable housing needs requirements for the Rural Area over the period 2009 – 2014 is 24 dwellings in the Rural Area. It follows that the affordable housing need in the Rural Area for the Plan period to 2029 will be greater and this is acknowledged elsewhere in the Plan's evidence base. Mr Baker considers for the Plan to be sound, it needs to be able to deliver the required number of affordable units. This requirement therefore should inform the Spatial Strategy and the distribution of housing including to the Rural Area as in Mr Baker's view there cannot be certainty that Rural Exception Sites will deliver the required numbers of affordable units. NPPF para 54 requires that local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs and this exercise needs to be undertaken. Mr Baker has previously indicated in representations to the Plan and to the Core Strategy EIP that he would be happy to make an affordable housing contribution as part of a

development proposal on his land which is put forward in whole or part for development.  
Following on from the above Mr Baker considers a proportion of the overall housing allocation should be made specifically to the Rural Area and as part of planning permissions affordable housing contributions be negotiated.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper.

## SP2 - Housing Spatial Strategy

136/3: Para 2.14

NPPF para 47 requires where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20 percent to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. According to Table 19 of the Annual Monitoring Report December 2011, only in one year in the seven period 2004 – 2011 did the LPA meet the RSS minimum requirement. In the circumstances this amounts to persistent under delivery and a 20 percent buffer should be provided.

Council Response: Comments noted and addressed in the housing delivery section of the Housing Need and Demand Topic Paper

## SP3 - Limits to Development

### New Policy

## H1 - Housing Allocations

136/4: SP3

There is a need for Limits to Development to be revisited and extended. Mr Baker proposes the site shown on the attached plan for inclusion within the Limits to Development of Carlton, such that it can come forward for housing and make an affordable housing contribution. In this respect Table 3.8 of the Stockton on Tees Rural Affordable Housing Needs Assessment groups the parishes of Carlton, Grindon and Redmarshall together. According to the Assessment this Parish Group had the second highest need for affordable housing out of all the Parish Groups in the period 2009 – 2013. Carlton is the only settlement in this Parish Group which is Tier 2 and it should therefore be the focus for development to meet the need.

Following on from the above, 'in certain circumstances' should be deleted from the policy it not providing a clear direction.

Council Response: The limits to development for Carlton have been revised to ensure consistency with the planning commitment at Land South of Kirk Hill, which is re-affirmed in the Publication version of the Regeneration and Environment Local Plan. It is not appropriate to amend the limits to development at this location because the current boundary defines the rural and urban areas.

## SP2 - Housing Spatial Strategy

136/5: H3

Please cross refer to representation to SP2. It is not sound to solely rely on rural exception sites meeting the need for affordable housing in the rural area. Where is the evidence and certainty to ensure the required delivery? NPPF para 54 requires that local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. Mr Baker considers a proportion of the overall housing allocation should be made specifically to the Rural Area and planning permissions on sites above a certain scale make an affordable housing contribution such that the assessed affordable need can be met.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

## 137 Individual

## HE2 - Character Areas

137/1: I fully support the Council Policy on HE2 Character Areas, especially as we have been and are still experiencing a scussion of developers targetting back gardens in Junction Road. One feature of developer strategy is to destroy immediately every tree, irrespective of type, condition or age on the proposed area so that they can claim 'cleared ground' as their starting point. I would suggest that when this has been done (and there will be plenty of evidence from neighbours) that the developer is recorded as being guilty of wilful damage to the environment and duly penalised in both current and also any future applications.

Council Response: Support comments noted.

137/2: On the subject of Sustainable Transport/ Living, I notice that a large proportion of incoming traffic uses Junction Road as the main route to the town centres rather than using the ring road as intended. The net result is an overload at peak times and use as a race track at many others. With the further construction planned this can only intensify. Can this problem be examined with a view to balancing it more equitable e.g. surely the emergency services should use the Ring Road as originally planned? If not, then possibly we need to install speed humps to deter this over use.

Council Response: The Council are working with the Council's Highways Engineers and the Highways Agency to consider the highways impacts of proposals.

### 138 Individual

H1i - West Yarm	138/1: 12/0980/OUT - Morley Carr, 12/1546/OUT - Mount Leven Retirement Village, 12/1990/EIS - Yarm School PF, 12/1595/EIS - Egglecliffe Village Ar. Field, 12/2047/OUT - Urlay Nook.
H1j - South West Yarm	
H1b - Urlay Nook	<p>The character of Yarm is to be further damaged by the overdevelopment. The town cannot cope with still more traffic that will arise from the development and I object to it.</p> <p>Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper . With regards to development at Egglecliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.</p>

### 139 Individual

H1i - West Yarm	139/1: 12/0980/OUT - Morley Carr, 12/1546/OUT - Mt Lev. Retirement Village, 12/1990/EIS - Yarm School P.F, 12/1959/EIS - Egg. Village Ar. Field, 12/2047/OUT - Urlay Nook.
H1j - South West Yarm	
H1b - Urlay Nook	<p>Yarm is a 'one street' town whose limited infrastructure would not cope in the future with over 2000 new houses. The very winners would be SBC with all that Council Tax income.</p> <p>I object to the above policies, Yarm is a difficult enough place to live now as it is.</p> <p>Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper. With regards to development at Egglecliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.</p>

### 140 Individual

H1h - Land East of Yarm Back Lane	<p>140/1: Council Plan to build 8250 homes 2014-2029</p> <p>I object to any homes being built on Yarm Back Lane:</p> <p>2.9 There are no facilities present or accessible in that area of Hartburn.</p> <p>3.0 The land as not been previously developed and should remain Green Belt Land. Large areas in central Stockton (brown sites) could be used.</p> <p>2.10 If some of the villages have facilities for some small scale development then this should be permitted.</p> <p>3.0 If there is a need for so much housing, why is the Parkfield development largely empty?</p> <p>Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper</p> <p>The Borough does not have any Green Belt. Green Belt is nationally designated areas. None have been designated in the Tees Valley.</p> <p>The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites. As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.</p> <p>Infil development is permitted in villages in Tier 1 and Tier 2 locations (the most sustainable locations as identified by the Stockton-on-Tees Rural Villages Study).</p>
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Regarding empty homes, see the Housing Need and Demand Topic Paper.

#### 141 Individual

H1h - Land East of Yarm Back Lane

141/1: Council plans to build 8250 homes 2014-2029

I object to any homes being built on Yarm Back Lane:

2.9 There are no facilities present or accessible in Hartburn.

3.0 The land has not been previously developed and should be maintained as Green Belt Land.

2.10 If some of the villages have facilities for some small scale development then let that happen.

3.0 If there is a need for so much housing, why is the Parkfield development mostly empty? Large areas in central Stockton could be used. Lawson Street, Norton Road, to build social and affordable housing.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

The Borough does not have any Green Belt. Green Belt is nationally designated areas. None have been designated in the Tees Valley.

The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites. As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

Infill development is permitted in villages in Tier 1 and Tier 2 locations (the most sustainable locations as identified by the Stockton-on-Tees Rural Villages Study).

For a discussion of issues regarding empty homes in the Borough, see the Housing Need and Demand Topic Paper.

#### 142 Individual

H1h - Land East of Yarm Back Lane

142/1: Concern about congestion of heavy traffic and rat run on Surbiton Road and surrounding roads. This would cause more disruption with road calming devices which Already cause distress.

Stockton meeting Darlington, which is now coming our way. Who will provide mortgages for new development and possibly for people to move (up - down).

Council Response: Concerns regarding the local highway network are valid have been explored before the Regeneration and Environment Local Plan progressed to the Publication stage. At the publication stage the Council's Infrastructure Strategy and Schedule identifies what additional infrastructure will be required to deliver the site allocations. The proposed allocation will not significantly reduce the Strategic Gap between Darlington and Stockton. Mortgage availability is not a planning issue

#### 143 Individual

H1h - Land East of Yarm Back Lane

143/1: Traffic on Yarm Back Lane

Problems with water pressure



Houses will be higher than mine.

Could see more traffic on Surbiton Road.

Council Response: Concerns regarding the local highway network are valid have been explored before the Regeneration and Environment Local Plan progressed to the Publication stage. At the publication stage the Council's Infrastructure Strategy and Schedule identifies what additional infrastructure will be required to deliver the site allocations. NWL are engaged in the infrastructure delivery process. The design and layout of housing development will need to provide adequate amenity and privacy for existing and future residents.

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#### 144 Individual

144/1: the details are fairly comprehensive and would require more details for discussion.

I await further detail for comments.

Council Response: Comments noted.

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#### 145 Individual

H1i - West Yarm

145/1:  
H1h?/H1i

H1j - South West Yarm

When we bought our property we believe we paid a premium price for the view and the privacy. To build on the land at the back of our property would drastically reduce the value of our property and certainly nullify the view and privacy we have. We feel there are better and less intrusive sites on your proposals to build on! The increase in traffic would also add to the problems that already exist at peak times.

Council Response: Comments regarding traffic noted and addressed within the Yarm and Kirklevington Topic Paper . The potential impact upon house prices in not a material planning consideration and cannot be addressed through the LDD.

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#### 146 Individual

H1i - West Yarm

146/1: Protect Tees Heritage Park and develop.

H1j - South West Yarm

Yarm and Eaglescliffe are not suitable for extensive housing development, particularly due to the bottle neck through Yarm.

ENV1 - Green Infrastructure

Lack of facilities for such a large development.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper.

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#### 147 Tees Valley Biodiversity Partnership

ENV1 - Green Infrastructure

147/1: On behalf of the Tees Valley Biodiversity Partnership I would like to thank you for the opportunity to comment and I note that Preferred Options Draft reflects most of the comments made by the Partnership during consultation at the Issues and Options stage.

ENV2 - Urban Open Space And Local Green Space

In particular the Partnership welcomes the proposed policies on biodiversity and the natural environment set out in section 9 'Environmental Protection and Enhancement' and considers that these will make a positive contribution towards maintaining, protecting and enhancing the environment of Stockton-on-Tees. The Partnership has therefore no further comments to make at this stage but looks forward to continue to be closely involved in the preparation of the Local Plan in the coming weeks and months.

ENV3 - Local Sites

ENV4 - Previously Developed Land, Development And The Creation Of New Habitat

Council Response: Comments noted

148 Mr I Snowdon

H1 - Housing Allocations

148/1: We write on behalf of the above client to object to the decision of the Council not to allocate land at Little Maltby Farm for residential development. We would wish the Council, having considered our arguments, to amend policy H1 and allocate 68ha of land at Little Maltby Farm for residential development. By way of background, a number of previous submissions have been made to the Council seeking to allocate land owned by Mr Snowdon and others for residential development. Little Maltby lies to the South East of Ingleby Barwick (IB), bounded by Low Lane to the south, Thornaby Road to the east whilst the edge of IB forms the northern and western boundaries. The Council have considered the use of Little Maltby Farm and it has undergone Sustainability Assessments as part of the Council's preparation of its SHLAA evidence base, in both 2011 and 2012. This submission is made on behalf of Mr Snowdon who owns the eastern part of the site. The adjoining parcel of land to the west is owned by Tiviott Way Investments and representations have been submitted to the Council on their behalf by Satnam. Whilst representing two different landowners, the Satnam and Prism planning teams have worked together on the development potential of the complete area and have a shared view of the suitability of the site as a whole for residential development.

Having carefully considered the consultation draft of the LDF put forward by the Council, there are a number of specific points of concern that we wish to raise as follows:

Council Response: Comments noted.

H1 - Housing Allocations

148/2: Originally to have been a Village for Ingleby Barwick

When the concept of Ingleby Barwick was proposed, the site was allocated as a one of the proposed villages to serve local housing needs. Through successive iterations of the masterplan, the village was never progressed but there is a clear historical precedent for the site being considered suitable as housing land.

Council Response: The extreme western edge of the Site formed part of Village 3 of the 1977 Ingleby Barwick Master Plan but was then otherwise demarcated as Major Playing Field Provision. The eastern part of Village 3 was subsequently removed by the 1991 Master Plan revision and demarcated as to be retained in Agricultural or other Open Space Uses.

H1 - Housing Allocations

Sustainability Appraisal

148/3: Sustainability of the Site

The whole thrust of the NPPF is to bring forward sustainable sites for housing to meet clearly identified needs. The Council have identified both short term (absence of five year land supply) and medium term needs. In both 2011 and 2012, through the SHLAA process the Council have carried out sustainability audits of potential housing sites, including Little Maltby Farm. As a result of those sustainability audits, it is clear that the site performs well on the criteria selected by the Council as important and indeed can readily perform substantially higher with minimal work on the part of any developer. This latter point has seemingly been ignored for some reason.

The site is well located to the form of IB, with easy and convenient access to a range of community facilities. On Low Lane a dental surgery abutts the site and is within convenient walking distance of all parts of the site. Furthermore, there are at least three points of safe and convenient pedestrian and cycle access linking the site with Beckfields. The neighbourhood centre at Beckfields lies within a convenient walking distance and already provides a public house, hairdressers, community meeting facility, takeaways etc. The IB southern primary school lies within a convenient walking distance of the site and the proposed new secondary school would be located on the same site.

The site is also within convenient (less than 1,000m) walking and cycling distance of Teesside Industrial Estate, a major source of local employment. At least three points of pedestrian/cycle access can be achieved along the southern boundary of IB, linking the developments.

Low Lane is used by a number of local bus services (X6, 507 etc) and the site can easily be expected to accommodate new services accessed off Low Lane and linking the site with a range of destinations. A number of services pass by or in close proximity to the site and can be expected to accommodate the development.

Overall it is one of the most sustainable sites that the Council could consider allocating. A detailed scoring matrix, prepared by Satnam sets this out in a clear and objective fashion.

Council Response: Comments noted. The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

H1 - Housing Allocations

SP4 - Green Wedge

148/4: Green Wedge

The site is provisionally allocated as green wedge in the RED LDD. This would normally mitigate against new development from taking place, policies relating to Green Wedge seeking to direct development to more sustainable locations and protect the countryside. However at a time of actively searching for the most sustainable locations

within which to put new housing, the restrictive purpose of a green wedge needs to be set aside until the most sustainable housing allocations are determined, with the balance of green wedge land then re-instated once appropriate selections have been made.

To exclude a potential housing site solely on the basis of its historic or provisional Green Wedge allocation would be illogical and perverse. By way of an analogy, potential housing sites will, at the time of search, be outside the limits of development. During the search, the limits are suspended, the sites assessed and the most sustainable sites allocated. Once allocated the limits to development are re-drafted to include the newly allocated site.

The above principle has been applied in this way by the neighbouring Middlesbrough Council in its search for sustainable housing sites to meet its identified shortfall. A number of its preferred housing sites fell within identified Green Wedges. It is not clear whether Stockton have applied the above logic in its search for the most sustainable housing sites although it appears potentially not in relation to this site. Other sites that score more poorly by the Council's own sustainability assessments have been allocated as proposed housing sites and there is no apparent rationale for this having taken place.

In terms of Green Wedge characteristics, it will be appreciated that the site is in agricultural (arable) use with no public access on to the land or indeed proposed by any of the Council's proposed strategies. This is in stark contrast with the land lying to the north, west and south of IB which in addition to being put forward as Green Wedge is also proposed as forming the Tees Heritage Park and is subject to a number of proposals to seek public access on to the land.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations. The Council has undertaken a Green Wedge Review which shows how the site has been assessed in this context.

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149 Mr Tom Howson

SP3 - Limits to Development

SP4 - Green Wedge

149/1: We write on behalf of our client Tom Howson to object to the allocation of part of his garden area at Thorntree Farm, Bassleton Lane, Thornaby as Green Wedge under policy SP4 of the above document.

Green Wedges are referred to in the LDD as having a variety of functions:-

- Protecting the countryside from inappropriate development
- Focusing development onto sustainable locations
- Protecting the open nature and character of the area
- Preventing the coalescence of communities through protecting the built up area.

The last function is referred to specifically in the reasoned justification for Policy SP4 which is used to assess new development on Green Wedge sites. In very simple terms, the case we wish to put to the Council is that the extended garden area of Thorntree Farm does not influence any of those objectives.

- 1) It is not open countryside but garden land enclosed behind a 2m high brick wall.
- 2) Its use as a garden area does not focus development onto other more sustainable locations.
- 3) The land is enclosed behind a brick wall, screened by trees planted on my clients land by Stockton Borough Council approximately 15 years ago and now virtually completely hiding the site. It is therefore not of an open character.
- 4) Finally the enclosed site does not have any bearing or impact upon the appearance or otherwise of coalescence of settlements.

By way of background the site was bought more than ten years ago by my client. Initially the site was initially enclosed by a fence, erected by the Council but this was replaced in later years by the 2m high brick wall seen today. Since the enclosure of the land, it has been used as domestic garden area.

As the site has been used as domestic garden area for a period in excess of ten years, it will be appreciated that the use of the site as domestic garden area is lawful. The site has been, and will continue to be used as a garden area, not needing any consent for this activity to continue.

Figure 1 - Shows the internal view of the site, including the wall referred to with the Council's trees beyond.

Figure 2 - Shows the incidental sheds that lie within the garden area together with the internally planted trees on the site.

It is clear that the retention of this site within the Green Wedge does not relate to any of the purpose or objectives that underpin the establishment of the Green Wedge and that accordingly, the Green Wedge boundary should be adjusted to pass around the outside of the site.

It is appreciated that there are clearly differences between the policy that underpins the limits to development and the policy objectives underpinning the Green Wedge. For the purposes of clarification and avoidance of doubt, this representation solely relates to the retention of the site within the green wedge.

The above clarification is offered specifically to address the points raised by the Council during their preparation and consideration of the review of settlement limits and green wedge boundaries carried out in 2009.

It is respectfully requested that the Council note the contents of this approach and amend the Green Wedge boundary accordingly.

Council Response: Please see review of the green wedge to see how this site has been assessed.

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## 150 INEOS

### EMP4 - Process Industries Sites

150/1: We are instructed to act on behalf of INEOS to make representations in relation to the above local plan document in respect of their land interests at Seal Sands.

As recognised in the Stockton-on-Tees Core Strategy (2010) and the draft Regeneration and Environment LDD, this area provides a unique focus for process industries, and secures a large number of employment opportunities.

Clearly, maintaining and enhancing this area's economic role is vital to the future of the wider Tees chemical cluster, Stockton-on-Tees and the wider economy. The cluster is heavily reliant on a few critical business relationships, as the various companies rely on each other heavily for both supplies and custom. The health of the cluster could therefore be significantly affected if any one of these businesses are not able to adapt and compete on a global basis during the course of the plan period.

Council Response: Comments noted

### EMP4 - Process Industries Sites

150/2: On this basis, we consider that Policy EMP4 should be as wide ranging as possible, to ensure the ongoing flexibility of the policy framework governing the operation of this area.

This would reflect the general approach in the National Planning Policy Framework (NPPF) Paragraph 21, which seeks to support existing economic clusters and to secure a flexible policy basis which can respond to changing economic circumstances.

INEOS support draft Policy EMP4 as this sets a strong framework for the continued operation of the cluster. However, to increase flexibility and the continued relevance of this policy, it is considered that the list of appropriate uses could be expanded. This would assist with meeting both the "justified" and "effective" soundness tests.

Council Response: The wording in the policy is based on the 'North South Tees Industrial Development Framework' which was produced by Tees Valley Unlimited (TVU). This evidence set out a strategic framework for the future of this area., which is one of the few industrial clusters of this type within the United Kingdom. The wording of the policy, which has been agreed with TVU, includes sufficient flexibility to allow alternative uses, providing they are of benefit to the cluster. A wording which is too flexible could result in inappropriate uses in the area which may negatively impact on the cluster.

### EMP4 - Process Industries Sites

150/3: Policy EMP4 (2) confirms Seal Sands as a location for process industries and lists a range of specialised industries that would be appropriate in this area. We agree that Seal Sands, as a location, should continue to be supported as a focus for process industries, and welcome the allowance for "other activities" which may have operational benefits for the cluster. This provides a degree of flexibility

However, as waste management and disposal is an inherent part of many of the chemical processes already undertaken in this area, and as all industries are required to appropriately dispose of the waste they generate, we consider that the list of appropriate uses should be expanded to include all forms of waste management and disposal. This would increase the flexibility of the policy framework to allow appropriate new or emerging technologies to be accommodated in the area, as well as reflecting the nature of some activities already undertaken, which includes elements of waste disposal.

We suggest that Policy EMP4 (2) should be amended as follows:

2. Uses considered appropriate in this area include liquid and gas processing; bio-fuels and bio-refineries; chemical processing; resource recovery, and waste treatment and disposal; energy generation; carbon capture; and other activities that have significant operational benefits to the North and South Tees cluster.

The Joint Minerals and Waste Core Strategy (2011) also recognises the benefits of providing clusters of waste management facilities, particularly where this would comply with the proximity principle. Similarly, the Minerals and Waste Core Strategy Policy WMC8 identifies land north of the River Tees (including Seal Sands) as one of the three areas appropriate for large scale waste management facilities, which should be reflected in the emerging LDD.

The suggested alternative wording set out above, would therefore accord with the NPPF and the recently adopted Core Strategy and Minerals and Waste Core Strategy.

We trust that these comments are helpful and that the Council will be able to accommodate this suggested amendment. In the meantime we would be grateful if you could please keep us informed of progress regarding this document.

Council Response: The Council is of the view that the drafting of the emerging policy is flexible as it is currently worded. The term 'waste disposal' is a broad definition which could be used to justify uses that have a detrimental impact on the North Tees Industrial Cluster. Furthermore, waste disposal / land fill is at the bottom of the waste hierarchy, as being the least sustainable option, after reduction, re-use, recycle, and energy recovery. The Council recognises that there needs to be some flexibility within the policy to allow industrial concerns in the North Tees area to process waste as a raw material to produce energy, chemicals and biofuels, and to re-use waste heat and energy within the cluster. In the Council's opinion the policy as currently drafted does allow such flexibility.

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## 151 The Peel Group

151/1: Peel Management Limited forms part of the wider Peel Group which is a leading infrastructure, transport and real estate investment company in the UK, whose assets include Durham Tees Valley Airport (DTVA).

Peel and DTVA welcome the opportunity to comment on the latest version of Regeneration & Environment Local Development Document and as such please find below representations made on behalf of DTVA as part of this public consultation.

Council Response: Comments noted

## EMP1 - General Employment Land

151/2: •Policy EMP1 – General Employment Land

DTVA support the allocation of 20 ha of land for economic development including at the Skylink Business Park (hereafter referred to as “the site”) in Policy EMP1, although, we strongly object to the wording within part 1 of the policy. The reasons for this objection are set out below;

Part 1 of Policy EMP1 states that “The following sites are allocated for economic development. Uses considered appropriate include B1 (b), B1 (c), B2, B8 and other economic development, which require a location on a general industrial location, excluding town centre and leisure uses.” 20 ha of land at Skylink Business Park is listed as one of the sites.

Outline Permission was originally granted in 1999 by the Secretary of State for freight handling and distribution and packaging, freight forwarding and light industrial / commercial assembly on the 70 ha site located on land to the south of Durham Tees Valley Airport (Permission Reference 95/1999/P).

Two Section 73 applications were subsequently approved to vary Condition 2 of the Outline Permission to extend the time period for submission of Reserved Matters, to 1 November 2005 (Permission Reference 02/1963P) and 7 July 2008 (Permission Reference 05/0957) respectively.

A further Section 73 application was approved in 2007 under Permission Reference 07/2393/ARC to enable general employment activities falling within Use Classes B1, B2 and B8 on 20 ha of the site.

As such, the acceptability of general employment use on 20 ha of the Skylink Business Park (70 ha in total) was established by the approval of the Section 73 application

in 2007 (Permission Reference 07/2393/ARC).

As such, we strongly object to the wording within part 1 of this policy which states that “Uses considered appropriate include B1 (b), B1 (c), B2, B8 and other economic development”.

The acceptability of all uses which fall within the B Use Class has been confirmed to be acceptable under (Permission Reference 07/2393/ARC) and it is clearly incorrect to restrict the use of 20 ha of the site to not include B1 (a) offices.

Furthermore, the principle of all uses which fall within the B1 Use Class was confirmed to be acceptable on 20 ha of the site through the approval of the Reserved Matters application on 2 July which related to airport related development and general employment (Use classes B1, B2 and B8).

All pre commencement conditions associated with Permission References 05/0957 and 08/0728 have been discharged and the permission implemented, although the development is not fully built out.

We strongly request that this policy is amended to include the acceptability of all uses under the B1 Use Class including B1 (a) offices on 20 ha of the land at Skylink Business Park along with uses that fall within Use Classes B2 and B8.

Council Response: The Council notes that the site has planning permission for B1, B2 and B8 uses. However, the consent is largely made up of industrial / warehouse floorspace with the B1 element a smaller part of the consent. According to the planning permission the B1 element, excluding ancillary floorspace to the industrial and warehouse space, is about 1,700sq.m. This equates to approximately 1% of the floorspace permitted.

Recognising the site as a B1 allocation could lead to a significant business park being developed on the site, which would be a substantial shift away from the permitted consent. This policy has been reworded to reflect the permission granted, stipulating that proposals should focus on aviation related development and the logistics sector.

#### EMP7 - Airport Related Uses

151/3: •Policy EMP7 –Airport Related Uses

Closely linked to our objection to Policy EMP1 (General Employment Land), DTVA objects to part 4 of Policy EMP7.

We welcome and support the allocation of 20 ha of general employment land at Durham Tees Valley Airport. However, part 4 of the policy states that “development proposals on this land will be limited to large scale industrial and logistics developments. Any new office development in this area must be required for the function of the airport.”

As previously outlined planning permission was granted under Permission Reference 07/2393/ARC to enable the development of general employment use falling within Use Classes B1, B2 and B8 on 20 ha of the Skylink Business Park site.

Accordingly, we request that Part 4 of the policy is amended to remove the restrictions which limit the 20 ha to be developed only for large scale industrial and logistics development and restricts any office development to being airport related.

We suggest the wording within part 4 is amended to read as follows;

“4. 20 ha of employment land is allocated at Durham Tees Valley Airport as part of the Skylink Business Park. Development which falls within Use Classes B1, B2 and B8 will be acceptable in accordance with the existing planning permission for the Business Park.”

We would be pleased to discuss this with Officers.

Council Response: The Council notes that the site has planning permission for B1, B2 and B8 uses. However, the consent is largely made up of industrial / warehouse floorspace with the B1 element a smaller part of the consent. According to the planning permission the B1 element, excluding ancillary floorspace to the industrial and warehouse space, is about 1,700sq.m. This equates to approximately 1% of the floorspace permitted.

Recognising the site as a B1 allocation could lead to a significant business park being developed on the site, which would be a substantial shift away from the permitted consent. This policy has been reworded to reflect the permission granted, stipulating that proposals should focus on aviation related development and the logistics sector.

## T6 - Aerodrome Safeguarding Zones

151/4: •Policy T6 – Aerodrome Safeguarding Zones

DTVA welcomes and supports the aim of this policy in accordance with the Joint Department for Transport and ODPM Circular 1/2003 (2003) (The Circular).

Circular 1/2003 requires that local plans and unitary development plans should include a policy stating that certain developments within airport safeguarded areas will be the subject of consultation with the operator of that aerodrome and that there may be restrictions on the height or detailed design of buildings or on development which may create bird hazard.

The Circular requires that the outer boundary of safeguarded areas should be indicated on proposals maps accompanying local plans and unitary development plans. The Airport is pleased to note that both the 13km birdstrike safeguarding area and 15km safeguarding area are illustrated on the draft Proposals Map and support the inclusion of these boundaries. However, at present, Policy T6 does not specifically provide guidance requiring applications for tall buildings located within the Aerodrome Safeguarding Area to be assessed and it is requested that reference to the development of tall buildings is included within the policy in accordance with Circular 1/2003.

Council Response: Comments noted, support welcomed. Policy TC6 has been amended to make specific reference to the Joint Office of the Deputy Prime Minister/Department for Transport Circular 1/2003. This policy has also been merged with other policies to create a single Durham Tees Valley Airport policy.

## T7 - Public Safety Zones

151/5: •Policy T7 – Public Safety Zones

DTVA welcomes and supports this policy in accordance with the Department for Transport Circular 01/2010.

The Circular requires that Local Development Frameworks should include a policy stating that there is a general presumption against most kinds of new development and against certain changes of use and extensions to existing properties within the Zones, as described in DfT Circular 1/2010.

DTVA is satisfied that Policy T7 provides the appropriate level of guidance restricting development in accordance with the Circular.

Council Response: Comments noted, support welcomed. Policy TC7 has been amended to make specific reference to DfT Circular 1/2010. This policy has also been merged with other policies to create a single Durham Tees Valley Airport policy.

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## 152 RSPB

### EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

152/1: Thank you for consulting RSPB over the Preferred Options Draft. We welcome the opportunity to contribute. Our comments are restricted to Policy EMP5.

Policy EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

1. Development will be encouraged in the North Tees and Seal Sands area on land which is not of functional importance for bird species associated with the Teesmouth and Cleveland Coast SPA and Ramsar site.

The Tees estuary supports internationally important populations of waterbirds which use intertidal areas, semi-natural habitats around the estuary and areas of open space interspersed among the industrial developments of Teesside. Some of the area is designated as part of the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site. However, other non-designated sites are functionally linked to the SPA by providing foraging and roosting sites for SPA species as they move around the estuary in response to changing conditions, e.g. tides or weather. This land use pattern was assessed using an evidence-based approach in the INCA study 'Use of land at Seal Sands and North Tees Pools by birds of the Teesmouth and Cleveland Coast Special Protection Area' (Barber, 2011) (with advice from Natural England and RSPB).

This study was based on the best available evidence of birds' usage of the North Tees and Seal Sands sites and identified non-designated areas of importance for SPA assemblage species, particularly at high tide. The findings of the study provide the basis for a strategic approach to planning for future development across the area. We therefore welcome the allocation decisions informed by this report.

However, we seek clarification as to the long term protection of the sites which have been excluded from development on the basis of their importance to the SPA population. This protection will be essential if the remainder of the land allocated in the plan is to be developed. Without such safeguards the risk of harm to the SPA would jeopardise the deliverability of these sites.

Council Response: The Council has previously sought to implement the findings of the North Tees Birds Study. This involved de-allocation of sites of functional importance to the SPA and Ramsar site, identification of strategic mitigation to enable land allocations in the area, and the allocation of sites for employment development.

Unfortunately it is not possible to identify strategic mitigation for land allocations in the Seal Sands area. Therefore the Council is no longer intending to allocate employment land sites in the document. The management and maintenance of these sites will be the responsibility of the land owner, who will be bound by existing legislation.

EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

152/2:

2. All proposals will be required to provide measures to reduce the impact of the development on the birds of the Teesmouth and Cleveland Coast SPA taking in to account the need to:

- a. retain and maintain an undeveloped margin between developments and sensitive areas and the Seal Sands SSSI
- b. retain and maintain an undeveloped margin between development and land known as the Vopak Foreshore

We welcome the retention of the undeveloped margin between future developments and sensitive areas and the Seal Sands SSSI and the Vopak Foreshore. These areas were identified as being of high value for SPA species in the INCA report and as such should be protected from future development. The Council should be aware that developments in land allocated adjacent to these areas have the potential to impact the quality of the undeveloped sites for SPA species and as such the impact of developments should be established on a case by case basis and implement additional mitigation measures where appropriate to reduce impacts (for example, noise limitations, screening, compensation habitat).

We seek clarification as to the long term protection of the sites which have been excluded from development on the basis of their importance to the SPA population.

Council Response: Support welcomed. See response to representation 152 / 1 for clarification on the Council's strategy.

EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

152/3: c. provide, where necessary, appropriate mitigation measures to offset any loss of identified habitats. Mitigation measures should be appropriately designed and established prior to the commencement of development.

We suggest 'compensation' is added to this policy wording to read:

c. provide, where necessary, appropriate mitigation and compensation measures to offset any loss of identified habitats. Mitigation and compensation measures should be appropriately designed and established prior to the commencement of development.

Mitigation and compensation habitat should be designed to benefit the species predicted to be displaced by development and it is essential that this is in place ahead of the loss of functional land to development. To ensure that the land is managed for nature conservation in perpetuity, we recommend that it is passed to an appropriate nature conservation organisation along with sufficient funds to facilitate the management of the site in perpetuity.

Council Response: Comments noted. Change to the policy made.

EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

152/4: 3. Elsewhere within the North Tees and Seal Sands land allocations, the Council will expect that developers take into account the combined or cumulative impact of any development proposals on birds of the Teesmouth and Cleveland Coast SPA.

4. Land is designated as strategic mitigation, to off-set development on allocated land elsewhere in the North Tees and Seal Sands area at land to the north of Brine Reservoir, Seal Sands link road.

Whilst we consider the land north of Brine Reservoirs, Seal Sands link road, to offer effective mitigation for the loss of allocated land to SPA species, this is dependent on the securing of a sufficient management fund and protection of the site in perpetuity.

We seek clarification as to how the Council envisage the strategic mitigation land working effectively. In particular, how and when the land will be delivered. We strongly advise that the land should be delivered as up front compensation for future developments on the allocated land and that the Council seek an appropriate nature conservation organisation to take the management of this land forward ahead of development on the allocated land.

Barber (2011) suggested that areas unsuitable for allocation for development in the Local Plan due to their functional value to SPA species (the 'red' areas defined in the INCA report), may be used as strategic mitigation options to offset loss of the allocated areas. We suggest that in order to ensure the effective protection of the SPA that a programme of habitat maintenance and enhancement on these plots should be carried out in addition to the mitigation provided by the land north of Brine Reservoirs. This would be an opportunity for the Council to deliver a suite of high quality habitat of great benefit to the internationally important species utilising the area.



Council Response: This land could not be secured as strategic mitigation, nor could any alternative location. Unfortunately it is not possible to identify strategic mitigation for land allocations in the Seal Sands area. Therefore the Council is no longer intending to allocate employment land sites in the document. The management and maintenance of these sites will be the responsibility of the land owner, who will be bound by existing legislation.

152/5: We welcome being listed for ornithological consultation in the Implementation Plan. We recommend that the newly formed Tees Valley Local Nature Partnership is added to the consultee list for ecological issues.

We hope you find these comments useful. Should the council wish to discuss our response in more detail we would welcome the opportunity for a meeting.

Council Response: Comments noted. The Implementation Strategy for policies has been merged and is now included as a separate chapter / appendix.

## 153 Prism Planning

### SP3 - Limits to Development

153/1: Introduction

### SP4 - Green Wedge

1.1 Prism Planning acts for the owner of land at Billingham/Norton Bottoms, hereinafter referred to as Norton Bottoms. The extent of the ownership at this location extends to some 254 acres (103 ha.) and is bounded by the A19/ Fleet Bridge Road to the west and north west, New Road to the north, Haverton Hill Road to the south east and Haverton Hill industrial area to the east.

### H1 - Housing Allocations

### EMP1 - General Employment Land

1.2 At present, the site is a mixture of a small amount of agricultural land, unused scrubland, reclaimed land or land which is in the process of reclamation. It should be appreciated that the site has been covered in a substantial depth of "gypsum slurry" from historic previous uses on the site, supplemented in a few areas with deposits of coal/bitumen. Moreover, in the past there have been a number of instances of 'sink holes' developing on the site which in some instances have swallowed horses that were grazing on the site. I understand you have previously been provided with evidence on this point from the Cleveland Fire Brigade.

1.3 To the west of the land in agricultural use is land that forms part of the Billingham Beck Local Nature Reserve, which extends northwards beyond the A139 Billingham Road. There is an established residential area to the immediate north and north east of the site with the major industrial area of Haverton Hill further east.

1.4 These representations are made in respect of the entirety of the 'Norton bottoms' site referred to above and with specific reference to draft Policies SP3, 'Limits to Development' and SP4, 'Green Wedge', of the Regeneration & Environment LDD.

1.5 On behalf of our client, we take issue with and object to Policies SP3 and SP4 as they are presently drafted, with reference to the Norton Bottoms site.

#### Representations

2.1 It would appear that the Council has a misconception that the site represents green and pleasant land with public access, openness and amenity value, possibly due to screening to the boundaries preventing views in from public vantage points, the A19 and A1046 (Haverton Hill Road) especially. In reality, in addition to parts of the site comprising wildlife ponds and reed beds, much of the site (the majority of it) is a post-industrial contaminated quagmire, covered in part with scrub vegetation. Indeed, significant parts of the site are heavily contaminated from previous industrial uses associated with ICI.

2.2 The key contaminants are Gypsum slurry (up to 10 feet deep in places and with the consistency of porridge) and deposits of bituminous materials (coal, coke and hydrocarbon contaminated materials, some in significant quantities and representing a potential fire hazard). It is our firmly held view that the Council do not properly understand the state of the land, the need for its reclamation on environmental grounds and that a post-reclamation mixed residential, industrial and recreational after-use (as well as ecological and environmental uses) is required to fund the reclamation works.

2.3 Moreover, in the current period of austerity such remediation cannot be expected to be financed from the public purse but could be financed through the after-use of a mixed residential, industrial and recreational development.

2.4 It needs to be recognised that the Norton Bottom site is quite different to the Impetus, Able and Aegean landfill sites. For these sites the low cost or free gate fee for cover material can be cross subsidised by the revenue derived from the actual landfill operation, for which the imported subsoil is merely 'cover' material and not a major revenue generator.

2.5 The Norton Bottoms site is unique in comparison with the above sites in that the planning permission isn't for a revenue generating landfill site, but refers to the remediation of a contaminated site (which resulted in major contamination of Billingham Beck and the Tees with Gypsum slurry). It was initially intended to landscape the site, but this will be impossible due to the current rating valuation / demand.

2.6 The present arrangement is that soil is imported at zero gate fee on the agreement that the soil provider also provides all plant, fuel and labour to carry out the on-site operations. In the present economic climate and reduced construction activity the volume of subsoil / topsoil for all the sites in the area, both reclamation and landfill, has been reduced resulting in a deficit of suitable material. Likewise it is recognised that as the site is not a landfill site, but a reclamation site and that there is no landfill tax liability.

2.7 The plant / fuel / labour costs for the site to date, from June 2009 are £2,476,605. Work undertaken on the site over the past 2 years has operated in an economic climate whereby only nominal profit has been made and it is feared that probably a loss has been made in the 2011/12 financial year. The land owner has concluded that there is no way that the operation is a profit making undertaking. There is probably a further 2 years work to finish the site with a similar cost involved. On top of this is a planning condition that requires the landowner to re-profile the site and undertake a planting scheme for the site. Such works have been estimated at £950,000. It seems likely that a figure in excess of £3m is required to provide the Green Wedge envisaged by the Council. It is highly unlikely that this will prove a viable scenario.

2.8 Furthermore, there are ecological issues affecting the three wildlife ponds (to which the Proposals Map indicate Policy ENV3 refers) within the site (the two northernmost lying within the Billingham Beck Nature Reserve) and the reed beds at the southern end of the site. The ponds are becoming encroached upon by vegetation whilst the reed beds are showing signs of drying out (reeds dying back and rose bay willow herb taking over).

2.9 Gradually, through a process of reclamation of construction wastes, the land owner is clearing up the area and hopes to leave it in a largely green and stable state. However it is difficult to justify continued investment in activities when all the Council ever want to see is the land given over as Green Wedge with public access and having had thousands of acres of trees planted on it. As should be appreciated, there is no public funding going into any of this site and therefore should work cease on the site, no reclamation and remediation will otherwise take place. There simply isn't money available in the public purse.

2.10 In light of the above, it is asserted that full remediation of the contamination on the site (itself immediately adjacent to existing industrial areas) and restoration of the reed beds will require new development ideas and approaches to allow and encourage site remediation and reclamation. Our concern is that the allocation of the site as Green Wedge and the definition of Green Wedges as lying outside of the Limits to Development will effectively preclude the clean-up of the Norton Bottom site, which will retain the appearance of land next door to existing industrial areas and retain images of blighted and semi-derelict land and adversely affect the image of the Tees Valley. Is that what Stockton-on-Tees Borough Council really wants of the site?

2.11 We would argue that the Council needs to recognise that new development which leads to reclamation should be encouraged as a matter of principle. Moreover, the Council needs to recognise that areas such as Billingham Beck valley need to be improved in terms of their environmental quality.

3.1 Attached at Appendix 1 to this representation a concept masterplan which has been prepared to illustrates some of the key points that the land owner would like to take forward on the site.

3.2 The land owner would like to progress a vision for the site which gives them some development activity to justify commercial activity and reclamation taking place balanced up with public access and amenity woodland planting. In this regard it should be noted that there is currently an application running for a new mound alongside the A19 to help screen some of our chemical backdrop from one of the strategic approaches into town.

3.3 It should also be noted the proposed development areas lie within Flood Zone 1 (as identified in the 2007 Strategic Flood Risk Assessment prepared for Stockton-on-Tees Borough Council by JBA Consulting). Extracts from the SFFRA are attached at Appendix 2; Appendix 2a refers to the Billingham (Norton) Bottoms site, whilst

Appendix 2b provides a copy of Sheet 2 of the SFRA map which includes the subject site. The SFRA extracts indicates that 80% of the Norton Bottoms site lies within Flood Zone 1. It is also noteworthy that part of the site where the retirement village is proposed has been sequentially assessed by the Council as part of their 2007 Strategic Flood Risk Assessment, which found the Flood Zone 1 areas to be suitable for allocation for more vulnerable uses. By inference it can be assumed that the findings can be applied across the larger area now promoted for allocation, i.e. all areas of the site which are located within Flood Zone 1 are suitable for future development in terms of flood risk. Further work undertaken for the landowner by Wardell Armstrong in September 2012 supports this view. Indeed, the Flood Risk Supporting Statement prepared by Wardell Armstrong (copy attached at Appendix 3) concludes that “the site is therefore considered suitable for allocation and future development”.

3.4 The land owner would like to progress a retirement village in a highly sustainable location towards the northern end of the site, just south of and accessed from New Road. This proposal recognises that we need to look at more comprehensive models of care than is currently the vogue. Individual care homes, whilst they have a place only deal with a particular type of care at a particular time in the person's life. It is very clear from Best Practice solutions being carried out elsewhere that retirement villages, providing a whole spectrum of care from the active elderly through to dementia units are a much more healthy way of meeting our care needs and help to avoid people leaving an area as their needs or those of their partner change. It is envisaged to seek a strategic partner to develop this project with the provision of a gated private community surrounded entirely by a water feature and with the provision of a surgery and pharmacy will allow people to move from family homes and allow those properties to accommodate younger families.

3.5 With reference to the proposed retirement village, background to the need to cater for the accommodation requirements of the ageing population is provided at Appendix 4.

3.6 The retirement village is proposed on land not subject to flood risk and indeed the proposal would include extensive excavations to create in effect a shallow water course surrounding the proposed village, this water course would be planted with suitable vegetation including reeds followed by further landscape mounding and planting to improve the visual and ecological environment thus attracting wildlife, such improvements would we believe improve the view for the existing local community. Moreover, such works will provide an extensive flood retention area to further mitigate potential flood issues.

3.7 Within the central part of the site is proposed a new business park, accessed from the Haverton Hill roundabout. This business park would provide a mixture of B1, B2 and B8 developments helping to boost the supply of suitable development sites in the borough caused by their development for other purposes. This point is not made as a criticism of the loss of other employment sites but simply in recognition of the need to offer sites up to the market that are in sustainable and commercially appropriate locations.

3.8 The intention would be to direct surface water run-off and foul water discharges from the business park together with flows from the retirement village to the reed beds so that they are regenerated and perform the function for which they were established on the site. At present we have what is believed to be Europe's largest reed bed filtration system being unused and decaying without any input occurring.

3.9 The Masterplan also indicates a BMX track towards the southern end of the site, with a small car park provided alongside, and new public access footpaths and cycleways provided through the site. The site conditions allow the creation of an Olympic standard 'extreme' track which could compliment the one proposed to be built in John Whitehead Park. In conjunction within these works the site would be planted with a mix of woodland planting and new shrub and hedge planting.

3.10 Historically, the Council line has always been that remediation should take place followed by reclamation by tree planting. Of course these aspirations were set in a different economic climate when levels of construction activity were very different to those currently experienced and we struggle to see how their vision will achieve any resources from the public sector to implement it at the moment. The Masterplan solution is proposed as an alternative, deliverable and sustainable solution, which retains much of the site as green open space and provides public recreational access which is presently not available.

3.11 With reference to the proposed retirement village site, it is noted from Stockton's 2011 SHLAA report that of the 1,300 respondees, 1,000 were either in favour of developing the site for residential purposes or expressed no opinion either way and only 300 respondees were opposed.

3.12 The landowner has undertaken low key consultations with various Billingham bodies, who have given support to the concept masterplan. Feedback from the Billingham Carnival indicated a 96% support to the concept masterplan, although this was from a relatively small number of respondents. Attached at Appendix 5 is a copy of the questionnaire and the survey results.

4.1 We would argue that the Council needs to recognise that in this current period of austerity, which shows no signs of coming to an end in the near future, remediation of the Norton bottoms site cannot be expected to be financed from the public purse and that alternative means of financing the remediation works need to be considered.

4.2 Moreover, we would argue that the Council needs to give proper consideration to the submitted Masterplan solution and the proposed after-use of a mixed residential, industrial and recreational development. Indeed, we would submit that new development which leads to reclamation should be encouraged as a matter of principle.

4.3 To facilitate the proposed development, as outlined in the Masterplan, we would argue that the following measures be implemented:

- Remove the allocation of the site as Green Wedge (Policy SP4) and re-instate the site within the 'Limits to Development' (Policy SP4).
- Reallocate the site as proposed in the Masterplan:
  - A retirement village towards the northern end of the site (H1) ;
  - A business park in the central part of the site; (EMP1) and
  - Designate the undeveloped areas as 'Urban Open Space' (ENV2(1)) with footpaths and cycleways (T1) to be provided running through it.

(Masterplan and other evidence also submitted.)

Council Response: Representations to the Regeneration and Environment LDD preferred options propose the delivery of a masterplan which would finance site remediation. The masterplan includes numerous elements but can be summarised as a mix of the following uses:

- Residential (retirement village) at Billingham Bottoms
- Industrial at Norton Bottoms
- Recreational

Billingham and Norton Bottoms are heavily contaminated sites. Much of the site is covered in a substantial depth of 'gypsum slurry' from historic previous uses with parts of the site containing deposits of coal/bitumen. The current uses can be summarised as a mixture of agricultural land, scrubland, reclaimed land or land in the process of reclamation. Extant consents exist at Norton Bottoms to reclaim derelict land for ecological purposes through the deposit of soil; these applications are subject to time limited conditions with the land to be restored in accordance with a scheme to be submitted and approved by the local planning authority. The reason for the time limited conditions is because the development is not considered suitable for permanent use on this restoration site and green wedge.

#### CORE STRATEGY REVIEW

The Billingham Bottoms site was included within the Core Strategy Review Issues and Options document for consideration as a housing allocation. The site was not taken forward as a preferred option within the Regeneration and Environment LDD for a number of reasons which are included within the Housing Site Selection topic paper.

#### KEY CONSIDERATIONS

The main justification for the proposal is that without development the scheme for the remediation of the site is unviable. Further information is required to justify this; however, should this prove to be the case then the Council might be able to direct the landowner to appropriate funding opportunities for reclamation or put them in touch with third parties who might be able to assist. Concerns regarding the viability of residential development on the Billingham Bottoms site have previously been highlighted and the site was not taken forward as a preferred option. In conclusion the allocation of Billingham and Norton Bottoms is considered inappropriate for the following reasons:

1) Housing for an Aging Population:

- The proposal has the potential to meet housing needs arising from demographic changes. However, there are potential impacts on Council resources of an increased

number of people who are able to fund their own social care initially, but whose financial circumstances change also needs to be considered.

- Adult social care would not support the development of a care home facility. Whilst the proposed masterplan does not include a care home, one may be required to provide for the full spectrum of need.

#### 2) Business Park:

- The Employment Land Review identified a portfolio of sites to take forward in the LDF. The employment portfolio met an optimistic growth scenario.

- Although sites have been de-allocated, it is considered that there is a sufficient employment land portfolio to meet needs over the plan period, and certainly in the near future.

- It is envisaged that the site would not be attractive to the market and may not be viable.

- Overall there is no need for this site, which, it is anticipated, would only be available in the very long term.

3) Ground Conditions and Remediation: It is unclear whether additional remediation and land stability work would be required to deliver a business park; this could represent a significant viability issue.

#### 4) Green Wedge and Landscape Character:

- Contrary to point 3 of Core Strategy Policy CS10 'Environmental Protection and Enhancement' by impacting on the openness and amenity of the green wedge (also see the Green Wedge review)

- As identified within the Landscape Capacity Study the site has very low capacity to accommodate change without significant effects on the character of the landscape.

#### 5) Green Infrastructure and Natural Environment:

- Contrary to the aims of the green infrastructure strategy, para 114 of the NPPF and emerging policy with the Regeneration and Environment LDD.

- Contrary to paragraphs 110 and 165 of the NPPF and may require further ecological work including details of how any potential negative impacts on biodiversity are to be avoided or mitigated.

6) Highways: further assessment required to consider access visibility, impact of development trips on Portrack Interchange and consultation with the Highways Agency.

7) HSE Zones: delivery of a business park in this location could limit the potential to expand existing uses at Billingham Chemical Complex which require a Hazardous Substance Licence.

8) Flood Risk: concerns regarding flood risk at the site have been raised. A flood risk assessment has been undertaken which addresses many of the issues raised. Officer opinion is reserved on whether this solution to safe access/egress in a flooding event would be technically sound.

## 154 Individual

H1i - West Yarm

154/1: Please find enclosed points for the Preferred Option Draft. I appreciate it is too late for planning on here, which is a shame because I believe it is the best site, having access to the A19 both ways and it would have caused the least objections. If however, for any reason either of the other sites don't go through, and I am sure they will, please get in touch.

H1j - South West Yarm

The trouble I am having is that the person that applied and got permission for the golf course has told everyone that he owns the land and because planning permission is in his name people believe him. I suppose they think that no body is stupid enough to apply and get planning permission unless they at least had an option however this is the case. This is the second missed opportunity as I recently found out that he was approached by a hotel chain for a boutique hotel and he told them he didn't have room. Is there anything we or the Council can do to stop him continually reapplying and being given extended planning permission?

I was also given to believe that Tees Active was very interested in the leisure facility. If this is the case there is an outside source that funds these things and rents back to yourselves as with this increase in houses I think Yarm is going to need something like this to keep the children off the streets and stop them getting in trouble.

With reference to the above I am writing to correct some errors in the details given for South East Yarm which I hope will be changed before the draft becomes finalised.

5.95 This comment is for Yarm West, Yarm South East is directly opposite the shops and is accessible by footpath.  
5.95 A need for school playing fields- this comment is for Yarm South West, as this site isn't associated with playing fields.  
5.96 The bus service is affected by the congestion and is extremely slow at peak times - I have not found this to be the case certainly not at 8.10am other than when Leven Bank was closed. Yar, South East has two bus stops along Green Lane and is 700 yards from the train station.  
5.97 The development would have been nowhere near the wildlife corridor. This is directed at Yarm West.  
5.97 Special Landscape Area along the River Leven - This site is nowhere near the River Leven.  
5.98 Erode the gap between Yarm and Kirklevington - this comment is for Yarm, South West as this site is over a mile away from Kirklevington.  
5.100 As mentioned earlier this site is opposite two bus stops and 700 yards from the train station, the shops and pub are easily accessible on foot. Improving deliverability of the other sites in the vicinity- similarly either of the other sites not going ahead would improve the deliverability of this one.  
The extant planning permission for a golf course and associated facilities - the planning permission for this was applied for and obtained by the owner, the person who did apply does not own, has never owned nor is likely to own land on this site so, unfortunately, as the landowner does not have the financial resources to go ahead with this venture it is isn't going to happen.

(Highlighted sections of Consultation Statement also submitted).

Council Response: Comments regarding land ownership noted. Comments in relation to the Land at South East Yarm have been taken into consideration in the Housing Site Selection Topic Paper.

## 155 Individual

H11 - Wynyard Village

ENV1 - Green Infrastructure

ENV4 - Previously Developed Land, Development And The Creation Of New Habitat

155/1: I wish to object to the proposed housing allocation at Wynyard, specifically the proposal to cut down the majority of Black Squares woodland to accommodate 300 houses.

My particular concern is the effect that this would have on the Castle Eden Walkway recreational route and the wider Wynyard Woodland Park. The proximity of the houses to those areas would completely change the character of the visitor experience from being in a rural setting to being on the edge of a housing estate. While it is proposed to retain a buffer of woodland I consider that this is unlikely to work in practice as the remaining woodland would be too narrow to be viable. I also have concerns about the ecological and landscape effects of such a proposal.

In Stockton Council's supporting evidence Wynyard is listed as one of the least sustainable locations for housing. Therefore a proposal to cut down a mature woodland to accommodate further housing at Wynyard is surely about as unsustainable as any proposal could be and should be rejected on sustainability grounds alone.

I also consider that this proposal is in direct contradiction to policies in Stockton's Regeneration and Environment LDD preferred options document and Stockton's Policy CS10. All of these policies reflect the need to retain and enhance green infrastructure. I have quoted the relevant sections that I consider that it contradicts below:

(My further comments in red.)

Policy ENV1 - Green Infrastructure

1. To deliver a strategic approach to Green Infrastructure, the Council will support development which protects and enhances the Green Infrastructure network.
2. The Council expects all development that will result in the loss of existing green infrastructure to be replaced by green infrastructure considered to be of equal or greater value than that which will be lost. It is difficult to see how several hectares of mature woodland can be replaced by something of equal or greater value.
3. Development proposals should retain and enhance:
  - existing landscaping and natural and semi-natural features on site, for example woodland, trees, hedgerows, ponds, watercourses, geological features
  - existing cycleways, footpaths and bridleways, improving connectivity and creating enhanced environmental settings for these routes.
4. The Council will require developers to include details of new hard and soft landscaping and illustrate how the development will be satisfactorily integrated into the surrounding area and improve the Green Infrastructure network.

Results of issues and options consultation:

9.40 Question 4: there was support to ensure that policies seek to ensure development is not detrimental to green infrastructure and where possible enhance it. This is encapsulated within the green infrastructure policy of this preferred options document.

Development and the Creation of New Habitat

Policy ENV4 - Previously Developed Land, Development And The Creation Of New Habitat

1. The council will expect that when proposals for development in previously developed land are submitted, areas of significant biodiversity interest should be identified and, where possible retained and enhanced as part of any development proposal.

2. New development and redevelopment schemes have the opportunity to create new habitat. Proposals should seek to complement and enhance existing habitat, in particular seeking opportunities to improve connectivity with any existing habitat and landscape features. It will be difficult enough to compensate for the loss, without having to also create new habitat. Are habitat creation areas identified?

9.59 In addition new development and redevelopment schemes have the potential to create new habitat and extend the green infrastructure network. The NPPF states that 'opportunities to incorporate biodiversity in and around developments should be encouraged.

Policy CS10. Environmental Protection and Enhancement. Habitats will be created and managed in line with objectives of the Tees Valley Biodiversity Action Plan as part of development, and linked to existing wildlife corridors wherever possible.'

I also consider this proposal to be in contradiction to the NPPF, in particular the sections quoted below. (Again my further comments in red)

NPPF

110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework

118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: ●if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Again it is difficult to see how this proposal could be suitably compensated for.

Council Response: Planning permission has now been granted for the removal of Black Squares Plantation and the replacement with housing development. This took in to account the ecological and landscape impacts of the development. This matter is covered in more detail in the Wynyard topic paper.

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156 Cllr Rigg, SBC

H1 - Housing Allocations

156/1: Para 2.12While I understand the reasons for some core sites not being considered viable over the next 5 years because of reductions in government funding for remediation work and the depression of the housing market I cannot agree that they should be excluded from calculations for the next 15 years or more. No-one can predict the national economy nor the actions of future governments. By excluding them from the projections it becomes less likely that developers will be encouraged to bring them forward, as greenfield sites are easier and cheaper to develop. If the brownfield sites are not there, the borough will develop as a "doughnut" with an empty centre.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment (SHLAA) shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

H3 - Housing Mix and Affordable Housing provision

156/2: Para 2.20 Affordable housing is a concept which causes much difficulty in areas of high cost housing. Even when provided it is not affordable to many people and does not of itself enable sustainable mixed communities. There is a real need to provide more social rented housing in such areas in order to avoid ghettos of high and low income around the borough.

Council Response: It is acknowledged that affordable housing provision is important and that it is one component of achieving sustainable mixed communities but does not do so independently of the other components. The Local Authority requests affordable housing to be provided at a target of 15-20% on housing developments of 15 dwellings or more and on development sites of 0.5 hectares or more. In terms of tenure (again based on the 2012 Strategic Housing Market Assessment) the Local Authority asks for a mix of 30% intermediate housing and 70% rented housing. Based on the government's updated definition of affordable housing, rented housing also includes the affordable rent model. This definition can be viewed at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf) (see annex 2)

SP4 - Green Wedge

156/3: Para 2.49I strongly support policy SP4 on Green Wedges. However I am concerned that the proposal is to exclude recreation from the permitted developments in the green wedges without more definition of the type of development. For example, would a building such as a leisure centre be allowed? Are sports fields which are open only to a particular group be permitted (e.g. a football club with changing facilities)? I would prefer recreation to be removed from the list.

Council Response: The Green Wedge policy seeks to maintain the separation between settlements through the protection and enhancement of their openness and amenity. Any proposals within the green wedge would need to be considered on their own merits.

H1j - South West Yarm

H1b - Urlay Nook

156/4: Policy H1b Urlay Nook Road This site would represent urban creep towards Darlington which is undesirable. Although within the limits to development it is currently agricultural land and would be better used as such, protecting the food supply for the nation in the future. Housing on this site could not be described as truly sustainable owing to the limits on transport and medical infrastructure.

Table 4.8D of the Tees Valley 2012 Strategic Housing Market Assessment states that supply and demand for dwellings in Yarm/Preston/Eaglescliffe are in balance other than in relation to bungalows and detached houses with four or more bedrooms and that the imbalance is not acute. This implies that Eaglescliffe and Yarm do not need the hundreds of houses being proposed on this and other sites in the area, particularly when they don't fit the identified need.

Policy H1i West Yarm and Policy H1j South West Yarm: Table 4.8D of the Tees Valley 2012 Strategic Housing Market Assessment states that supply and demand for dwellings in Yarm/Preston/Eaglescliffe are in balance other than in relation to bungalows and detached houses with four or more bedrooms and that the imbalance is not acute. This implies that this site is not needed to provide the number or type of housing being proposed.

Council Response: With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft of the Regeneration and Environment Local Plan.

Comments regarding housing need and demand are noted and addressed in the Housing Need and Demand Topic Paper.

ENV1 - Green Infrastructure

156/5: Policy ENV1- I do not consider that this policy provides sufficient protection for the green infrastructure of the borough. I accept that there are some areas where it might be possible to provide replacement green space of equal or better quality. However, a large stretch of Green Infrastructure is designated as Tees Heritage Park, protected in the Council's Core strategy. Any development within that area is likely to completely change the character of the Heritage Park and should be avoided at all costs. Once lost, land within that Park can never be replaced. The landscape is the result of many years of the particular kind of management, whether as agricultural land or as Parkland or whatever else is its current designation. In some stretches that useage has been current for more than a century. It cannot be replaced in less time than it took to develop. The current proposals for Mount Leven Retirement Home and Yarm School playing fields would both fall into this category and should be resisted. The Green Infrastructure strategy should offer stronger protection than it does currently.

Council Response: The Green Infrastructure policy has been significantly amended since the preferred options. It is considered that when read as a whole the Local Plan provides sufficient protection for the natural environment.

ENV2 - Urban Open Space And Local Green Space

156/6: Policy ENV2 Para 9.27 Sites of Local Importance Tees Heritage Park is omitted from this list despite being strongly supported by Stockton Borough Council which acts in partnership with the Friends of Tees Heritage Park and others to develop and promote the area. Developers will claim ignorance of its importance if it is not listed alongside other important sites.

Council Response: The list within 9.27 lists specific sites many of which are located within the Tees Heritage Park.



ENV3 - Local Sites	<p>156/7: Policy ENV3 - Again this does not offer the right level of protection to the Local Sites. It is wrong to identify only those habitats which cannot easily be recreated. In the Tees Heritage Park for example the beauty and worth of the area lies not just in the individual sections but in the mix of the whole, the juxtaposition of arable field and pasture, woodland and scrubland, wetland and formal park etc. Changing that mix changes the character irrevocably, just as destroying a single section would.</p> <p>Council Response: The NPPF identifies that "Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites should be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites...". Whilst the Tees Heritage Park contains a number of locally designated sites, it is not itself a designated site as identified by the NPPF and is therefore not covered by this policy.</p>
HE2 - Character Areas	<p>156/8: Policy HE2 - I fully support the proposal to include Yarm Road in Eaglescliffe as a character area. This will complement the current conservation areas.</p> <p>Council Response: Comments noted</p>
HE4 - Stockton and Darlington Railway	<p>156/9: Policy HE4 - I fully support policies to preserve what remains of the railway heritage of the borough, some of which is in Eaglescliffe ward. I hope that cooperation with Darlington council will be sought as a way to ensure the preservation of links along the Stockton to Darlington rail line.</p> <p>Council Response: Comments noted</p>
G1 - Stockton Riverside	<p>156/10: Policy G11 fully support the development of the riverside which will make central Stockton a more attractive place to visit, to work in and to live near, thereby encouraging residential and business development in the centre of the borough and relieving pressure on the urban fringe.</p> <p>Council Response: Comment noted</p>

## 157 Individual

SP4 - Green Wedge	157/1: Section 9 -Environment Protection and Enhancement
ENV1 - Green Infrastructure	I strongly support the Council in its approach to protect and enhance the green infrastructure, but I am a little surprised that there has not been a greater emphasis on the protection of the Tees Heritage Park.
H1j - South West Yarm	<p>This has been a major initiative by the CPRE and is incorporated in Stockton Council's current (and we hope) future plans. The Project has received financial support from the Council, the Lottery Fund together with financial contributions from other parties. Despite this the Heritage Park in Yarm / Egglecliffe is now under threat from Yarm School, following their submission of a detailed planning application in August 2012.</p> <p>If this proposal succeeds it will be an absolute disaster for the Tees Heritage Park and the residents of Yarm and Egglecliffe. To me it is regrettable that this Planning Application is even considered during the current Consultation Period and before this Local Development Document has been finalised. As a community we are all fervently opposed to the Yarm School application and we are all fighting hard to have it rejected.</p> <p>Council Response: When read as a whole the Local Plan provides ample protection for the Tees Heritage Park which is identified as part of the strategic green infrastructure network, green wedge and outside the limits to development. Specific policy regarding the Tees Heritage Park has been included within the publication draft of the plan.</p>
SP4 - Green Wedge	<p>157/2: Green Wedge</p> <p>I find it very surprising that in your report you have used the term 'Green Wedge' to define an area of land that is to be protected. There may be some legal interpretation involved, but the term 'Green Belt' would perhaps be a more clearly understood term for an area of protected land.</p> <p>Council Response: Green Belt is a national designation and has never been designated within the Borough. Green Wedges are a long standing policy within the Tees Valley being identified within the Tees Valley Structure Plan and Stockton-on-Tees Local Plan adopted 1997.</p>
SP2 - Housing Spatial Strategy	157/3: Housing Development in Stockton
H1 - Housing Allocations	In my opinion Stockton Council should use all possible means at its disposal to persuade developers that it is in their financial interest to construct new housing on existing 'brown field' sites in the Borough.

I appreciate that these sites require remediation before construction can start. But failure to undertake this work will clearly result in large tracts of land in Stockton remaining derelict. This will in turn have a negative impact on the adjoining areas, which will progressively degenerate and hasten the run down of the town.

This will have a further negative impact on the Town Centre (even more than at the present time) resulting in a progressive downward spiral of degeneration and disrepair. Where as the vision should be to develop Stockton into thriving community that can compete with Yarm, Northallerton and Thirsk.

Even if the cost of site remediation exceeds the sales value of the land to the developer, this would still be cost effective for the Council.

In my opinion the emphasis should be a mix of private and social housing. Social housing seems to be in demand. Funding for this type of investment seems to be generally available.

The proposed over-development of Yarm will be a disaster, I would question the real level of demand for new houses in Yarm, as there is no real increase in the overall population in the area. There are few new jobs being generated and it will just result in a further exodus from Stockton, accelerating the downward spiral.

I think we all look to Stockton Council to have a vision of the future and not to revert to short term expediency that will on a longer term result in failure of both Yarm and Stockton.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute towards overcoming these constraints. As a result there is not sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2029 to meet our housing requirement, and the Council are required to identify greenfield sites to meet the housing requirement.

Comments relating to housing need and demand are noted and addressed in the Housing Need and Demand Topic Paper

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## 158 Individual

H1k - Wynyard Masterplan

158/1: Wynyard was originally created to provide a high quality residential area to attract high earners and executives into the Tees Valley area along with providing a sub regional employment location. This is still the case and Wynyard has an important role to play in uplifting the Tees valley and this opportunity should not be reduced.

H1l - Wynyard Village

Council Response: Comments noted

H1m - Wynyard Park

Sustainability Appraisal

158/2: The Council's own Core Strategy Development Plan Document Review Issues and Options Consultation Summer 2011 recognised that all Wynyard sites were unsustainable in terms of housing development – see extracts below. I have highlighted in red the Council's stance in that document that appear to have changed in a 12 month period.

H1k - Wynyard Masterplan

H1l - Wynyard Village

WYNYARD HALL ESTATE

H1m - Wynyard Park

Sustainability

3.116. The indicative yield for the site indicates that there is potential to provide a housing development of strategic importance which may have significant benefits for the economy of the Borough. This has been identified as the only significantly positive impact arising from the development of this area as it currently stands.

3.117. The Sustainability Appraisal largely finds that development on this site will be unsustainable. Wynyard Village is rated as a Tier 4 settlement village within the Villages Study as it has poor local facilities and no access to public transport. In addition, strategic scale development at Wynyard has the potential to significantly increase pressure on the Strategic Road Network.

3.118. This site is also a greenfield site with significant mature tree cover and a development of low density housing will be a poor use of this environmental resource. There is also potential to undermine the setting of an area of Special Historic Importance.

3.119. It is considered that, without significant mitigation, this expansion of Wynyard Village for housing would be unsustainable. Required mitigation will need to include measures that address the lack of local facilities, provide links to public transport and improve the road network.

#### WYNAYRD PARK

##### Sustainability

3.123 While new housing development of a strategic scale would normally be considered to be significant importance for the economy, at the Wynyard Park site the benefits from new housing must be balanced against the potential loss of employment development. There is currently potential for the relationship with the economic sustainability objectives to be either positive or negative.

3.124 The Wynyard Park site is located adjacent to the village of Wynyard and, like Wynyard Park, also suffers from a lack of access to facilities and services and public transport. Largely as a result of its poor accessibility, Wynyard Park is considered to be an unsustainable site for housing development.

3.125 Unlike the Wynyard Hall Estate site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the Borough's environmental infrastructure. The identified site is greenfield land but has no environmental designation and no significant environmental assets. It is also located in an area that has been identified as having high landscape capacity for development. In addition, the development of the site for housing will include open space provision that has the potential to improve on that required for employment development.

3.126 Should the site be proposed for housing development significant mitigation will be required to make the development sustainable. This will need to include the provision of accessible local services and facilities and links to public transport. Consideration will also need to be given to the design of a housing development that is in close proximity to employment uses, in order to minimise noise and disturbance for residents. In addition, any development at Wynyard Park will also need to consider the impacts upon the Strategic Road Network.

#### EAST OF WYNYARD VILLAGE

##### Sustainability

3.129 The development of this site has the potential to create a strategic level housing development on a site that is not currently allocated for any other uses. This development, would therefore, have a positive impact upon the Borough's economy.

3.130 The development site is located on greenfield land within the Strategic Gap and will result in some impact upon the landscape. However, it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impacts upon the landscape.

3.131 The Land East of Wynyard Village is, like the previous two potential Wynyard sites, considered to be unsustainable due to the poor access to local facilities and services and to public transport. Mitigation, including the provision of public transport links and local facilities, will be required in order for development at this site to be considered as sustainable.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

H1l - Wynyard Village

H1m - Wynyard Park

#### 158/3: VILLAGES

Q4: Do you think village extensions of an appropriate scale and character should be considered to accommodate some additional development in:

• • •

All Villages

Only the most sustainable villages

No village extensions

Q5: At present, development inside the village boundaries is only allowed within the most sustainable villages. Should development inside the village boundaries be allowed in all villages?

To help you answer question 4, Figure 26 shows indicative dwelling numbers if the villages expanded by approximately 5, 10 or 15%. These numbers are purely indicative and are intended to illustrate the implications in terms of the number of new households if a village expanded by one of these percentages.

There are a few points I would like to make in respect of this:

A)I do not understand how the decision has been arrived at that Wynyard Hall Estate and Wynyard Park become preferred housing options – other than to be of the understanding that that other options have now been discounted such as:

East Wynyard  
North West Billingham  
West Preston  
Allens West  
Little Maltby Farm/Ingleby Barwick  
Urlay Nook  
Durham Lane Industrial Estate

Interestingly, the rationale for some of these sites being discounted were the original reasons for Wynyard not being a preferred option – neighbouring industrial/employment sites, continues to be attractive to new and existing businesses, viable employment site, lack of access to local facilities so I fail to see why Wynyard is now a preferred option. Nothing has changed at Wynyard so how can this now be a preferred option?

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

H1l - Wynyard Village

H1m - Wynyard Park

Consultation

158/4: I was informed at the Drop in Session on Thursday 20th September 2012 that consultation responses had shaped these changes. I requested a breakdown of responses but have been told that these are not available – I was interested in the number of comments for each area e.g. where ‘a number of respondents said.....’ what was the actual number. This is important to gauge the strength of feeling. Having read the Regeneration and Environment Local Development Document Consultation Statement I feel that little regard has been taken of the questionnaire. Many Charts are shown where the narrative outcomes do not support the questionnaire response. See:

Chart 11 – North West Billingham would be a good place for housing. Around 150 respondents disagreed compared to 600 agreeing but it has not been included in the revised plan.

Chart 12 South West Yarm would be a good place for housing. Less than 200 respondents thought that it would be a good place for additional building but it has been included in the revised plan.

Chart 7 picks up Wynyard issues. It is interesting to note that Wynyard Park was the least preferred option of the three proposed sites but this has been included in the revised plan.

Chart 8 shows that housing development was the least desired out of a choice of Offices and Warehousing/Logistics & Manufacturing/Small Proportion of Housing/Mainly Housing.

Given that I could not get the answer to the questions that I asked in terms of numbers of respondents to individual issues I have forsaken my day off to read through the schedule of all the representations made to the Core Strategy Review Issues and Options Consultations. This runs to nearly 400 pages so no mean feat! Once again I do not feel that the narrative supports the strength of feelings with regards to (non)development at Wynyard and some of the statements contained within are misrepresentative of the consultation response. With the exception of the current landowners and their partners, the vast majority of responses in terms of Wynyard state that it should remain as is due to the lack of facilities available, the lack of infrastructure, environmental issues and the need to retain the executive offer which make the village attractive – dilution of this will be futile.

Some examples:-

Paragraph 5.53 – the vast majority of comments related to the traffic congestion which has been acknowledged. However it is then stated that ‘However, several comments suggest that the sites must have good transportation links, because they are immediately adjacent to two major roads.’ There were probably a couple of statements such as this – yes there are major roads nearby – but unfortunately the A689 which interlinks them is not fit for these expanded plans. I doubt these respondents live in the adjacent area.

Paragraph 5.54 – A statement was made ‘Some responses suggest that there is no demand for executive housing within the Borough.’ Once again these were few and far between. There were more responses wishing to keep Wynyard’s unique offer, including planners and key organizations, and there were also lots of calls for similar types of housing elsewhere in the Borough.

Paragraph 5.55 - this reads as follows – ‘several respondents suggested that if there was to be more housing at Wynyard they should be either a mix of sizes or the provision of affordable housing. One suggestion identifies that small pockets of affordable housing could blend this type of housing in to these areas and that this was preferable to building large areas of social housing. The contrasting view was that affordable housing was unsuitable given the high cost of land, poor road links, poor public transport and lack of education facilities.’ This is completely out of context – the contrasting view referred to here was the majority view by a long way. The paragraph reads as if the affordable housing option was a 50/50 split. It was not. This is a disappointing use of the consultation responses and probably the breakdown of figures I requested was not readily available. It is disappointing that the consultation is marred by this lack of transparency.

Paragraph 5.58 – it states that sustainability issues were raised. This is true and the vast majority of responses expressed this as a concern. The paragraph then states ‘However, an alternative view suggests that the Wynyard sites provide scope to improve existing infrastructure in the Wynyard area.’ It should be noted that these were mainly by current landowners.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

EMP3 - Key Employment at Wynyard Park

158/5: In addition I would like to add that Wynyard Park should be retained as Key Employment Land. It is a key driver for economic growth and employment and performs a key role within the borough and the sub regions employment land portfolio.

H1k - Wynyard Masterplan

The suggestion that use of private cars would be lessened by building housing here or on Wynyard Park Estate has no foundation – unless you can provide evidence that a substantial number of Wynyard residents work within Wynyard Park. I have not been asked for such information so doubt that it is available. In addition, much is being made of cycle paths and walkways to connect employment areas within Wynyard to residential areas. As per the previous statement, this is only relevant where residents work where they reside. During your Core Strategy examination the significance of the employment allocation was recognized and also the fact that if the hospital site were to progress it was unlikely that residential properties were required in situ to support the operation of the hospital (paragraph 7.1.14 of ‘The Council’s Employment Land Review Stage 2 (EC2.2)’)

H1l - Wynyard Village

H1m - Wynyard Park

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

158/6: B) CORE STRATEGY REVIEW SURVEY The design of the survey undertaken was seriously flawed. This is partially recognised in paragraph 5.8 of the Regeneration and Environment Local Development Document Consultation Statement. Questions were designed so that a preference had to be given as to where in a particular area houses could be developed. Please see extract below. There should have been an option to say that there should be no development at all – and in terms of a robust and transparent process respondents should not have been led in this way. The outcomes from the consultation suggest that hundreds of people felt strongly about something. The reality is that a real alternative option was not available. This should be incorporated into future work.

H1l - Wynyard Village

H1m - Wynyard Park

Q7: If housing were to be permitted in the broad Wynyard area, where should it be located?

a. Wynyard Hall Estate

b. Wynyard Park

c. Land east of Wynyard Village

d. Other (Please provide a location plan and give your reasons for suggesting this location)

The other point is that an overall Borough wide preference ranking for each site was not available. This was a Borough wide consultation so this also should have been

available. Therefore the consultation output is seriously flawed and potentially not fully reflective of residents' views.

In terms of the villages question 4 asked respondents to comment on village extensions of an appropriate size, scale and character. Helpfully, an indication was offered of the increase in dwelling numbers if villages were expanded by 5, 10 or 15%. Respondants will have answered with these percentages in mind. Wynyard currently has 750 houses - sourced from Figure 26 of the document although I was informed verbally at the Drop In Session of 20th September 2012 that the figure is 950 – I am not aware of 200 houses being built in the last 12 month period so I am unsure as to the correct figure so have assumed 750 in my calculations). The suggested Wynyard proposals will increase the size of the village from 750 to 2050. This is a completely unsustainable increase of 173% in size and a further example of how the document has misled in its intent.

I wish to make clear that I oppose the preferred Wynyard options in this regard. I am happy with the village as it stands. I do not wish to see any further development here and the new proposed figures are far too high – echoed by comments in the consultation responses.

The Tees Valley Strategic Housing Market Assessment 2012 identifies Wynyard as an area for executive housing and recognizes that it is a unique location and assists in attracting high earners and wealth creators. The area would lose its established reputation if general market housing were to be made available.

Wynyard was included in the document as a village. In terms of responses to the question 'should villages be allowed to get bigger by building a small number of houses on undeveloped land around the village?' (see para 5.133 of the Regeneration and Environment Local Development Document Consultation Statement) the response was out of 791 completed questionnaires (source para 5.5 of Regeneration and Environment Local Development Document Consultation Statement) was that 400 responses said 'No, not at all' and nearly 500 said 'Only in the villages with the most facilities and services for residents' which clearly Wynyard does not satisfy given sustainability issues and no plans in place to address this. Only 200 respondents said yes. The proposed options do not appear to be following the majority viewpoints.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

158/7: C) SUSTAINABILITY

H1l - Wynyard Village

As can be seen from the Core Strategy Development Plan Document Review Issues and Options Consultation document from Summer 2011 it has been recognised that all Wynyard sites were unsustainable in terms of housing development. The Regeneration and Environment Local Development Document Consultation Statement para 5.10 required that:

H1m - Wynyard Park

5.10. In order to allocate sites for development, the Council must be satisfied that they are sustainable (or can be made sustainable), that they are viable development options and that they will be delivered within the plan period. Ensuring that these requirements are met has been a significant factor in the selection of sites for allocation for residential use in the Regeneration and Environment LDD Preferred Options draft.

As I have said I attended a Drop in Session on 20th September 2012 a full year from the initial consultation. There is no assurance available with regards to plans for the A689 to cope with the additional traffic (increase of traffic from 1300 homes in Stockton plans (and how these homes will access the A689) , 200+ houses from Hartlepool Borough and the anticipated hospital site – I approximate that there will be 4000 staff employed there plus patients, visitors, deliveries etc. I am very uncomfortable to support a housing development where the master plan for both infrastructure and amenities is not yet available – there are major implications in terms of both issues and the impact that this will have on local Wynyard roads and the estate in general. I have been told that work has been initiated on the required Supplementary Planning Document but there is no timeframe as to when this will be available. It is impossible to support a development without this crucial information and I would request a delay in the approval of any such options until such information is available to allow residents to make an informed decision.

In response to the Core Strategy Development Plan Document Review Issues and Options Consultation document from Summer 2011 the Highways Agency (response 16/6) have stated that there will be a detrimental impact on the Strategic Road Network (SRN). They also stated that further evidence would need to be provided in relation to the specific impact of Wynyard sites on the SRN and particularly how the strategy's policy would address the identified impacts. The Council's response was that there would be a coordinated approach with Hartlepool Borough Council and the Agency to ensure that an appropriate and robust strategy for the Wynyard area is developed. Furthermore, the council stated that they had begun to prepare evidence to inform decision making in the Wynyard area, as suggested in the Core Strategy Issues and Options paper and that the Highways Agency and Hartlepool Borough Council were approached as part of this study. The results of this work were to inform the preferred options document – where is this please? At the drop in session I was told that this was not available (except a reference to another access point to the A689 perhaps being required but this would be subject to funding). How can realistic meaningful consultation take place when this is not available to inform the options?

I reproduce the Council's sustainability assessment from your Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 update report (Appendix Three) below as a refresher:

The Hierarchy of Sustainability in the Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 Update Report.

Tier 1(40 points plus)

Stillington 41

Tier 2(30 to 39 points)

Long Newton36

Carlton33

Wolviston31

Kirklevington30

Maltby30

Tier 3(25 to 29 points)

Redmarshall29

Hilton28

Thorpe Thewles28

Elton28

Tier 4(24 points and less)

Whitton22

Wynyard22

Cowpen Bewley20

Aislaby13

As can be seen there are no improvements to the Wynyard score.

I fail to see how adding dwellings to an already isolated location would improve sustainability even with added facilities. Residents will still need to get work via car – and increasing environmental impacts.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

158/8: D) ENVIRONMENTAL/HISTORICAL ISSUES

H1l - Wynyard Village

Wynyard Hall Estate site was at the time of writing the Core Strategy Development Plan Document Review Issues and Options Consultation document from Summer 2011 last year identified as an important part of the environmental infrastructure and that development on this site would result in a negative impact.

H1m - Wynyard Park

There has been a seismic shift in the views of the Planning Department in 12 months – some of which do not appear to be based on changed evidence. E.g the mature tree cover/woodland/rural setting at Wynyard Hall Estate has not changed but it is now deemed appropriate to build on this site

In addition to this I would like to highlight that the original proposed site was of a much larger hectorage – and the document estimated that this would house 300 dwellings. Changes have been made to this plan which mean that the hectorage has significantly reduced– but the 300 house dwellings remain. This is a concern – I oppose the building of houses here but if this were to proceed they must be in keeping with the rest of the Wynyard Woods dwellings and be of an executive style. In terms of Wynyard Park I would also expect Wynyard features to be retained.

I would also wish to retain woodland where possible – both for environmental purposes but also to retain privacy elements. My house backs onto the proposed site and the privacy afforded was one of the main reasons for buying the house. The Black Squares Woodland is well established – being there for around 40-50 years and I cannot understand how an environmentally aware Council could be complicit in the felling of these trees which have an average lifespan of 150-300 years. I am aware that other compensatory planting will be undertaken but this will not provide the same carbon sink for a number of years. The wildlife habitat will be significantly affected - although I have not sighted them myself I have heard two independent reports of red squirrels in the area. The woodland provides an attractive setting for the Wynyard

area. Removal of the woodland substantially changes this character and is morally unacceptable when there are other sites suitable for development of less environmental quality.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

SP2 - Housing Spatial Strategy

158/9: You have informed me that as at 1st April 2012 the number of empty homes in the borough was 2,781 – this is just short of the required dwelling requirements. You have stated that you would support them being brought back into use and that you do have some legal powers to make this happen. I would urge you to review this as an option – this would retain heritage within the Borough and also ensure that there are no derelict properties.

H1k - Wynyard Masterplan

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1l - Wynyard Village

H1m - Wynyard Park

H1k - Wynyard Masterplan

158/10: D) Infrastructure

Wynyard has a severe lack of public transport so more houses here would mean a need for public transport also the A19/A689 junction needs upgrading to cope with extra traffic. The Council recognises that Wynyard is currently not one of the most sustainable locations in the Borough and has conceded that concerns regarding the local highway network are valid and 'will be explored before the document progresses to the 'publication stage' in 2013. At the publication stage the Council's evidence base will identify what additional infrastructure will be required to deliver the site allocations. If the highway, or any other issue, can not be satisfactorily mitigated the sites will be removed from the publication version of the Regeneration and Environment Local Development Document.'

H1l - Wynyard Village

This is too late – the preferred options will by then have been approved. The decision should be delayed until this important issue is resolved otherwise development will be progressed without necessary infrastructure in place.

H1m - Wynyard Park

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

158/11: In conclusion, there are more sustainable sites within the Borough, than those proposed at Wynyard Hall Estate site. There is no credible justification for the deallocation of employment land at Wynyard Park. Sustainability arguments have not been sufficiently addressed.

H1l - Wynyard Village

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1m - Wynyard Park

Consultation

158/12: This document is my one and only comment on this matter via this consultation.

H1k - Wynyard Masterplan

I have concerns with regards to the Council's consultation strategy – Wynyard does not receive the Herald & Post or Stockton News. This appears to have been raised in previous consultations (including the Core Strategy Review) but has not been addressed and therefore Wynyard residents are at risk of not being involved in key policy decisions. I became aware of this consultation only as a result of a proactive resident. As a result, I request that you add me to the Council's planning consultation database (or other suitable means) to ensure that I am kept informed of progress on Local Development Documents and other planning policy issues. I am particularly interested in how this matter progresses and would be pleased if you could notify me of meetings where this will be discussed.

H1l - Wynyard Village

H1m - Wynyard Park

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

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## 159 Friends of Tees Heritage Park

SP4 - Green Wedge

159/1: The Tees Heritage Park is a community initiative which developed, with the Council's support, to recognise the particular character of this part of the river valley as an entity. It is referred to in the Council's Core Strategy, CS10 as an initiative the Council supports and is also included in the Strategic Plan.

New Policy

We have always understood that identification and designation of the Heritage Park area was to recognise its value to the community as a place to enjoy the natural environment and our local heritage. This would enable specific policies to be formulated to secure its future, separate but complementary to other 'green' proposals currently under consideration.

Other council documents refer to the Tees Heritage Park and the Council's Green Infrastructure Strategy published in 2011 makes specific references to 'delivery of the



Tees Heritage Park' and 'the area between Yarm and Stockton has been designated as the Tees Heritage Park'.

The LDD Preferred Options document refers to the Park as one of two sites which form an essential part of the boroughs green infrastructure and are protected by the Green Infrastructure Policy. It points out that information regarding the delivery of the sites will be included within the Green Infrastructure Action Plan and designates the Tees Heritage Park outside the limits to development and within green wedge.

We are delighted that the Heritage Park is supported by the Council and recognised in current documents, but concerned that not enough attention is being given to its special character and how this is to be protected and enhanced. The reference to 'within green wedge' could imply that it may be treated as green wedge for the purposes of determining proposals affecting it. This would be very different to what we understood when the Heritage Park proposals were being formulated with the Council and it was subsequently designated.

The formulation and operation of policies for the Heritage Park should recognise the aims and objectives already established, particularly as a place to experience peace and quiet, to appreciate our local landscape and wildlife and celebrate our local heritage. We would like to see this made clear as the LDD is progressed to ensure that the Park's special quality is recognised and that it not seen as simply another variation of Green Wedge. Otherwise there would have been no point in designating it in the first place.

Recognition of the importance of the Heritage Park could also be critical to the achievement of future funding streams. Funding already obtained and in the pipeline has been a direct consequence of emphasising the unique character of the river valleys and their importance to the community and the image of our area generally. FTHP is also a partner in 'The Tees Rediscovered' project, which has received a stage one pass by Heritage Lottery Fund, and will develop a stage 2 delivery programme worth £1.9m. The Lottery bid was developed and submitted by a Partnership of interested organisations along the river. The submission emphasised the inherent beauty of the lands alongside the Tees and their association with the area's heritage. The introduction to the bid highlighted the Tees Heritage Park as an example of what could be achieved in the heart of the lower Tees Valley. It is so important that this is reflected in the Council's policies to enable future funding opportunities.

For the reasons explained we would ask that, in the next stage of the LDD process, it is made clear that the Tees Heritage Park is seen as a separate entity (not green wedge) and that future policies will recognise this and its importance to the community, the image of the area and lower Tees valley generally.

Council Response: When read as a whole the Local Plan provides ample protection for the Tees Heritage Park which is identified as part of the strategic green infrastructure network, green wedge and outside the limits to development. Specific policy regarding the Tees Heritage Park has been included within the publication draft of the plan.

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## 160 Tithebarn Land

H2 - Housing Phasing and Implementation

160/1: Comments in relation to Chapter 8 - Representations relating to the allocation of land between The Mitre public house and Bishopsgarth School at Harrowgate Lane, Stockton-on-Tees.

H1 - Housing Allocations

My comments are made in the context of many years of lobbying for housing development west of Harrowgate Lane and taking into account continuing dialogue with other landowners, including the Cooperative Wholesale Society, Stockton-on-Tees Borough Council, Mr. Alan Smith and Mr. Ian Clayton. Notwithstanding this on-going negotiation, the comments made here are very much my own.

H1g - Harrowgate Lane

Comments on the Housing Site Allocations from Roland Firby representing 'Tithebarn Land' and others welcoming the major Allocation adjacent to Harrowgate Lane

### SUMMARY

SBC planners have done unprecedentedly well to allocate a major site along Harrowgate Lane. The area to the south of the school can be started immediately with no major infrastructure costs, thus providing urgently needed housing to address the current shortfall.

This is a sustainable site in an area of underutilised local infrastructure and environmentally friendly routes to the High Street, and where residents' spend is most likely to aid Town Centre revitalisation. However they should avoid seeking to impose onerous and possibly unnecessary 'planning gains' thus causing the site to be less rapidly developed. To delay or impoverish this site only to cross-subsidize less sustainable sites in areas which will not aid the economic prosperity of the High Street would be to

let down the Town Centre retailers and all of those council staff who work so hard to improve the High Street.

An immediate start to house building on Tithebarn Land can be made with no major infrastructure needs. The owners are working closely with two major national house builders to ensure a rapid delivery of quality homes.

An early start south of the walkway will not detract from nearby housing projects, and will add multiple delivery points to SBC's completion programme.

By putting the Development Plan ahead of schedule these developments will aid success and avoid the need for the early release of the borough's peripheral sites. The peripheral, less sustainable sites will result in the diversion of retail money away from the Town Centre.

Not only is needless delay completely contrary to current Government policy, but it militates against short term, medium term and long term High Street prosperity. A run-down town centre in turn will deter innovators and inward investors from living in, or considering investing in Stockton - on - Tees.

Introduction.

1.1 The long standing flag ship policy of Stockton Borough Council is to regenerate and revitalise the High Street area. Tax payers' money from central Government has been sought and allocated in the past to help with the regeneration. (e.g. The City Challenge £30,000,000) A recent major grant has been lost due to the national financial situation. SBC should do all that it can to revitalise the High Street from within its own resources. This must add weight to any future grant application.

1.2 The flowers in the High Street which helped Stockton's win in the Britain in Bloom competition, and the fantastic High Street Christmas lights help to create a pleasant environment. If High Street retailers could emulate the shopping parks and super stores and remain open later several evenings per week for the convenience of full time workers (i.e. monied people) who wish to shop when convenient to them, then I am sure that the quality of the retail offer could be improved. The way in which SBC can aid High Street prosperity through the planning process has been understood for a considerable time.

1.3 I made submissions to the Stockton on Tees Local Plan Public Inquiry of 1995. My comments about retailing were based on the comments of various principle retailers and evidence taken from 'New Life in the High Street' survey. This showed in section after section that shoppers who used the High Street lived in Stockton town and Norton. It seemed logical to me that to aid High Street prosperity new housing should be allocated in or on the periphery of Stockton town and Norton, provided that it was in areas where people would actually wish to live and where potential contamination would not frighten off mortgage lenders.

1.4 Inspector Turner accepted this argument. He prefaced his report by writing that he had "taken into account current Government policy as set out in Circulars and Planning Policy Guidance Notes, and the provisions of the Cleveland Structure Plan". He then went on to say "At a critical stage in arresting its decline, it is of prime importance now, and for the indefinite future, to get the largest numbers of people possible, in the most efficient way, as near as many of the shops as can be."

1.5 The SBC department 'Stockton City Challenge' with Mr Ayres as Town Centre Manager and Cllr Gibson as vice chairman wrote to me supporting my idea of housing along Harrowgate Lane because "it should enable more people to live in an area where they will regard Stockton Town Centre as a natural shopping and commercial centre, and help to stem moves to outer areas of the district or even out of Cleveland". At that time North Yorkshire County Council anticipated the need for about 20,000 houses for their needs, but allocated 44,000 to allow for in-migration knowing that there no plans for popular housing allocations on Teesside.

1.6 The appointed developer for the Town Centre Scheme, Swan Hill, wrote to Chief Planning Office Mr M Leason and sent a copy to me. I quote "I am therefore happy to support Mr Firby's views with regard to further development in the Harrowgate Lane area which can only help the town generally but more importantly bring increasing population into the town centre facilities on a regular basis."

Relevant Background.

2.1 Unfortunately for the Town Centre retailers all of this support was to no avail because of the central Government planning policies at that time, and until just a couple of years ago, which curtailed the pro-active measures SBC could take. I talked to several people in the planning department who favoured my idea. I met and talked to, and was cheered by Mr Leason at the Wellington Square inquiry, to successive forward planning on several visits to the council planning office. One forward planner, in the run up to the RSS Inquiry significantly increased his estimate of the housing need for Stockton during a phone conversation with me because we were both aware of the

physical and political constraints on some of the allocated sites actually being delivered.

2.2 The physical constraints to allocating housing where it would aid Town Centre prosperity were in two parts. Far too much housing had been allocated at Ingleby Barwick and Wynyard to meet the prevailing market demand for those areas, leading to years of underused allocations. The House Builders Federation at the time declared that 64% of the supply was in areas with 4% of the demand. Housing had been allocated on contaminated sites which were judged un-marketable by house builders through several housing booms, for example the F Hills/Sareck joinery site with 700 allocations. The Ropner playing field site sold out in a matter of months. If those 700 had been built 15 years ago along nearby Harrowgate Lane it could have led to an extra £100 million of spend in the High Street shops, and maybe twice as much again in the High Street building societies, banks and estate agents. I suppose that this money went instead to Stokesley, Northallerton and elsewhere. At the time SBC had over 7500 house sites allocated. Only 7.5% of these were in locations that would aid High Street prosperity.

2.3 The political constraints were caused by two no doubt well meaning policies of New Labour. First they sought to reinforce the perceived prosperity of London and the South East (based on the success of the gamblers in corporate banking and derivatives!) by allocating investment, i.e. housing and associated infrastructure, to that area to the detriment of the rest of the country. Spokespersons for the Regional Assemblies of the S.E. and also of Eastern England told me that they had worked out their housing needs much in accordance with the estimated needs of the D o E based on their populations only to have them rejected by the D o E as being far too small. I heard of southern boroughs similar in size to Stockton, but without the manufacturing background, with allocations of 28k or 45k houses when Stockton had 8k. Meanwhile the NE RSS settled for only 80% of our fair share of the national estimate of housing, thus planning for decline. This is not a political point – no doubt many Tory donors favoured housing for their “servants” - police, nurses, council workers, teachers, in the expensive S.E. From the point of national prosperity the only region in the country with a positive balance of trade with the rest of the world at present is the North East. The maxim of reinforcing success comes to mind!

2.4 Secondly there was the presumption of development on brown field sites. This again was a cross party policy but very much affirmed by New Labour and it had undesirable consequences. For a redundant sugar warehouse on the bank of the Thames which would make £500k flats and £1.75m penthouses it was a good thing, bringing prosperity to a rundown area.

2.5 However for sites such as Sareck joinery it was bad. Without the presumption for residential development on such sites the owners may have chosen a mix of office use, light technical, trade retail and green area. This would have released those allocations for a more readily-developable area. The Dowmac site had a rail siding and industrial power supply. It would have been a more “sustainable” solution to have considered another industrial use or distribution businesses, given its proximity to the trunk road system and in an area designated for significant industrial use. However national policy prevented this. The same could be said about the naval distribution depot over the road.

2.6 In York the brown field presumption led to the closure of the sugar factory with the loss of hundreds of town and rural jobs. The multi-national owners ABF exported the jobs to Poland. Most (probably all) of the chocolate factories in York have suffered the same fate. The brown field presumption meant owners could close a business without needing to seek a new owner and thus preserve the jobs. The brown field policy militated against businesses wishing to expand. Instead of buying a shed on an acre of hardcore they were in effect buying a dozen house sites.

2.7 The Government guide lines were so discriminating against industrial towns that e.g. Stockton had to make provision in its housing figures to allow for factories which might close. If a factory closed and the jobs were lost then the town could build some more houses. If the factory stayed open, generating wealth, then the houses had to be built in Stokesley or Northallerton, taking the consumer spending power and education grants away from Teesside. If it hadn't been true, you couldn't have made it up!

2.8 I belong to an agricultural lobbying group. After the sugar factory rural disaster we have lobbied against the brown field presumption on the basis of job and wealth preservation. I credit the junior ministers Richard Benyon in Environment (agriculture) and Bob Neill in Communities for quickly grasping the point and lobbying for it. The Chancellor announced the dropping of the brown field presumption two budgets since on the economic grounds. However the Daily Telegraph has rallied many Tories to campaign against it, so far without success, because the economic arguments for growth are so strong.

2.9 Councils like Stockton, Middlesbrough, Hartlepool have been very alert to grasp the chance to go for growth and increasing prosperity given this opportunity. Obviously a relaxation of the restrictions on green field development will not bring overnight prosperity to the High Street, but everything else just seems to have led to decline. It has to be a very positive move.

I approve of the major allocation to the west of Harrowgate Lane.

3.1 At past examinations I have argued against too much housing being allocated in one site, to avoid the inertia brought about to the massive Ingleby Barwick allocation in an area “alien” to Stockton and Norton people. Again to quote the HBF at the time “64% Of the supply with 4% of the demand”. I therefore approve of the Yarm Back Lane allocation as a later compliment in the plan period to Harrowgate Lane.

3.2 To justify the idea “inertia” I quote figures from the Cleveland Structure Plan about outward migration from Stockton-on-Tees.

1961 - 1970 1000 people-These years marked the completion of Roseworth and Hardwick, plus private building in the Junction Road, Norton Church, Ragworth area. All in Norton/NW Stockton.

1971 - 1980 4,300 people- The commencement of Ingleby Barwick, but still private development in the Junction Road area.

1981 - 90 20,700 people- Planning restrictions to force people to go to Ingleby Barwick.

There were only 7000 county job losses in this period, so this out-migration was not Thatcherism's fault. Wasn't this the time of the North Sea industrial activity peak? I do not know if the figures are true; I just copied them from the official document.

3.3 However, the planners have been so proactive and forward thinking in the size of the Harrowgate Lane allocation that it will allow multiple delivery points and so the town needs only occasional build elsewhere to fulfil the projected deliveries and aid the High Street.

Delivery.

4.1 As the historically most active landowners along Harrowgate Lane at promoting the site because of its sustainability and economic benefit to the Town Centre my brother, sister and I have granted two builders a legal interest in our land. We chose Barratt and Taylor Wimpey after careful consideration.

4.2 We thought that two builders would lead to a more rapid delivery making SBC's plan more “sound”. We think that it should give comfort to SBC that our plan is deliverable and sustainable.

4.3 We have retained to ourselves a say in density and house type to ensure the delivery of that type of aspirational housing so frequently identified by council officers at the 2010 Examination as to be what the town needed. We like the quality of housing on different of their sites that the builders have shown us and they seem pleased to have our involvement, being confident in their ability to deliver quality housing. Quality housing immediately to the south of the school will best complement the existing area. If you wish me to elaborate on our reasoning, please ask.

Phasing.

5.1 The Yarm Back Lane allocation should have phasing to start six years after the Bishopsgarth School area of the Harrowgate Lane allocation to allow the developers there to manage the demand for infrastructure improvements and show that these improvements can be budgeted for in their plans. The area of Harrowgate Lane on a westward projecting line south of the Mitre could be identified as benefiting from and contributing towards improvements to the Darlington Back Lane/Bishopton Road West roundabout in collaboration with the Yarm Back Lane allocation. I believe that this area should be joint Phase Two, but my planner prefers Phase One, part Two.

5.2 Along Harrowgate Lane, because of the few infrastructure demands, the area immediately south of Bishopsgarth (for the avoidance of doubt Tithebarn Land with SBC's own land coming as soon as practicable) should be phased first. We should be encouraged to apply for a detailed planning permission very soon. We have kept legal restraints on the builders to prevent them delaying the start of development. Of course they cannot be expected to ignore market forces, but both BDW and TW are very positive about prospects there. This is an opinion based on the experiences of both of them in recent times in the near-by market. Because of the benefits which should accrue to the Town Centre from development here, according to the SBC survey, the start of building on Tithebarn should logically be ahead of Morley Carr, but should at the latest coincide with the start there.

5.3 With the best, our, part of Harrowgate Lane to get the ball rolling, other areas can be phased in, particularly up to the walkway and west to the designated limit.

5.4 Both the builders and I have commissioned planning consultants to make representations to you. Both are men with excellent track records and comprehensive local knowledge. Both live in the town/Norton. At a joint planning conference of the Family owning Tithebarn, and representing other landowners, and of TW and BDW plus our respective planners, it is significant that both planners highlighted similar points of the existing local infrastructure and the relevance of early development of Tithebarn Land to the borough's housing supply needs, plus the undersupply of housing. These points so well fitted in with my impressions of the town gained since I started at Norton Board School over sixty years ago that I believe that it gives them great weight and significance.

Early delivery.

6.1 It would be an unhelpful short term policy to seek so much cross-subsidy out of this site to help sites which will yield little to High Street prosperity. It must be far better to go for an early buzz of success and so help the borough and particularly the High Street. Early development on SBC's own land will of course add to the buzz, besides providing money to help front line services.

6.2 Further government subsidy to revitalise the High Street. The current policy is for subsidies to be awarded by competitive application. In farming the money siphoned of EU agricultural support (modulation) is awarded by competitive application to farmers offering to devote land and effort to aiding flora and fauna habitat. Personally I have received environmental stewardship grants based on the work already done on my farm to aid wild life. I have also received river basin catchment grants because of a history of work in that area. I am sure that any application for High Street redevelopment money would be aided by you being able to demonstrate a positive and proactive role in helping Stockton through the planning process.

6.3 You have already done the major step by the imaginative size of the Harrowgate allocation. Now is not the time to delay by trivialities.

6.4 Peripheral sites e.g. beyond Yarm and Ingleby Barwick. Please do not handicap the High Street further by diverting consumer spending away into North Yorkshire at this critical time.

Council Response: Comments noted. The Council are working in collaboration with ATLAS, landowners and developers to bring forward development on the site. A Development Framework Document is under preparation for the site and this will include a phasing plan for the site.

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## 161 Tithebarn Land

### H1 - Housing Allocations

#### H1g - Harrowgate Lane

161/1: Comments in support of 'Policy H1 - Housing Allocations.'

1. It is encouraging to note the positive stance taken by Stockton-on-Tees Borough Council in proposing significant changes to the Stockton Core Strategy in order to release additional land desperately needed to remedy the shortage of housing experienced within the Borough. It is also heartening that the Council considers a substantial urban extension to the west of Harrowgate Lane to be an important element in the future provision of housing.

2. It has long been argued by the owners of that part of the land to the west of Harrowgate Lane known as 'The Tithebarn Land' that the allocation of land to the north of the Mitre Public House and south of the Bishopsgarth School for housing has particular merit in terms of:

- bolstering the economy of Stockton Town Centre;
- providing a rational, structural expansion of the Town;
- diversifying the choice of locations for prospective house purchasers;
- balancing the disproportionate allocation of land on existing and proposed sites in and around Ingleby Barwick and Yarm in the south of the Borough;
- supporting local facilities and amenities, particularly Bishopsgarth School and shops in Marske Lane in Bishopsgarth;
- accessibility to core public transport services;
- proximity to cycle ways, especially the Castle Eden Walkway and national cycle route;
- involving no loss of high value farmland; and

- the limited intrusion into, and impact on, the surrounding rural area and wider countryside.

3. Taken together these provide a compelling case for allocating land at Harrowgate Lane for future housing, a case now accepted by the local planning authority in proposing a new allocation as part of the Core Strategy review, albeit that the site between 'The Mitre' and Bishopsgarth School is included in a more general allocation extending from Darlington Back Lane in the south to Durham Road in the north.

Council Response: Support comments noted

H2 - Housing Phasing and Implementation

H1g - Harrowgate Lane

161/2: Comments on the 'Indicative Phasing Table' at Page 106.

1. The Consultation Draft is silent as to which parts of the Harrowgate Lane allocation are intended to comprise Phase 1, Phase 2 or Phase 3.

2. The Harrowgate Lane allocation can be separated into three distinct elements:

- that essentially between 'The Mitre' public house and Bishopsgarth School, but including land extending to Darlington Back Lane in the south and land to the west of Bishopsgarth School to the north;
- that between Bishopsgarth School and Letch Lane, bisected into a southern and northern part by the Castle Eden Walkway; and
- that between Letch Lane and Durham Road.

3. The logical location of Phase 1 is the area of land between 'The Mitre' public house and Bishopsgarth School, extending westwards almost to a line of electricity pylons and with a southwards extension towards Darlington Back Lane. The presence of the public house and the school serves to provide something of a frame for new development, partly enclosing a block of largely undifferentiated, gently-undulating farmland.

4. In terms of urban structure and the local housing market, this part of Harrowgate Lane relates well to the Bishopsgarth estate to the east of Harrowgate Lane and would provide a mix and quality of housing complementary to that contained within Bishopsgarth, affording opportunities for local upward movement by existing residents.

5. Identifying this area as Phase 1 would allow for the creation of a traffic-light-controlled access opposite Leam Lane, providing the principal access to the development away from both the access to the Mitre's car park and that to Bishopsgarth School, whilst improving the situation for drivers entering Harrowgate Lane from Leam Lane, and without disrupting or delaying traffic flow along Harrowgate Lane.

6. The site will provide the opportunity of delivering significant numbers of houses early in the programme, in a way that the land between the School and Letch Lane and between Letch Lane and Durham Road could not.

7. The land north of the School and south of Letch Lane is crossed by the Castle Eden Walkway which, with necessary works to improve its condition and provide a peripheral buffer from housing development will severely constrain the number of houses which can be accommodated in that location.

8. The land between Letch Lane and Durham Road is dominated and constrained by electricity installations from which housing development will need to be cushioned by the creation of a 'cordon sanitaire', eating into the amount of land potentially devoted to housing.

9. Taking these aspects together, the amount of housing that can be delivered in a phased manner early in the Core Strategy programme from the sites to the north of the school and south of Durham Road will be considerably less than the relatively unconstrained site between 'The Mitre' and Bishopsgarth School.

10. The early release of land to the north of the School may also create problems for the continuing regeneration of housing in Hardwick, the type of housing provided on these northern Harrowgate Lane sites being likely to be in competition with that being constructed in Hardwick. The regeneration of the Hardwick estate should be given every chance to succeed before potentially-competing sites are brought forward nearby. The size of the site between 'The Mitre' and Bishopsgarth School and the mix and range of housing likely to be constructed in that location will enable the early development of housing that will not compromise the ambitious programme intended in Hardwick.

11. The ultimate Regeneration and Environment Local Development Document should be specific in identifying:

- 'Harrowgate Lane Phase 1' to be the area between Darlington Back Lane and Bishopsgarth School, with the land between 'The Mitre' public house and Bishopsgarth School at its core because of the relative ease of gaining access thereto. This part of the proposed Harrowgate Lane allocation could sensibly be considered in two phases, the land between the public house and the School, including the land to the west of the School, being Phase 1a, and that extending to the south towards Darlington Back Lane being Phase 1b;
- 'Harrowgate Lane Phase 2' to be the land to the north of Bishopsgarth School and south of Letch Lane, with the proviso to protect and enhance the character and functionality of the Castle Eden Walkway; and
- 'Harrowgate Lane Phase 3' to be the land between Latch Lane and Durham Road, safeguarding housing from potential effects of adjacent electricity installations and apparatus to the west and crossing the site.

Council Response: Comments noted. A Development Framework Document is under preparation for the site and this will include a phasing plan for the Harrowgate Lane site. The Housing Phasing and Implementation Policy in the Preferred Options has not been carried forward to the Publication Draft of the Regeneration and Environment Local Plan.

## H1g - Harrowgate Lane

161/3: Objection to proposed 'Indicative Phasing Table' at Page 106.

## H2 - Housing Phasing and Implementation

1. Whilst the inclusion of 'The Tithebarn Land' as part of the overall Harrowgate Lane allocation is welcomed, it is disappointing that the suggested timing of the release of the land for development would prevent development from happening until 2016 at the earliest, the Consultation Draft proposing that no housing should commence until 2016-17 when 'Harrowgate Lane Phase 1' would come on-stream.
2. The allocation is not due to be effective until that time despite a shortfall in the current five-year supply of housing. The local planning authority should be looking to make good that shortfall by promoting those housing sites which will make the most significant contribution to the urban economy by structuring growth and expansion in those parts of the Borough most in need of additional housing and suffering most in relation to diversity and choice.
3. A recent expedient planning permission for housing west of Yarm in advance of the completion of the Core Strategy Review is ill-conceived in relation to the wider context of housing provision. It not only undermines the integrity of the Core Strategy Review process itself but also disadvantages those owners of land now included as probable additional housing allocations who have been prepared to respect the plan-led approach, legitimised by appropriate public consultation and examination. The local planning authority need not have acceded to an early grant of permission at Yarm given the defensible position that could be adopted on the strength of the well-advanced nature of the Core Strategy review.
4. Even with an acknowledged shortfall in the five-year supply of land for housing, the review has proceeded to a point which would have allowed the local planning authority to resist ad hoc applications for planning permission, current progress on the review and the degree of public consultation undertaken to date being such as to afford emerging proposals considerable weight.
5. In granting planning permission, the local planning authority has not acted in the long term public interest, having now predetermined a significant allocation without the benefit of having first considered all of the potential sites in the area and their impacts on each other.
6. It would be iniquitous, and difficult, for the local planning authority now to insist that further applications will be opposed on the basis that the immediate pressure on the five-year supply has been eased by an application and permission that has effectively 'jumped the gun'.
7. Whilst it is important for the local planning authority to have regard to the Government's priority of promoting an increased supply of land for housing, appropriate consideration should also have been given to the Government's over-riding intention to stimulate economic development.
8. In that context, whilst the delivery of additional housing in terms of the number of units added to the overall stock is important, the priority for early development should be those locations which afford the best chances of impacting positively on the economy of Stockton Town Centre and supporting existing under-used social infrastructure. Housing development at Yarm is more likely to benefit the economies of Middlesbrough, Darlington and Northallerton than it is to do any good for Stockton Town Centre.
9. The land west of Harrowgate Lane should be a priority for housing and recognised to be available for development at a very much earlier date than 2016-17. If land on the periphery of Yarm at Morley Carr Farm is now considered suitable for an early commencement of construction, even though not identified in the Consultation Draft for

development until 2016-17, then it is appropriate to consider other sites around the Borough programmed for commencement from that same date to be equally suitable for an early start.

10. In that context, the 'Indicative Phasing Table' at Page 106 of the Consultation Draft should be re-visited and a number of sites, including 'Harrowgate Lane Phase 1', brought forward in the programme to match the timing of development now likely at Morley Carr Farm, i.e. from the date of adoption of the Regeneration and Environment LDD. This will afford the prospective developers the degree of certainty necessary to allow them to prepare detailed proposals that will ensure that housing delivery commences at the earliest possible time.

Council Response: Comments noted. A Development Framework Document is under preparation for the site and this will include a phasing plan for the Harrowgate Lane site. The Housing Phasing and Implementation Policy in the Preferred Options has not been carried forward to the Publication Draft of the Regeneration and Environment Local Plan.

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## 162 Middlesbrough Council

SP2 - Housing Spatial Strategy

H1 - Housing Allocations

T4 - Portrack Relief Road

162/1: Middlesbrough Council would like to support the spatial strategy proposed in the document and the detailed housing allocations. In particular how these will support the wider regeneration in Stockton and economic growth in the wider Tees Valley. However, there are concerns in relation to the impacts on the transport infrastructure of these proposed allocations. Particular, the impact on the A19, A66 and wider road network within Middlesbrough.

Middlesbrough Council would welcome the opportunity for a meeting of relevant planning and highways officers to discuss the issues in more detail.

Council Response: Support welcomed. Stockton Council recognises that the policies in the Regeneration and Environment Local Plan have the potential to impact on its neighbouring authorities, particularly in relation to transport infrastructure. At a meeting held on 29 October 2012 involving representatives from neighbouring authorities including Middlesbrough Council, it was concluded that these issues should be addressed through the Tees Valley Area Action Plan process.

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## 163 Homes and Communities Agency

163/1: Thank you for requesting comments from the Homes and Communities Agency (HCA), the national housing and regeneration agency. Our enabling role is to support our local authority partners in creating opportunity for people to live in high quality, sustainable places. We are a national agency working locally. We help provide funding to deliver affordable housing, bring land back into productive use and improve quality of life by raising standards for the physical and social environment.

The HCA support the proposals being put forward but have no specific comments to make at this stage of the consultation process.

David Curtis  
Director  
North East, Yorkshire and The Humber

Council Response: Comments noted

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## 164 The Cooperative Group

H1g - Harrowgate Lane

164/1: These representations have been prepared by HOW Planning on behalf of The Co-operative Group in response to Stockton Borough Council's consultation on the Regeneration and Environment Local Development Framework Preferred Options Consultation: July 2012 (LDD). The representations are made in respect of Land at Harrowgate Lane, Stockton, which is identified under Policy H1g.

The Co-operative Group has prepared a Development Strategy Document which demonstrates the allocation of Land at Harrowgate Lane for residential development is a sustainable and preferred option, meets the broader local community priorities and accords with national policy and guidance. These representations should be read in conjunction with the Development Strategy Document, which demonstrates the sustainability and suitability of the site for development, the deliverability of the scheme and the significant benefits to the local area and Stockton Town Centre.

The Development Strategy Document and these representations<sup>745</sup> have been developed in the context of very positive dialogue with the Council and key stakeholders such



as the Environment and Highways Agencies, which has resulted in a scheme which meets all the technical requirements of draft Policy H1g.

The comments that follow relate solely to the Policies contained in the Preferred Options. Where necessary, the representations propose changes to the draft Policies. It is requested that these representations, which are supported by the Development Strategy Document, are fully considered by the Council in the preparation of the Publication Local Development Document.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

164/2: Housing Need

The LDD establishes a requirement to deliver 8,250 dwellings between 2014 and 2029, derived from the adopted Core Strategy requirement of 555 dwellings per year.

From 2004-2012, 4,405 dwellings have been delivered against a requirement of 4,730. This amounts to a shortfall of 325 units which should be added to the forward supply requirement which results in an increased total requirement of 8,575, as the Council should take full account of underperformance in the plan period (which commenced in 2004). This is an annual average of 572.

In accordance with the National Planning Policy Framework (NPPF), a minimum buffer of 5% is required for the maintenance of a 5-year supply of deliverable housing land to ensure choice and competition in the market for land. The 5% buffer is not to be regarded as a ceiling for the supply of housing in order to ensure other objectives are met. This increases the annual requirement to 600 dwellings per year, and a total requirement of 9,000 for the remainder of the plan period. The Council must ensure that the minimum total housing requirement for the plan period includes shortfalls in completions from earlier in the plan period and the minimum 5% buffer as required by the NPPF. The annual requirement should be amended to a minimum of 600 dwellings.

The recent Core Strategy Review Issues and Options paper identified a housing delivery gap of 2,800 dwellings. The LDD identifies that the gap has increased to approximately 4,670 dwellings, due primarily to the lower than previously envisaged delivery of existing planning consents.

The LDD proposes to allocate land to accommodate some 6,950 dwellings in order to deliver approximately 5,770 dwellings for the plan period. It is estimated that only 1,200 of these will come from sites located within the conurbation, and therefore other new sites will be required.

The Council should be cautious with its estimates of the number of houses to be delivered on previously developed sites as the development of such land is difficult currently due to challenging economic conditions. The approach therefore of identifying enough sites to potentially provide a greater than required number of houses over the plan period is supported as it aligns with the requirement of the NPPF to secure investment, deliver growth, and allows flexibility should previously developed land not come forward as currently anticipated.

The Tees Valley SHMA 2012 identifies that demand exceeds supply in 3 and 4+ bedroom properties, detached and flatted properties. The LDD identifies that development of the Harrowgate Lane site (Policy H1g) has the potential to contribute to meeting these needs. In particular paragraph 2.18 states that:

‘A site of this scale would also be able to support a range of house types, sizes and tenures, which would encourage a sustainable community. In addition if development in the northwest of the conurbation were encouraged, it would support wards which may benefit from investment, for example Hardwick and Roseworth. In this area, ‘High Newham Court’ Local Centre has a high vacancy rate and poor physical environment. It is likely that this will be subject to a regeneration scheme, and as a result it could be appropriately expanded to absorb the spending capacity generated from housing growth in the area.’

Full support is given to the recognition of the strong potential the Harrowgate Lane site has to deliver these benefits. The Development Strategy Document sets out these benefits in further detail.

Council Response: Comments regarding the housing requirement noted and addressed in the Housing Need and Demand Topic Paper.

Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

SP2 - Housing Spatial Strategy

164/3: Spatial Policy SP2 - Housing Spatial Strategy

The sequential approach to delivering housing sites is supported in part. It is acknowledged that delivery of sites within the Core Area and in turn the wider conurbation should take priority.

The third bullet point, which identifies a third tier of priority, is sites 'adjacent to the conurbation'. This is too general and does not place strong enough emphasis on delivering housing adjacent to the dominant settlement of Stockton, which not only offers the greatest range of facilities and services, but which also is in greatest need of regeneration, relative to the other parts of the conurbation.

The merits of amending the Policy wording is supported by paragraph 8.64 of the LDD which identifies that in the north west of Stockton, outside the Core Area, are the most deprived wards of Hardwick and Roseworth. These are located immediately adjacent to Harrowgate Lane.

Paragraph 8.65 identifies a need to encourage development in the northwest of the conurbation to support wards that will benefit from investment. It highlights that the redevelopment of High Newham Court Local Centre would make it well placed to benefit from the additional spending capacity generated from housing growth at Harrowgate Lane (policy H1g).

An additional third tier should be inserted to the current sequential assessment in policy SP2, for the delivery of residential development on land adjacent to the North West of Stockton. This would prioritise allocations adjacent to the existing main conurbation of Stockton prior to other settlements such as Yarm and Billingham, where new residential development would not bring as significant regeneration benefits to Stockton.

It is recommended therefore that part 3 of Strategic Policy SP2 – Housing Spatial Strategy should be amended to read:

'A site selection hierarchy, which places sustainability at the heart of the site selection process, has been used as the basis for determining the preferred options. This follows a sequential test approach, which prioritises sites in the following order:

- Core Area sites - the most sustainable sites, in accordance with CS1.2 which states that priority will be given to previously developed land within the core area.
- The wider conurbation - the next sites in terms of sustainability in accordance with CS1.3 which states that the remainder of the housing sites will be located elsewhere within the conurbation, with priority given to sites that support regeneration.
- Adjacent to the northwest of Stockton - sites located adjacent to Stockton (emphasis added)
- Adjacent to other parts of the conurbation - sites located adjacent to the existing conurbation
- New sustainable settlements - sites which can contribute to the creation of a new sustainable settlement
- Village sites - sites within or adjacent to sustainable rural villages, as defined in the latest update of the planning the future of rural villages study'

This approach is fully justified by the Sustainability Appraisal which underpins the LDD. This clearly details that Harrowgate Lane is the site which is capable of meeting the greatest number of Sustainability Objectives identified in the Appraisal, relative to all the other allocations. The Sustainability Appraisal highlights that there are no uncertainties or conflicts.

Council Response: Comments noted. The Housing Spatial Strategy in the Publication Draft of the Regeneration and Environment Local Plan allocates the sites of Harrowgate Lane and Yarm Back Lane to form a strategic urban extension to the west of Stockton.

H1 - Housing Allocations

164/4: Policy H1 - Housing Allocations

Full support is afforded to the inclusion of Harrowgate Lane and the potential to deliver in the region of 2,470 dwellings. The Development Strategy Document (which is based on a significant amount of technical and masterplanning work) confirms the potential of the site to accommodate the 2,470 dwelling capacity identified in the LDD.

Council Response: Comments noted

Policy H1g sets out that development of the Harrowgate Lane site will be subject to a comprehensive masterplan. This approach is appropriate for a site of this size and the Development Strategy Document includes an illustrative masterplan which indicates how the site can be delivered. The masterplan has been prepared in full accordance with policy H1g, including allowance for:

- Creation of a soft landscape boundary between residential development and the countryside, including the creation/retention of woodland and other semi-natural habitats, the provision of cycle/pedestrian and equestrian access and linkages to the south;
- An ability to provide off-site works for pedestrian and cyclist connectivity;
- Retention and enhancement to the existing Castle Eden Walkway;
- Creation of high quality cycle/pedestrian links from within the development to Castle Eden Walkway;
- Enhancements to the public right of way along the northern perimeter; and
- Creation of an enhanced landscape buffer along the north fringe and the substation

The masterplan also allows for the provision of a Neighbourhood Centre to meet local needs, which could include health and leisure facilities, as well as other community needs. The site has the flexibility to accommodate these uses, as well as additional ones such as education should the need be demonstrated. The second bullet point under Policy H1g Part 2 should be amended to also refer to local needs retail and food and drink uses (A1, A3, A4 and A5) as these would be appropriate in a Neighbourhood Centre.

Paragraph 8.67 of the Reasoned Justification suggests that the Council will prepare a masterplan for the site development; following discussions with senior planning officers it has been agreed that a developer-led masterplan would be appropriate, and the text should be amended to reflect that, to simply confirm that a masterplan will be produced. The Development Statement Document has significantly progressed a masterplan already.

Paragraph 8.68 suggests that much of the site has been identified within the Council's Landscape Capacity Study as having a low capacity. A detailed landscape assessment has been undertaken to support the Development Strategy Document and this clearly confirms the landscape capacity of the site to accommodate development.

Paragraph 8.72 highlights that flexibility will be required regarding the nature of uses within the Neighbourhood Centre, as well as the extent of education and other community facilities, which is appropriate at this stage given uncertainty surrounding precise need. It is inappropriate to state that full on-site provision of open space, sport and recreation should be provided, particularly as the alternative of seeking contributions for off-site provision which could be used to improve existing facilities in the local area which has been suggested by officers in recent meetings. The masterplan prepared on behalf of the Co-operative Group currently allows for full on-site provision in accordance with policy, and if required it can be provided, but flexibility for off site provision should be included in the Reasoned Justification at this stage.

Council Response: Comments noted. The Council is working in collaboration with landowners and developers to produce a Development Framework Document which will guide development of the site. This document will address many of the queries raised through this representation.

The Co-operative Group supports this policy should the following amendments be incorporated. The introduction to the Policy allows for phasing to be refined following detailed discussions with developers and infrastructure providers and this is welcomed.

The Development Strategy Document demonstrates clearly that there are no technical reasons why Harrowgate Lane (policy H1g) cannot come forward for development in the short term to contribute immediately to housing land supply. Furthermore the socio economic benefits are significant, with the site being in an almost unique position of being capable of bringing benefits to Stockton Town Centre. The majority of other potential site allocations are unlikely to bring as significant benefits due in part to their location removed from Stockton Town Centre. Harrowgate Lane is extremely well located relative to the Town Centre and the socio economic study carried out to inform the Development Strategy Document establishes the development of the site will result in an additional spend of £31m annually in Stockton, whilst the scale of development will also support the creation of approximately 270 jobs in the health and education sectors alone.

The draft Policy, cross referring to the indicative phasing plan, sets out that development at Harrowgate Lane will come forward from 2016/17 at an initial rate of 50 dwellings per year building to 150 for the period through to 2029. The early commencement of development date of 2016/17 is strongly supported.

Since the LDD was published planning permissions have been granted or applications submitted on several sites, some of which are identified as other potential allocations. These sites do not compare as favourably to Harrowgate Lane in the Council's Sustainability Appraisal, and therefore it is imperative that their potential delivery ahead of timescales for implementation identified in Policy H2 should not preclude delivery in the short term of the most sustainable and beneficial allocation in the Borough. It is essential therefore that Policy H2 should not be overly restrictive in terms of when allocated sites should be released.

Part 1 of the policy is supported insofar as land allocated for housing development should come forward in a phased approach. It is overly restrictive however for planning policies to place artificial constraints on delivery. It is considered that there is no need to specifically restrict the number of units which could come forward on a site in one given year. If market demand is strong it is right that delivery should be allowed at a rate which meets that demand. At Harrowgate Lane, given the size of the site, it is reasonable to expect that several different house builders could be active on the site at the same time, and there is a strong likelihood that a figure in excess of 50 units per year could be delivered promptly, increasing through the plan period to potentially in excess of 150 units per year. The Council's phasing plan must therefore allow for flexibility and should not limit the number of phases which could come forward.

As currently worded parts 2 and 5 of Policy H2 are overly restrictive and negative, going against the very purpose of the NPPF. The NPPF at paragraph 14 sets out that for plan making local planning authorities should seek positively opportunities to meet the development needs of their area. Paragraph 17 of is clear that planning should drive and support sustainable development to deliver homes and should respond positively to opportunities for growth, whilst paragraph 47 sets out measures which local planning authorities should follow to 'boost significantly the supply of houses'.

It is evident throughout the LDD that the Council clearly recognises the benefits of achieving growth. It must be careful however to not unnecessarily hold back the release of sustainable sites.

Part 2 of the draft Policy H2 should be deleted. It will stifle sustainable development and does not accord with the NPPF which does not suggest that a 5 year supply of deliverable housing is to be regarded as a maximum; rather the figure should be the minimum supply of deliverable housing. This is emphasised by the fact that should a council be unable to demonstrate a five year supply its housing policies lose their weight. Furthermore the policy as currently worded suggests that the Nifco site, which is in the Core Area, could not come forward if a 5 year supply exists. This cannot be the intent of the policy, given the importance the Council places on regenerating the Core Area.

Part 5 of the draft Policy is also overly restrictive and should be deleted. It is unclear how such a policy would realistically function in practice and it runs the risk of effectively creating a housing moratorium which would not accord with the NPPF. The Reasoned Justification at paragraph 8.6 suggests a need to ensure that the housing market and supporting infrastructure capacity are not exceeded; however it is more appropriate for such matters to be considered at the planning application stage, where the onus is on the applicant to assess issues such as deliverability, infrastructure capacity and if necessary identify solutions to the satisfaction of the Council.

It is therefore recommended that parts 2 and 5 of draft Policy H2 be deleted

Council Response: Comments noted. A Development Framework Document is under preparation for the site and this will include a phasing plan for the site. Comments noted. The Housing Phasing and Implementation Policy in the Preferred Options has not been carried forward to the Publication Draft.

H3 - Housing Mix and Affordable Housing provision

164/7: Policy H3 - Housing mix and Affordable Housing Provision

Support is given to the need to provide a mix of good quality housing of all types and tenure in order to create sustainable communities. Regarding density, it is considered that schemes should be viewed in the context of their setting and location, and flexibility should be incorporated to allow for sites to provide different character areas within the development to deliver areas of varying density within individual sites where capacity allows.

Council Response: Comments noted.

## SP2 - Housing Spatial Strategy

164/8: Conclusion

### H1 - Housing Allocations

These representations have been prepared in response to Stockton Borough Council's consultation on the Regeneration and Environment Local Development Framework Preferred Options Consultation: July 2012 (LDD) and in support of the allocation of Land at Harrowgate Lane, Stockton for residential development. The representations should be read in conjunction with the Development Strategy Document which demonstrates the sustainability and suitability of the Harrowgate Lane site for development, the deliverability of the scheme and the significant benefits to the local area and Stockton Town Centre.

### H2 - Housing Phasing and Implementation

### H3 - Housing Mix and Affordable Housing provision

The Council must ensure that the minimum total housing requirement for the plan period includes shortfalls in completions from earlier in the plan period and the minimum 5% buffer as required by the NPPF. The annual requirement should be amended to a minimum of 600 dwellings.

### H1g - Harrowgate Lane

Spatial policy SP2 should incorporate a new third tier of sequential preference for housing delivery to specifically direct development to allocations to the northwest of Stockton, to achieve maximum benefit for the local area and the Town Centre.

Support is provided to the allocation of the Harrowgate Lane site via Policy H1g for residential development however amendments are required to avoid future potential objections including:

- Inclusion of additional A1-A5 uses suitable for the Neighbourhood Centre in order to meet the needs of the local community;
- Amendment to paragraph 8.67 to remove specific reference to the Council preparing the masterplan for the site ;
- Deletion of paragraph 8.68 which refers to a low landscape capacity for development, which the Development Strategy Document demonstrates to be incorrect; and
- Amendment to paragraph 8.72 to allow for open space, sport and recreation to be provided either on or off site.

Further amendments are required to policy H2 as follows to avoid future potential objections:

- Allowance for flexibility in annual build out rates on allocations to encourage growth;
- Deletion of parts 2 and 5 which are not compatible with the NPPF;

Further dialogue with the Council, key stakeholders and the local community will be welcomed in order to further progress in a positive fashion the allocation of land at Harrowgate Lane for residential development.

Council Response: Comments noted. The points raised within this conclusion have been addressed as part of the detailed responses.

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## 165 Individual

### h1m - Wynyard Park

165/1: 1. Principle of development at Wynyard

### h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

### h1k - Wynyard Masterplan

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that

does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton’s Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the ‘Core Area’. An approach I would support and thus welcome Stockton’s Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

h1k - Wynyard Masterplan

165/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater

access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

h1k - Wynyard Masterplan

165/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.

- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

h1k - Wynyard Masterplan

h1l - Wynyard Village

h1m - Wynyard Park

165/4: 4. Conclusion

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.



4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

166 Mr John Mason

SP2 - Housing Spatial Strategy

166/1: Comments in relation to Chapter 8. Housing – Paragraphs 2.9-2.11

H1 - Housing Allocations

1.Paragraph 54 of the National Planning Policy Framework states:

“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exceptions sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.”

2.National planning policy therefore establishes three requirements:

- that local planning authorities need to cooperate to gain a proper understanding of the dynamics of rural housing need;
- that local planning authorities should take a positive position in planning how to provide for rural housing needs; and
- that local planning authorities should look to identify rural exceptions sites where a combination of market and affordable housing could be provided as a positive contribution to the rural housing issue.

3.Although referencing an element of research, it is not clear from the content of the Consultation Draft of the Regeneration and Environment Local Development Document that the local planning authority has properly addressed any of the above requirements of national policy.

4.On the contrary, the local planning authority has chosen to maintain a negative stance in relation to the villages within the Borough, with a general presumption against any form of development which increases the size of a village unless a proven need for affordable housing is identified.

5.At paragraph 2.11 of the Consultation Draft the local planning authority suggests that: The responses [to questions asked as part of earlier consultation] do not represent a clear and unambiguous mandate to change the Housing Spatial Strategy for rural areas but are rather broadly consistent with maintaining the current approach .

6.In answer to both questions cited in paragraph 2.11 more respondents were in favour of development within villages and on undeveloped land around villages than were against. Whilst it is recognised that planning policy is not formulated on a ‘voting’ preference, the responses do indicate that there is a significant weight of opinion supportive of further planned housing development in the rural area.

7 Previous policy appears to have been largely founded on the issue of the sustainability of villages in terms of availability of services and the need to travel by private car to satisfy daily needs. The Nation Planning Policy Framework cautions that this may be too limited an interpretation of what constitutes sustainability in respect of the location of housing development. There are wider factors to be taken into account, not the least being the vitality of the rural economy and the sustainability of the communities it supports.

8.Stockton Council’s review of villages according to their ‘sustainability’ focused on restricting new development depending on the availability or lack of services and facilities within each settlement. The presumption is that trips by car to service centres outside villages where services may be absent is to be avoided because of adverse effects on the environment and climate change. A limited amount of development would be allowed only within those villages that had a particular threshold of services, but the expansion of villages would be resisted.

9.This has tended to reflect a limited perception of the role of the villages within the Borough, a perception perpetuated in the Consultation Draft. The negative attitude to development seems to rest on the presumption that most of the villages are dormitories to the main employment centres. Even if this is the case, the opposition to development ignores the potential value of villages in providing homes for young people and families with either employment in the countryside or long-standing family ties

to particular rural communities.

10. There appears to have been little work undertaken with neighbouring local planning authorities to identify either the degree of local need generated by involvement with rural employment or the level and mix of accommodation needed to satisfy that requirement.

11. Rural households have found access to housing in villages increasingly difficult because much of the housing stock has been purchased by more affluent 'incomers', so that house prices, over time, have become inflated beyond the means of many local households. It is something of a paradox that villages, because of their rural location and high amenity, perform a valuable role in attracting potentially highly mobile affluent groups to put down roots in the area, to the benefit of the wider sub-regional economy, but to the disadvantage of 'locals'.

12. By preventing new housing development in villages, planning policy adds to the rarity value of existing housing, further inflating house prices to the increasing exclusion of local families. Planning policy should ensure that villages both continue to perform their role in attracting what may be a beneficial group of high income families or investors, whilst making provision for those groups with either a tie to the land through employment or to particular communities through family and heritage.

13. This can be achieved by planning housing in a variety of locations and at a scale sensitive to the size and structure of each village, such development to incorporate a mix of market and affordable housing. Intrinsic to the Regeneration and Environment Local Development Document and in recognition of the requirement in the National Planning Policy Framework should be the identification of sites which are capable of providing for local need, supported by market housing in numbers which enable the cost-effective delivery of affordable homes.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

New Policy

H1 - Housing Allocations

166/2: 14. Although these comments relate to rural housing in and around villages generally, the respondent's land in Kirklevington, extending to approximately 1 hectare in area, to the north of 18A Braeside and put forward for consideration in the 2011 Strategic Housing Land Availability Assessment review would be a suitable location for rural housing. It would provide a suitably-sized extension to the village, offering the prospect of a mix of both affordable and market housing, within a substantial landscaped setting, in order to ensure that the development is of high amenity value in visual terms whilst assimilating well with surrounding countryside. In addition to providing for local needs, such further housing will help to secure the continued existence of the local primary school, the village hall, local public house and other businesses in the village.

15. Development on this site would fall in line with comments made by respondents to the Village Survey in so far that it will not lead to coalescence between villages and the erosion of strategic gaps (the local planning authority's intention to allocate substantial housing sites to the south of Yarm being much more suspect in that regard), but will help to retain village identity and sustain the Community by supporting the school and other village amenities.

16. The 'Proposals Map – South of Borough' should be amended to incorporate the land to the north of 18a Braeside, Kirklevington.

17 Other villages will be able to provide similar extensions. These should be shown on the relevant proposals maps.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

166/3: Comments in relation to 'Strategic Policy SP2 Housing Spatial Strategy'.

1. It is not appropriate for 'Village sites' to be identified as acceptable only at the end of a sequential approach to suitability for housing development.

2. Villages have their own specific needs and the means by which a housing requirement can be satisfied in a village location has little to do with a more general analysis of acceptability.

3. Strategic Policy SP2 should separately highlight how the suitability of new housing in and around villages will be assessed and accommodated.

Council Response: Rural housing need and demand is discussed in the Housing Need and Demand Topic Paper

## 167 Individual

H1b - Urlay Nook 167/1: Having attended the public consultation event in Eaglescliffe, and having reviewed the draft proposals on line, I would like to object to the suggested options for housing development around Yarm and Eaglescliffe.

H1i - West Yarm

H1j - South West Yarm

There is too much housing development proposed on greenfield sites and not enough emphasis on brownfield development.

The scale of development proposed around Yarm and Eaglescliffe is beyond the capacity of the highways (particularly the problem of Yarm High Street) and services.

The traffic generated by such massive developments would add to the existing congestion and delay and create additional road safety hazards.

The scale of the development proposed would destroy the heritage of Yarm.

Council Response: Comments are noted and responses provided within the Yarm and Kirklevington Topic Paper. With reagrds to Eaglescliffe, planning approval has been granted for housing development on part of the Urlay Nook site and Allens West. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication version of the Regeneration and Environment Local Plan

## 168 Individual

H1i - West Yarm

168/1: Yarm School Site

H1j - South West Yarm

I object to this planning application due to the following reasons.

The traffic in Yarm is already problematic due to high volume and the natural bottleneck of the High Street. To add to this with the additional 800 + houses to be built on the old Admiralty site, the proposed 350 houses at Morley Carr farm and now 700 + houses proposed at the south of Yarm, this will only ascerbate this already traffic nightmare.

Where will the approximately 4000 children from these homes be schooled? Will they be ferried in cars and buses to their place of education, again adding to the traffic. I have not heard of any new schools being proposed, where are the school places to come from?

The pollution levels surely will increase due to the high volume of traffic in the area so our children are going to be the ones to suffer if they are to be expected to walk to these non-existent schools.

Parking in this area has already been highlighted in this area, therefore I don't see how adding more cars will help?

If the proposed building goes ahead I can't see how this will help this area as new businesses need a good transport infrastructure, but the gridlock which will ensue will ensure any new investment in the area will keep new enterprises well away.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

H1i - West Yarm

H1j - South West Yarm

168/2: Submitted online: I object to this planning application due to the following reasons. The traffic on Yarm already is problematic due to high volume and the natural bottleneck of the high street. To add to this with the additional 800 + houses to be built on the old Admiralty site, the proposed 350 houses at Morley Carr farm and now 700 + houses proposed at the south of Yarm, this will only ascerbate this already traffic nightmare. Where will the approximately 4000 children from these homes be schooled, will they be ferried in cars and buses to their place of education, again adding to the traffic. I have not heard of any new schools being proposed, where are the school places to come from? The pollution levels surely will increase due to the high volume of traffic in the area so our children are going to be the ones to suffer if they are to be expected to walk to these non-existent schools. Parking in this area has already been highlighted in this area, therefore I don't see how adding more cars will help? If the proposed building goes ahead I can't see how this will help this area as new businesses need a good transport infrastructure, but the gridlock which will ensue will ensure any new investment in the area will keep new enterprises well away. Maureen Harrison Yarm resident

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

## 169 Bellway Homes

SP1 - Presumption in favour of sustainable development

### 169/1: INTRODUCTION

These representations are submitted on behalf of Bellway Homes (NE) Ltd following detailed consideration of the Regeneration & Environment DPD - Preferred Options.

SP4 - Green Wedge

### DRAFT POLICIES

H1 - Housing Allocations

Strategic Policy SP1 - Presumption in Favour of Sustainable Development

Bellway support the inclusion of Strategy Policy SP1 which reflects guidance in NPPF concerning the presumption in favour of sustainable development.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

169/2: Strategic Policy SP2 - Housing Spatial Strategy

Bellway would generally support the proposed housing spatial strategy and the decision to allocate a range of housing sites to deliver a wide choice of high quality homes over the plan period instead of a single large site.

However, Bellway would suggest that there needs to be a sufficient wide range of smaller housing sites identified to ensure choice and competition in the market and ensure a steady supply of housing over the plan period. The large strategic sites identified in the Preferred Options are likely to take time to come forward owing to infrastructure constraints and/or complex landownership arrangements.

The Council must therefore include provision for smaller sites to come forward in the short term such as the land south of Liverton Crescent to meet existing housing needs.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper.

SP3 - Limits to Development

169/3: Strategic Policy SP3 - Limits to Development

Bellway Homes would object to the exclusion of Green Wedge land from the limits to development as suggested as part of the Strategic Policy SP3.

A Review of the Limits to Development and Green Wedges was undertaken in May 2010 and forms the evidence base for this policy. It confirms the approach that was undertaken and states:

"Whilst revising the limits to development officers have had to ask themselves a number of key questions when considering whether or not to include land within the boundary. These questions include:

- Where is the break between urban and rural/open areas?
- Whether or not planning permission has been granted and if so what the permission is for?
- Does the land in question relate well to the rest of the limits to development?
- Would inclusion of the land create a potential piecemeal development site out of character/proportion with the surrounding area?"

It is clear that this assessment has not been undertaken correctly in respect of the land to the south of Liverton Crescent, Thornaby. The key question in respect of the site at Liverton Crescent is whether its inclusion would create a piecemeal development site out of character/proportion with the surrounding area?

The reasoned justification to demonstrate why the area of land should not be within the Green Wedge is outlined below. As the area of land should be excluded from the Green Wedge it should be included within the limits to development as its inclusion would not create a potential piecemeal development out for character/proportion with the surrounding area.

Council Response: A review of the green wedge and limits to development has been prepared in support of the publication draft of the plan. Further information regarding the assessment of this site is included within the Housing Site Selection Topic Paper.

SP4 - Green Wedge

169/4: Strategic Policy SP4 - Green Wedge

Bellway Homes object to the inclusion of the land at Liverton Crescent in the Green Wedge. A plan showing the area of in question can be found at Appendix A.

The reasoned justification supporting Policy SP4 states that, "the function of the Green Wedge is to prevent the coalescence of communities within the built-up area". The purpose of the Green Wedge and the importance of the Bassleton Beck Valley as a green corridor is acknowledged but the site is different and should not be viewed in the same context for the reasons set out below. The aerial image below shows the application site and the Bassleton Beck Valley in context.

The aerial image above clearly highlights the difference in character between the site and the surrounding Green Wedge (Bassleton Beck Valley). The site is well maintained grassland with no significant vegetation cover. The 'wider' Green Wedge is significantly different in character and is a wooded valley. It is clear that the characters of the land in question and the 'wider' Green Wedge vary considerably as shown by the photographs below.

The role of Bassleton Beck Valley as an important part of the wider green infrastructure network for the recreational and leisure needs of the local population is not disputed. The land in question is however in private ownership, maintained by the landowner and is not accessible to the public. There are no links through the land to the Green Wedge nor is the site of any recreational benefit. The removal of this small alcove will therefore have no detrimental impact on the amenity value or recreational enjoyment of the Green Wedge.

The reasoned justification supporting Policy SP4 continues by stating that, "the policy seeks to improve the appearance of the Green Wedge by maintaining its openness". The land forms an alcove within the existing built form as shown on the aerial image on the previous page. The removal of the land from the Green Wedge would therefore still maintain the existing physical boundary between the settlement and Green Wedge. The separation between this part of Thornaby and Ingleby Barwick will be maintained and openness of the Green Wedge not affected through the removal of this area of land.

The site is not open to the public, has no interesting landscape features and is bounded on its northern edge by an abrupt suburban edge with unattractive barriers to movement. The site has a high degree of discreetness and contributes little to the landscape that is enjoyed by the public.

The difference in character between the land and 'wider Green Wedge' highlights that it should never of have been incorporated into the Green Wedge. The extent of the Green Wedge is essentially an arbitrary line not related to any existing landscape features, character or uses. The removal of this area of land will therefore not have a detrimental impact of the use and enjoyment of the wider Green Wedge nor will it diminish the degree of separation between the existing settlements.

Council Response: A review of the green wedge and limits to development has been prepared in support of the publication draft of the plan. Further information regarding the assessment of this site is included within the Housing Site Selection Topic Paper.

Policies Map

169/5: Proposals Map

For the reasons outlined above, Bellway Homes would object to the proposals map in its current form. The land to south of Liverton Crescent should be excluded from the Green Wedge and included within the limits to development or should be allocated for housing development. There are currently no housing allocations proposed in Thornaby. The site occupies a sustainable location within Thornaby and should come forward for housing development before other site outside the conurbation. A draft site layout can be found at Appendix B.

## RECOMMENDATIONS

It is recommended that the Stockton Regeneration & Environment LDD is revised to:-

- Retain the land set out within this submission within Development Limits of the conurbation and de-allocate it as 'Green Wedge';
- Allocate the land as a housing site to deliver a mix of housing in the short terms.

Council Response: A review of the green wedge and limits to development has been prepared in support of the publication draft of the plan. Further information regarding the assessment of this site is included within the Housing Site Selection Topic Paper.

TC10 - Proposals for Hot Food Takeaways

170/1: We write on behalf of GMI Holdings Ltd (GMI) in relation to the above document, which has recently been published for consultation by Stockton on Tees Borough Council. On behalf of GMI, we wish to set out our views in relation to draft Policy TC10 of this Preferred Options document, which relates to proposals for hot food takeaways. We also comment on draft Policy TC6, which relates to Development and Change of Use within the District Centres. These comments are provided in the context of GMI's interest in bringing forward the redevelopment of the former Tristar site in Thornaby.

TC6 - Development and Change of Use within the District Centres

Council Response: Comments noted. The site referred to in this representation received planning permission for the erection of drive thru restaurant (Use Class A3/A5) and petrol filling station (Sui Generis) with ATM and associated access, servicing, parking in February 2012. The uses are currently operational (12/2877/FUL).

TC6 - Development and Change of Use within the District Centres

170/2: Policy TC6 (5) proposes the allocation of land at Allensway for town centre uses which complement the Thornaby District Centre's offer and promote the regeneration of the centre. This represents an extension of the site's existing allocation for mixed use purposes, under Policy S13 of Local Plan Alteration no. 1 (adopted in March 2006).

The National Planning Policy Framework (NPPF):

- advises local authorities to allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centre sites are not available; and

- states that it is important that needs for main town centre uses are met in full and are not compromised by limited site availability.

Following the completion of the recent redevelopment scheme by Thornfield, there are no sites located within the existing Thornaby District Centre which have any significant development potential. Against this background, the former Tristar site provides scope to accommodate new uses, potentially including a new drive-through restaurant and petrol filling station, which would help to generate additional visits to the centre and complement the existing range of uses there. This site has been vacant for a considerable length of time and such development would help to create a significant number of new locally accessible employment opportunities.

GMI therefore supports the proposed allocation of the former Tristar site for redevelopment. However, the company would also request that the proposed allocation be amended to refer to mixed use development, recognising the potential of the site to meet the need for a new drive-through restaurant and petrol station in Thornaby.

Council Response: Support welcomed.

It is acknowledged that where suitable and viable town centre sites are not available, the NPPF advises LPAs to allocate appropriate edge of centre sites for main town centre uses. It is also acknowledged that the NPPF states that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. The representation makes specific reference to the development of a drive through restaurant and petrol filling station at the former Tristar site, adjacent to Thornaby District Centre. This site was identified in Draft Policy TC6, Point 5 for town centre uses to complement the centre's offer and has since been developed; however as drive through restaurants are identified in the NPPF as a main town centre use and it is understood that a petrol station previously existed on this site, it is not considered that the policy as drafted at the Preferred Options stage would have precluded this development.

TC10 - Proposals for Hot Food Takeaways

170/3: Part 1 of Policy TC10 seeks to direct proposals for hot food takeaways to suitable and available units within town, district, local and neighbourhood centres. It also states that, where appropriate, planning permissions will specify the hours of operation, in order to manage late night opening.

Whilst GMI recognises the need to protect residential amenity, it does not consider that Policy TC10 (1) is fully consistent with national planning policy. Although the National Planning Policy Framework requires local authorities to apply a sequential test to proposals for main town centre uses which are not within an existing centre and are not in accordance with an up to date Local Plan, hot food takeaways are not included within the list of main town centre uses set out in Annex 2 to the NPPF.

It is acknowledged that drive-through restaurants, which function as hot food takeaways (albeit only in part), are included on the list at Annex 2. However, the NPPF also advises local authorities to allocate appropriate edge of centre sites for main town centre uses that are well connected to the centre, where suitable and viable town centre sites are not available. This recognises that there may not always be suitable, viable and available sites located within existing centres which are able to meet the full range of identified needs.

This is the case in Thornaby where, as set out above, the former Tristar site at Allensway is allocated for mixed use purposes under Policy S13 of Local Plan Alteration no. 1 – and also proposed for allocation for town centre uses as part of the draft Regeneration and Environment LDD. It would not be appropriate to prevent certain types of main town centre uses, including drive-through restaurants, from being developed on such edge of centre sites.

GMI does not consider that the local planning authority should apply a blanket approach towards restricting the hours of operation of proposed new hot food takeaways, or

drive-through restaurants. Instead, each proposal should be considered on its own merits, taking into account its location (including whether it lies within/on the edge of an existing centre), the nature of the use, the likely impacts, in terms of noise, fumes and visual appearance, and any existing and proposed mitigation measures. Restrictions on opening hours should only be imposed where necessary and in the public interest and, in particular, where there would be a significant and demonstrable impact upon residential amenity.

Council Response: It is acknowledged the NPPF does not include Hot Food Takeaways on the list of main town centre uses which should be subject to a sequential test when proposed outside of existing centres. However, the NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. The NPPF's silence does not, therefore, preclude the Council from directing Hot Food Takeaways to designated centres.

It is acknowledged that there was a potential conflict between TC6 Point 5 which allocates Allens Way for town centre uses which complement the centre's offer and TC10 point 1 which directs hot food takeaways to existing town, district, local and neighbourhood centres, meaning that hot food takeaway would not be considered appropriate in this location.

Policy TC10 stated that to protect residential amenity, planning permissions will specify the hours of operation of takeaway premises in order to manage late night opening, where appropriate. This is not a blanket approach and any decision would take into account all relevant material considerations.

Since the preferred options consultation, planning permission has been granted on the site and the area has been developed. Furthermore, whilst the hot-food takeaway policy has been redrafted, it still seeks to locate this use in town centres and seeks to limit hours where appropriate.

#### TC10 - Proposals for Hot Food Takeaways

##### 170/4: Part 2: Over-Concentration of Uses

Part 1 of Policy TC10 states that the Council will not support proposals for hot food takeaways that would result in an overconcentration of that use in an area or a continuous grouping of more than two adjacent units in food and drink use (Class A3, A4 and A5). GMI does not consider that there is any justification for including Class A3 uses when assessing whether there is an overconcentration of hot food takeaways. The results of such an assessment would be misleading, and could lead to proposals being refused where there is not, in practice, an over-concentration of hot food takeaways. In addition, this approach is inconsistent with the supporting text to the policy, which indicates that the Council are concerned about creating 'dead frontage' during the day time, and the impact of the evening economy upon the character, appearance and perception of an area. Class A3 uses include a range of restaurants and cafes, as well as drive-through restaurants, all of which are likely to be open throughout the daytime.

It is therefore considered that restaurants/cafes, including those with a drive-through facility, should be excluded from this policy.

Council Response: The Council considers that clusters of food and drink uses (A3, A4 and A5) can lead to an over concentration of uses associated with the evening economy which, as well as leading to 'dead frontage' during the day, can impact on the character, appearance and perception of an area, as well as its ability to meet the needs of local people for goods and services. Therefore this policy has been retained, however it has been expanded to refer to food and drink uses more generally and the accompanying text has been added to, to further explain the reasoned justification for it.

##### 170/5: Part 3: Proposals nearby Schools and Parks/Playgrounds

Part 3 to Policy TC10 states that proposals for hot food takeaways outside designated centres will be resisted, where the premises fall within 400m of the boundary of an existing primary school, secondary school, park or playground boundary. This forms part of the Council's commitment to improving health and tackling childhood obesity. It is agreed that it would not be appropriate to apply this policy to proposals within existing designated centres. However, it is also considered that edge of centre sites which are allocated for redevelopment should be excluded. It would clearly be inappropriate to prevent a scheme including a hot food takeaway element from coming forward on a site allocated for redevelopment on the edge of centre – particularly given the regeneration benefits which could be delivered, and importance attached to economic growth in the NPPF.

In addition, it is important that the Council takes into account the nature of the offer provided by proposed new hot food takeaways and drive-through restaurants, as well as their target catchments. Many food and drink operators have significantly improved the nutritional value and range of products on their menus in recent years. They also attract customers from beyond their immediate walk-in catchment, particularly where a drive-through facility is provided. It would be wrong to assume that all such uses will automatically lead to poor health and obesity in the local area, and indeed the NPPF does not provide any support for such an approach.

It is therefore essential that Policy TC10 provides a more flexible framework for assessing the impact of such proposals on health.

## Proposed Amendments to Policy TC10

Taking into account the above comments, we would propose that the proposed Policy TC10 of the draft Regeneration and Environment LDD be amended as follows:

1. To protect residential amenity and existing investment in established industrial and business areas, proposals for hot-food takeaways will be directed to suitable and available units within town, district, local and neighbourhood centres, as well as edge of centre sites and those allocated through the Local Plan for such uses. Where appropriate, any planning permission will specify the hours of operation of the takeaway premises in order to manage late night opening. The need for restrictions on the opening hours of such uses will take into account their location (including whether they lie within/on the edge of an existing centre), the nature of the use, the likely impacts, in terms of noise, fumes and visual appearance, and any existing and proposed mitigation measures.
2. The Council will not support proposals for hot food takeaways (excluding drive-through restaurants) that would result in an over-concentration of that use in an area or a continuous grouping of more than two adjacent units in food and drink (Use class A3, A4 or A5) use.
3. As part of the Council's commitment to improving health and tackling childhood obesity, proposals for hot food takeaways outside designated centres, and which are not on edge of centre sites or sites allocated for such uses through the Local Plan, will be resisted where the premises fall within 400m of the boundary of an existing primary school, secondary school, park or playground boundary and where the proposal would lead to a demonstrable and significant impact upon the health of the local population.

Council Response: It is acknowledged that a potential conflict existed between draft TC6 Point 5 which allocates Allens Way for town centre uses which complement the centre's offer and draft TC10 point 3 which resists proposals hot food takeaways in areas outside of designated centres within 400m of the boundary of an existing school, park or playground boundary, meaning that hot food takeaway would not be considered appropriate in this location. However, this was a unique issue and as this site has now been developed it is not considered necessary to revise the policy more generally.

### 171 Tablerone Ltd

H1 - Housing Allocations

171/0: Development of land at Leeholme Road amounting to 30 units will make little contribution to the overall housing needs of the Borough and does not reduce the need to identify further strategic housing allocations such as that proposed at West Preston or local housing need sites such as that proposed at Darlington Road Hartburn.

H1c - University Hospital of North Tees

Council Response: Comments noted and addressed in the Housing Site Selection Topic Paper.

H1f - Land off Leeholme Road

H1 - Housing Allocations

171/1: (Substantial representation submitted which includes detail of the West Preston site and a site at Darlington Road, Hartburn and justification for their allocation as housing developments. References to how the site would comply with other policies were also included in the representation.)

New Policy

Council Response: Comments noted and addressed in the Housing Site Selection Topic Paper.

H1 - Housing Allocations

171/2: The Councils inclusion of sites at University Hospital North Tees, Blakeston School and Norton schools are at risk of non delivery due to uncertainty in funding through NHS/PCT programmes and cancellation of the Building Schools for the future programme, the delivery of such sites cannot be relied upon and risk the loss of up to 426 dwellings amounting to over 5% of the total housing allocations over the Plan period.

H1c - University Hospital of North Tees

Council Response: The University Hospital of North Tees site has not been allocated for housing in the Publication version of the Regeneration and Environment Local Plan. To see how the Land North of Junction Road (former Blakeston School) and Land off Albany Road (former Norton School) sites have been assessed see the Housing Site Selection Topic Paper. Both sites are considered to be deliverable.

H1d - Blakeston School

H1e - Norton School

H1 - Housing Allocations

171/3: Whilst recognising that Wynyard still has an important role to play in housing delivery within Stockton, particularly in respect of executive housing, it is also recognised that Wynyard does not provide the most sustainable of sites particularly for family housing and the allocation of a further 1300 dwellings to be delivered over the plan period is considered to be a risk to SBC strategic aims, representing nearly 19% of the total allocation under policy H1.

H1l - Wynyard Village

H1m - Wynyard Park

Council Response: To see how the authority has assessed the Wynyard sites see the Housing Site Selection Topic Paper. The sites are attractive in a housing market context and the delivery rates are not considered to be unduly ambitious.



H2 - Housing Phasing and Implementation

171/4: Concern is expressed at the optimistic rate of housing delivery at Wynyard, with a projected build rate of 140 units per annum for the period 2023 to 2029. It is not considered reasonable to assume that this level of build will be delivered and a more reasonable (yet still ambitious) yield of 90 dwellings pa would result in a reduction of 50 units per annum reducing the dependency on this site without prejudice to long term potential.

H1l - Wynyard Village

Council Response: To see how the authority has assessed the Wynyard sites see the Housing Site Selection Topic Paper. The sites are attractive in a housing market context and the delivery rates are not considered to be unduly ambitious.

H1m - Wynyard Park

171/5: The numbers relied upon do not take account of cumulative performance, which continues to show an under performance in housing delivery, adding in these figure will exacerbate the under-supply of housing and jeopardise the economic recovery of Stockton. The Councils Core Strategy Development Plan Document Review (Summer 2011) identified a continued shortfall in housing delivery of nearly 2800 dwellings Over the period 2004 to 2028.

Council Response: Cumulative performance has been taken into account in both the allocation of housing sites and their projected delivery in the Publication version of the Regeneration and Environment Local Plan.

H1 - Housing Allocations

171/6: Development of land at Harrowgate Lane combined with the adjacent land at Yarm Back Lane suggests that nearly 2250 homes will be delivered in the plan period up to 2029 with annual yields of up to 250 homes. It is unrealistic to suggest that these numbers are achievable (they compare with the very best years of development at Ingleby Barwick) and if they were to be achieved they would put unbearable strain on existing highway network, local facilities and schools. The junctions of Durham Road/Harrowgate Lane, Harrowgate Lane/Darlington Back Lane, Darlington Back Lane/ Bishopton Way, and Yarm Back Lane/Darlington Back Lane (perhaps as the very names indicate) were never designed with the potential to accommodate development of this scale. The resultant pressure on the adjoining estates of Roseworth, Hardwick, Bishopgarth, Fairfield and Hartburn will reduce local amenity, create unwanted intrusion, resulting in additional trip generation and presenting road safety issues.

H1g - Harrowgate Lane

H1h - Land East of Yarm Back Lane

Council Response: Extensive highways modelling and designed improvements to key junctions at the following locations as part of the collaborative working have established a maximum quantum of housing that can be delivered to the acceptance of the Highways Agency and Local Highway Authority:

Elton Interchange  
Darlington Back Lane and Yarm Back Lane  
Durham Road, Junction Road and Harrowgate Lane

The delivery rates that are projected for the Harrowgate Lane and Yarm Bck Lane sites are considered to be realistic.

H1g - Harrowgate Lane

171/7: Development at Harrowgate Lane and Yarm Back Lane have little regard to the impact of the overhead power lines, and do not present limits of development that are well founded and defensible from future outward sprawl beyond the current proposed boundaries thus threatening the integrity of the open countryside beyond. As a result it is proposed to apply a modest reduction in housing production from these sites during the Plan Period.

H1h - Land East of Yarm Back Lane

Council Response: The impact of overhead power lines is being fully taken in the masterplanning of these sites. The boundary has been refined through the masterplanning process to ensure a robust and logical limits to development is drawn.

H1j - South West Yarm

171/8: Development of land at West Yarm and South West Yarm (H1i/H1j) raises significant concerns on deliverability due to the resistance to these proposals from local residents and the identified harm to local amenity, traffic congestion in and around Yarm, car parking issues, increased pressure on local facilities, impact on countryside, loss of playing pitches and harm to the character of both Yarm and Kirklevington. Over 1000 dwellings are at risk of non delivery or significant delay in development.

H1i - West Yarm

Council Response: Development of the Morley Carr Farm site has started and the Land South of Green Lane site has planning permission and is re-affirmed in the Publication version of the Regeneration and Environment Local Plan.

New Policy

171/9: For the reasons stated above Land at West Preston as identified on Plan 1 (001/24/09/12) attached, has the capacity to provide a strategic housing allocation of 2250 homes to be delivered at an annual rate of 120 units per annum, with the balance to provide continued development beyond the Plan period. The additional capacity identified will help make good the deficiency in overall supply, address the concerns of non delivery of identified sites and absorb the under supply from sites with excessive projected yield.

H1 - Housing Allocations

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

## H2 - Housing Phasing and Implementation

### New Policy

171/10: Land at Darlington Rd Hartburn, identified on Plan 3 (003/24/0912) attached is proposed for inclusion as a housing site to meet local need. Whilst the site has the capacity to accommodate a far larger number of houses, the site capacity will be limited to 38 dwellings with the balance of the land protected and made available as valuable amenity land. Owners of this site are however prepared to discuss with Stockton Borough Council alternative uses for this site including local community use or provision of local services if development of West Preston is approved.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

## H2 - Housing Phasing and Implementation

171/11: Land allocated for housing and development should be Phased and released according to an indicative Phasing Plan, including where appropriate Phasing conditions on larger sites.

The Indicative Phasing Table produced by The Council is considered to be over optimistic and over-reliant both on site allocation and more specifically on rate of development. Such failings will present a significant risk to the fundamental economic and regeneration aims of The Council.

Stockton Borough Council is urged to include the allocation of Land at West Preston as identified on the accompanying plans to address the absolute shortfall in housing numbers, the risk of non delivery of allocated sites and the over estimate of annual rate of delivery.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper.

The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.

## H2 - Housing Phasing and Implementation

171/12: The Council's stated intention is that the Release of housing sites will be brought forward if required to maintain an adequate housing land supply, the Council are urged to adopt a 20% contingency and apply a 6 year housing land supply test rather than the stated 5 year approach in order to encourage growth and stimulate development rather than impose an inappropriate brake on the rate of development that can be other wised achieved.

Council Response: Comments noted and addressed in the housing delivery section of the housing Need and Demand Topic Paper.

## SP2 - Housing Spatial Strategy

171/13: The adoption of a sequential approach to site selection (and release) is supported, with West Preston identified as a site that can deliver regeneration objectives, support communities and satisfy the housing demand in line with the Tees Valley Strategic Housing Market Assessment in accordance with Policy SP2. Darlington Road Hartburn can assist the Council in the early years of its Plan by accommodating a modest amount of development in a sustainable location.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

## SP2 - Housing Spatial Strategy

171/14: It is recognised that a site that is either brown-field or can deliver the plans and strategies of other service providers will be allowed to come forward sooner than projected.

## H1 - Housing Allocations

The restriction on allocation of land that exceeds housing requirement by more than 20% is a blunt measure and should be relaxed where other objectives of the plan are supported or not put at risk, the economic benefits of a strategic release may be dictated by the market and un-timely restriction might jeopardise the Councils overall aims and objectives.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.

## H2 - Housing Phasing and Implementation

171/15: It is suggested that the indicative Phasing Plan produced by SBC should be adjusted to take account of reduced build rates on major sites, the prospect of some sites not coming forward as planned and the need to take account of landscape features which will reduce net developable areas.

It should be noted that the larger sites need not be reduced greatly in scale, save for any reductions that may occur to net developable area to accommodate appropriate landscaping buffers, but that surplus capacity beyond that which can be sensibly delivered in the period up to 2029 will remain as a developable reserve beyond the period and assist Stockton in achieving long term sustainable growth without having to make further encroachment into the protected countryside beyond the revised limits of development. This prudent approach to housing allocation will provide certainty for both residents and developers alike.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan. Comment regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

H1a - Nifco site - Yarm Road Gateway	<p>171/16: Development of land at Nifco averaging approximately 50 units per annum will make a modest contribution to the overall housing needs of the Borough. This does not reduce the need to identify further strategic housing allocations such as that proposed at West Preston or local housing need sites such as that proposed at Darlington Road Hartburn.</p> <p>Council Response: The Nifco site has not been carried forward to the Publication version of the Regeneration and Environment Local Plan as a housing site allocation.</p>
H1b - Urlay Nook	<p>171/17: Development of land at Urlay Nook averaging less than 50 units per annum will make a modest contribution to the overall housing needs of the Borough and does not reduce the need to identify further strategic housing allocations such as that proposed at West Preston. Such an allocation should also be weighed against the loss of employment land, relationship to and impact of neighbouring employment uses, and the need to extend the Core Bus Route.</p> <p>Council Response: Comments noted. Planning approval has been granted for 145 dwellings on part of the site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication version of the Regeneration and Environment Local Plan.</p>
H1c - University Hospital of North Tees	<p>171/18: Policy H1c University Hospital</p> <p>This site should not be relied upon due to continued uncertainty in funding of a replacement facility; at best its delivery may be significantly delayed. No clear strategy exists for provision of a replacement facility and the amount of land subsequently made available for housing is unclear due to continued operational requirements. It is suggested that the scale of site is reduced by 50% and the programme delayed.</p> <p>Council Response: The University Hospital of North Tees site has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.</p>
H1d - Blakeston School	<p>171/19: Development of the school sites approximately 40 units on each site will make modest contributions to the overall housing needs of the Borough and do not reduce the need to identify further strategic housing allocations such as that proposed at West Preston or local housing need sites such as that proposed at Darlington Road Hartburn.</p>
H1e - Norton School	<p>Council Response: To see how the Land North of Junction Road (former Blakeston School) and Land off Albany Road (former Norton School) sites have been assessed see the Housing Site Selection Topic Paper. Both sites are considered to be deliverable.</p>
H2 - Housing Phasing and Implementation	<p>171/21: The Cumulative impact of both of these sites should be looked at together as they both represent significant expansion to the existing limit to development on the Western boundary of Stockton and are both incursions into open countryside. Whilst it is recognised that both have a significant role to play in meeting a housing need within the Borough it should be recognised that the sites irrespective of Phasing will have a negative impact on highway safety and the amenity of existing neighbouring communities. It is considered that Stockton Borough Council has placed an over reliance on the ability of these sites to deliver the suggested quantum of housing as well as satisfy the planned rate of development. In particular little or no regard has been taken of the impact on rates of development during the overlapping of sites which will inevitably slow housing sales and thus build rates. It is suggested that year 1 production is halved due to the lag between start on site, build and legal completion as well as lack of momentum; subsequent years should be reduced by 10 units per annum at Harrowgate Lane to reflect the overlap of Phases 1, 2 and 3 and build rates at Yarm Back Lane reduced by 20 units per annum to reflect a more reasonable build and sale rate between developers active on all of these sites..</p>
H1g - Harrowgate Lane	<p>The suggested changes reduces the delivery of Harrowgate Lane Phase 1 by 105 units in the period up to 2029, Harrowgate Lane Phase 2 is reduced by 95 units in the period, Phase 3 is reduced by 70 units in the same period and Yarm Back Lane yield falls by 205 units in the period up to 2029: Providing a reduced Yield of 475 units in the period up to 2029.</p>
H1h - Land East of Yarm Back Lane	<p>It is suggested that a defensible western edge is created on all of these developments in order to resist continued pressure for sprawl into open countryside, such a boundary may also reduce overall net developable area and therefore total site capacity and yield. Caution should be placed on development in close proximity to the overhead pylons on the western extent of the built up area requiring sensitive master-planning and design.</p> <p>Council Response: Comments noted and addressed in the housing delivery section of the Housing Need and Demand Topic Paper.</p>
H1i - West Yarm	<p>171/22: The site lies outside of the limits to development and its development will not make a positive contribution to regeneration and revitalisation of more disadvantaged areas.</p> <p>The allocation of this site for housing represents an incursion into open countryside beyond a clear limit of development. The need to allocate housing land in the Borough</p>

generally and South West Stockton in particular is recognised but it is considered that land at West Preston provides a more logical and acceptable alternative location. The site is visually intrusive both from existing residential neighbourhoods to the East and also from the wider River Tees corridor to the North and West. It is noted that the proposed allocation in the current document extends significantly beyond the area previously identified in consultation documents with land beyond Morley Carr, as far as Ash Tree cottage now included for development.

Additional development of the scale proposed will create further pressure on existing facilities and exacerbate current problems of car parking and traffic congestion in and around Yarm.

It is suggested that development, if accepted in this area is limited in scale with a maximum output or yield of 200 units (reduced from 300), allowing for the creation of a defensible western boundary and reducing the impact of additional traffic in Yarm.

Council Response: The site now has planning permission for 350 dwellings and development has started.

H1j - South West Yarm

171/23: Development of land to the immediate South of Yarm represents an unacceptable breach of a well established and defined village boundary and an incursion into open countryside. The site is predominantly open countryside, agriculture and involves the loss of existing school playing fields and sports pitches, with a designated local wildlife site at Saltergill Woods. The impact of additional traffic in this area exacerbates an existing problem creating further issues of congestion, car parking and highway safety. If development is to be located in this area the scale of residential development should be limited in scope to 350 dwellings, representing a reduction of 385 units in order to reduce impact, lessen damage to local amenity and limit impact on highway infrastructure as well as respond to the need for a high quality landscape buffer and stand off from the railway line.

Council Response: To see how the authority has assessed this site see the Housing Site Selection paper. Comments regarding the impact of development on the local highway infrastructure and the estimated dwelling capacity for the site are noted and addressed in the Yarm and Kirklevington Topic Paper .

H2 - Housing Phasing and Implementation

H1l - Wynyard Village

H1m - Wynyard Park

H1k - Wynyard Masterplan

171/24: It is recognised that Wynyard continues to have the potential to make a significant contribution to the housing needs of the Borough. Concern is expressed however at the degree of over reliance on delivery in absolute terms as well as rate of delivery. Concern has been identified on the ability of the Highway infrastructure to cope with the continued and planned development of Wynyard both for residential development as well as employment uses which could constrain future growth and impinge on delivery. The impact of Hartlepool's housing plans in the Wynyard area has not been fully taken on board by the Council as well as the negative impact on landscape character, and the need for social infrastructure. It is suggested therefore that the Council act in a more prudent manner and reduce the allocations within the combined Wynyard Hall Estate and Wynyard Park by an overall 300 units and reduce the annual output in years 2023:2029 by circa 50 units per annum to a more acceptable (yet still ambitious) rate of around 90 units per annum.

Council Response: Both Wynyard Village and part of Wynyard Park now have planning permission subject to the signing of Section 106 Agreements. The impact of development on the highway network has been assessed through the planning application processes. Both planning commitments have been re-affirmed in the Publication version of the Regeneration and Environment Local Plan.

RG1 - Regeneration and Gateway Sites

171/25: The Council's recognition that Regeneration and Gateway sites whilst important to the long term growth strategy of the Council have significant deliverability issues and therefore should not be regarded as integral to the Borough's strategic requirements such as meeting housing need and demand is welcomed and supported. The Council's continued commitment to supporting and promoting regeneration sites as a key priority is supported.

Council Response: Comments recognising the importance of regeneration aspirations welcomed. Where these aspirations are considered to be deliverable they have been identified in the Publication version of the Regeneration and Environment Local Plan and supported.

## 172 Individual

H1i - West Yarm

H1j - South West Yarm

172/1: I would like to state my surprise in the position of the Council, in that that it has deemed it necessary to revise its planning strategy only two years after adopting it. That strategy aims to deliver development in areas that would benefit the greatest. Whilst I appreciate that government policy has changed in the meantime, I do not agree that a 15-20 year strategy can be considered to be undeliverable after two years simply based upon the economic conditions of the present. It would have been preferable to pursue the adopted strategy and monitor and revise the development sites within the plan as proves to be necessary. It should be the role of the Council to plan properly to deliver the development that its local communities really need.

Overall, the document fails to set out a clear and coherent strategy for the borough to meet its identified needs in their broadest sense. There appears to be little understanding of the existing role and character of each settlement, the existing issues facing your communities and how development will help to address those issues.

The development that is being proposed simply aims to deliver more housing to meet your numerical requirements. It is a market led approach that supports opportunistic development in higher value areas, with the effect of oversupplying housing in those areas whilst failing to meet identified needs in other areas. Whilst you have identified needs through your own evidence base ( the strategic housing market assessment) you have not adequately planned to meet them. For example, there are clear housing pressures identified in Thornaby or Billingham, yet no allocations provided to meet these needs. As fairly self-contained housing markets, these needs cannot simply be met in other areas that are detached from those markets and are completely different in character. If there are no suitable, available sites within those settlements then you should seek site allocations in as close proximity as possible, even if this requires working with neighbouring authorities to meet this need outside of the borough. People do not recognise political boundaries and are more likely to want to live near their preferred areas.

Conversely, the SHMA identified limited demand for 4 bedroom detached dwellings and bungalows in the Yarm and Eaglescliffe area. There is therefore no strategic justification for promoting the level of housing that the DPD does in this area. I do not see how an additional 2600 or so houses (total permitted and proposed) of mixed types equates to providing moderate levels of 4 bedroom detached housing and bungalows (I also note that these types of dwellings are not actually specified as being required in your policies).

Development can affect different places in different ways, and it is important that the amount of housing development is appropriate in scale for the community in which it is located. In areas in need of regeneration it can provide a much needed economic boost alongside social and environmental gains that will benefit the established community and wider area more generally. However, the oversupply of housing in successful communities can actually bring negative impacts that make those areas less attractive and contribute little, if any, benefit to the local economy and existing residential population. Your focus on delivering higher value, greenfield sites will ultimately further drive down land and property values in the areas in need of improvement, making regeneration all the more difficult.

The preferred options DPD clearly no longer seeks to prioritise regeneration– it is simply a plan for housing growth through urban extension. At the very least the document should be renamed as it gives a false impression of what you are aiming to deliver. Sites in Yarm and Eaglescliffe.

As a resident of Yarm, the following comments are focused on the aspects of the document that will affect my community the greatest. Yarm and Eaglescliffe are not in need of regeneration. They are successful communities with a good mix of housing, and often rank highly in surveys taken to establish areas offering the best quality of life. People choose to live in this area because of its unique character and different housing offer to other parts of Teesside. If this special character is eroded then there will be nowhere in the borough for people who want this type of housing to live, with the consequence of driving people away into other areas (most probably 'North Yorkshire') .

The NEMS research commissioned by the Council showed an average spend of £78 per visit to Yarm Town Centre, following which proposals have been put forward to charge for parking to reduce the number of visits. This clearly demonstrates that (1) Yarm's economy does not need boosting through additional residential development; and (2) that the Council accepts the existing problem of too much traffic using the highways and parking in and around Yarm and has yet to put forward any workable solutions to deal with this issue.

As a resident of Yarm I have to contend with high volumes of traffic heading towards the High Street on a daily basis. The roads are simply overloaded with traffic, causing tailbacks from both the north and south approaches. My experience of travelling from the south of Yarm is that a journey of approximately 1 mile can often take 20 minutes. This is not confined to traditional peak hours in the mornings and evenings but also in the middle of the day and at weekends. There is insufficient parking to support the demand for the High Street, which is a significant contributing factor to this situation. However, the problems are exacerbated by visitors to Yarm from further afield. At morning and evening peak, there is significant additional traffic generated by parents dropping off/picking up children from Yarm School, which has a very wide catchment. This can be evidenced by noting the traffic flows at different points in time; this private school has different term dates to state schools and often their holidays are taking place whilst state schools remain in operation. During these periods, traffic congestion is very much reduced . In addition, the High Street attracts shoppers/diners etc. from the wider Teesside area. These visitors are of course helping to support our local economy. However, the fact is that our centre quite often does not have the capacity to support the visitors and the existing residents.

You are proposing significant housing development in and around Yarm and Eaglescliffe that will undoubtedly make the situation much worse. In Yarm, there are already 493 permitted at Tall Trees and Morley Carr Farm, with extremely limited mitigation provided (that will go no way to resolving existing issues). An additional 735 at south west Yarm would represent the total number of households in Yarm increasing by a third from what we have now. However, there appear to be no deliverable proposals to

add highway and parking capacity to support the existing residents, never mind the additional ones. The problems will be much worse once the 845 dwellings permitted at Allen's West, and 570 proposed in your plan at Uray Nook are taken account of.

Furthermore, I cannot see how the site at South West Yarm has been assessed and included as a suitable greenfield extension for 735 dwellings. Your previous consultation suggested 480 dwellings on this site, whilst the developer's own consultation suggested approximately 500. Developers are known to push their luck by cramming as many houses onto their sites as possible, signifying that even they thought 500 was the absolute upper limit for this site. The 735 appears to be based on a different calculation to other sites in the plan, although there is nothing to show how this number was arrived at. I can only assume, therefore, that 735 is a mistake. Such a high number of dwellings would be inappropriate for the site, would be out of keeping with the suburban nature of this part of Yarm and incapable of delivering good design, particularly given that a volume house builder is already associated with the site. It would result in small houses, with small rooms and small gardens alongside limited open space. It should also be noted that this site is detached from the shops and services in Yarm and there is no justification for such a high number of dwellings in such an unsustainable location.

In addition, there are no proposals to provide additional convenience retail and facilities to support the additional housing. I can only assume that you envisage the new population crawling in their cars to the High Street to do their shopping. The reality is that I (and others) already often choose to shop outside the borough (for example Middlesbrough) as it takes me less time to get there with less hassle than going to the High Street or beyond (Tesco Eaglescliffe) or to the next nearest supermarket at Ingleby Barwick. Your DPD is likely to increase this unsustainable pattern of travel, unnecessarily impacting on the environment, and would also result in money leaking out of the borough to support other local economies.

I understand that this proposal is driven, in part, by the desire of Yarm School to relocate their playing pitches to land on the opposite side of the river from where they are now. This is a ridiculous proposal, which would benefit the privileged few whilst significantly damage the character of the historic cores of Yarm and Egglecliffe Village, and lessen their attractiveness to visitors and residents alike. The noise associated with playing pitches would notably harm the amenity of occupiers of properties in Yarm and Egglecliffe. It would also set a dangerous precedent for development on that part of the river bank. This would clearly be contrary to adopted Policy CS10, which offers protection to land that is of environmental importance (specifically the land where the pitches are proposed). I note that this policy is not subject to review and the playing pitches do not form part of your proposed plan; as such any proposals to develop this area would warrant an immediate refusal.

In any case, it would make much more sense to relocate Yarm School to the proposed housing site, thus freeing up the land they currently occupy for a more sustainable housing development. This would also free up highway capacity by removing the traffic associated with the school from the route to the High Street. This would be a proper planning intervention as opposed to merely supporting the market led approach of developers and their agents. If, however, the site is to be developed as envisaged in your DPD, Yarm School should be required to relocate their pitches to a less sensitive area, and take measures to reduce the level of traffic they generate.

It should also be noted that Yarm residents already pay the highest rates of Council Tax in the borough, yet have few facilities (e.g. leisure) within the town and must travel to Stockton, Thornaby or Billingham to use what is on offer there. There is nothing in the plan to show how the money generated from the existing and proposed residents of Yarm, including New Homes Bonus, will be spent in our area to support our needs/demands and reduce our need to travel.

As the plan stands, it will be of great detriment to the existing residents of Yarm and the town itself. I strongly urge a downward revision in terms of housing numbers, preferably with the removal of the sites to the south west of Yarm and Uray Nook.

Alternatively, if you insist on pursuing the additional housing then number of dwellings should be reduced. You should also properly plan for mitigation through increasing highways capacity, increasing car parking within Yarm and/or by taking measures to reduce traffic. Therefore, I request that you take measures to provide a new relief road; remove the school traffic associated with Yarm School; or provide better shopping and leisure facilities to the south of the town. Best of all, do all three. This is your opportunity to get developers to pay for what is needed. If the housing is allowed without seeking such improvements then ultimately Council funds will be required to resolve the issues in the long term, which would be a clear failure of the Council's financial responsibilities.

Council Response: Comments regarding the character of Yarm, traffic, parking, the planning application to develop land north of the Tees and the estimated dwelling capacity for the South West Yarm site are addressed in the Yarm and Kirklevington Topic Paper .

The decision to no longer to rely on brownfield regeneration sites in the Core Area was taken in the context of a number of factors. These included current economic circumstances but also site specific issues such as flood risk, the potential for contamination and availability as well as reductions in the overall public funds to support

regeneration schemes. Given the emphasis in national policy on housing delivery it is not realistic to rely on these sites as a key element of meeting the housing requirement.

There are no suitable, available sites within the settlements of Thornaby and Billingham. Neighbouring local authorities have their own planning strategies to deliver their housing requirements and face their own challenges in meeting their requirements. It is unrealistic that that they would consider having part of the Stockton-on-Tees housing requirement exported to them. Comments regarding the spatial distribution of housing need and demand are addressed further in the Housing Need and Demand Topic Paper.

It is acknowledge that in areas in need of regeneration, housing can provide a much needed economic boost alongside social and environmental gains that will benefit the established community and wider area more generally. The Stockton-on-Tees Housing Strategy continues to support housing market renewal schemes such as the Swainby Road redevelopment. However, it is not feasible to meet the housing requirement without allocating greenfield sites in urban fringe locations.

Consideration has been given to the role of existing settlements and their housing needs. For example the largest allocation is the Harrowgate Lane site which has the potential to contribute to meeting the need for affordable dwellings which is highest in the Stockton housing sub division. The Wynyard allocations acknowledge the well-documented successful role of Wynyard in contributing to the Tees Valley executive housing offer and also the potential of the Key Employment Location to anchor the creation of a new settlement which will contribute to addressing the lack of amenities in the area. It is acknowledged that the allocations include higher value areas. This reflects both the emphasis in the NPPF on delivery and the Council's aspirations for economic growth.

The SHMA shows that demand exceeds supply for 4+ bedroom and detached properties and for bungalows in the Yarm, Preston and Eaglescliffe housing sub division. The highest overall housing need and demand is identified in the Billingham and Stockton housing sub divisions. The Wynyard Park allocation is close to the Billingham sub-division and may reasonably be expected to address some of this need. The need identified in the Stockton housing sub division is acknowledged by the Harrowgate Lane and Yarm Back Lane allocations. However, taking into account projected housing delivery rates, it is unrealistic that the Borough's total housing requirement can be met in or near the areas identified as having the greatest overall need in the SHMA.

The Yarm School site has previously been the subject of a planning application to redevelop it for housing. A number of site specific issues were identified that would have to be addressed before any scheme could be accepted as suitable by the planning service. These included flood risk, listed building status, Conservation Area status, trees, ecology and archaeology. Moreover since this time there has been significant capital investment in the site in order to enhance it as an education facility. It would not appear therefore, that there is a reasonable prospect of the site becoming available for housing redevelopment.

## 173 Individual

H1k - Wynyard Masterplan

173/1: 1. Principle of development at Wynyard

H1m - Wynyard Park

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1l - Wynyard Village

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton’s Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the ‘Core Area’. An approach I would support and thus welcome Stockton’s Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central……sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

173/2: 2. Development at Wynyard Park

H1m - Wynyard Park

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

H1l - Wynyard Village

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is



unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

173/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1m - Wynyard Park

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

H1l - Wynyard Village

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.

- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

173/4: 4. Conclusion

H1m - Wynyard Park

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1l - Wynyard Village

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

## 174 Individual

h1k - Wynyard Masterplan

174/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

h1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation

however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

174/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

174/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium

landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape.” This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

174/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 175 Individual

h1k - Wynyard Masterplan

175/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

h1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton’s housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton’s Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the ‘Core Area’. An approach I would support and thus welcome Stockton’s Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

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1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

175/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

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h1k - Wynyard Masterplan

175/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

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h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduced for a number of years.
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- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.



3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

175/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

h1l - Wynyard Village

h1k - Wynyard Masterplan

176/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Council's overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

h1m - Wynyard Park

176/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1k - Wynyard Masterplan

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base the allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land is unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park

housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

176/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1k - Wynyard Masterplan

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re-planted as a compensatory measure would take time to develop and thus the capacity sink would be reduced for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

176/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1k - Wynyard Masterplan

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 177 Individual

H1k - Wynyard Masterplan

177/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options

document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

177/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in

fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

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Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

177/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a

negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

177/4: 4. Conclusion

H1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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178 Individual

h1k - Wynyard Masterplan

178/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.



1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

h1l - Wynyard Village

H1m - Wynyard Park

178/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be

reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

178/4: 4. Conclusion

H1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 179 Individual

h1m - Wynyard Park

179/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1k - Wynyard Masterplan

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

179/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1k - Wynyard Masterplan

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

179/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1k - Wynyard Masterplan

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

179/4: 4. Conclusion

H1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1k - Wynyard Masterplan

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

180 Individual

h1l - Wynyard Village

180/1: 1. Principle of development at Wynyard

h1k - Wynyard Masterplan

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1l - Wynyard Village

180/2: 2. Development at Wynyard Park

h1k - Wynyard Masterplan

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park



h1m - Wynyard Park

is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1l - Wynyard Village

180/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall

Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1l - Wynyard Village

180/4: 4. Conclusion

H1k - Wynyard Masterplan

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 181 Individual

h1m - Wynyard Park

181/1: 1. Principle of development at Wynyard

H1k - Wynyard Masterplan

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1l - Wynyard Village

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the

urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

181/2: 2. Development at Wynyard Park

H1k - Wynyard Masterplan

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1l - Wynyard Village

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

181/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1l - Wynyard Village

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already

had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1m - Wynyard Park

181/4: 4. Conclusion

H1k - Wynyard Masterplan

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1l - Wynyard Village

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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182 Individual

H1k - Wynyard Masterplan

182/1: 1. Principle of development at Wynyard

H1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant

proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour. So proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard would tend to deflect growth away from more sustainable more central sites. The Inspector also stated in paragraph 3.103 'Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport'. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

182/2: 2. Development at Wynyard Park

H1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

H1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated 'in order to assist in the regions accelerated economic growth'. In addition in paragraph 7.1.10 the council states 'The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance'. This sub regional significance

was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states. Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

New Policy

182/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

H1l - Wynyard Village

H1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.

- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife



including Deer, Badgers and vole species.

- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a 'poor use of environmental resource'. When discussing the Wynyard Park proposal the Council states 'Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure'. This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

H1l - Wynyard Village

H1m - Wynyard Park

182/4: 4. Conclusion

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

## 183 Individual

H11 - Wynyard Village

183/1: 1. Principle of development at Wynyard

h1k - Wynyard Masterplan

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane

Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1l - Wynyard Village

183/2: 2. Development at Wynyard Park

h1k - Wynyard Masterplan

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over

developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1l - Wynyard Village

183/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1l - Wynyard Village

183/4: 4. Conclusion

H1k - Wynyard Masterplan

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 184 Individual

h1k - Wynyard Masterplan

184/1: 1. Principle of development at Wynyard

h1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

h1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to

one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton’s Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the ‘Core Area’. An approach I would support and thus welcome Stockton’s Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

184/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

184/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.

- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

184/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.



## 185 Individual

h1k - Wynyard Masterplan

h1l - Wynyard Village

h1m - Wynyard Park

185/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other

alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

185/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options <sup>811</sup>paper also considers Wynyard Park to be an unsustainable location for housing; I

would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

185/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

185/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 186 Individual

H1i - West Yarm

186/1: I object to the plans for proliferation of housing on the outskirts of Yarm. If the plans were to succeed the existing traffic problems would be exacerbated beyond endurance. The town lacks the infrastructure for these plans to succeed.

H1j - South West Yarm

Why has Stockton blocked plans which could have alleviated the problem?

A) Yarm School could have relocated nearer to Kirklevington thus easing the chaos which exists between 8.30 and 9.00 and negating the need for playing fields planned along the Teesdale Way.

B) The medical centre could have been rebuilt on the outskirts of town. Patients would not have had to fight for parking with the opportunities who treat the car park as overflow from the High Street.

Council Response: Comments regarding traffic noted and addressed within the Yarm and Kirklevington Topic Paper .

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## 187 Letch Lane Residents

H1g - Harrowgate Lane

187/1: We don't agree with any development either in front of our houses or behind. Behind us is a few pylons with overhead wires which is not suitable for houses beneath in front. The road is not wide enough to support extra vehicles, Harrowgate Lane is already grid locked from the junction to the Horse and Jockey roundabout. Most of the residents in Letch Lane are quite elderly and this proposal would cause them a lot of worry and stress, which they don't need, in the summer. Late summer the sun sets to the west of Letch Lane and shines into our houses, any development in front would deprive us of the sun setting and obscure the light and warmth from the sun. We all feel that it will also devalue our house value. I would also point out that we don't get any local papers delivered to Letch Lane, Stockton Post, Herald and Post etc.

Council Response: The Summerville Farm site has been granted permission subject to a s106 agreement. A Development Framework Document is under preparation which will guide development on the wider proposed allocation. The council has consulted the Councils Highways team and the Highways Agency regarding the deliverability of sites in highways terms.

To avoid noise and disturbance caused by construction planning applications include conditions where necessary, for example, to control hours of construction. Issues regarding amenity and overshadowing will be considered through the masterplanning process. Property prices are not a material planning consideration

## 188 Individual

H1i - West Yarm

188/1: No to sports pitches below Egglecliffe Village and Mount Leven Retirement Village. They would be on land already designated as part of the Tees Heritage Park and the Green Wedge. It is a wildlife haven and should be protected - deer, badgers, fox and otters have been spotted. Countryside and farmland will be destroyed. Local identity of Yarm and Ingelby Barwick lost. Leven Nank, Green Lane, Yarm Town will not sustain increase in traffic. Proposed footbridge will increase pedestrian traffic through housing estates and upset residents.

H1j - South West Yarm

Objection to any development on this site, South of Green Lane Yarm. Extra traffic from 735 homes cannot be accommodates by local roads, narrow bridge, and Yarm Town- already suffering from long traffic queues at certain times of the day.

Increased pollution - a few years ago the High Street was voted one of the highest polluted in the country.

Increased difficulty in parking - Very limited spaces now in the High Street. Increase in traffic and proposed parking fees will deter people from stopping to shop and businesses will suffer.

There is no shortage of houses for sale or rent the estate agents are full of them - so why build more.

I object to using greenfield sites when there are brownfield ones that should be developed first - regardless of cost.

Council Response: Comments regarding traffic, parking, Tees Heritage Park, wildlife, air pollution and brownfield sites noted and addressed within the Yarm and Kirklevington Topic Paper . Comments regarding housing need and demand noted and addressed within the Housing Need and Demand Topic Paper.

## 189 Individual

189/1: The following comments are personal and not on behalf of any body, but are from my experience as an Eaglescliffe resident since 1979, a parish councillor for the area since 1983, its borough councillor from 1987 to 2011 and currently Chairman of this borough's Public Transport Users Group.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

189/2: Para. 2.35 - I support the Council's preferred draft approach to designate Green Wedges and for them to be placed outside the limits to development. Strategic Policy SP4 supports "and uses and small scale development" as listed "provided they do not damage the function of the Green Wedge, which is to prevent the coalescence of communities within the built-up area by maintaining its appearance and openness." Strategic Policy SP3 supports a slightly different list of developments. It would therefore appear that in a green wedge a development would be supported if it satisfied either SP2 or SP3, but in areas outside the limits of development which are not in a green wedge recreation developments could be approved only if they satisfied SP3. While it may be understandable to allow allotments, horticulture and burial grounds (being urban fringe activities) in a green wedge but not otherwise outside the limits of development, I think that all areas outside the limits of development should be considered for "and uses and small scale development" of agriculture, forestry, footpaths, bridleways and cycleways.

SP3 - Limits to Development

SP4 - Green Wedge

Council Response: Policies have been amended to avoid conflict/confusion.

H1 - Housing Allocations

189/3: Para. 8.2 says that "The housing requirement over the period 2014 to 2029 is 8,250 dwellings", of which Policy H1 will provide sites for 6,950. "Housing trajectory work ... indicates that about 5,770 dwellings will be built within the plan period on land allocated for housing. If all of the commitments assessed as deliverable or developable are built then the total build over the plan period (2014 to 2029) will be about 9,760 dwellings." That paragraph goes on to say why it is proposed to exceed the (8,250 x 105% = 9187). Given the significant drawbacks to some of the sites in Policy H1 (please see below) zoning nearly 500 spaces more than is required by government guidelines seems unnecessary, especially as much of the greenfield land included in Policy H1 is in areas in or near Yarm which developers perceive as high demand and easily developed.

Do the calculations of "commitments assessed as deliverable or developable" include the proposed 845 dwellings on the former naval depot site at Allen's West, for which Planning Committee agreed an outline application but planning permission has not yet been give? If not, what provision is there to amend the Local Plan to take account

of this or similar supplies of housing land which have not entered into the reckoning?

Council Response: The approach of identifying enough sites to potentially provide a greater than required number of houses over the plan period is consistent with the Council's growth aspirations, the NPPF emphasis on encouraging investment in housing and the need to have a flexible housing delivery strategy should a site or sites not come forward as currently anticipated. For further comments regarding housing delivery, see the Housing Need and Demand Topic Paper.

Planning permission for 845 dwellings has been granted at Allens West and has been factored into housing supply calculations.

189/4: Para. 11.1 says that regeneration and gateway sites "are not integral to the delivery of the Borough's strategic requirements such as meeting housing need and demand" because of deliverability problems. I understand that sites originally intended for regeneration by housing (such as "the Green Blue Heart") are now considered unviable owing to the curtailment of Government funding for land remediation. While I can understand the exclusion of such sites from the rolling 5-year supply of housing land in the early years from 2014 onwards (given the time it takes to secure the remediation of land), it is wrong at this stage to assume that such land will never be available up to 2029. No-one can forecast economic conditions or government policy so far ahead. A conclusion was previously reached by the Council that such land was physically capable of remediation. To designate now for development more greenfield land to compensate for taking out of housing allocation these brownfield sites will only make it less likely that developers will ever find them economic to develop. This conurbation would be left with a "doughnut" of development round an empty core, which would discourage town-centre regeneration and increase total length of residents' journeys.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

H2 - Housing Phasing and Implementation

189/5: Policy H2 - Housing Phasing and Implementation - I support the statement in Para. 8.5 "Phasing is also required in order to co-ordinate with the provision of any necessary supporting infrastructure such as improvements to the road network and additional educational provision." Popular demand for or the ease of development of certain areas should not be reasons for allowing sooner development there before "the provision of any necessary supporting infrastructure".

Council Response: Comment noted

H1b - Urray Nook

189/6: Policies H1b, H1i & H1j - There are already severe traffic problems at peak times in Eaglescliffe & Yarm. For instance, tailbacks from the A67/A135 junction often stretch back to the Tesco roundabout and beyond (along Durham Lane) – further traffic coming along A67 Urray Nook Road from the right from the Urray Nook site would exacerbate this. In the absence of any alternative to Yarm Bridge without a lengthy diversion substantial increases in dwellings in Eaglescliffe and Yarm can only worsen the situation. I see no proposal to overcome the fundamental problem – local highway improvements at best would be superficial palliatives.

H1i - West Yarm

H1j - South West Yarm

Policy H1b proposes to develop a site at Urray Nook which, especially at its western extremities, is unsustainable in that residents will use their cars for travel to shops, schools and community facilities. Existing bus services west of Durham Lane and through to Stockton are infrequent. The walking route to Allen's West Station is circuitous. The proposed condition to Policy H1b "Improvements to pedestrian/cycle linkages ... in the new residential development to the north" would give access to that Station (via Urray Nook Crossing) only if the proposed Allen's West development goes ahead with a pedestrian/cycle link through it between that level crossing and the Station.

Any further housing development is likely to put pressure on primary school places in Eaglescliffe. I understand that currently there are only 5 vacant places and that proposed extensions to Junction Farm School are designed to cater for no more than the demand generated by the development at Allen's West approved by Planning Committee to include 845 dwellings.

Similarly, any further housing development is likely to put pressure on Eaglescliffe Health Centre. I understand that the present building was designed to accommodate the existing size only of Eaglescliffe Medical Practice.

Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Papers and the planning application process for applications in these areas.

HE2 - Character Areas

189/7: Policy HE2 – I strongly support this policy for Character Areas Yarm Road (North) and (South), Eaglescliffe. Over the years it has been difficult to resist "garden grabbing" and the replacement of houses which fitted the character of these areas by new flats.

Council Response: Comments noted, support welcomed.

HE3 - Local List

189/8: Policy HE3 – I strongly support this policy. Over the years it has been difficult to resist in Eaglescliffe Ward the replacement of houses of character which fitted the area by new flats. However, there must be provision to extend and update the Local List in Appendix 5. When I was a councillor for that ward I submitted a number of buildings which have still to be considered.

Appendix 5: Local List Buildings

Council Response: Comments noted, support welcomed. Policy within the publication draft supports the review and regular update of the Local List

HE4 - Stockton and Darlington Railway

189/9: Policy HE4 – I strongly support this policy. Hitherto, each time there has been an application affecting the course of the 1825 Stockton & Darlington Railway it has been necessary to flag up this issue. An example of the current protection problem is a wall built of stone sleeper blocks from that Railway alongside Uray Nook Road, Eaglescliffe, at West View. That wall was formerly protected when it was in the curtilage of a Listed Building, but when the plot of Layfield House was divided the wall lost this protection, being protected only by a planning condition on West View.

Council Response: Comments noted, support is welcomed.

## 190 Individual

h1k - Wynyard Masterplan

190/1: Thank you for the opportunity to make representations in relation to the proposals within the Regeneration and Environment DPD, these comments relate to the proposed development at Wynyard of which I am a resident.

h1l - Wynyard Village

1. Principle of development at Wynyard

h1m - Wynyard Park

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to

development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

190/2: 2. Development at Wynyard Park

h1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

h1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.



2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

190/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

h1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

h1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of

Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

190/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 191 Individual

h1k - Wynyard Masterplan

191/1: Consultation Response to Stockton- on- Tees Regeneration and Environment Local Development Document – Preferred Options July 2012. Thank you for the opportunity to make representations in relation to the proposals within the Regeneration and Environment DPD, these comments relate to the proposed development at Wynyard of which I am a resident.

h1l - Wynyard Village

h1m - Wynyard Park

1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Council's overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

h1l - Wynyard Village

h1m - Wynyard Park

191/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be

reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

191/4: 4. Conclusion

h1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

h1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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## 192 CPRE Stockton District

Introduction

192/1: Introduction - Para 1.3 :

H2 - Housing Phasing and Implementation

a) Because of radical development threats since the Yarm and Eaglescliffe Area Action Plan (YEAAP) was first included in the Local Development Scheme, it is essential the Plan be revisited and then placed on hold until reviewed by an Inspector in the LDF Review Examination-in-Public. In the 2007 consultation it was stated that "in the process of taking the YEAAP towards the Preferred Options stage ... "it became apparent that no significant change was scheduled within the area and the document had limited scope ...". A raft of recent large-scale housing planning applications has radically changed this point of view.

b) Following on from the 2007 consultations local stakeholders are still seeking to resist large-scale housing developments that would seriously affect the character, historic environment, landscape and countryside. There is an apprehension by the non-statutory stakeholders that the original principles of the YEAAP are being inappropriately transcended by the desire to meet housing forecasts that will threaten the historic character, vitality and the boundary green spaces of this sensitive area.

c) As you will be aware, a key concern of CPRE has been to protect green belt, green wedge and avoid building on greenfield land wherever possible. CPRE has participated at Examinations in Public where Stockton Council have stated, before an Inspector, that there was no requirement for a green belt in the area as, green wedge status conferred more than sufficient protection. It is therefore with astonishment that we see that areas such as Billingham Bottoms, Land at Ingleby Barwick and Land south of Preston Farm Industrial Estate (all green wedge) is under consideration for development. This is compounded by the fact that the Preston Farm land lies within the Tees Heritage Park whose protection is written into all Stockton Councils future plans. If the reason given for these sites inclusion is that you have no choice under central government regulations, then we would also like your assurance that you will be vigorously opposing any development on such sites.

Introduction, Evidence base: - Para 1.7 :

a) There is considerable doubt as to the soundness of the evidence base (SHLAA and SHMA) leading to the Preferred Options Housing Phasing Implementation table showing the housing requirements from 2014 to 2029.

Council Response: The Council attaches great importance to green wedge policy. Planning applications submitted to develop housing on green wedge will be assessed in accordance with the development plan and any other relevant material considerations.

The SHMA was undertaken by experienced and reputable consultants. The methodology for the SHLAA follows the relevant guidance.

SP2 - Housing Spatial Strategy

192/2: •Section 2 The Spatial Strategy

The Spatial Strategy para 2.1 :

a) Because of the considerable doubt surrounding the government's NPPF definition of "sustainable" development, especially with regard to the environmental dimension, we regard the intent of the Localism Bill allowing Local Planning Authorities to take the lead in the application of the "sustainable" term by the Council seriously taking into account the impact of so-called sustainable development on sensitive local environments.

Council Response: Comments noted

SP1 - Presumption in favour of sustainable development

192/3:

Strategic Policy SP1 - Para 2 :

a)The employed term – "unless material conditions indicate otherwise" is considered too wide a term which developers could easily circumvent within their application assessments. The NPPF does not provide sufficient definition to protect locally sensitive environmental areas. Also, devolvement down to policies in neighbourhood plans is not a practical device as many neighbourhoods are declining to become involved due to the increasing costs and time involvement required within communities in commencing a plan.

Council Response: The term 'unless material considerations indicate otherwise' is consistent with the relevant national planning legislation. The policy acknowledges that not all areas will choose to adopt neighbourhood plans by stating that planning applications will be assessed in relation to the policies in neighbourhood plans 'where relevant'.

SP1 - Presumption in favour of sustainable development

192/4: Strategic Policy SP1 – Para 3 :

a) Again, there is insufficient definition within the NPPF to determine any adverse impacts.

Council Response: This approach is consistent the NPPF.

192/5: Reasoned Justification – para 2.2 :

a) We fully support the Council's determination of balance locally between the different dimensions of sustainable dimension. However, it is essential the Council take into account the weight of opinion of the locally impacted community when it comes to determining the meaning of 'sustainability' and its wider implications on the future of the impacted area.

Council Response: The Council takes consultation on development proposals very seriously and all opinions expressed are carefully considered. However, whilst the weight of local opinion is a factor when assessing development proposals no community has a veto on development and it is not considered that the weight of local opinion is, in itself, necessarily relevant to determining whether or not a proposal represents sustainable development.

SP2 - Housing Spatial Strategy

192/6:

The Housing Spatial Strategy, Introduction - para 2.5 :

a) CPRE's comments on the housing requirement are included in the comments against Para 8.2 below.

The Housing Spatial Strategy, Introduction – para 2.6 :

a) Because of many doubts which challenge the basic need for 555 dwellings (figures rounded) per year, it is difficult to understand the Council's wish to consider the required 5% should be exceeded as they state – "this will not be regarded as a ceiling for the supply of deliverable housing land in order to ensure other objectives are met."

b) As there is no legal need or government directive to exceed the 5% buffer if there is no record of persistent under delivery (and Stockton's under delivery is not persistent) ref NPPF, para 47, it appears the above Council statement and the intention itself is superfluous and antagonistic. If there is any indicated need to increase the buffer (i.e. due to a massive shortfall of anticipated developments) during the 15 years of the Plan this could be scrutinised and addressed by use of the Annual Monitoring Review (AMR). As it stands, this statement risks giving developers more scope to push through inappropriate and unnecessary development on greenfield land.

Council Response: Comments noted and addressed in the housing delivery section of the Housing Need and Demand Topic Paper

Appendix 3: The Hierarchy of Sustainability in the Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 Update Report

192/7: Village Development – para 2.9 :

a) We strongly support the Council's sustainability hierarchy as contained in their the Planning the Future of Rural Villages in Stockton-on-Tees Borough - 2012 Update Report).

Village Development – para 2.10 :

a) We also strongly support the maintenance of Limits of Development and the principles for maintaining the Council's current approach to this feature.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

192/8: Preferred Option – para 2.12 :

a) The statement in the last sentence of this paragraph immediately contradicts the principles behind maintaining the policies set out in the original Core Strategy. (CS1, 2, 1.3 and 1.4 and 1.5)

Strategic Policy SP2 – Housing Spatial Strategy – para 1 and para 2 :

a) We agree that to meet the additional need the Council's approach will focus on sites that can deliver the spatial strategy as set out in the adopted core strategy (a strategy accepted by virtue of the Core Strategy evaluation and adoption process in 2010). We are also extremely concerned over deteriorating housing stock within the current limits to development.

b) We feel that far more emphasis should be given to redevelopment within existing older housing areas and bringing back into use abandoned properties. The absence of such a policy will only exacerbate the doughnut syndrome that is becoming more evident in many towns, and affecting Stockton in particular. Almost certainly the recession will mean that far more Central Core sites will appear in the future as businesses fail, dramatically reducing the requirement for new build on green field sites. We question whether pursuing this option of concentrating within the Core Area and remediating the land is in fact more expensive when compared with the huge cost of providing additional infrastructure, schools etc. on greenfield land. We recognise the power of the building lobby and the fact that they would always prefer to build on flat greenfield land rather than brownfield.

c) However, we must disagree with the second bullet point on the housing need and demand identified in the TVSHMA. This was a highly biased assessment produced with very little heed of the environmental and social impacts of their primarily economic based conclusions.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

Agreement that the Council's approach will focus on sites that can deliver the spatial strategy as set out in the adopted Core Strategy noted. Concern over the condition of housing stock noted.



For a discussion of issues regarding empty homes in the Borough, see the Housing Need and Demand Topic Paper.

The Council wishes to ensure that the housing requirement is met through a plan-led approach and to do so within a context of planning for growth. The approach suggested by the CPRE of relying upon windfall sites appearing in the Core Area and of planning for a continuation of the recession is not consistent with the clear expectation of the NPPF that local planning authorities plan positively for new development.

It is acknowledged that there can be significant infrastructure costs associated with greenfield development. However, the development industry is clearly of the view that, as a general rule, such sites are more likely to be viable than brownfield sites in urban areas.

The TVSHMA was undertaken by reputable consultants with considerable experience in this field and the Council does not have any reason to question their objectivity

## SP2 - Housing Spatial Strategy

192/9: The Housing Requirement – para 2.13 :

a) We assume that the housing delivery gap has been addressed in the figure of 9,760 dwellings assessed as deliverable or developable in Para 8.2 below and our comments are included below against that paragraph.

The Housing Requirement – para 2.14 : See response to para 2.6

Delivering the Housing Requirement – Sites within the conurbation – para 2.16 :

a) As commendable as it is to plan for 1,200 houses within the Core Area over the plan period, this proposal is unlikely to happen unless funding from either central government or Council/developer partnership is established to tackle the huge job of site decontamination.

b) As such, there is likelihood that the comment made in the last sentence of this paragraph will take precedence during the plan period i.e.- “this means that sites adjacent to the conurbation will be required to make up the Borough’s identified housing need”. Developers are now aware of this Council –stated policy and would prefer to opt away from Core Area sites and opt instead for green spaces adjacent to the conurbation.

Delivering the Housing Requirement – Sites adjacent to the conurbation – Para 2.17 :

a) In the search for profitability developers will be quite willing to offer some of the factors mentioned in this paragraph in order to persuade the Council to support their wish to build high cost executive houses on sites adjacent to the conurbation i.e. open green spaces.

b) We recommend the criteria for the sequential approach is made more stringent and for the Council to encourage developers to make effective use of previously developed land as per the NPPF (Core planning principle 17, bullet point 8).

Delivering the Housing Requirement – Sites adjacent to the conurbation – Para 2.18 :

a) Considerable doubt is always attached to a SHMA ,being composed by a number of self-interested individuals and organisations without any independent community or resident representative on the assessment committee. We totally agree with the need to provide more affordable housing but suggest they are built within the Core Area where most facilities are located – adequate community and shopping facilities, a transport hub and easy access to commercial properties offering employment.

b) The financial situation of today and perhaps for many years to come precludes the viability of large-scale housing estates adjacent to the conurbation, comprising the 3 bedroom and 4+ bedroom properties advocated by the TVSHMA placing . We suggest considerable doubt on the TVSHMA statement that the demand for such properties demand exceeds supply. This is not borne out by a number of independent surveys both locally and across the country.

Delivering the Housing Requirement – Sites adjacent to the conurbation - para 2.20 :

a) We are encouraged the Council states that a number of sites adjacent to the conurbation in the Yarm area would not meet regeneration objectives or support disadvantaged communities. The TVSHMA with its bias may identify an annual requirement for a number of properties both affordable and executive. The paragraph continues on to highlight the anticipated difficulties as identified by the Council's Highways team on the local road network.

b) Yarm itself is almost unique in that very little mitigation could be carried out on the constricted main road through the town, an important commuter route to nearby employment areas. A Yarm bypass would be beyond any s106 developer financial contributions and it is unlikely that in the present and perhaps future financial climate that assistance would be received from the government.

c) Existing traffic delays on the approaches to Yarm, particularly from the South, are discouraging even Yarm residents from using shops in the High Street, in favour of Northallerton. Any further development in Yarm will exacerbate this situation

Council Response: The statement in the Preferred Options that sites adjacent to the conurbation will be required to make up the Borough's identified housing need is an acknowledgement of the reality of the situation. The policy cannot be fit for purpose if it is not realistic.

Comments regarding the potential impact of development in Yarm on the local highway infrastructure are noted and addressed in the Yarm and Kirklevington Topic Paper

### SP3 - Limits to Development

192/10: Strategic Policy SP3 and SP4, Limits to Development and Green Wedge, para 2.41 and para 2.49 respectively :

### SP4 - Green Wedge

a) Both policies are quite specific in their bullet points on the development allowed in these defined areas i.e. mostly related to rural requirements. We consider this definitely does not include the development of executive housing and other housing not directly related to the rural uses as specified in the two policies

Council Response: Comments noted- policies have been amended

### T1 - Footpaths, Cycle Routes and Bridleways

192/11: •Section 3 Sustainable Transport

Policy T1, Footpaths, Cycle Routes and Bridleways :

a) As part of their policy regarding tranquillity of the countryside (and elsewhere where it exists) CPRE positively support Policy T1. Enjoyment of tranquillity is supported by the sensible placement and retention of footpaths, cycleways and bridleways. We also support any policy that reduces the dependency on private cars for accessing community facilities as well as the open countryside.

b) We strongly support the Council sustainable transport policy and cycling strategy as outlined in the 2011 – 2016 Local Transport Plan. However we believe this should be stronger and should refer to safety (in accordance with The Times "Cities fit for Cycling Campaign" which has been debated in Parliament and won wide political support) and should encourage development which is cycle friendly (e.g. provides changing/showering facilities) secure parking of sustainable transport and recognises safety and reducing conflict between the car and the cyclist.

c) In the Manual for Streets guidance para 1.61, the modern approach to road users has inverted the previous user hierarchy where now the highest priority is the pedestrian at the top followed by the cyclist and then the vehicular user. This priority and consideration for cyclists should be extended to all cyclist-user roads in the Borough.

Council Response: Support noted and comments welcomed. Manual for Streets is referenced in the Sustainable Design Guide in relation to new developments.

### SL2 - Renewable Energy Generation

192/12: •Section 4 Sustainable Living

Policy SL2, Renewable Energy Generation:

a) CPRE stands for protecting the countryside. While onshore wind energy can make a contribution to achieving the policy targets of the Government we believe this should not come at the expense of the beauty, character and tranquillity of the rural countryside. There are some circumstances and locations where the provision of wind

turbines can be inappropriate.

b) Policy SL2 quite clearly defines parameters of appropriateness with which we entirely agree. However, it is essential that such parameters are maintained and not be influenced by pressure from developers who will inevitably promote their applications based on the single issue of achieving Government targets for alternative energy. The amenities of the surrounding communities and also the wildlife in and around any proposed sites must be considered uppermost by the Council in any decision on wind energy installations.

c) We also hope and anticipate the Council will continue their compliance with their Green Infrastructure Strategy which we strongly supported at its adoption.

Council Response: Support welcomed and comments noted.

192/13: Section 5, The Economy

Employment Land, how much and where - Para 5.5 :

a) CPRE entirely support option 1 with the following comments :-

b) Despite being heavily industrialised the North Tees/Seal Sands sites are still a highly important strategic area for wildlife and plantlife specific to this landscape. As much as we encourage and appreciate the benefits such employment sites bring to our area it is still essential that habitats of all bird and plantlife are considered and protected from inappropriate encroachment by proposed industrial plant and infrastructure.

c) When previously developed land, already allocated for employment, is not immediately taken up for use as a result of present market forces but may be available for a future take-up, or become derelict, the Council should undertake to reinstate the land with green space planting. This has been very successful in areas within the region of ex-pit landspoil. It may not be a feasible exercise under present financial conditions but when Government funding regains its momentum such a policy could then followed. The cost of returning the green land to an employment status could be placed on the future purchaser as a developer's obligation to be refunded into the Council's account.

Council Response: Support for option 1 is noted.

CPRE's concerns regarding the location of important habitats is also noted. The Council is no longer pursuing land allocations in the Seal Sands area as strategic mitigation can not be identified to demonstrate the impact of these allocations.

The comments regarding planting improvements on allocated land are noted. The Council does not own any of the large industrial estates in the Borough where such schemes could be implemented. Furthermore, there is no available funding to enable such a scheme. Notwithstanding the above, the Council has previously sought remediation schemes for proposals at Port Clarence land fill site, which is currently operational.

EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

192/14: Policy EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites :

a) We support the Council including such a stated protection in their Policy EMP5 over and above the already statutory protection offered to threatened and protected species, especially the undertaking to retain and maintain undeveloped margins. However, as an extension to this mitigation CPRE would wish to suggest an arrangement whereby such undeveloped margins are offered to an appropriate nature conservation organisation along with adequate funding to continue their management in perpetuity.

Council Response: Supportive comment noted and welcomed

192/15: Issues and Options Consultation para 5.35 :

a) We entirely support option 2 in this paragraph and request the Council to ensure all efforts are made by the industrial users of employment land to improve the visual appearance of their sites to preserve the visual tranquillity of the landscape where possible.

Council Response: Support noted and comments welcomed 828

192/16: •Section 7. Provision of Facilities

Open Space, Sport and Recreation Facilities – para 7.12 :

a) CPRE, as co-founders of the Tees Heritage Park strongly support Stockton Council's protection of the boundaries and context of Tees Heritage Park. Core Strategy Policy CS10, point 7 seeks to support initiatives at Tees Heritage Park. This preferred options document designates the Tees Heritage Park outside the limits to development and within green wedge.

Council Response: Comments noted

192/17: Open Space, Sport and Recreation Facilities – para 7.13 :

a) It is part of CPRE's mission statement to promote the concept that open space and recreational facilities are a major contributor to the health, social, economic and environmental well being of communities.

b) We agree with Stockton Council that it is essential that these open spaces – green spaces, parks, treed and woodland areas and access to these facilities (e.g. footpaths, cycleways and bridleways) are attractive, safe, well managed and accessible, as the provision of and access to open spaces facilities underpins a number of Sustainable Community Strategy strands

Council Response: Comments noted

192/18: •Section 8. Housing

CPRE consider Stockton Council has ample housing land. It also has the correct strategy for regenerating its inner core. Proposing housing on its limited green fields detracts and reduces the chance of eventually using this available previously developed land in the inner core. We consider the claimed 5 year land supply gap is a poor planning base on which to base the future 15 year forecast.. Analysis of the 5 year deliverable housing supply shows that the claimed shortfall is a construct, not an objective evaluation based on an up to date assessment as at 2012.

Housing Allocations and Phasing – para 8.2 :

Please review this section in association with the attached Excel document – Appendix 1 : “CPRE interpretation of the Housing Forecast”

a) The housing requirement for the 15 years to 2028/29 is said to be 8,250 dwellings (approximately 555 dwellings per year for 15 years, or 8,325 dwellings). This forecast is based on Regional Spatial Strategy (RSS) figures arrived at in 2004 based on an assumption of annual economic growth at 2.8%.

b) That growth has not occurred in recent years and there is no evidence to suggest that it will be achieved in the future, at least in the short term. CPRE objects to this basis of calculation of the housing requirement because it is not objectively justified by reference to current circumstances. The use of this basis of calculation has a number of effects which the LDD Preferred Options document ignores or underweighs:

1.The ease with which housing loans could be obtained before the credit crunch allowed house prices to rise to an unsustainable level. As a result first time buyers needed to borrow up to 5 times their annual income in order to get on to the property ladder. This compares with a maximum of around 3 times in the previous 50 years. Thus the old figures for new household formation and purchase are no guide to the present.

2.Banks and Building Societies are now unwilling to lend to prospective purchasers of dwellings either at all or without substantial deposits which most cannot afford.

3.As a result first-time buyers are now on average in their mid-thirties and many who were able to buy are unable to move on since they are trapped in negative equity. House improvement, extensions, living at home, shared housing and other responses we presently observe are in fact happening, objectively speaking, instead of new-home aspirational purchasing or moving up some notional ladder.

4.Those not trapped in negative equity cannot borrow the funds to move or are unwilling to pay “dead” money (removal costs and fees, particularly fees calculated as a

percentage of artificially inflated house prices) in order to move.

5. There is circumstantial evidence to suggest that homeowners are choosing instead to upgrade their properties rather than move. This evidenced by the proposed relaxation on permitted development.

6. The present position is unsustainable. The evidence of the past 4 years suggests that the most likely outcome is a sustained period of house price stagnation until:

- Earnings have increased so that house prices are again within an affordable earnings multiple

- Banks and Building Societies have rebuilt their balance sheets and are again willing to lend.

7. With changing demographics in this region - an older population with fewer of working age - it is unlikely that demand would exceed supply. Also with the lack of sufficient jobs appearing in this region it is very unlikely that demand would exceed or even meet supply. Even taking into account the East to West migration caused by the decline in traditional chemicals and steel it is questionable whether the Tees Valley could support the growth aspirations of its Councils or population.

8. It should also be noted that many of the most productive and entrepreneurial home-seekers preferred to, or aspired to, live in North Yorkshire villages and commute, rather than live in the Tees Valley. A fact evidenced by the enthusiastic efforts of the North Yorks Councils in their own planning policies and documentation to attract such residents.

c) All this means the assumption that housing demand will continue at 555 dwellings per year is not objectively justified. To continue with this false assumption brings the risk that more and more additional planning permissions will be granted increasingly on green field sites (to the detriment of funding to remediate brown field sites). The lack of demand (whether on the part of first time buyers who cannot meet the lenders' income criteria or on the part of existing owners to whom banks and Building Societies are unwilling to lend) means that unbuilt planning permissions will multiply. Since these in practical terms cannot be rescinded, then developers will have ever-increasing land banks, increasingly of green field sites, to the detriment of the environment and of us all.

d) Para 8.2 states that the number of dwellings assessed as deliverable or developable in the plan period is 9,760. This represents an annual average of 650 (9,760 divided by 15). This exceeds the target of 555 dwellings by 95 per year, or 1,425 dwellings over the plan period. This is presumably part buffer and part catch-up of past under-delivery. If the target remains unrealistically and unsustainably high, then the gap between the (unrealistic) target and what is delivered will continue to grow. To address the issue by the granting even more planning permissions is not objectively justified.

e) There is evidence to suggest that other Local Authorities are rejecting the RSS targets and opting for a lower and more pragmatic forecast where appropriate in accordance with the limitations described above. For the above reasons we at CPRE urge Stockton to reject them too and substitute targets which are objectively justified by reference to the current economic circumstances in their own locality.

f) Para 8.2 states that commitments assessed as deliverable or developable over the plan period (2014 to 2019) will be about 9,760 dwellings. Following a meeting on 4 September 2012 with SBC Spatial Planning Officer Matthew Clifford we understand that this number is in principle the unbuilt dwellings from the Housing Trajectory dated 1 April 2012 (for which planning permission has already been granted) plus the dwellings listed in the indicative phasing table on page 106 of the LDD (for which planning permission has not been granted). From these two documents we have prepared a summary (see attached Excel sheet in appendix 1) which shows a total of 9,674 dwellings being deliverable in the 15 years to 2028/29, which is not 9,760 but is close. These comments are based on this CPRE interpretation of the housing forecast numbers. We consider the purported gap is insufficient justification for identifying such a large number of green fields for the purpose of large-scale housing development

g) Para 8.2 states that the housing requirement over the plan period is 8,250 dwellings. CPRE believes that this is not objectively justified (see above). Para 2.14 states that a 5% buffer is appropriate. Adding a 5% buffer (412 dwellings) results in a target of 8,662 dwellings for the plan period.

h) Para 8.2 states that the commitments deliverable or developable over the plan period total 9,760 dwellings. This is 118% of the housing requirement of 8,250 dwellings. Limiting this to 105% would mean that 1,098 less planning permissions (9,760 less 8,662) would be needed even before amending the housing requirement to an objectively justified basis as discussed above..

i) We note that a significant number of dwellings included in the 5 Year Housing Supply Final Assessment 2012-17 have been excluded from the Housing Trajectory dated 1 April 2012. It follows that all the dwellings so excluded have been granted planning permission but it is not demonstrated by the Council that these planning permissions remain valid but perhaps stalled. It must therefore follow that should a change in economic circumstances render these dwellings capable of being constructed profitably by developers, they will be built although they are not included in either the LDD Indicative Phasing Table or the Housing trajectory dated 1 April 2012.

This could result in the construction of significant numbers of dwellings in excess of the 9,760 included in the plan.

j) Bearing in mind that the plan is not yet approved and is unlikely to be so before 2014, there is a significant risk that the current flood of planning applications in the context of the government's recently announced presumption in favour of sustainable development will result in the granting of planning permissions which hindsight will show to have been unnecessary to meet planned numbers. We emphasise that the release of such a large amount of greenfield, wildlife rich sites across the Borough does not benefit from the presumption in favour of sustainability.

k) Given that the need for the plan has been triggered by under-performance it seems ironic that the direct result of the plan could be significant over-performance as the economy improves.

l) The evidence of the last few years is plain to see. The granting of additional planning permissions does not result in the construction of the target numbers of dwellings. This is because the target is unrealistically high and remains so and because potential purchasers (and developers) are unwilling to take the risk of investing in these uncertain times.

m) It is CPRE's view, particularly in the current economic climate, that housing strategy and therefore the granting of planning permissions should be based on a Plan-led approach and that wherever possible the granting of planning permissions should be deferred until the (or a) Plan is approved in 2014. This will have the added benefit of allowing time for the economy to recover. If this is impractical (and it may be given the present government's presumption in favour of sustainable development), then planning permissions granted before the plan is approved should be limited to the minimum required to comply with government policy.

n) The Annual Monitoring Review (AMR) provides a degree of control for monitoring and managing the amount of housing land released (including the required 5% buffer) and subsequently the number of dwellings built - it does not allow planning permissions to be rescinded once they have been granted. In the present financial climate those earlier planning permissions would be likely to have been granted on green field land if requested by a developer, which, sadly and perhaps irresponsibly, would be lost for ever.

o) Although for the time being it appears Councils must consider the RSS figures of as part of their development plan and apparently effect must be given to them in accordance with section 38(6) of the 2004 Act unless material considerations indicate otherwise. The Secretary of State's intention to abolish the regional strategies is clearly capable of being such a material consideration, and he would like LPAs and planning inspectors to act as though it had already happened, local decision makers can then decide for themselves how much weight they give to this material consideration.

p) It is CPRE's view is that Stockton Borough Council should reject the RSS targets and substitute forecast targets which reflect current economic circumstances. Substituting objectively justified targets may well mean that there is no shortfall in potential housing delivery during the 5 years 2012 to 2017. If there is no shortfall then the Core Strategy Review targets would still be valid and no review (other than AMR each year) would be necessary in accordance with the first bullet point in paragraph 47 of the NPPF. This in turn would mean that many of the housing numbers included in the attached Excel schedule would not be objectively justified and therefore unnecessary.

q) In the event this is not possible then it is CPRE's view that the 5% buffer should be strictly applied so as to avoid the granting of over 1,000 potentially unnecessary planning permissions on predominantly green field sites.

Council Response: The CPRE make a number of general points (not specific to the borough of Stockton-on-Tees) regarding factors affecting the housing market. These comments are noted but are not regarded as being particularly relevant to the proposed housing spatial strategy as the Government has a clear expectation that district

housing requirements are met despite the challenges presented by the current housing market.

The CPRE representation contends that many of the most productive and entrepreneurial home-seekers aspire to live in North Yorkshire rather than the Tees Valley and that this is supported by North Yorks Councils. However, the success of the Wynyard development supports the view that there is a need and demand for executive housing in the Tees Valley.

The CPRE representation refers to lack of demand for owing to factors such lack of mortgage availability. However, whilst it is well documented that there are issues in respect of mortgage availability in the housing market at the present time, these are factors outside of the remit of the local plan process.

Comments regarding the housing requirement and housing delivery are noted and addressed in the Housing Need and Demand Topic Paper.

The CPRE contend that there is a risk in the context of the presumption in favour of sustainable development that planning applications will be granted planning permission which will be shown in hindsight to have been unnecessary. The presumption in favour of sustainable development is contained within the NPPF and is part of the context within which all local planning authorities have to operate with regards both to plan making and planning decision making. If the CPRE disagrees with this context then it should address its concerns to the Government as it is not within the remit of Stockton-on-Tees Borough Council to change the NPPF.

The CPRE representation refers to planning permissions being excluded from the housing trajectory and speculates that if economic circumstances change positively then such permissions could become deliverable. Any trajectory is a point in time assessment. Where a planning permission for housing has been discounted as producing a yield this has been done on the basis of the best information available at the time. If the local planning authority does not have positive evidence that a planning permission is deliverable or developable then a yield from it cannot be included in the housing trajectory.

The CPRE representation refers to the evidence of the last few years in respect of the relationship between the granting of planning permissions and the achieving of housing targets. The last few years has seen a well documented very challenging housing market owing to the continuing repercussions of the 'credit crunch' such as lack of mortgage availability. It would not be positive planning to use these circumstances as a benchmark for the whole of the plan period. It is also noteworthy that, bearing in mind the very challenging conditions in the housing market over the past few years, the borough of Stockton-on-Tees has a very good housing delivery record.

192/19: Policy H2, Housing Allocations and Phasing - item 3 :

a) It is to be hoped the Council will adhere to its SP2 Hierarchy policy where development on brownfield sites in the Core Area and wider conurbation takes precedence over development on greenfield land. To protect existing green spaces consideration of sites adjacent to the conurbation should be strictly scrutinised, with public consultation, for provision of adequate benefits such as health or education in proportion to the size of the development and the lack of such of suitable benefits within the nearby conurbation.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.

192/20: Housing Allocations and Phasing – para 8 6 :

a) We are apprehensive over the use of the proposed 20% "headroom" referred to in this paragraph based on a questionable principle whereby housing targets for the Plan period could be exceeded. This suggestions flies in the face of the Council's carefully calculated figures produced to justify the forecasted housing allocations for the Plan period identified in Policy H1 and H2.

b) We disagree this approach strikes an appropriate balance between supporting the delivery of housing and ensuring the housing market and supporting infrastructure is not exceeded. This large amount of intended flexibility indicates an uncertainty in the Council's own housing forecast figures and their possible doubts in the trend of the housing market over the Plan period provided by the contributors to the associated SHMAA report.

General comment on present housing demand in Yarm and Eaglescliffe :

a) Based on a market demand survey for Yarm and Eaglescliffe used as a basis for the 2011 SHLAA report for this area, there appeared to be an excess in the supply of dwellings versus the demand, probably as a result of current market conditions. The survey did state there were specific shortfalls in properties with four or more bedrooms, detached houses and bungalows. The survey also indicated that the overall numerical supply of properties in this area exceeded demand by 23%. Overall, supply exceeded demand by 23%, which in our view is a significant amount".

b) With a transposition of property types by developers in favour of 4 bedroom detached houses as against 2/3 bedroom semis, this would more than cover the shortfall without the need to build a greater number of new houses. By offering the correct property type for the market requirement the developer could also improve the viability.

c) The ability to meet the housing demand as indicated in the 2011 figures leaves the LDF Preferred Options housing forecast for this area in considerable doubt. CPRE request Stockton Council to revisit their housing figures and produce a more realistic forecast.

Council Response: Comment regarding housing delivery are noted and addressed in the Housing Need and Demand Topic paper

Comments regarding housing need and demand in the Yarm area are addressed in the Housing Need and Demand Topic Paper.

#### H1b - Urray Nook

192/21: Urray Nook Road, Policy H1b :

a) Although within the Limits to Development this site will consume a large hectare of agricultural farmland. CPRE argue that recognising the intrinsic value of the wider countryside, including agricultural land, is an issue of both local and national importance. This argument is not against any development in rural areas or on greenfield sites, rather it is against the possible future consequences of removing such land forever as a vital food source in the face of anticipated shortages due to climate change. A major benefit of retaining greenfield sites with the upcoming effects of climate change is their ability to absorb vast amounts of rainfall. By converting these fields into housing developments the possibility and probability of excessive flooding into the urban environment is likely to be exacerbated.

b) Equally, CPRE request Local Planning Authorities should ensure the natural environment, including the countryside, is also protected for the sake of its character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources including soil and food production capacity and to ensure it may be enjoyed by all.

c) Because of the site's isolation we also anticipate difficulties in establishing the sustainability of the project with limited public transport access, distance from central health and education facilities and an increasing dependence on the use of private cars and the impact on the local highways.

d) We would also be very concerned, in the current economic climate, at any suggestion of developing land allocated for employment, for housing. Therefore Durham Lane and Urray Nook should be excluded.

e) Both sites are close to the airport, which is unusually quiet at the moment. Any upturn in the economy is likely to lead to increased air traffic, which will impact on these sites. The designation of Urray Nook as employment land, which could benefit from easy access to a rejuvenated airport, is practical and preferable and arguably more economically valuable to the borough as such than housing use.

Council Response: With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urray Nook allocation has not been included within the Publication Draft of the Regeneration and Environment Local Plan.

#### H1c - University Hospital of North Tees

192/22: University Hospital, Blakeston School, Norton School, Land at Leeholme

a) These sites appear to be acceptable for new housing, contributing to SBC's housing requirements without too much impact on undesignated greenfield spaces.

Council Response: Comments noted

#### H1e - Norton School



H1f - Land off Leeholme Road

H1 - Housing Allocations

192/23: Harrowgate Lane – 126 Ha of primarily agricultural land. :

H1g - Harrowgate Lane

a) Harrowgate Lane, West Stockton and land east of Yarm Back Lane when fully developed have the potential to take virtually all of the projected shortfall detailed in Council forecasts. For all the Sustainability reasons previously stated in the Council Issues and Options consultation we feel that although described as a strategic gap and as greenfields, these two sites would be the least bad option in contributing to the housing forecast figures.

H1h - Land East of Yarm Back Lane

b) Both sites are an urban extension and the nearest match to our preferred option of developing/redeveloping within the existing limits, utilising existing infrastructure. In our view, any development outside the limits should take place on this site. This will protect Stockton from piecemeal development in the future which could prove to be “the thin end of the wedge”. As a result we decline to commit to any other site as, for the reasons stated above, we do not think the requirement will ever arise.

Council Response: The strategic urban extension to the west of Stockton will make a very important contribution to meeting the housing requirement. However, the Council has recognised that in order to have a flexible housing delivery strategy other sites have also been allocated.

H1 - Housing Allocations

192/24: Land East of Yarm Back Lane :

H1h - Land East of Yarm Back Lane

a) Please see previous paragraph on the probable suitability of this site as an urban extension. Potential large-scale development of this whole area of Harrowgate Lane and Yarm Back Lane will have a considerable impact on the A66 Elton Interchange. Care should be taken not to sacrifice more green fields in providing a new access to the A66.

Council Response: Comments noted. No guarantee can be offered that highway mitigation measures will not involve the loss of greenfield land.

H1i - West Yarm

192/25: West Yarm – Morley Carr - para 8.88 :

a) Planning permission has already been agreed by the Council. It should be noted this application was outside the Limits to Development and appears contrary to the use of such land as per Strategic Policy SP3 - Limits of Development, in which such developments as Morley Carr (and South West Yarm) in Yarm do not conform to any of the bullet points contained in the policy.

b) As pointed out in the earlier Issues and Options consultation one of the main concerns was that development of West Yarm would have an adverse impact on traffic. It was considered that the highway is highly congested and that no development should be allowed that exacerbates traffic problems, parking and through flow. Respondents considered that the highway infrastructure would be unable to cope with further traffic congestion and that Yarm does not have the capacity to accommodate the vehicles arising from more housing.

c) As these I & O responses were obviously disregarded it is essential the Council take into account this very cogent observation when considering other planning applications within the Yarm area. Although each planning application is considered on its own merits it is essential the Council consider cumulative effects of future applications on all current aspects of Yarm itself with its limited road capacity, community, health and educational facilities.

Council Response: The planning permission was granted for the reasons stated in the officer report. The Council's preferred approach is to amend the limits to development as required by the housing site commitments and also housing site allocations in the Regeneration and Environment Local Plan. No Issues and Options responses on any subject have been disregarded. All have been taken into account alongside all of the other factors that the local planning authority needs to take into account such as technical issues, sustainability appraisal and housing requirements. It is acknowledged that the cumulative impacts of planning applications need to be taken into account through the planning application process and they are.

H1j - South West Yarm

192/26: South West Yarm – para 8.98 :

a) A planning application has now been submitted for 735 houses. (Paragraph 8.98 in the Preferred Options document states a yield of 480 dwellings). Our comments in the above paragraph above also directly relate to this new application. Table 4.8D of the Tees Valley 2012 Strategic Housing Market Assessment states that supply and demand for dwellings in Yarm/Preston/Eaglescliffe are in balance other than in relation to bungalows and detached houses with four or more bedrooms and that the

imbalance is not acute? Is this correct and if so why are developers pushing for 4+ bed detached houses?

Council Response: Comments regarding the estimated dwelling capacity for the Land South of Green Lane site (South West Yarm) are noted and addressed in the Yarm and Kirklevington Topic Paper . Comments regarding housing need and demand are addressed in the Housing Need and Demand topic paper.

#### H1l - Wynyard Village

192/27: Wynyard settlement – Policy H1l, Western extension :

- a) The proposed extension to Wynyard Village involves the clearance of the Black Squares Plantation. The plantation runs adjacent to the Wynyard Woodland Park Walkway, an extremely important recreational area, offering healthy walking benefits to residents of the Borough as well as being a considerable tourist attraction.
- b) It is considered building housing so close to the Walkway without the benefit of screening from natural tree growth will reduce the visual amenities of those using the Walkway and remove the effect of peace and tranquillity experienced when using the Walkway. It should also be noted that in reducing the area of a wooded plantation it takes away the natural and mutual wind protection offered by the plantation as a whole. This is exacerbated when the bulk of trees are removed to leave a narrow belt of trees, supposedly to protect the visual amenities of an adjacent popular feature. It is inevitable such a narrow belt would suffer greater loss due to wind conditions and would be unlikely to survive for the duration of the Plan period.
- c) The suggestion of replacement planting to mitigate any loss of tree cover at the Black Squares Plantation would produce very little protection of visual amenities for the Walkway over the duration of the Plan period.

Council Response: Issues relating to Wynyard are noted and addressed in the Wynyard Topic Paper.

#### H1k - Wynyard Masterplan

192/28: Wynyard settlement – Policy H1k Wynyard Masterplan :

- a) As mentioned in the above response to para 2.21, 2.22. and 2.23, the existing substantial Wynyard settlement has already been described as being an extremely low scorer in the hierarchy of sustainability (Planning the Future of Rural Villages in Stockton on Tees – Executive summary 2008), with a sustainability score of 22 and with very little improvement in facilities since that date. It can only be hoped that benefits from the new development would raise the level of sustainability.
- b) It is possible a suitable mitigation project for improved access onto the A19 may involve a further loss of green space. The last bullet point in the Policy paragraph 2 refers to “The management and maintenance of Wynyard Hall, the Parkland of Special Historic Interest and any other heritage asset in the area”. As Wynyard Hall an entirely privately owned concern it is to be hoped there would be no financial contribution from the Council towards the management and maintenance of the property other than on adopted infrastructure.

Council Response: Comments regarding Wynyard and sustainability noted. It is acknowledged that a suitable mitigation project may involve the loss of greenfield land. Comments regarding the management and maintenance of Wynyard Hall, the Parkland of Special Historic Interest and any other heritage asset in the area noted.

#### H1m - Wynyard Park

192/29: Wynyard settlement – Policy H1m, Wynyard Park :

- a) The placement of 1,000 dwellings and mixed-use development on the north side of the A689 would create considerable road infrastructure problems unless there is a radical highway proposal put in place as a part of the SBC Wynyard Masterplan.
- b) Section 110 of the 2011 Localism Bill requires that local planning authorities should cooperate on “strategic matters” defined as “sustainable development or the use of land that has or would have significant impact on at least two planning areas”.. The NPPF paragraph 178 sets out this Duty to Cooperate. We suggest that Stockton Borough Council make every effort to cooperate with Hartlepool Borough Council in producing a further Masterplan that covers the SBC housing proposals and future HBC housing proposals for this particular area. By doing so it may be possible to lessen the impact on green spaces when viewing a cooperative approach to the local roads and A689 and A19 highway infrastructure that would be needed to support such large proposals.

Council Response: Issues relating to Wynyard are noted and addressed in the Wynyard Topic Paper.

192/30: Section 9. Environmental Protection and Enhancement

Introduction. para 9.1 :

a) CPRE strongly supports the Council's undertaking to protect and enhance green infrastructure as a priority, including the Borough's parks, greenspaces, water bodies and trees. We would wish the Council in this section in the final LDF Review document to also add protection of the Tees Heritage Park, already regarded and supported by the Council as an essential green infrastructure.

Council Response: Comments noted. It is considered that when read as a whole the plethora of policies contained within the Local Plan provide ample protection of the land forming the Tees Heritage Park i.e designated as green wedge, outside limits to development and forming a green infrastructure network. However, a specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

#### ENV1 - Green Infrastructure

192/31: Policy ENV 1 – Green Infrastructure :

a) We consider item 2 in the policy does not offer the degree of protection to valuable green spaces that once delivered for development have no chance of being replicated to the same extent as the original as suggested. An example is the threat to a portion of the Tees Heritage Park by the Mount Leven Retirement Home proposal. Once the land is given over to the developer the whole context of the Tees Heritage Park would be damaged. Other areas of the Green Infrastructure across the Borough could be similarly affected as being impossible to replicate elsewhere. Such areas are only briefly identified in the Green Infrastructure Strategy and should indeed be strongly protected within the LDF policies (not just in assessments, strategies and guidance) by specific name and location, especially the Tees Heritage Park.

Council Response: This policy has been significantly amended from the policy presented at preferred options stage. The policy seeks to deliver a strategic approach to Green Infrastructure by protecting and enhancing the Green Infrastructure network. The Tees Heritage park forms part of the green wedge and green infrastructure network and is therefore covered by this policy. In addition, a specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

#### ENV3 - Local Sites

192/32: Sites of local importance. para 9.27 :

a) Although mentioned elsewhere in the document it is noted that this particular list of specific designated sites (Sites of Local Importance) within the borough does not include the Tees Heritage Park by name. We consider it is essential this Park be included in such a list to prevent developers claiming ignorance of its importance by such an omission.

b) The Tees Heritage Park is strongly supported by Stockton Borough Council and is very active in the partnership which has developed the Park. Recognition and protection of the Park in LDF policies would be greatly appreciated by other members of the partnership and those residents who use the Park as a part of their recreation.

Policy ENV3 – Local Sites :

a) We consider ENV3 has the same looseness as ENV1 in protecting those sites that are regarded as unique. We do not believe there is any housing development proposal that could possibly supersede some of the unique Local Sites in the Stockton Borough. Again, we use as a prime example the potential for the Mount Leven Retirement Home proposal to completely damage the context of the Tees Heritage Park. Such sites, locations and habitats should be protected by policies contained within the LDF.

Council Response: Numerous of the sites listed within the list of sites of local importance are located within the Tees Heritage Park. In accordance with the NPPF the council must include a criteria based policy concerning locally designated sites. The sites covered by policy ENV3 are those meeting the criteria to be designated as local sites. Numerous local sites fall within the Tees Heritage Park. Delivery of the Tees Heritage Park is supported through the Core Strategy and the Regeneration and Environment Local Plan seeks to protect the sites as green wedge, outside the limits to development and as a green infrastructure corridor. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

192/33: Rural Environment - Introduction para 9.68 :

a) We strongly support the countryside and environmental protection as contained in the Core Strategy through Policy CS10 (Environmental Protection and Enhancement) which seeks to maintain the separation between settlements and recognises the amenity value of Strategic Gaps, Green Wedges and the Limits to Development.

Council Response: Comments noted

192/34: Section 11. Regeneration and Gateway Sites

a) As enthusiastic supporters of the current housing strategy (concentration on the blue/green heart) we are bitterly disappointed at its possible abandonment, particularly since it is basic to the whole future of both Stockton on Tees and greater Teesside and was so recently adopted by the Council.

b) We understand the new financial constraints that the current economic crisis is imposing on Councils, but feel that it is important that very long term strategic ambitions should not be abandoned for short/medium term gain.

It is our contention that remediating despoiled land and providing necessary infrastructure, is crucial to the future of the Tees Valley and indeed the North East as a whole. It is one of the key factors holding up development in the area, heavily influencing its image.

c) As construction/civil engineering is one of the few industries that is still fairly labour intensive, we consider it would be an appropriate area for government to direct the very limited funds it has at its disposal to try to alleviate the effects of the recession. Remediating spoiled ex-industrial land could be beneficial to redevelopment of the area, provision of town-based sustainable housing and, at the same time, employing experienced manpower already available in the area seeking rewarding work. If the North-South divide is ever to be bridged it is essential that this problem is faced up to, and the image which has bedevilled the area for generations is dispelled once and for all.

d) We appreciate that this is not within the Council's gift in present financial circumstances, but would like your assurance that it is still a key policy objective for Stockton in the foreseeable future. It is hoped that you will continue to press central government for its implementation as a "New Deal" for both the Stockton area and perhaps the launch of a similar concept across the country..

e) The near abandonment of the Blue/Green Heart building programme at the Marshalling Yards is a tragedy, as it could have transformed Teesside for ever. It is critical this policy is not abandoned. We would also surmise that because the Yards have been used for this purpose for so long it is possible that this area is far less polluted than some of the other previously developed chemically polluted land at the Core, and therefore less expensive to remediate.

Council Response: The Council has not abandoned its long term strategic ambitions. The Council acknowledges the benefits of environmental remediation to improve the image of the Tees Valley. However, such work is expensive and the funds are not currently available. The Council has been pro-active in bidding to the Regional Growth Fund when it has seen opportunities to do so but the Government's overall funding priorities are not within the remit of the Council. The consultation on which comments were invited is specifically in relation to the Regeneration and Environment LDD Preferred Options document. If the CPRE wishes to contend that the Council should push for a 'New Deal' for the Stockton area, then such comments should be addressed to the Chief Executive.

192/35: Document attached – Appendix 1 : CPRE interpretation of the housing forecast 2014 - 2029

Council Response: Comments noted

192/36: Guiding the location of development: Strategic Gaps, Green Wedges and Limits to Development, Introduction – para 2.26 :

a) We are in agreement with the retention of Strategic Gaps, Green Wedges and Limits to Development as expressed in Core Strategy Policy CS10 and further strengthened in Strategic Policy SP3 and Strategic Policy SP4.

b) However, the 2011 SHLAA report, para 2.17 and 2.18 appears to allow planners the possibility to remove some Green Wedges from the implied protection of zero housing potential by allowing them the flexibility in allowing a site for development when taking into account other aspects of the Spatial Strategy. We consider this allowance should be reversed to retain the protection for all Green Wedges, whether within the Limits to Development or outside the Limit to Development.

Council Response: Support for Strategic Gaps, Green Wedges and Limits to Development welcomed. The SHLAA report does not affect the status of Green Wedge and amendments to the designations are considered through the plan preparation process.

192/37: New sustainable settlements – para 2.21 and 2.22 :

a) The existing substantial Wynyard settlement has already been described as being an extremely low scorer in the hierarchy of sustainability (Planning the Future of Rural Villages in Stockton on Tees – Executive summary 2008), with a sustainability score of 22 and with very little improvement in facilities since that date. We consider the addition of a further proposed 1300 dwellings may offer a reasonable improvement in the availability of both commercial and community facilities for both the proposed and existing communities in such an isolated location.

New sustainable settlements – para 2.23 :

a) The existing Strategic Road Network in the Wynyard area presents an important transport hub already overloaded with the existing traffic during rush hour periods. The Highways Agency has also identified additional housing development and increased employment dominated developments would exacerbate this situation. It is possible a suitable mitigation project for improved access onto the A19 may involve a further loss of green space

Council Response: Issues relating to Wynyard are noted and addressed in the Wynyard Topic Paper.

Concerns regarding the local highway network are valid have been explored before the Regeneration and Environment Local Plan progressed to the Publication stage. At the publication stage the Council's Infrastructure Strategy and Schedule identifies what additional infrastructure will be required to deliver the site allocations.

It is acknowledged that it is possible that highway mitigation measures could require the development of some land that is currently greenfield.

SP2 - Housing Spatial Strategy

192/38: Strategic Policy SP2 – Housing Spatial Strategy – para 3 :

a) We entirely agree with para 3 on the site selection process. However, the reference to a sequential test approach in prioritising previously developed land in the Core Area sites is a limited one-sided statement of intent - the adoption of this hierarchy is entirely dependent on the will of the developers. It would appear they have no wish to follow this hierarchy. Developers prefer to avoid previously developed sites in their preference to build on the green spaces of the town's boundaries. This is a commendable Spatial Strategy policy but entirely impractical under the circumstances.

Council Response: It is acknowledged that, as a general rule, developers prefer greenfield sites in urban fringe locations to brownfield sites in the conurbation. For this reason it is not realistic to rely on brownfield sites in the conurbation to meet the housing requirement. However, it is considered that it is still important to state that the Council's preference is for brownfield sites within the conurbation and to incorporate this into a site selection hierarchy.

193 Taylor Wimpey UK Ltd

SP2 - Housing Spatial Strategy

193/1: These representations are put forward on behalf of Taylor Wimpey UK Ltd and follow detailed consideration of the Council's Regeneration & Environment LDD - Preferred Options and the background documents that have informed its preparation, including:-

H1 - Housing Allocations

- The National Planning Policy Framework
- Core Strategy Review – Issues & Options
- Tees Valley 2012 Strategic Housing Market Assessment
- Stockton Strategic Housing Land Availability Assessment 2011
- Housing Supply in the Borough of Stockton-on-Tees - 5 Year Deliverable Housing Supply Final Assessment: 2012 – 2017
- Stockton on Tees Green Infrastructure Delivery Plan – 2012
- Landscape Character Assessment & Capacity Study

The representations relate in particular the proposed Housing Spatial Strategy, The Council's Housing Requirements and the Proposed Housing Allocations as set out within the LDD. In particular, this response sets out the need for a higher housing requirement (and additional housing allocations) and the need for a wider mix/range of viable housing sites to create choice and competition in the market to ensure that the full, objectively assessed market and affordable housing needs of the Borough are met in full.

To this end, these representations identify the role of Land at Preston Farm as a sustainable urban extension to create a mixed housing development, to compliment the strategic scale housing allocations, and its scope for inclusion into the Regeneration & Environment LDD.

Council Response: Comments noted.

## SP2 - Housing Spatial Strategy

### 193/2: THE HOUSING SPATIAL STRATEGY

#### Range of Housing Sites

- 2.1 In principle, Taylor Wimpey UK Ltd generally support the proposed Housing Spatial Strategy in particular the decision of the Council to provide/allocate a range of housing sites to deliver a wide choice of high quality homes over the plan period instead of a single large site.
- 2.2 The Tees Valley SHMA (2012), even at the broad sub regional level, identifies a number of differing housing sub areas within the Borough with their own individual issues of supply and demand both in terms of existing stock and future requirements. The proposed provision of a range of housing sites to serve the overall needs of the Borough and the specific needs of certain sub areas accords with the advice laid down in the National Planning Policy Framework to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'.
- 2.3 However, it is considered, having regard to the scale of the housing requirement (see section below), that a number of the sites proposed to be allocated have infrastructure constraints and complex land ownership arrangements, and a wider range of 'smaller' (less than 400 dwellings – around 5 years worth of building with 2 developers) housing sites should be provided for in addition to the strategic sites. This would ensure choice and competition in the market and to ensure a steady supply of new housing over the plan period.

Council Response: The range of sites that have been allocated or had planning commitments re-affirmed is wide. The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

## H1 - Housing Allocations

### 193/3: THE HOUSING REQUIREMENT

- 3.1 The National Planning Policy Framework, at Section 6 (Delivering a Wide Choice of High Quality Homes), makes it explicit that local planning authorities should 'boost significantly the supply of housing' through a number of means, including:-  
'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs of market and affordable housing in the housing market area, as far as consistent with the policies set out in this Framework, including key sites which are critical to the delivery of the housing strategy over the plan period' (Paragraph 47 NPPF (2012))'
- 3.2 Since the adoption of the Council's Core Strategy in 2010, a further Tees Valley Strategic Housing Market Assessment (2012) has been carried out that provides an up to date position in respect of housing needs and aspirations in respect of market and affordable provision.
- 3.3 The results of the SHMA in respect of the Borough's Affordable Housing Requirement of 560 dwellings per annum are acknowledged at Section 8.145 (Page 138) of the Preferred Options. However, the document then goes on to explain that the Council's housing strategy being taken forward has a target of only 110 affordable dwellings per annum as this is 'realistic'. It sets out that the anticipated delivery is based on a mixture of the amount of affordable housing (15-20%) from market-led housing schemes and the delivery of affordable housing from the National Affordable Housing Programme ('assuming it is renewed').
- 3.4 The proposed approach to affordable housing, assuming the allocated market housing sites can viably deliver 20% affordable housing and in the face of significant uncertainty over the publically funded affordable housing schemes, would amount to less than 20% of the full, objectively assessed affordable housing needs of the Borough.
- 3.5 There is no reasoned justification provided for the statement 'it is clearly not realistic to set an affordable housing target at around the same level as the total housing requirement for all tenure types' (Section 8.145). There is no evidence that explains why planning for a greater number of houses overall on additional viable/deliverable sites, to deliver greater amounts of affordable housing (as a proportion of the market housing) would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The proposed approach of the Council to plan for only 100 affordable dwellings per annum in the face of a requirement of an annual affordable housing requirement of 560 is not justified in this respect.
- 3.6 As currently drafted, the Council's proposed Regeneration & Environment LDD/Core Strategy Review will not meet the full and objectively assessed needs of market and affordable housing in the plan area; it is therefore in conflict with national policy. It is therefore unsound.

Council Response: Comments regarding affordable housing targets noted and addressed in the Housing Need and Demand Topic Paper.

### 193/4: DELIVERING THE HOUSING REQUIREMENT

#### Housing Allocations

- 4.1 Taylor Wimpey UK Ltd welcome the provision of site specific housing allocations through the emerging Regeneration & Environment DPD to deliver the required housing over the plan period. This will identify the key sites critical to the delivery of the Council's housing strategy over the plan period which is in line with the advice set out in the NPPF (Paragraph 47).

4.2 As set out above, and explained in detail below, Taylor Wimpey UK Ltd consider that the range of proposed allocated housing sites should be increased over the plan period to accommodate the full evidenced based housing requirements of the Borough and to create a more flexible and response range of sites.

Housing Phasing and Implementation

Implementation Strategy & Trajectory

4.3 The provision of a housing implementation strategy and indication of the expected rate of housing delivery (or trajectory) to steer housing delivery over the plan period is compliant with the requirements of the NPPF (Paragraph 47) and is supported in principle by Taylor Wimpey UK Ltd.

Bring Forward Allocated Sites From Later in the Plan Period

4.4 The provision of a mechanism to 'bring forward' allocated sites in circumstances where there is a shortfall of deliverable supply (against a 5 year requirement + buffer) is supported, and is again compliant with the requirements of the NPPF.

'Rolling' 5 Year Deliverable Housing Lane Supply

4.5 The suggestion that the Council will only apply the mandatory 5% buffer to the 5 year housing policy requirement instead of 20% is seriously questionable.

4.6 The NPPF is clear that in circumstances where:-

'there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land' (Paragraph 47 NPPF).

4.7 Housing delivery across the Borough over the last 9 years, save for one year (2007/08), has, as a matter of fact, been less than the planning policy requirements. This represents persistent under delivery and has resulted in a cumulative shortfall of housing delivery against requirements and therefore a 20% buffer should be applied.

4.8 Therefore, based on Core Strategy (2010) requirement and shortfall to date, the 5 year requirement should be around 3500 units.

Over Supply of Housing Against Requirements

4.8 The scope to allow a range of housing sites (in excess of the housing requirement) to come forward at any one time is logical, will provide for choice and competition in the market and will assist the Council in 'significantly boosting the supply of housing' across the Borough in line with the requirements of the NPPF . However, there are very serious concerns regarding proposed Policy H2 (5) which states:-

'Land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan period.'

4.9 This suggests that, in the event that windfall (unallocated & uncommitted) housing sites coming forward, that those sites allocated for housing development within the Regeneration & Environment LDD may not be granted an appropriate planning permission to deliver housing – the allocated sites will be 'held back'.

4.10 Paragraph 154 of the NPPF makes it explicit that:-

'Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'

4.11 As drafted, the policy will result in significant uncertainty for developers looking to deliver allocated development sites (at considerable expense). This will also have a significant negative impact on the Council's aspirations of co-working between developers to create masterplans for the development of the strategic scale housing sites. This uncertainty will result in delay in housing delivery or limited housing delivery.

4.12 Fundamentally, there is no requirement in the NPPF, or indeed any robust justification put forward by the Council, to set a ceiling for housing delivery. Moreover there is no evidence, or logic, to suggest that an overprovision of housing will result in material and unacceptable harm, especially within the context of the Governments clear directive to Local Planning Authorities to 'boost significantly the supply of housing'. The development of brownfield sites in the conurbation, as windfalls, during the plan period should be seen as a significant benefit to increasing the supply of a range of housing sites across the Borough for choice and competition in the market and the associated regeneration and environmental benefits. Seeking to place a 'cap' or 'ceiling' on the amount of housing development to come forward renders the plan not positively prepared and therefore unsound.

4.13 The rate and amount of delivery of new housing and the capacity of the housing market areas is, and will continue to remain, entirely dictated by the market and a commercial decision for the respective housing developers.

Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

193/5: HOUSING & GREEN WEDGE ALLOCATIONS – THE ROLE OF LAND TO THE SOUTH OF PRESTON FARM INDUSTRIAL ESTATE

5.1 Neither the Regeneration & Environment LDD: Preferred Options or any of its supporting background reports provide a justification for the discounting of other potential housing sites that were identified in the Core Strategy Review Issues & Options Paper. The LDD is therefore not justified in this respect.

5.2 Taylor Wimpey UK Ltd is concerned that the proposed Regeneration & Environment LDD does not include the land as a housing allocation, and instead seeks to identify the land to the South of Preston Farm Industrial Estate as 'Green Wedge'. Therefore Taylor Wimpey propose a further a revision of the 'Development Limits' as currently drafted in the LDD (see Figure 1) to exclude the land from its current position within the adopted Development Limits (Stockton Local Plan Proposals Map).

The site (Figure 2) shown overleaf (excluding the existing converted Farm Buildings on Preston Lane) extends to approximately 34ha gross and was considered by the Council as a (51ha including land adjacent to Queen Elizabeth Way) potential housing site at the Issues & Options Stage of the Core Strategy Review: Planning for Housing.

The original site (Figure 2 above) put forward by Taylor Wimpey was split in two by Yarm Road with the area to the west of Yarm Road extending to approximately 5.5ha and the land to the east covering 28.5ha. Both areas are flat with few distinguishing physical features and are currently in intensive agricultural use (arable). There is limited public access to this area except along Preston Lane and the River Tees.

5.5 The site is bounded by Preston Farm Industrial Estate to the North, the Darlington / Yarm - Stockton railway line to the west, Preston Park to the south and agricultural land, beyond which is the River Tees, to the east.

Existing Planning Policy Status

5.6 At present, in planning policy terms the site is allocated in Stockton on Tees LP Proposals Map as 'Green Wedge'. However, a significant part of the site is located within the defined Urban Development Area covered by Policy EN17. This policy sets out that within the defined area a number of development allocations were made, including housing, industry, commerce, sport, recreation, tourism and education. Whilst the land put forward by Taylor Wimpey is not allocated for a specific use within the 'Urban Development Area' the reasoned justification of the policy (page 22 of the Local Plan 1997) makes clear that development proposals for parcels of land without a specific development allocation will be encouraged provided that it does not have a detrimental effect on the character of the area or on the amenity of the neighbouring uses and provided that satisfactory access and parking can be achieved.

5.7 In the adopted Core Strategy part of the land is designated as 'Tees Heritage Park' (Policy CS10) and some of it constituting 'Green Wedge'. The Green Wedge designation does not cover the entire 'gap' between Preston Farm and Eaglescliffe, indeed the land to the west of Yarm Road is simply white land within the development limits.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

193/6: Development Potential of the Land

5.8 Both adopted Policy CS10 of the Core Strategy and the emerging Strategic Policy SP4 (Green Wedge) in the Preferred Options states that the function of the Green Wedge is to prevent the coalescence of communities within the built up area by maintaining its appearance and openness.

5.9 In reality, the only characteristic of the 'gap' that the existing farmland provides between Preston Farm Industrial Estate and the built development to the south is its openness. In all other respects it is of little inherent landscape, ecological or amenity value. Indeed, the Council's Landscape Character Assessment & Capacity Study 2011 identified the site as having Medium Landscape Capacity for Development.

5.10 For the most part the 'gap' is only experienced on the ground by those vehicle occupants on Yarm Road as a very fleeting interlude between the built up area of Eaglescliffe and the visually dominant larger scale industrial buildings and car dealerships at the southern end of Preston Farm Industrial Estate.

5.11 Green Wedges are a common and long established policy designation throughout the Tees Valley and come in a variety of shapes, sizes and widths – many are much narrower than the gap between Preston Farm Industrial Estate and Eaglescliffe e.g. Spencer Beck, Ormsey Beck in Middlesbrough and still deliver the functions of the policy. On this basis a Green Wedge does not need to be of any specific minimum width to be effective, nor does its width have to be consistent.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

193/7: Development Potential of the Land

5.12 Notwithstanding the proposed designations set out in the Preferred Options, Taylor Wimpey UK Ltd continue to consider that there is scope to create a high quality, sustainable housing development upon part of this land and retain a 'gap/wedge' between the residential settlement of Eaglescliffe to the south and Preston Farm Industrial Estate to the north.

5.13 A housing development that seeks to combine the provision of pockets of new housing development in this area together with significant landscaping, tree planting and public open / amenity space that will help to emphasise the physical differences and physical / visual separation between the predominantly industrial area to the north and the residential area to the south. A high quality sustainable environment can be delivered.

5.14 The site, as evidenced by the accompanying Illustrative Masterplans, can deliver a modest (up to 370 units @ 30 dph) strategic housing site in a sustainable location with excellent links to a wide range of services and facilities for day to day sustainable living, to assist in the provision of a wide range of housing sites around the Borough during the plan period to create choice and competition in the market.



5.15 In addition, the site offers opportunity for a high quality smaller scale development of around (190 units) to assist in the provision of a flexible and responsive deliverable supply of housing sites.

5.16 In respect of both options, it should be noted that the size of site put forward by Taylor Wimpey in these representations is substantially less than that previously put forward. The land in closer proximity to the river corridor, future employment land and Queen Elizabeth Road, and the development beyond, has been removed.

5.17 The development option demonstrates how a 'Green Wedge' can be maintained between the settlements to avoid 'coalescence'. The development of the site, subject to appropriate structure planting would not harm the local or wider landscape character, the visual amenity of the Tees Heritage Park or the setting of Preston Park.

5.14 In all other respects the development of housing in this broad location would be a sustainable development option – as demonstrated by the Council's own Sustainability Appraisal of the site. In addition, detailed consideration has been given to the potential access arrangements to the parcels of land to the east and west of Yarm Road at Preston Farm by Taylor Wimpey's Highway Consultants.

5.15 The highway assessment (Appendix 1) concludes that all of the parcels of land set out upon the illustrative plans can be satisfactorily accessed and that there are no constraints to development in this respect.

5.16 Other initial investigations, and acknowledgment that the site is not subject to any ecological, landscape or heritage constraints, have established that development of the site for housing (in accordance with the identified needs set out in the Tess Valley SHMA) would be compliant with the adopted Development Plan, the National Planning Policy Framework and the emerging planning policies set out in the Regeneration & Environment LDD as far as relevant.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

193/8: 6.1 It is considered that the Council require a wider range of housing sites to meet the full and objectively assessed housing needs (market & affordable) and to provide choice and competition in the market. The land South of Preston Farm provides an opportunity to deliver a modest scale of housing development in a sustainable location.

6.2 The site can deliver a development that will retain an open 'Green Wedge' that will retain the individual character of Preston and Preston Farm. Moreover it will lead to environmental improvements and easy access to the public that will contribute to improvements towards the quality of life of residents in the urban areas.

7.1 It is recommended that the Stockton Regeneration & Environment LDD is revised to:-

- Increase the amount of housing planned for to meet the full, objectively assessed needs for market and affordable housing in the Borough consistent with the requirements of the National Planning Policy framework.
- Remove Point 5 of Draft Policy H2 to provide confidence/certainty for developers to invest in and acquire allocated housing sites at an early stage to ensure constant deliver of new housing over the plan period to meet the housing needs of the Borough.
- Retain the land set out within this submission within the Development Limits of the Conurbation and de-allocate it as 'Green Wedge'.
- Allocate the land as a housing site to deliver of a mix of housing with scope for delivery on site within the short term.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

Comments regarding affordable housing targets noted and addressed in the Housing Need and Demand Topic Paper.

193/9: Highways Access Assessment and Indicative Masterplan attached - concludes that satisfactory access can be achieved for each masterplan option, although capacity issues have not been assessed.

Council Response: Comments noted.

## 194 Natural England

### H1 - Housing Allocations

#### EMP1 - General Employment Land

### 194/1: Evidence around allocations

There does not seem to be any evidence to show that the allocations are consistent with National Planning Policy Framework paras 110 (Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework) and 165 (Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area). In addition, it has not been shown that the sites are deliverable in that it may transpire that

developing certain sites will necessarily result in such a loss of biodiversity, that to adequately compensate or this loss will render the site undeliverable. Whilst a map based exercise may have been performed to ascertain biodiversity value, we advise that this is likely to be inadequate unless the district can confirm that these were based on phase one surveys covering the allocated sites. From a purely biodiversity perspective, we advise that at least a phase one survey should be undertaken for each allocated site to allow consistency with paras 110 and 165.

Paragraph 98 of ODPM Circular 06/20051 states that

'The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.'

Paragraph 99 also states that

'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted otherwise all relevant material considerations may not have been addressed in making the decision.'

In the absence of any information about the likelihood of presence of a protected species on these sites, there is concern that the allocations may not be deliverable. A phase one survey should provide a good indication as to whether protected species are likely to be a constraint on these sites and whether further survey work is required.

Similarly it is unclear how the landscape and amenity value of each site has been considered. On the basis of these points, NE advises that the Local Plan is unsound.

Council Response: Tees Valley Wildlife Trust (TVWT) are confident that the series of Phase 1 and detailed site and species surveys have resulted in a comprehensive knowledge of biodiversity in the Borough, that this has been taken into account in the planning process and that the proposed land allocations within the publication document take biodiversity into account and are deliverable. TVWT have reviewed land allocations within the plan giving careful attention to protected species and are satisfied that it is highly unlikely that European Protected Species would render any of the sites undeliverable.

The one exception to the above statement made by TVWT is the allocation at Durham Tees Valley Airport as TVWT have never been granted access to this secure area and therefore cannot give assurances to its status for biodiversity or protected species. Industry Nature Conservation Association (INCA) have confirmed that they are satisfied that it is highly unlikely that European Protected Species would render the DTVA site as undeliverable in the life of the LDF. The basis for this response was that INCA were commissioned by DTVA in 2004 to undertake the ecological surveys for the site. This work identified that the site has extensive areas of MG5 grassland though to their knowledge it did not at that time support significant populations of any legally protected species; INCA consider that it is unlikely that the status of the site for protected species has changed significantly given that there has been little change in the balance of the habitats.

It is therefore considered that the sites identified for allocation are consistent with the NPPF. The Sustainability Appraisal for the Regeneration and Environment LDD publication has identified how the sites to be allocated are those of least environmental and amenity value.

#### ENV3 - Local Sites

194/2: Designation hierarchy

Para 2.10. says that "Sites of nationally and/or international importance to nature conservation ... are subject to protection as set out in relevant national planning policy (see Appendix 3)." For information appendix 3 does not describe these policies. Furthermore, most national policies have now been superseded by the NPPF, which says regarding designated sites: "113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks." At present the local plan (the adopted Core Strategy combined with the sites and development management policies) does not do this (policy ENV3 on Local Sites notwithstanding). On this basis, NE advises that the Local Plan is unsound.

Council Response: Policies within the LDD have been revised to ensure consistency with para 113 of the NPPF.

#### H1 - Housing Allocations

194/3: Policy protection for public rights of way and access

The NPPF states: "75. Planning policies should protect and enhance public rights of way and access." Policy does propose a number of enhancements to the public right

of way network. However, we have suggested a number of places in policy H1 where further enhancements should be considered.

Council Response: Comments noted. Policy regarding Footpaths, Cycle Routes and Bridleways, and Green Infrastructure comply with para 75 of the NPPF. Amendments to policies covered by H1 have been amended where necessary.

#### 194/4: Tranquillity

The NPF states: "123. Planning policies and decisions should aim to... identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason." There are no references to identifying or protecting areas of tranquillity in the Local Plan, and on this basis, NE advises that the Local Plan is unsound.

Council Response: The proposed housing allocations are predominantly extensions to the existing built up area and are primarily not identified as being the most tranquil areas on the tranquillity mapping produced by the CPRE. Policy SP3 'Locating Development' within the publication draft seeks to direct development and protect the most tranquil areas of the Borough. Therefore, the Council has not identified areas of tranquillity and sought to protect them from noise.

#### 194/5: Light pollution

The NPF states: "125. By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation." The only reference to light pollution is in policy SL1 which is confined to the amenity of occupiers of neighbouring properties. We advise the requirements of this paragraph of the NPPF are incorporated into this LDD to ensure consistency with the NPPF.

Council Response: The council has specific reference within the Sustainable Design Guide SPD to artificial lighting. It is considered that this combined with Core Strategy policy CS3 is adequate.

#### 194/6: Environmental quality of development (High Quality Design)

The National Planning Policy Framework has a number of paragraphs relating to the environmental quality of developments (paras 56, 58, 61). We advise the council considers whether a policy specifically around high quality design would be appropriate, as a number of other local planning authorities have done to ensure consistency with the NPPF.

Council Response: The council has produced a Sustainable Design Guide SPD. It is considered that this combined with Core Strategy policy CS3 is adequate.

#### 194/7: Policy EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

1. It is unclear in point 3 what the term 'Elsewhere' is being contrasted with, given point 2 applies to all proposals. This should be clarified, perhaps by incorporating it within point 2.

2. The policy states: "Land is designated as strategic mitigation, to off-set development on allocated land elsewhere in the North Tees and Seal Sands area at land to the north of Brine Reservoir, Seal Sands link road." We note that in para 5.48 it says that this land has not yet been secured. It is therefore uncertain that suitable mitigation can be delivered to allow the allocations to be developed.

3. We are not aware of any evidence demonstrating that the cost of mitigation will be such that it will not render the allocations unviable. Until it is clear that the costs are supportable, we advise that there is inadequate certainty that the policy is deliverable.

4. The HRA report does not make an explicit assertion that the strategic mitigation is capable of offsetting the impacts, and provide evidence for such an assertion.

5. The INCA report identifies a number of plots which it recommends may be allocated, but also recommends that policy should identify significant constraints (e.g. page 70, plot 17 of the December 2011 report). This latter recommendation has not been taken forward other than via points 2 a) and 2 b). We advise that suitable wording is included in this policy to address these recommendations.

6. It should be made clear in the policy that the strategic mitigation does not include the offsite mitigation already agreed with respect to plots 4 and 22 in the INCA report.

7. It should be noted that there are likely to be biodiversity assets on this site other than those related to the SPA. It may be appropriate for clarity to raise the need for appropriate survey and mitigation/compensation in this policy, policy ENV3 notwithstanding.

Council Response: Policy EMP5 has been revised for publication, due to the Council no longer allocating land in the Seal Sands area.

EMP5 - Important Bird Populations  
and the Seal Sands and North Tees  
Sites

The Council has previously sought to implement the findings of the North Tees Birds Study. This involved de-allocation of sites of functional importance to the SPA and Ramsar site, identification of strategic mitigation to enable land allocations in the area, and the allocation of sites for employment development.

Unfortunately it is not possible to identify strategic mitigation for land allocations in the Seal Sands area. Therefore the Council is no longer intending to allocate employment land sites in the document. The management and maintenance of these sites will be the responsibility of the land owner, who will be bound by existing legislation.

## ENV1 - Green Infrastructure

### 194/8: Policy ENV1 - Green Infrastructure

In para 9.3, we suggest that the definition of Green infrastructure in the NPPF is adopted, namely "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities."

In para 9.4, we suggest that the following text is added at the end of this paragraph "...for example through the development of neighbourhood plans."

We advise adding within the policy wording itself more specific reference to aims, objectives and principles (e.g. "as set out in 9.11 below" and "in more detail in adopted Green Infrastructure strategy), in particular the Green Infrastructure corridors as identified in the strategy on page 46 (and referenced outside policy wording in 9.12.)

We would welcome more specific commitment to seek to implement the final draft Green Infrastructure Action plan, e.g. through planning conditions and planning obligations.

We would also welcome any other more specific commitment, e.g.

- a. Every development (over a certain size) will be asked to provide Green Infrastructure on a minimum of xx% of the overall area or provide a commuted sum to contribute to the enhancement of the identified Green Infrastructure corridors or other strategic Green Infrastructure projects.
- b. The Council will aim to have the (lower tier of the) standard for accessible natural greenspace (ANGST) met for xx% of the population by YYYY.
- c. The Council will aim to have the standard for accessible woodlands (spaces for people) met for xx% of the population by YYYY.
- d. The Council will aim to have xx% of its urban parks achieve Greenflag standard by YYYY.
- e. The Council will aim to have xx% of its Country Parks accredited by YYYY

Point 3 of this policy states: "Development proposals should retain and enhance..." For clarity, we advise that this should be replaced by "Development proposals should retain and enhance the quality and quantity of...". For the same reason, we advise that "existing cycleways, footpaths and bridleways" should be replaced by "existing formal and informal cycleways, footpaths bridleways and accessible open space".

### Council Response: Policy ENV1 - Green Infrastructure

This policy has been significantly amended following preferred options consultation. The definition of Green Infrastructure identified within NPPF has been adopted

Paragraph 9.4 has been omitted. The community has been actively involved in the preparation of the Green Infrastructure Delivery Plan. Reference to neighbourhood plans and development proposals identifying, planning and managing 'Green Grid' networks has been included within the reasoned justification to the policy.

The strategic green infrastructure network is to be protected and enhanced through this policy. Commitment to implement the Green Infrastructure Delivery plan has been added to the policy.

## ENV3 - Local Sites

### 194/9: Policy ENV3

It should be noted that the local sites inventory in many parts of the country is not a complete listing of all sites meeting the relevant criteria, but just those known about. There is therefore no policy protection of priority habitats which have not been identified as local sites. In addition there is no policy protection for priority species (see <http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx> for more information). In the absence of a more comprehensive biodiversity policy we advise that this LDD is not consistent with the NPPF para 109 (The planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible) and 117. (To minimise impacts on biodiversity and

geodiversity, planning policies should: ... promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets.) As such we advise that the plan is unsound.

Where compensatory provision is needed, the overriding principle is that at a minimum, no net loss should occur to biodiversity, and a net gain should be secured where possible. This should factor in the uncertainty around achieving the requisite habitat quality, and the loss of biodiversity value for the period before the original value has been attained. We advise that the supporting text should set this out.

Council Response: Policy ENV3 has been revised and incorporates the full designation hierarchy. It is considered that this policy is fully consistent with chapter 11 'Conserving and enhancing the natural environment'. The policy outlines within the first point that 'Development should seek to achieve net gains in biodiversity by protecting, managing, enhancing and extending existing resources, and by creating new resources.' The policy justification identifies that where compensatory provision is needed the overriding principle is that no net loss to biodiversity should occur and a net gain should be secured where possible.

## H1 - Housing Allocations

194/10: Policy H1.

As a general comment, we welcome the policy requirements relating to the natural environment and public access within the policy.

H1h. It is not clear from the map where this allocation is. We presume it is wrongly marked as H1i, on map 15. On this basis, we are unclear what "Improvements to and extension of the green infrastructure network; this will be delivered through facilitating access (including from the existing adjoining built up area) through to the wider countryside." will mean in practice. We advise that this should be clarified, and in particular, options to link the site to the public rights of way network to the west of the site, and options to link the public right of way ending at Ouston Moor Farm to the public right of way running to the north of Coalgarth Farm should be explored and specified if viable.

H1j. We advise there is a need to ensure connectivity to the public right of way to the west of this allocation. In addition, opportunities for achieving connectivity to the public right of way network to the south east of the site should be explored. We also note there is no provision for any pedestrian access over the railway line. Such an access measure would allow greater connectivity within the site, support sustainable travel, and increase access to recreation. We also advise that from a biodiversity and green infrastructure perspective, it may be appropriate to use the land between the allocation and Pitt and Hall woods as an area of high quality natural greenspace, including significant tree planting, and we advise that this should be explored.

H1l. We note this policy requires replacement woodland planting. We advise that it is specified that this planting should be done to maximise its biodiversity value. We also note that there is no reference to achieving connectivity with the countryside public right of way network, and advise that this should be specified as per policy K1k.

H1m. As per H1l, we note that there is no reference to achieving connectivity with the countryside public right of way network, and advise that this should be specified as per policy K1k.

Council Response: Comments noted. Amendments will be made to emerging policy where necessary

## Habitat Regualtions Assessment

194/11: Habitats Regulation Assessment.

Natural England see no reason to disagree with the screening assessment other than one matter. This is that the potential impact of policy EMP7 does not appear to consider collision and or disturbance of birds related to the Teesmouth and Cleveland Coast Ramsar and SPA site. We advise that this is considered.

We note that the Habitats Regulation Assessment concludes "7.15: Given the reasons above, the Stockton on Tees Regeneration and Environment LDD is assessed as not having an adverse effect on the integrity of sites designated as of European importance for their nature conservation value, either alone or in combination with other plans and projects." We do not find that the assessment is sufficiently rigorous in demonstrating this conclusion. In particular:

Para 7.5. There is no certainty that policy EMP7 in combination with policy T2 will result in no net increase in air pollution.

Para 7.7. There is no statement about how far the SAC is from the A19.

Para 7.11. See comments on policy EMP5 above.

Para 7.14. The Core Strategy policies quoted have no bearing on whether the R&E LDD is compliant with the Habitats Regulation Assessment, in the sense that the HRA does not demonstrate that these policies are both sufficient to address any impacts, and that they are deliverable alongside the policies in the R&ELDD. We therefore advise that additional justification is provided for concluding that each of these issues will not result in an adverse effect on integrity.

Para 7.15. Contrary to what this paragraph states, the NPPF does not provide any policy protection to International Sites itself (see point earlier with respect to “Designation hierarchy”). Moreover it is not clear to what degree the R&ELDD is relying on these other “legislation and proposals” to reach the conclusion of no adverse effect. Clarity around this would be helpful.

Finally, we have not cross checked the list of issues in chapter 7 against the issues identified in tables 11 to 18. It would be helpful to explicitly state in chapter 7 that all policies for which further assessment is required identified in tables 11 to 18 have been considered in chapter 7.

Council Response: The comments have been noted and the Habitat Regulations Assessment has been revised and takes into account the points raised within this response.

## Sustainability Appraisal

194/12: Sustainability Appraisal

As discussed earlier, there is no site level assessment of the biodiversity, landscape or amenity value of each site, meaning that the impacts of the allocations on these things can only be appraised in a very crude manner. In order to properly appraise the relative merits of differing options, a more detailed assessment should be undertaken.

Council Response: Comments noted. The Sustainability Appraisal has been redrafted and takes into consideration the points raised within this response.

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## 195 The Church Commissioners for England

### H1 - Housing Allocations

195/1: The Church Commissioners have land interests both at Wynyard Village, as well as at Wolviston. In respect of their land at Wynyard, the Commissioners have worked collaboratively with Cameron Hall Developments in support of their aspirations for the wider master planning of Wynyard Village on the southern side of the A689, in order to deliver a truly sustainable community.

Our client has been supportive of the Borough Council’s early review of the adopted Core Strategy following identified difficulties regarding the deliverability of previously identified sites to meet its housing targets during the Plan period, primarily as a result of changing economic conditions. The Commissioners continue to support the identification of additional housing sites in order to meet what is now an even higher shortfall than previously thought, and concurs that it is critical that sufficient housing sites are identified now in order to fully meet the Borough’s housing needs during the Plan period.

The emphasis of ensuring an adequate supply of housing is all the more relevant following the Government’s overhaul of the planning system, as demonstrated by the publication of the National Planning Policy Framework (NPPF). Subsequently, the Written Ministerial Statement ‘Housing and Growth’ issued in September 2012 highlights the continuing need to support a thriving, active and stable housing market and the associated benefits of helping generate local economic growth through associated development activity.

#### Wynyard Settlement

In light of our client’s interests, these comments focus mainly on the draft proposals at Wynyard as set out principally within Section 8 of the draft document, and specifically Policies EMP3, H1, H2, H1I, H1k and H1m.

Council Response: Comments noted.

### EMP3 - Key Employment at Wynyard Park

195/2: Policy EMP3 – we OBJECT to the proposed de-allocation of employment land at the Regionally / Sub-Regionally important Wynyard Park and the proposed reallocation of a large part of the site for residential and associated development. Wynyard Park is identified as a Prestige Employment site within the RSS and has a key role to play in helping support the Tess Valley City Region as a focus for new economic development and investment. The RSS remains part of the Development Plan and should be given significant weight.

The evidence base supporting the Draft Plan includes the Employment Land Review, set out in three stages. Stage 2 firstly states at paragraph 5.37 that Wynyard Park provides greenfield sites in a mature parkland setting with very good access to the strategic highway network. It continues by stating that a high proportion of Tees Valley's business leaders live nearby (Wynyard Village). Paragraph 8.47 also highlights that Wynyard Park is a prestige site that will enhance the image of Stockton by providing high quality commercial office premises at a high profile development, helping to attract high value industries throughout the Plan period, such as financial and business sector uses, as well as large scale warehousing and distribution facilities. Paragraph 9.32 continues that Wynyard Park will enable Stockton to compete for tenants with other sites within the Tees Valley region and beyond. Notwithstanding the recognition that there is a general oversupply of employment land within the Borough, the report concludes at paragraphs 11.20 and 11.21 that employment sites of regional and sub-regional significance need to be safeguarded, noting in particular that Wynyard is important to the image of Stockton and the development of the sub-regional economy which can help attract high value industries as well as units suitable for large scale warehousing and distribution.

Stage 3 of the ELR highlights in Table 3.3 that 14 sites clearly merit retention as part of the Borough's employment land portfolio, including both Wynyard Business Park and the former Samsung site. Paragraph 5.5 confirms that the sites identified within the Stage 3 Report will provide the Borough with a well balanced stock of employment land that is well distributed both spatially and sectorally, without the need for further allocations through the LDF. As a result, the report concludes that as a consequence, the Borough can meet the needs of inward investors and local businesses, as well as support the aspirational level of growth identified as the preferred scenario for Stockton.

The NPPF states the following:

Paragraph 7 – sustainable development includes an economic role, requiring the planning system to build a strong, responsive and competitive economy and ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

Paragraphs 18 and 19

The Government is committed and places significant weight on securing economic growth in order to create jobs and prosperity, ensuring the planning system does all it can to assist.

Paragraph 22

Whilst this seeks to avoid the long term protection of sites allocated for employment use, it should only consider proposals for alternative uses where there is no reasonable prospect of a site being used for that purpose. The evidence base does not support such an approach.

The loss of regionally / sub-regionally significant employment land will not therefore result in a plan which proactively seeks to meet the development needs of business and support an economy fit for the 21st century, neither locally or at a regional level. We therefore consider that Policy EMP3 is not considered to be 'Sound' in that it: Is not positively prepared. It does not meet the objectively assessed needs for economic growth, as identified by the ELR; Is not justified – it is not the most appropriate strategy, based on the available evidence base; and Is not consistent with national policy – it is not consistent with the NPPF as highlighted above.

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In order to resolve this, we would support the retention of Wynyard Park for employment purposes and other alternatives should be considered in order to aid the wider master planning of the Wynyard settlement through additional residential development, including our client's land east of Wynyard Village.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1 - Housing Allocations

195/3: Policy H1

H1k - Wynyard Masterplan

We object to the proposed housing allocation under Policies H1k and H1m in relation to a proposal for 1,000 units at Wynyard Park. As detailed above in relation to Policy EMP3, we do not agree that land at Wynyard Park allocated for Prestige Employment should be de-allocated and allocated for residential development as this is not 'Sound' for the reasons stated above.

H1m - Wynyard Park

H2 - Housing Phasing and Implementation

As a result of maintaining the employment allocations at Wynyard Park, and in order to address the issues at paragraphs 8.128-131 of the Draft Plan (i.e. Council recognition that Wynyard Village is currently deficient in a number of local services and expansion of the residential development would help achieve a more sustainable community), we support the allocation of our client's land east of Wynyard Village for up to 200 dwellings. Such an approach would help contribute towards new community facilities as envisaged by the Master Plan prepared by Cameron Hall, helping to improve the sustainability credentials of the village and provide the necessary

infrastructure for both existing and new residents. Contributions towards improved accessibility to both the employment opportunities to the north, and the day to day facilities at Wynyard Village could also be supported.

At present, there is a clear distinction between the employment generating uses to the north of the A689 and the wholly residential community at Wynyard Village to the south of the A689, providing a clear strategy for its future development as a new sustainable settlement. Proposals to develop a significant area of land for residential and community uses to the north of the A689 would seriously undermine the continuing development of a sustainable community at Wynyard Village by diluting this original concept. The proposal for a comprehensive Master Plan for the wider area is unlikely to be successful where development to the north is reliant on cross funding from Wynyard Village to help deliver the necessary infrastructure to support the proposed residential development at Wynyard Park (as confirmed at paragraph 8.128 of the draft Plan). This does not appear to have been well thought out in that Cameron Hall have highlighted the need for development of an appropriate scale at Wynyard Village to help support the provision of additional community facilities to the south of the A689, as well to fund the Conservation Management Plan for Wynyard Hall.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## New Policy

195/4: Wolviston

## H1 - Housing Allocations

The Issues and Options Paper put forward a potential housing site to the north west of Billingham which has not been maintained within the Preferred Options document due to concerns regarding the size of the site following the need to provide a significant buffer to the A19, and the potential for coalescence with Wolviston.

Our client controls land to the north west of Wolviston (SHLAA site 20) which is considered suitable for residential purposes. As a larger site, this would enable it to provide a sufficient buffer to the A19 without reducing the potential developable area of the site for housing. The scale of development would therefore be commensurate to the village and would be well located to a Tier 2 settlement in sustainability terms, with existing public footpaths providing easy access to a good range of facilities. It would also avoid any coalescence with other settlements. As highlighted at paragraphs 54 and 55 of the NPPF, new market housing in rural areas can help meet needs for affordable housing and also enhance or maintain the vitality of rural communities. It is noted that there are no other housing proposals at Wolviston.

We therefore object to Policy H1 on the basis that land at Wolviston (SHLAA site 20) has not been allocated for housing.

We trust the above comments are of assistance in progressing the review of the Core Strategy and we look forward to providing further input to this document over the coming months. In the interim, should you have any queries or require any further clarification on the comments provided, please do not hesitate to contact the writer in the first instance.

Council Response: The Spatial Strategy (policy SP2) does not allocate housing sites at the villages. The reasons for not allocating the site are identified in the Housing Site Selection Topic Paper.

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## 196 Mr S Singh

## SP3 - Limits to Development

196/1: We write in respect of the above-mentioned consultation, and in particular the role of a parcel of land (approx. 1.5ha) at Yarm Riding School can plan in delivering a modest, but exceptional quality, self-build executive housing development over the course of the plan period.

## SP4 - Green Wedge

At present, in respect of the Stockton Local Plan Proposals Map (1997) the site is located within the Green Wedge but within the limits to development. However, in respect of the Regeneration & Environment LDD Preferred Options the site is to be allocated as 'Green Wedge' and excluded from the Limits to Development.

## H1 - Housing Allocations

## New Policy

In contrast, the site and the adjoining land under the control of our Client offers very significant opportunity for landscape and ecological improvements in this location to the wider benefit of the character, appearance and function of the Green Wedge and the Tees Heritage Park. In particular it will assist in greatly improving (by softening) the 'harsh' urban edge in this location.

The Council's approach to allocate a range of housing sites across the Borough to address the needs of the differing housing market sub areas is supported. However, it is considered that a wider mix of smaller sites to meet specific demands in specific sub areas should be considered. This will provide choice and competition in the market and a flexible and responsive supply of deliverable housing land. This is fully supported by the NPPF.

It is noted that Policy H3 (Housing Mix and Affordable Housing Provision) supports executive housing provision, particularly in the Yarm, Preston & Eaglescliffe Sub Area.



The provision of executive housing on this site would fall in line with the draft policy.

Paragraph 50 of the NPPF advises that to provide a wide choice of high quality home, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:-

'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);

It is noted that as drafted the Regeneration & Environment LDD does not make provision specifically for opportunities for people wishing to build their own home. This site provides excellent opportunity for a modest self-build development of executive housing in a strong and well established market housing area. The site lies in a sustainable location, within walking distance of the nearest Primary school (Levendale Primary) and close to a secondary school, shops, sport facilities etc. The proposed access to the site will be via the existing site access off Glaisdale Road. The nearest bus route, with regular and frequent services throughout the day to Yarm, Stockton and Middlesbrough, is the X6 with stops on Glaisdale Road and Mount Leven Road.

The site is deliverable with a willing land owner. Save for the existing land use allocation of the site, its development will comply with Development Plan and National Planning Policy in all other respects.

In light of the above we would recommend the following amendments to the Regeneration & Environment LDD as currently drafted:-

- Increase the range of housing sites, to include smaller sites alongside the strategic housing land to provide choice and competition in the market and a flexible and responsive supply of deliverable land.

- Retain the land set out within this submission within the Development Limits of the Conurbation and de-allocate it as 'Green Wedge'.

- Allocate the land as an executive housing development of self-build properties to assist in meeting the need for executive housing across the Borough and provide opportunities for people wishing to build their own homes. This will comply with the requirements of the NPPF.

Council Response: See the Housing Site Selection Topic Paper for the reasons why this site has not been identified as a housing site allocation.

#### SP4 - Green Wedge

196/2: Proposed Strategic Policy SP4 (Green Wedge) in the Preferred Options states that its function is to prevent the coalescence of communities within the built up area by maintaining its appearance and openness. However, on the ground, the parcel of land at Yarm Riding School, site by virtue of the projection of the surrounding development towards Ingleby Barwick, contributes very little to the 'gap' or its openness. In all other respects the land is of little inherent landscape, ecological or amenity value. To this end we would seriously question its proposed allocation as Green Wedge and its exclusion from the Development Limits.

Council Response: See the Housing Site Selection Topic Paper for the reasons why this site has not been identified as a housing site allocation.

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#### 197 Hellens Group

#### SP2 - Housing Spatial Strategy

197/1: The Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 update report recommended that "infill development will be appropriate within Tiers 1 and 2" and this is reflected in paragraph 2.9 of the R&ELDD. Whilst we support Tier 1 and 2 villages being the focus for new development within the villages we do not consider it appropriate to stipulate that only infill development will be appropriate.

In our view up-to-date national policy does not support such a narrow approach to site selection and housing delivery. Indeed, the NPPF states that "The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages..." (NPPF paragraph 52)

In addition we would highlight that whilst in our view the proposed approach is unduly inflexible, it would also appear likely to fail in meeting the needs of the villages as there are no infill sites assessed in the SHLAA as developable within 0-18 years. As such it is not appropriate that only infill development will be appropriate in villages when there are no identified deliverable infill housing sites in the Tier 1 and 2 Villages and this narrow approach is not supported by national policy. Indeed Strategic Policy SP2 appropriately recognises that sites within or adjacent to sustainable rural villages are appropriate for site selection.

We consider that there should be a consistent approach to development in villages and this should identify that development both within or adjacent to sustainable villages is appropriate.

## H1 - Housing Allocations

197/2: The [representation] is prepared in the light of our Client's interest in bringing forward a residential development at Carlton. Figure 1.1 shows our Client's site in relation to Carlton and Figure 1.2 shows an indicative layout of housing development at the site. It is of note that a small area to the south east of the site falls within Flood Zone 3. However, only water-compatible development (garden/amenity open space), as identified in the Technical Guidance to the NPPF (March 2012) is proposed in this area. Indeed all housing development is proposed within Flood Zone 1 which accords with the NPPF which advocates a risk-based approach to the location of development and states: [quotes NPPF paragraphs 100 and 101]

This document puts forward an evidenced proposal justifying the opportunity at Carlton. Our client's site provides an opportunity to deliver a sustainable extension to the village of Carlton and would help to meet the housing needs of the Borough by the provision of new family homes.

As an overarching comment we broadly welcome the Council's positive approach to meeting defined development requirements and positive assimilation of the key messages from the National Planning Policy Framework ("NPPF"). The Council are taking a number of positive steps to address both current and forecast housing requirements and this is supported.

Council Response: See the Housing Site Selection Topic Paper for the reasons why the land at Carlton has not been identified as a housing allocation. Overarching comment broadly supporting the Council's positive approach noted and welcomed.

197/3: Guidance in the National Planning Policy Framework (NPPF) emphasises the importance of:

- Significantly increasing the supply of housing;
- Using an evidence base to ensure that Local Plans meet the full, objectively assessed needs for market and affordable housing, including identifying key sites critical to the delivery of the housing strategy;
- Delivering a wide choice of high quality homes that people want and need;
- Widening opportunities for home ownership; and
- Creating sustainable communities;

At the heart of the NPPF is a presumption in favour of sustainable development. The planning system should contribute to building a strong economy, provide the supply of housing to meet present and future needs, whilst also protecting and enhancing the natural, built and historic environment.

In relation to planning for rural areas, the NPPF advises that: "The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages..." (NPPF paragraph 52)

Furthermore, the NPPF states that: "In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local need..." (NPPF paragraph 54)

The Stockton Council Core Strategy was adopted in March 2010. However, by 2011 the Council acknowledged that: "not enough housing sites have been identified [in the Core Strategy] that are compliant with the adopted Core Strategy and which can deliver the number of homes that need to be built in the Borough by 2028".

The Council published a Core Strategy DPD Document Review: Issues and Options document in July 2011, which sought to review the housing element of the adopted Core Strategy and to identify how the shortfall at the time of 2,800 dwellings can be met and by which sites.

We understand from recent conversations that, for 2012, Stockton Borough Council will be updating the SHLAA through the Annual Monitoring Report which includes updates on new sites and which is due to be published in December 2012. Representation's for our client's site at Carlton have been submitted to the SHLAA and should be read alongside this report.

SP1 - Presumption in favour of sustainable development

197/4: Strategic Policy SP1 – Presumption in Favour of Sustainable Development

We fully support the Council's position acknowledging the pivotal nature of the NPPF's presumption in favour of sustainable development. The opportunities which housing development provides to achieving sustainable development and sustainable communities should be recognised by the R&ELDD.

We welcome the Council's approach to considering development proposals which broadly aligns with the NPPF. This positive approach and presumption in favour of sustainable development will assist in ensuring defined development requirements are met without delay. We note that our client's site at Carlton represents a site that the Council's 'Planning for the Future of Rural Villages Study' (updated 2012) has effectively defined as sustainable, with the village achieving the third highest sustainability score of all the 14 assessed villages.

Council Response: Comments noted.

Appendix 3: The Hierarchy of Sustainability in the Planning the Future of Rural Villages in Stockton-on-Tees Borough 2012 Update Report

197/5: We acknowledge the Council's approach to meeting housing needs in the Borough through a site selection hierarchy; however we consider that the R&ELDD should reflect the importance of new development across all levels of settlements in the hierarchy to reflect local need and to ensure that sustainable communities are enhanced and maintained. As such, the sequential approach set out in SP2 should not lead to a static approach to development in settlements lower down the hierarchy. Indeed the Tees Valley SHMA has identified a need in rural areas in Stockton for a range of house types except for terraced houses, and a need for market housing and 3+ bedroom properties. Furthermore, the NPPF requires that in rural areas, LPAs should be responsive to local circumstances and plan housing development to reflect local need.

New Policy

As the Council cannot demonstrate a five year supply of deliverable housing sites and has acknowledged that its approach in the CS will not provide sufficient dwellings to meet the Borough's identified need, developable housing sites within villages should be considered.

SP2 - Housing Spatial Strategy

We support the Council's view that it does not regard the additional 5% buffer as a ceiling and wishes to plan for higher delivery in order to ensure that housing need and demand are fully met. The importance of delivery in settlements lower down the hierarchy to meet the Borough's needs must therefore be recognised.

H1 - Housing Allocations

We support the Council's view in SP2 that it will look to allocate sites that can deliver the housing need and demand identified in the Tees Valley SHMA and sustainable communities with an appropriate and aspirational housing mix. This reflects the NPPF requirement to "...positively seek opportunities to meet the development needs of their area..." (NPPF paragraph 14)

However in order to achieve this, the needs of rural communities in Stockton, as identified in the SHMA must be met. Our client's site at Carlton would help deliver a mix of low to medium density family homes, reflecting the need identified in the Tees Valley SHMA for 3 and 4+ bedroom semi-detached and detached properties. There is also the potential to explore the delivery of affordable housing at the site to meet local needs and deliver a sustainable mixed community.

Furthermore, The 'Planning the Future of Rural Villages in Stockton-on-Tees Borough Report' identifies that Carlton's close proximity to other villages, particularly Redmarshall and Thorpe Thewles means that other villages utilise facilities in Carlton, in particular the shop, post office and village hall.

The villages above, including Carlton also have a relationship with Stillington which provides a primary school and employment area. Indeed the Report states that: "There is an interdependence between Stillington and the surrounding villages of Whitton, Thorpe Thewles, Carlton and Redmarshall."

The importance of the interdependency between the network of villages is clear and housing development at Carlton would impact positively on both lower tier villages and the Tier 1 village of Stillington. As discussed further in section new housing development at Carlton would deliver a number of economic benefits for the area to include new jobs, increased spend, increased GVA and increased revenue for the Council which would assist in strengthening the role of Stillington which provides employment opportunities to surrounding villages. This reflects the requirement of the NPPF which states that: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby." (NPPF paragraph 55)

As such it is considered wholly appropriate that our Client's site be allocated for housing development reflecting the NPPF advice that development in one village may

support services in a village nearby. Development at Carlton would enhance and maintain the vitality of the rural community by enhancing the viability of its services, shared by other villages.

Council Response: Comments regarding rural housing need and demand noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

### SP3 - Limits to Development

197/6: We support paragraph 2.41 which states that: “

The preferred draft policy is to direct development to within those limits, whilst supporting appropriate development outside of these limits.”(NLP emphasis). However we consider that the appropriate development listed in points ‘a’ to ‘h’ in policy SP3 should acknowledge that housing development may be appropriate outwith the Limits to Development. This would reflect Policy SP2 that refers to sites within or adjacent to sustainable rural villages as being appropriate for housing sites. Indeed, the NPPF provides support for housing development adjacent to villages and states that: “

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages...” (NPPF paragraph 52).

As such it is not considered that the identified limits to development at Carlton should prevent sustainable housing development that will help meet the housing needs of the Borough and further strengthen the network of surrounding villages.

Council Response: Comments regarding rural housing need and demand noted and addressed in the Housing Need and Demand Topic Paper

### New Policy

#### H1 - Housing Allocations

197/7: Policy H1 makes allocations for approximately 6,950 dwellings across 13 sites in Stockton. The Council’s identified housing requirement over the period 2014- 2029 is 8,250 dwellings. In paragraph 8.2 of the R&ELDD the Council identify that if all the commitments assessed as deliverable or developable are built then the total build over the plan period (2014 to 2029) will be about 9,760 dwellings. However the Council does not regard the additional 5% buffer as a ceiling and wishes to plan for higher delivery.

Whilst we have no detailed comments specific to any of the 13 assessed sites we note that there are no village sites allocated for housing development. As identified in the Tees Valley SHMA, within rural areas in Stockton, only the supply of terraced houses exceeds demand, whereas demand for flats, bungalows and semi-detached properties exceeds supply. Further demand for 3 bed and owner occupied property exceeds supply. Accordingly, development of around 40 family dwellings at Carlton would meet the needs of the borough by providing 3+ bed, largely detached or semi-detached properties.

The NPPF requires that: In rural areas...local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs.” (NPPF paragraph 54)

As such it is our firm view that our client’s site at Carlton should be allocated under Policy H1 for housing, with approximate capacity of 40 dwellings. As detailed further in section 5.0 we consider that the site is suitable, available and achievable and thus deliverable within the next five years, subject to the grant of planning permission. We consider that the site represents a sustainable location for housing development and note that the village of Carlton has been assessed and given the third highest sustainability score compared with the 13 other villages assessed in The Planning the Future of Rural Villages Study. We therefore consider that, in accordance with the NPPF, the following applies to our client’s site: “Housing applications should be considered in the context of the presumption in favour of sustainable development.” (NPPF paragraph 49)

Council Response: Comments regarding rural housing need and demand noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

#### H1 - Housing Allocations

### New Policy

197/8: Overall, Hellens Group fully supports the Council’s aim to deliver sufficient dwellings to meet the Borough’s identified housing need, although a number of concerns have been raised regarding the housing requirement identified as well as the housing spatial strategy. In the context of the above we consider our client’s site at Carlton is an appropriate, sustainable and deliverable housing development site. We consider that housing development at the site would not only help meet the identified housing needs of the Borough and its rural villages but would also strengthen the role of Carlton and villages it shares an interdependency with, specifically Stillington, Redmarshall and Thorpe Thewles.

We consider that there should be a consistent approach to development in villages and this should identify that development both within or adjacent to sustainable villages is appropriate.

The R&ELDD should reflect the importance of new development across all levels of settlements in the hierarchy to reflect local need and to ensure that sustainable communities are enhanced and maintained. As such, the sequential approach set out in SP2 should not lead to a static approach to development in settlements lower down the hierarchy. Policy SP3 should acknowledge that housing development may be appropriate outwith the Limits to Development. This would better align with Policy SP2 that refers to sites within or adjacent to sustainable rural villages as being appropriate and reflect the interdependencies of villages.

Housing development at our Client's site at Carlton would provide a number of family homes with the potential of exploring the provision of affordable housing to meet the Borough's housing need.

New housing development at Carlton would also deliver economic benefits for the area. It would create new jobs, increase the Council's revenue base and contribute to the local GVA. This would strengthen the role of Carlton and would enhance the interdependency between the network of villages, with housing development at Carlton likely to impact on both lower and higher tier villages. Housing development at Carlton would assist in strengthening the role of Stillington which provides employment opportunities to surrounding villages. As such it is considered wholly appropriate that our Client's site be allocated for housing development.

Details of client's site at Carlton's suitability, availability, achievability and thus deliverability in the next five years subject to the grant of planning permission included within the representation.

Council Response: Comments regarding rural housing need and demand noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

## SP2 - Housing Spatial Strategy

197/9: •Housing development at Carlton would provide a number of family homes with the potential of exploring the provision of affordable housing to meet the Borough's housing need.

In relation to the final point above, we are pleased to be able to confirm that subsequent to the submission of our representation our client has secured the status of a registered provider (Hellens Residential Limited, Registration Number 4744). Linked to this our client would like to request that the subject site be allocated as a rural exception site, for the reasons set out in the remainder of the representation.

NPPF Guidance on Rural Exception Sites

NPPF paragraph 54 states that:

"In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs."

We consider that the above course of action is appropriate.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

## H3 - Housing Mix and Affordable Housing provision

197/10: Regeneration and Environment LDD Consideration of Rural Exception Sites

R&ELDD Policy H3(10) states that:

"The requirement for affordable housing in the rural parts of the Borough has been identified through detailed assessments of rural housing need. The requirement will be met through the delivery of 'rural exception' sites or sites for people in identified housing need with a local connection. These homes will be affordable in perpetuity. Planning applications for rural exception sites should be supported by robust evidence of deliverability."

Whilst the NPPF guidance is clear that allowing some market housing to facilitate the provision of affordable housing to meet local need, it is not clear if or how the Council has considered the role of market housing on rural exception sites in the Borough, although it is clear that deliverability of rural exception proposals must be evidenced.

Further, whilst the Council sets out that rural affordable housing needs will be met through rural exception sites associated with villages with access to services and facilities by sustainable means, no such sites have been allocated for housing. Our view is that the best means to ensure delivery is to allocate sites rather than rely upon the potential emergence of windfall sites at some point in the future.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

H3 - Housing Mix and Affordable Housing provision

197/11: Affordable Housing Delivery

The R&ELDD confirms that there is a need for affordable housing in the rural areas, drawing upon the SHMA and Housing Needs Study. The SHMA (2012) identifies a net annual affordable housing requirement of 33 dwellings in rural areas in Stockton. The Stockton Housing Needs Study (2010) identifies a requirement of 6 affordable homes per year between 2009/10 and 2013/14 in Carlton, Grindon and Redmarshall. Consequently, there is a requirement for around 30 affordable dwellings in Carlton, Grindon and Redmarshall by the end of 2014. On review of the SHLAA it is clear that no deliverable or developable sites have been identified in these villages.

From discussions with Council Officers we understand the presently, the Council's view is that the majority of affordable housing will be delivered as a percentage of allocated sites, unless there is a reason why the allocated sites cannot deliver affordable housing.

Policy H3 (4) sets out that:

“the average annual target for the delivery of affordable housing is 110 affordable homes per year during the plan period. This target is a minimum not a ceiling.”

Additionally, policy H3 (5) sets a target range of between 15-20% affordable housing required on schemes of 15 or more dwellings.

The Indicative Phasing Table in the R&ELDD sets out that in the first five years of the Plan, the allocated housing sites are expected to deliver 1,246 dwellings (between 2015/16 and 2019/20). The target of 110 affordable homes per year would equate to 550 affordable homes in the same period. The requirement for 550 affordable homes represents 44% of the expected housing delivery of 1,246 dwellings between 2015/16 and 2019/20.

Between 2015/16 and 2028/29 the Indicative Phasing Table sets out that the allocated housing sites are expected to deliver 5,761 dwellings. The target of 110 affordable homes per year would equate to a requirement for 1,540 affordable homes in the same period. This represents 27% of the expected overall housing delivery between 2015/16 and 2028/29.

As policy H3 (5) sets a target range of 15-20% affordable housing requirement on schemes of 15 or more dwellings, it seems unlikely that the allocated housing sites will deliver the affordable housing target of 110 dwellings per year, particularly in the first five years. This is because based on the phasing of allocated housing sites, to deliver the target of 110 affordable dwellings per year, this would require:

- more than double the amount of affordable housing on the allocated sites in the first five years - 44% compared to the 15-20% target set out in Policy H3 (5); and
- 27% of affordable housing on the allocated sites between 2015/16 and 2028/29 compared to the 15-20% target set out in Policy H3 (5).

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

H1 - Housing Allocations

197/12: Delivery of Affordable Housing at Carlton

H3 - Housing Mix and Affordable Housing provision

Our client is confident that affordable housing can be delivered on the subject site at Carlton. Based on a site capacity of around 40 dwellings the subject site has potential to deliver between 12 and 20 affordable homes (based on a range of 30%-50% affordable housing which would depend on scheme viability).

The NPPF makes clear that in rural areas, local planning authorities (LPAs) should plan housing development to reflect local needs, and that LPAs should in particular consider whether allowing some market housing would facilitate the provision of additional affordable housing to meet local need.

The allocated housing sites appear unlikely to deliver the target of 110 affordable homes per annum. Further, the provision of between 20 and 28 affordable rural houses at Carlton, which is identified as a sustainable village in the Council's Planning for the Future of Rural Villages Study' (updated 2012), would clearly help meet the Rural HNA identified need of 30 affordable units in Carlton, Grindon and Redmarshall by the end of 2014. Indeed, this need will clearly increase beyond March 2014.

As set out in our SHLAA representation (submitted on 24 September 2012) we consider that the subject site at Carlton is suitable, available and achievable in the next five years subject to the grant of planning permission.

Consequently, and for the reasons set out in this letter, particularly given that no Rural Exception Sites have been allocated and no sites have been identified as deliverable or developable in Carlton, Grindon or Redmarshall we respectfully request that the subject site at Carlton is allocated as a rural exception site for around 40 dwellings constituting a mix of affordable and market housing. Our client would welcome the opportunity to discuss the site's potential with planning and housing officers at an early stage.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

## H1 - Housing Allocations

197/13: We fully support the Council's aim to deliver sufficient dwellings to meet the Borough's identified housing need. However, in terms of the level of need identified we have a number of concerns.

### Housing Requirement

The Preferred Options sets out a housing requirement over the plan period 2014 to 2029 of 8,250 dwellings creating an annual requirement of 550 over the 15 year plan period. We understand that this requirement is based on the Core Strategy/RS targets rolled forward.

Taking the latest 2010 Sub-National Population Projections which use demographic and migratory trends over the preceding 5 year to project forward population growth, we estimate that the housing need is likely to be higher than assumed with approximately 773 dwellings per annum being required. As the 2010 sub-national projections rely on data from the last 5 years they include both positive (2005-2007) and negative (2008-2010) economic conditions, this would therefore be a reasonable, albeit conservative basis for planning for housing growth for the 15 year period ahead

Assuming modest economic growth of 2.3% per annum (in line with Stockton Employment Land Review – Bronze Scenario, 20081) this results in an increased need of 833 dwellings per annum when converted into houses to support an increased workforce.

We are therefore of the view that the Council housing need estimates are conservative and suggest that there is further scope for the housing requirement to be increased.

As such we are confident that our client's land at Carlton can be allocated in addition to Stockton's preferred housing sites.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

197/14: We understand that the Preferred Options housing requirements are predicated on a 5% 'buffer', to ensure choice and competition.

However, in the light of the Council's net performance on housing delivery since 2004 as illustrated below, the Council has exceeded the housing requirement in only one year and, in the round, has consistently under-delivered. We therefore consider it reasonable and appropriate to increase the buffer to 20%. This is in line with the guidance at paragraph 47 of the NPPF.

Year	Net completions	Requirement	%
2004/5	345	600	57.5%
2005/6	387	600	64.5%
2006/7	563	600	94%
2007/8	1141	600	190%
2008/9	496	600	83%
2009/2010	542	600	90%
2010/2011	459	600	77%
2011/2012	471	530	89%
Total	4,404	4,730	93%

Indeed, R&ELDD Policy H2 (5) would appear to accept the above, stating that land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan”.

Whilst a 20% buffer should be planned for and the evidence clearly supports this, should a different view be taken it is important that the 5% buffer is not viewed as a ceiling and as recognised in the Preferred Options, higher delivery should be supported and not stifled.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

197/15: As detailed in the accompanying SHLAA representations and summarised below we consider our client’s site at Carlton to be suitable, available, achievable and thus deliverable in the next five years subject to the grant of planning permission.

#### Suitability

Having regard to the factors to be considered in assessing a site’s suitability set out in the SHLAA Practice Guidance, it is evident that there are no physical problems or limitations, other potential impacts or environmental conditions which would preclude the development of the site for housing in the next five years.

The application site is outside of the settlement limits as defined by the Stockton Local Plan (Policy EN13) which restricts residential development in such areas. However, Table 1 of the Planning the Future of Rural Villages Study identifies a number of services available in Carlton.

- ☐ Shop
- ☐ Post Office
- ☐ Post Box
- ☐ Phone box
- ☐ Public House
- ☐ Bus Service Internal
- ☐ Village Hall
- ☐ Place of Worship
- ☐ Equipped Children’s Play Area
- ☐ Footpath Links

Furthermore the Study identifies that within 3.5km of Carlton there is a Primary Schools located in Hardwick and also the village of Stillington and Secondary Schools located in Egglecliffe and Bishopsgate. Again, within 3.5km there is also a Supermarket, Doctors Surgery and Local Centre. There is an hourly bus service (number 6) providing connections with Stillington (8 minute bus journey) and Stockton town centre (18 minute bus journey) and there are bus links to both the primary and secondary schools. The appraisal identifies there are currently pedestrian/cycle links to the main urban area.



The site occupies an accessible location capable of making a contribution to sustainable development and mixed communities and hence should be prioritised for housing.

The accompanying SHLAA representations detail that there are no insurmountable constraints to new housing development at the site when assessing:

- ☐ Access
- ☐ Flood Risk
- ☐ Neighbouring Uses
- ☐ Environmental Constraints
- ☐ Archaeology

We concluded that in our view the site should be considered suitable for housing development. It offers a suitable location for housing development that would contribute to the creation of sustainable, mixed communities.

#### Availability

Hellens Group owns the site and initial soundings reveal there is firm interest from house builders. Hellens Group is able to confirm that there are no legal or ownership constraints which would preclude the early delivery of the site. As such, there is no doubt that the site is available to provide housing within the next five years.

#### Achievability

Given that the site will be available for housing within the next five years, and having regard to the above there is confidence that if planning permission is granted new housing development will be achieved at the site within the next five years. The above confirms that there are no environmental constraints or physical limitations to the early delivery of the site; hence no onerous predevelopment works are required to deliver the development.

#### Deliverability

The NPPF and the SHLAA Practice Guidance state that a site is deliverable within the next 5 years when it is:

- ☐ Suitable for housing development;
- ☐ Available for development; and
- ☐ Achievable within the next five years.

#### Summary

The above demonstrates that Land at Carlton is Suitable, Available and Achievable in the next five years subject to the grant of planning permission. Land at Carlton is therefore Deliverable as defined by paragraph 47 of the NPPF. Indeed, the above confirms that there are no obstacles to the early delivery of the site and given that the Council cannot demonstrate a deliverable 5 year supply of housing land, and in the context of the NPPF it is wholly appropriate that the site is considered deliverable within the next five years.

Council Response: For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

#### 197/16: Benefits of Housing Development at Carlton

The provision of around 40 low to medium density family homes at Carlton would deliver a mix of modern high quality housing types. It will help to address the shortfall of 3 to 4+ bedroom dwellings and affordable housing could be provided in line with the Council's policies and local need to achieve a balanced and sustainable community.

Furthermore, whilst the village has expanded with 10 dwellings granted planning permission at Willow Bridge in 2004, this has not contributed to the delivery of affordable

housing at Carlton. As we understand it, recent housing development schemes in Carlton over the past decade have delivered little or no affordable housing. Our client is willing to explore the possibility of delivering affordable housing at the site at Carlton which will contribute to meeting the identified needs for affordable housing as detailed in the Tees Valley SHMA.

New housing development at Carlton would also deliver economic benefits for the area. The construction value is estimated at £4million. Building new homes creates significant numbers of new jobs. These occur in the construction industry and in the supply chain, as well as other related services, such as in shops and leisure centres. Based upon industry standard employment densities, it is estimated that the development will generate 22 permanent Full Time Equivalent (FTE jobs) during the construction phase, including jobs in the supply chain (this is drawing upon Government-backed figures).

The proposal will also result in an increase to the Council's revenue base. It is estimated that 40 new homes would result in:

£530,000 from the Government's New Homes Bonus

£90,000 every year in additional Council Tax.

The development will contribute to the local Gross Value Added (GVA), which is a common measure of economic output. It is estimated that the construction phase will result in an addition £385,000 of GVA. New housing development at Carlton would generate a net additional expenditure of around £105,000 which will increase the viability of existing facilities in the area. As detailed above and in the accompanying SHLAA representations, our client owns the land and has confirmed that the site has firm developer interest. We consider that the site is deliverable within the next five years subject to the granting of planning permission and as such would help to meet the housing needs of the borough and its rural villages.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper. For the reasons why the site identified in the representation has not been allocated see the Housing Site Selection Topic Paper.

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## 198 Durham County Council

198/1: As a general point, the need for the revised housing strategy and also the new approach in bringing together the originally intended 3 DPDs into this single document is understood and supported.

I trust these comments are of assistance, the Council looks forward to the opportunity to comment further on later drafts of the plan.

Council Response: Comments noted and welcomed

### H1 - Housing Allocations

#### H11 - Wynyard Village

198/2: With regards to the specifics of the document, Durham County Council have some concern over the levels of new housing proposed at Wynyard and Wynyard Park. Policy H1K and H1L propose 1300 new houses in total in this area of the Borough, where there are known issues with the capacity of the A19 and A689 junctions. The 70ha of employment land proposed at Wynyard Park through policy EMP3 will also impact on this junction.

#### H11 - Wynyard Village

As you may know Durham County Council, through the Local Plan Preferred Options, has identified a housing allocation for 444 new houses to the south of Sedgfield village. Although the development of this site would have a minimal impact on the highway network in isolation, we are concerned that the amount of development proposed in the Wynyard area could have an impact on the delivery of this site.

#### EMP3 - Key Employment at Wynyard Park

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

198/3: In regard to the 1000 houses proposed at Wynyard Park, the site does appear to be detached from any settlement in what is a potentially unsustainable location. There will be clear infrastructure requirements as a result of this development although it is acknowledged that the development of H1L is intended to cross fund these new facilities.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## 199 Taylor Wimpey/West Raynham Developments

H1b - Urlay Nook	199/1: Section 8 of your Preferred Options Report relates to housing allocations and requirement for the period 2014 to 2029. The housing requirement for 2014-29 identified as being 8,250 units (without taking into account “cumulative performance” (that is housing delivery up to 2014). Policy SB2 states that a 5% buffer will be used as the bench mark with a 5 year supply of deliverable housing land and adds that the Council does not regard this as a ceiling. Stockton Borough Council have a record of persistent under delivery of housing over the past 5 years, therefore in accordance with NPPF (para 47) this buffer should be increased to 20% to provide a realistic prospect of achieving the planned supply and to ensure a choice and competition in the market for land.
H2 - Housing Phasing and Implementation	
SP2 - Housing Spatial Strategy	Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.
H1b - Urlay Nook	199/2: Supply of Housing against Requirements
H2 - Housing Phasing and Implementation	<p>The scope to allow for a range of housing sites, in excess of the housing requirement to come forward at any one time is logical and will provide for choice and competition in the market. This will also assist in boosting the supply of housing across the Borough in line with the requirements of the NPPF.</p> <p>The inclusion of Policy H2 (5) does however provide serious concerns as this policy suggests that where windfall housing sites come forward, sites allocated for housing within the Regeneration and Employment LDD may be held back. There is no requirement within the NPPF or any robust justification put forward by the Council to set a ceiling for housing delivery. There is no evidence that an overprovision of housing will result in material harm, especially in the context of the Governments clear directive for Local Authorities to ‘boost significantly the supply of housing’. The development of brownfield sites in the conurbation as windfalls should be seen as a significant benefit to increasing the supply and range of housing. Placing a ‘cap’ on the amount of housing to come forward renders the plan unsound as it has not been positively prepared in accordance with the NPPF (para 154).</p> <p>Given the land at Urlay Nook will be delivered in phases, the policy provides added uncertainty to both developer and landowners as to the delivery of an allocated site within the plan period, which is unwelcome given the investment involved in delivering such sites.</p> <p>Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.</p>
H2 - Housing Phasing and Implementation	199/3: Regarding SBC’s Indicative Phasing Table we note that Urlay Nook Phase 1 is predicted to yield 25 units per annum from a start date of 2017/18.
H1b - Urlay Nook	<p>Urlay Nook Phase 2 is then predicted to begin to yield 25 units per annum from 2019/2020 and Phase 3 will begin to yield 20 to 25 units per annum from 2021/22. The approximate dwelling capacity of all three phases on 25 hectares of land is considered to be 570 units.</p> <p>The provision of a housing implementation strategy and trajectory of the expected rate of housing delivery over the plan period is supported and is compliant with the NPPF (para 47).</p> <p>Council Response: The Housing Implementation and Phasing Policy in the Preferred Options has not been carried forward to the Publication Draft.</p>
H1b - Urlay Nook	199/4: Site Update / Development Potential
	<p>As you are aware a formal Planning Application was submitted on the 3 September 2010 and is now validated. The determination period expires on 3 December 2012 and this Application consists of Phase 1 for circa 160 units. It is therefore considered that based upon the masterplan and timing of the current application that the site could yield circa 30 units per annum from 2013/2014 with the remainder coming forward as per the attached table (Fig 1).</p> <p>It should be reiterated that the Urlay Nook site lies within the urban area of Eaglescliffe and has for a significant period of time been an allocated employment location. The site has been approved subject to a Section 106 Agreement being in place; however, given the significant level of objection during the determination period, coupled with depressed market conditions, the site has never been delivered. Early representations were made as part of the SHLAA process and as part of the Core Strategy Preferred Options Review. The site is considered to be unencumbered and could allow development to take place immediately.</p> <p>In assessing this site SBC have concluded that the site lies within the settlement limits under Policy LDD, Policy SP3 of Eaglescliffe and is therefore a sequentially</p>

preferable location to other housing schemes.

It is therefore highly likely that the site could yield 30 units per annum from the initial phase, should Planning Permission be forthcoming in December this year; with completions increasing further for the remaining phases as the enclosed masterplan includes a range of house types with the ability for multiple housebuilders to operate from the site. It is noted that the site has been allocated since 1997 for general industrial and storage use and the long term plan from the freehold owners of the site is to rescind their Planning Consent should a Planning Permission be forthcoming for residential development.

It is noted that the Boroughs Employment Land Review has recommended the allocation of the Urayl Nook site.

Council Response: Comments noted.

H1b - Urayl Nook

199/5: Masterplan

Submitted with this representation is a Masterplan prepared by B3 Architects which indicates that Phases 1 and 2 could yield potentially circa 570 residential units. The Masterplan identifies and opportunity for the provision of additional community facilities, open space, sport and recreation in accordance with Policy CS5 and PF1 of the Core Strategy. The facilities could be provided on land outside the settlement boundary, directly to the west of proposed allocation H1b. This land is within the same freehold ownership and as indicated on the enclosed masterplan (Fig. 1).

Please therefore accept this as further supporting evidence to ensure Site H1b Urayl Nook continues to be allocated for residential development in the Publication Draft Document.

Council Response: The Housing Site Selection Topic Paper sets out how this site has been assessed.

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200 Teviot Way Investments Ltd

H1 - Housing Allocations

SP2 - Housing Spatial Strategy

New Policy

200/1: 1.1 These Representations are submitted on behalf of Tiviot Way Investments Limited who own land at Little Maltby Farm, Ingleby Barwick (see Attachment 1). It is their view that this land should be allocated for residential development in the Plan.

1.2 The land is in two ownerships, TWIL and Ian Snowdon. Both owners wish to work together and co-operate in the development of the site in a comprehensive manner. The land is able to be relied upon to be brought forward for development speedily, in line with requirements in NPPF.

1.3 The land is adjacent to Ingleby Barwick, a modern settlement with a good range of facilities and support services. Much of the land was originally allocated for housing development in the original Master Plan for Ingleby Barwick (Attachment 2). It lies within walking distance of existing local primary and secondary schools and services, and the employment at Thornaby Industrial Estate. A new Free School (secondary with 6th form) is proposed within the site. The development is able to provide affordable, family homes in a popular location in line with the requirements of NPPF (see Attachment 3)

1.4 The relationship between the Preferred Options LDD and the Core Strategy (adopted March 2010) is unclear. We are aware that the Borough Council regards the Housing Distribution, Supply and Phasing Policies of the Core Strategy as non-compliant with NPPF. The LDD must follow the requirements of NPPF. In that regard the policies of the Plan should look to allocate land which brings forward sustainable forms of development.

1.5 Specifically, the relationship of Policy SP2 to Housing and Distribution Phasing Policy CS7 is uncertain as there are numerous references within a recent Committee Report (22 August 2012, reference application 12/0980/OUT – Morely Carr, Allerton Balk, Yarm Attachment 4) which states on page 25 (within the response from the Spatial Plans Manager),

“The Adopted Core Strategy is largely NPPF compliant and therefore up to date. However it is acknowledged that the Housing Spatial Strategy and the Housing Distribution and Phasing Policy are not NPPF compliant”.

1.6 This is summarised by the Planning Officer later in his report on the application at paragraph 40 where he states “In addition the Local Planning Authority has already accepted that the Core Strategy is not fit for purpose ... “.

1.7 It is clear therefore that Strategic Policy SP2 requires substantial amendment to become NPPF compliant.

Council Response: Comments noted

## SP2 - Housing Spatial Strategy

200/2: 2.1 SP2 – Housing Spatial Strategy - seeks to rely on Policy CS7 of the Adopted Core Strategy which is in effect a sequential test based policy seeking to concentrate new housing development within the conurbation. Accordingly Policy SP2 seeks to follow this approach and indeed at 3 states that the policy “follows a sequential test approach which prioritises sites in the following order”. It will be noted, of course, that the sequential approach to the selection of housing sites is an abandoned form of policy and has not formed part of national planning guidance for some years. The policy therefore seeks to rely on a sequential approach which has no basis in national planning policy or guidance.

2.2 The policy must conform to the advice set out within NPPF, in particular paragraphs 150 and following. The overarching requirement of NPPF is that,

“Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities” and “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development”.

2.3 Policy SP2 therefore needs to be re-worded to remove reference to the “not fit for purpose” [Stockton Borough Council description] housing policies of the Core Strategy, and to include the requirements of NPPF that sustainable development should be achieved by the allocations set out within the Plan.

2.4 We would recommend the following wording: “Proposed replacement strategic Policy SP2 – Housing Spatial Strategy:

1 To meet the additional housing needs the Council has identified, the Council will allocate land that is able to deliver sustainable development. 2 A site selection process which places sustainability at the heart of the site selection process has been used as the basis for determining the Preferred Options for the additional housing sites required and these are set out in Policy H1.”

Council Response: The approach in the Housing Spatial Strategy Policy in the Publication Draft confirms that the Core Area and the conurbation remain a priority but also allocates a strategic urban extension to the west of Stockton and a sustainable new settlement at Wynyard. It is considered that this is consistent with the NPPF as it both reflects local circumstances and represents a flexible housing delivery strategy.

## H1 - Housing Allocations

200/3: H1 – Housing Allocations

3.1 The sites shown for allocation within Policy H1 do not follow the principles of NPPF which requires Local Authorities to achieve sustainable development. Some of the sites proposed for allocation are not sustainable and other more sustainable sites have not been allocated. Also, a number of the proposed housing sites have uncertain availability and should not be relied upon at a time when housing delivery is vital. (Ref: paragraph 47 of NPPF). The rationale used by the Borough Council to rank sites is unclear and not consistent. By way of example the opportunities to create a community and provide on-site facilities feature highly in the Council’s commentary on some of the proposed allocated sites, whilst the same opportunities at Ingleby Barwick Little Maltby Farm, are ignored. Furthermore, there is no recognition that Little Maltby Farm has been selected as the site for the approved new secondary Free School, for opening September 2013; and how that affects the sustainability credentials and allocation selection process. The allocation of the wider Little Maltby Farm site plays an important role in the funding of the new Free School and a further opportunity for a new primary school is sought.

3.2 In summary,

H1A – Nifco – land ownership issues and existing employment operations affect the availability of this site.

H1D – Uray Nook – the HSE Consultation Zone still affects much of the site and the site selection process relies on the sequential approach. The site scores poorly in the sustainability matrix submitted.

H1C – University Hospital of North Tees – finance for the relocation to a new Hospital at Wynyard is not available and the availability of this site is uncertain.

H1H – Land East of Yarm, Back Lane – the allocation of this site relies on the sequential approach and flooding and other issues have yet to be resolved / investigated. The availability and suitability of this site are therefore uncertain. The site scores poorly in the sustainability matrix submitted.

H1I – West Yarm – these sites are located within a Strategic Gap south of the main road that at present provides a firm limit to the southward expansion of Yarm. The availability of part of the site relies on the relocation of Yarm School playing pitches. The local community is against this outward expansion of Yarm. The availability of the site is therefore uncertain, and the release is not in compliance with NPPF. The site scores poorly in the sustainability matrix submitted.

H1K – Wynyard - Wynyard is an unsustainable location with no local services or facilities and paragraph 8.134 (page 134) of the Draft Plan states “this is because Wynard is currently considered to be an unsustainable settlement”. Its allocation is not NPPF compliant. The site scores poorly in the sustainability matrix submitted.

3.3 Satnam has produced an alternative site analysis matrix which seeks to score the main allocated sites on a sustainability assessment in line with the requirements of NPPF (see Attachment 5). The land owned by Tiviot Way and Ian Snowdon at Little Maltby Farm has also been included within this site matrix. It will be seen from the scoring matrix that Little Maltby Farm should be allocated and a number of the proposed allocations removed for the reasons set out above and their low scoring on the matrix.

3.4 Unless such a process is followed the Plan will be unsound due to its non-compliance with NPPF (see legal opinion at Attachment 6). Paragraph 182 of NPPF is specific in that it should be “Positively prepared”, “Justified”, “Effective”, “Consistent with National Policy”.

3.5 It is clear from the Preferred Options Document that the plan is not “justified” as a proper analysis of the most appropriate strategy weighed against the “reasonable alternatives” has not been undertaken and therefore the Plan fails in that regard.

3.6 Furthermore, the Plan is not consistent with National Policy as the submitted matrix shows it will not “enable the delivery of sustainable development in accordance with the policies in the Framework”.

3.7 This LDD is the opportunity to set out a balanced strategy that will bring forward the most effective and sustainable development alternatives within the Borough. The enclosed scoring matrix shows that the land at Little Maltby Farm should be allocated as it scores highly on any sustainability test. Some of the sites proposed for allocation score very poorly and therefore do not fulfil the requirements of the paragraph 182 of NPPF.

3.8 Policy H1 should be amended therefore to allocate land at Little Maltby Farm for up to 1400 dwellings and to remove some of the lower scoring sites as shown on the Satnam matrix and as set out above.

Council Response: See the Housing Site Selection Paper for how housing sites have been assessed. See also the Sustainability Appraisal which has been revised for the Publication stage.

#### SP4 - Green Wedge

200/4: SP4 – Green Wedge – is based on Core Strategy Policy CS10. The key diagram for the Core Strategy sets out the broad extent of the Green Wedge in the vicinity of Little Maltby Farm, see Attachment 7. This excludes the central area of the site.

4.2 The Proposals Map for the Preferred Options Document by contrast, shows the Green Wedge extending across the whole site.

4.3 The diagram for the Core Strategy shows the central part of the site without the Green Wedge notation for a number of reasons. This follows the historical fact that the site was allocated for residential development as one of the earlier villages of Ingleby Barwick in the original Master Plan. It also reflects evidence of the Borough Council and the comments of the Inspector at the Stockton on Tees Local Plan, who regarded this section of the Green Wedge as having the ability to be drawn away from the existing built up area without affecting the integrity of the Wedge notation (See attachment 8).

4.4 It is also necessary to look at the function of the Green Wedge. Core Strategy Policy 10 specifies that the Green Wedge around Ingleby Barwick aims to separate Yarm and Ingleby Barwick (to the West) and Ingleby Barwick and Thornaby (to the East). It is noted that to the South of Low Lane the Strategic Gap separates the outer limits of the conurbation (Ingleby Barwick) from the surrounding villages. Thus there is no Green Wedge function to the south of Little Maltby Farm, in the vicinity of Low Lane, specified in the Core Strategy.

4.5LDD proposed strategy Policy SP4 – Green Wedge – seeks only to regulate land uses within the Green Wedge (the Policy “seeks to improve the appearance of the Green Wedge by maintaining its openness”) and does not seek to amend the areas to which it relates.

4.6As the LDD does not seek to amend the extent of the Green Wedge as set out in the Core Strategy, the Proposals Map should be amended to reflect the position in the Adopted Core Strategy and to omit the designation from the main central part of the site as shown on the Core Strategy diagram.

Council Response: The role of a strategic diagram is to show the broad, not detailed, spatial distribution of development and strategic designations. The 1997 Local Plan Proposals Map sets out the current extent of the Green Wedge. This will be replaced by the policies map associated with the Regeneration and Environment Local Plan in due course.

## H2 - Housing Phasing and Implementation

200/5: 5Policy H2 – Housing Phasing and Implementation

5.1Subsequent amendments should be made to Policy H2 to reflect the sites allocated in Policy H1 (see Satnam objections to Policy H1).

Council Response: Comments noted.

## New Policy

200/6: Proposed new Housing Allocation Policy - H1X – Little Maltby Farm, Ingleby Barwick

6.1A new allocation of land at Little Maltby Farm should be part of the Plan. This should be drafted as follows,

“68 hectares of land is allocated for housing at Little Maltby Farm for approximately 1400 dwellings.

Development of the site will be subject to a comprehensive Master Plan detailing design, access arrangements and development phasing. The Master Plan will include the following elements:

Through design and landscaping a soft boundary between residential development and the countryside should be provided. This should include the creation / retention of woodland and other semi-natural habitats and the provision of cycle / pedestrian and possibly equestrian access along the full eastern fringe of the site. There should be good linkages into the development itself and to access networks in the development site from Ingleby Barwick and Thornaby Industrial Estate.

Any necessary off-site works to achieve connectivity for pedestrians and cyclists to the community facilities and opportunities for travel by sustainable modes in the existing urban area and for the new facilities provided within the development will be provided with the development.

Retain and enhance the existing Beck green corridor to make this an important element of the new development.

Create high quality pedestrian / cycle links to Ingleby Barwick and Thornaby Industrial Estate.

To provide for public open space to the perimeter of the site (East and South) so that existing and future residents have easy and direct access to these open space areas

Land identified in the Master Plan will include the following purposes:

New (secondary) Free School off Low Lane

New primary school (if required) within the development area

Neighbourhood Centre to meet local needs. This will include the provision of health facilities, leisure facilities and any other community needs.”

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

200/7: 7.1The little Maltby Farm site is suitable for residential development and should be allocated. We enclose a Master Plan showing how the site is able to be

arranged.

7.2 The allocation of Little Maltby Farm will provide housing of the type which is required within the Stockton on Tees's area (see Strategic Housing Market Appraisal and see Attachment 9 letter from Stanton Mortimer Surveyors). The allocation of the wider Little Maltby Farm is also an important element in the funding of the agreed Free School off Low Lane (see EFA document Attachment 10).

7.3 As shown in the Satnam scoring matrix, Little Maltby Farm scores highly and should be allocated on sustainability grounds.

7.4 Unless the requested re-appraisal of the allocated sites is made the LDD Preferred Options Document will be found to be "Unsound".

Representation also includes a covering letter, a red edge plan, a copy of the 1977 Ingleby Barwick Master Plan, an aerial photo, an alternative sustainability appraisal, a QC opinion, an extract from the Core Strategy Strategic Diagram, an extract from the 1995 Local Plan Inspector's Report, a letter from a property consultant, a letter from the Education Funding Agency, a noise report and an air quality report.

Council Response: The Housing Site Selection Topic Paper will address how this site has been assessed, both individually and in relation to other potential site allocations.

## 201 Theakston Estates

SP1 - Presumption in favour of sustainable development

201/1: Presumption in Favour of Sustainable Development – Strategic Policy SP1

NLP welcomes the Council's positive approach to considering development proposals which broadly aligns with the NPPF. This positive approach and presumption in favour of sustainable development will assist in ensuring defined development requirements are met without delay.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

201/2: Nathaniel Lichfield and Partners ("NLP") have pleasure in submitting representations to the Stockton-on-Tees Borough Council's ("the Council") As an overarching comment we welcome the Council's positive approach to meeting defined development requirements and positive assimilation of the key messages from the National Planning Policy Framework ("NPPF"). The Council are taking a number of positive steps to address, inter alia, both current and forecast housing requirements and this is supported.

By way of background, as you will appreciate, our client currently has two live planning applications before the Council:

Residential development of up to 735 dwellings on land at South West Yarm (Ref: 12/1990/EIS) – land allocated within the Preferred Options as a housing site under Policy H1j

Provision of new sports facilities and public park on land north of the River Tees, Yarm (Ref: 12/1595/EIS).

Additionally, our client also controls other land within the Council's administrative area, including that to the south of William Cassidi School, Stillington (Strategic Housing Land Availability Assessment ref: 104).

Council Response: Comments noted

SP2 - Housing Spatial Strategy

201/3: Further, at the current time – until any revocation is concluded – there remains a legal requirement for the Preferred Options to be in broad accordance with the Regional Spatial Strategy ("RSS") for the North East 2008. This is acknowledged in the Preferred Options and, indeed, the RSS housing requirement has formed the general basis for establishing the Council's baseline housing requirement to 2029. That said, we note the RSS provided for Council's to "make the case for higher figures as appropriate" (paragraph 3.89). This is particularly relevant in light of the NPPF's approach to delivering a wide choice of high quality homes (paragraphs 47 – 55 inclusive) and generally increasing housing supply.

New Evidence on the Housing Requirement

Since conclusion of the RSS clearly the economic outlook has changed markedly through two recessionary periods. Further, there have been a number of new population and household projections produced by, amongst others, the Office for National Statistics.

Cognisant of the most recent 2010 Sub-National Population Projections NLP considers the housing requirement to be significantly higher than previously envisaged. By



way of comparison the Preferred Options requirement is around 550 units per annum whereas the ONS forecasts 773 dwellings per annum. This equates to 11,595 new homes being required over the plan period, some 40% in advance of the Council's Preferred Options document.

These population projections take into account demographic and migratory trends over the preceding 5 year to project forward population growth. As such, the 2010 projections include both pre and post recession conditions and are therefore considered a reasonable, albeit conservative, basis for planning for housing growth for the 15 year period ahead.

Further, assuming modest economic growth of 2.3% per annum (in line with the Stockton Employment Land Review – Bronze Scenario) the annual requirement increases further to 833 dwellings per annum when converted into houses to support an increased workforce.

As such, we respectfully submit that the Council's forecast housing requirement is too low and will ultimately fail to ensure locally derived housing requirements are met in full, thereby constraining economic growth.

Council Response: The housing requirement for the Borough is discussed within the Housing Need and Demand topic paper.

#### SP2 - Housing Spatial Strategy

##### 201/4: NPPF Buffer

The Preferred Options housing requirements are predicated on a 5% 'buffer' to ensure choice and competition albeit paragraph 2.6 of the Preferred Options confirms this will not be regarded as a ceiling for the supply of deliverable housing land. However, in light of the Council's net performance on housing delivery since 2004, as illustrated below, the Council has exceeded the housing requirement in only one year and, in the round, has consistently under-delivered.

It is, therefore, entirely reasonable and appropriate to increase the buffer to 20%. This is in line with the guidance at paragraph 47 of the NPPF. Indeed, Policy H2 (5) would appear to accept the above, stating that "land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan".

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

#### SP2 - Housing Spatial Strategy

##### 201/5: Village Development – Paragraph 2.9

We note that Appendix 3 confirms Stillington as a Tier 1 Village with a sustainability score of 41 points – the highest of any villages within the Council's administrative area. The Council's Rural Villages Report (2012 Up-date) confirming that infill development will be appropriate in tier 1 and 2 villages and consideration should also be given to meeting affordable housing requirements within the rural areas through the release of exceptions sites.

We have previously submitted representations in relation to land south of William Cassidi Primary School, Stillington, and understand the Council are considering that site for development, particularly to meet rural affordable housing requirements. In undertaking such an assessment we consider that the next iteration of the Preferred Options should include an allocation of the site to assist in meeting the rural housing requirement including both affordable and market housing the site having a capacity for around 50 dwellings.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper.

The land south of William Cassidi Primary School, Stillington has been granted planning permission for housing development. The Publication version of the Regeneration and Environment Local Plan re-affirms the planning commitment.

#### PF1 - Open Space, Sport and Recreation Facilities

##### 201/6: Open Space, Sport and Recreation Facilities – Policy PF1 and Paragraph 7.23

Our clients support the Council's approach to ensuring open space, sport and recreation requirements are properly met through new development in line with prevailing standards and requirements. There may, however, be situations where an off site contribution can assist in better meeting open space, sport and recreation requirements and this should also be incorporated within the Policy. Indeed, both the Supplementary Planning Document and paragraph 7.23 provide for this scenario and policy PF1 should be amended accordingly.

Council Response: Policy PF1 enshrines the standards identified within the Open Space, Recreation and Landscaping SPD within the LDD. It will always be preferable to provide open space on site. However, it will only be practical to provide open space on site if the space provided is of a suitable size. The minimum acceptable size standards will be used to identify when open space is required on site. The minimum acceptable size triggers the need for open space to be provided on site when the

demand caused by the development reaches the area outlined.

## H1j - South West Yarm

### 201/7: Housing Allocations - South West Yarm H1j

Theakston Estates Limited fully support Policy H1j which allocates land at South West Yarm for up to a total of 735 new homes. The current planning application before the Council confirms that the site is a sustainable and deliverable housing site. Indeed, the Preferred Options Sustainability Appraisal confirms that “the site [allocation H1j] is located adjacent to the existing conurbation and the provisions of the policy have led to a positive assessment against the majority of objectives within the sustainability appraisal. No conflicts or uncertainties were identified”.

In terms of deliverability, in line with the NPPF (footnote 11) the site is available, suitable and achievable. A summary of the assessment included within the planning application submission is set out below:

#### Availability

Approximately 80% of the application site is available for residential development immediately. The availability of the remaining 20% is dependent upon the successful re-location of Yarm School’s existing playing pitches to land to the north of the River Tees (the subject of a current planning application ref: 12/1595/EIS). Residential development would be phased from west to east to enable sufficient time for the pitch relocation proposals to be implemented, whilst allowing early housing delivery to proceed.

#### Suitability

The application site is currently outside of the settlement limits as defined by the Stockton Local Plan (Policy EN13) which restricts residential development in such areas. However, the Core Strategy Review (paragraph 3.55) confirms that the application site is one of the most sustainable sites in the Borough for a residential release by virtue of its proximity to a number of local services and facilities, including:

- Yarm Town Centre within 1.7km of the site ;
- Yarm Railway Station (which is located in the centre of the site providing excellent public transport links);
- Conyers Secondary School (directly opposite the development site);
- Two primary schools within 1km of the site;
- A designated retail centre within 500m of the site; and
- Health care facilities within 2km of the site.

The Sustainability Appraisal which accompanied the Core Strategy Review identifies the site as the third most sustainable of the 16 strategic housing options identified in the Borough.

#### Achievability

As demonstrated through the current planning application and through the developer and major house-builder interest in the site, there are no foreseeable viability issues that would preclude development for housing. The site is demonstrably deliverable within the next 5 years subject to a grant of planning permission with the potential to contribute around 285 units to the Council’s current shortfall in housing supply.

The Preferred Options document (Para 8.102) states that “One of the main concerns of representors was the capacity of the of the road infrastructure to accommodate the extra traffic... Parking in Yarm is considered limited and causes problems through the town and is considered that more homes would add to those problems and extra parking provision required”.

In relation to these concerns, the Transport Assessment and Travel Plan, prepared by SAJ Transport Consultants to accompany planning application demonstrates that the:

- Proposed improvements to key junctions (A67/Worsall Road, Green Lane/A67 roundabout and the A19/A67 Crathorne Interchange) will mitigate the impact of development traffic;
- Traffic resulting from the proposed development will not materially impact upon highway safety and improvements to the Green Lane/A67 roundabout will provide benefits to pedestrians; and
- The 36 car parking spaces proposed to north of Yarm Town Centre (subject to a separate parallel application Ref: 12/1595/EIS) will mitigate the impact of the proposed

development on car parking within the Yarm High Street area.

Through the current planning application it has been demonstrated that there are no other constraints which would prevent the development coming forward. Further, the planning submissions currently before the Council also demonstrate compliance with points 2 and 3 of policy H1j.

Council Response: Comments noted. For a discussion of issues relating to the Land South of Green Lane (South West Yarm) site see the Yarm and Kirklevington Topic Paper .

## H2 - Housing Phasing and Implementation

201/8: Development Phasing – Policy H2

Policy H2 of the Preferred Options indicatively phases land at South West Yarm as contributing to housing needs from 2019 onwards. We are firmly of the view that, given the unencumbered nature of the site as set out above, delivery can be accelerated and outputs achieved from 2014/15 with 285 units being completed over the next five years or thereabouts. This will make a positive and meaningful contribution to addressing the Council's current lack of a five year housing land supply, meeting both current and future housing requirements.

Whilst the final timings are clearly dependant on a planning permission being granted the following indicative phasing programme is considered realistic and achievable. As noted within the planning application itself, development is forecast to proceed from west to east allowing sufficient time for Yarm School's replacement playing pitches to be implemented and operational before the existing facilities are redeveloped.

We, therefore, respectfully submit that Policy H2 should be amended to reflect this phasing.

Finally, in looking at policy H2 itself we note point 1 which suggests that "where relevant this will include phasing by condition within overall schemes". Given the current overarching policy approach to increasing housing supply and delivery we do not consider such an approach necessary given it could artificially constrain delivery. Further, notwithstanding our comments in relation to policy SP2, it is not clear how the third bullet point (phasing the release of sites) inter-relates with policy SP1, the presumption in favour of sustainable development and the requirement at paragraph 187 of the NPPF that "decision takers at every level should seek to approve applications for sustainable development where possible". Again, this could artificially constrain or delay early delivery of new housing.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan

201/9: Housing Viability Guidance Note: Appendix 4

We object to the Council's approach to the calculation of Gross Development Value and would recommend a working group be established with the Home Builders Federation and other key stakeholders to agree a common framework and assumptions for such calculations where practicable.

Of particular concern is the calculation of developer profit (paragraph 3) at 15% of the gross value of sales. Research across Community Infrastructure Levy's adopted or approved elsewhere confirms this is regularly calculated at a level of 20% e.g. Wycombe, Poole and Newark and Sherwood. Further, the Planning Inspectorate's 2009 assessment of the Council's own Economic Viability of Affordable Housing study (undertaken by BNP Paribas) confirmed that "banks will not provide funding for a scheme that shows a profit of less than 20% on gross development value (which equates to approximately 25% of development costs). It is very difficult to predict if and when profit levels might fall back to 15%." At the current time dialogue within the market place confirms the BNP Paribas analysis to remain relevant today and as such a 15% profit level is not acceptable – 20% currently being the appropriate minimum profit level.

Further, within the calculations clearly determining an acceptable residual land value (paragraphs 5 and 6) will be germane to ascertaining whether a land owner will sell and hence development be delivered. Clearly this varies from site to site based on acquisition costs and land owner expectations but having a positive value at D may not necessarily be sufficient to motivate a land owner to proceed. Further, consideration will also need to be given to any future Community Infrastructure Levy as a deductible from the land value.

Finally, in relation to the Development Costs a number of assumptions do not reflect what we understand to be the current position in the market place e.g. finance at 2% above base rate – typically this is significantly higher at 6% plus. Further contingencies of 5% are standard practice as confirmed by the Homes and Communities Agency not the 2% lower level as suggested.

As such, given the sensitivity and importance of viability within planning we re-iterate our recommendation that the Council establishes a working group to cover this key

issue both in relation to scheme viability calculations but also progression of the evidence base to the Preferred Options and any Community Infrastructure Levy. Further, we would be happy to participate in any such dialogue.

Council Response: The GDV paragraph has been re-worded as follows: 'The appropriate profit level will depend on the nature of the project and the risk/reward scenario. The developer shall be required to provide written justification from a suitably qualified person for the level of development profit that is built into the financial appraisal. Profit on the affordable housing element would be expected to be lower, as there is no marketing risk, and this can either be shown separately or as a blended return across the whole scheme.'

In the experience of the Council's Land and Property team and of the District Valuer, a range of 2-5% is typical for contingencies. The Council recently defended an appeal (APP/HO738/A/13/2/2193511) at which the principle issue was viability. A figure of 3% was agreed for contingency in the Statement of Common Ground. It is acknowledged that the point within the range of 2-5% that is selected will depend on individual site characteristics and the degree of risk involved.

SP2 - Housing Spatial Strategy

H1j - South West Yarm

201/10: Conclusions

Overall, NLP on behalf of Theakston Estates limited welcomes the Council's positive approach to meeting defined development requirements and positive assimilation of the key messages from the NPPF. In particular Theakston Estates Limited support the Council's aim to deliver sufficient dwellings to meet the Borough's identified housing need. That said, we consider that the Council's forecasted housing requirement is too low and will ultimately fail to ensure locally derived housing requirements are met in full, thereby constraining economic growth.

We agree with the Council that the South West Yarm (Policy H1j) site is an appropriate, sustainable and deliverable housing development site. This site can be brought forward in the short term to meet defined housing needs.

Council Response: Comments supporting the Council's approach noted and welcomed. Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic Paper.

202 WT Elstob & Son

202/1: Response to Regeneration and Environment Local Development Document : Preferred Options

This response is submitted on behalf of WT Elstob & Son, the "respondents" in relation to the above mentioned consultation. It is to be taken into account and afforded positive weight in the Council's preparation of the Plan. The respondents are specifically interested in SHLAA site 116, land at North West Billingham which they have promoted for development in earlier stages in the preparation of the Plan. Site 116 is assessed in the SHLAA which finds the site is suitable for residential development, developable in the period 2016 – 2020 and projects it to contribute 25 dwellings to supply per annum over this four year period, 100 dwellings in total.

Council Response: Comments noted. The North West Billingham site has not been allocated because of noise emanating from the concrete section of the A19(T). Whilst the 2014 budget statement identifies that this road will be widened and re-surfaced, it is considered that the location will be an inappropriate location for housing development until the scheme is implemented.

202/2: Para 2.12

It is stated that the 'Preferred Option' is to use the Spatial Strategy set out in the original Core Strategy. Para 2.12 goes on to state that 'it is acknowledged that this approach will not provide sufficient dwellings to meet the Borough's identified need'. NPPF para 47 requires LPAs to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. That being the case the respondents consider there is a need for the Spatial Strategy to evolve such that sufficient housing can be delivered to meet the Borough's identified need.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

202/3: SP2

The respondents support the site selection hierarchy which sequentially prefers sites in the wider conurbation (tier 2) and adjacent to the conurbation (tier 3) above those in new sustainable communities (tier 4) and village sites (tier 5) respectively. The respondents consider as required by the policy, allocations should be made accordingly.

The respondents have considered whether SHLAA site 116 is a tier 2 or tier 3 site in the hierarchy, the Core Strategy Strategic Diagram being large scale and not showing the precise extent of the wider conurbation. The respondents agree that the SHLAA Assessment for site 116 under the heading 'suitability' records it is 'well related to the

existing pattern of built development as its northern boundary aligns with that of the adjacent school'. The site's other boundaries are the School to the east, Sandy Lane to the south and the A19 to the west. The site is therefore enveloped by urban infrastructure which suggests it is a tier 2 site acknowledging it is constrained and not open countryside.

Further support that site 116 is within tier 2 of the hierarchy is found in the SHLAA. This records that the site is in the Billingham Housing Sub Area. This is unlike tier 3 sites, ie those adjacent to the conurbation which would entail an urban extension into the open countryside. Site 35 for example, Land to the West of Harrowgate Lane, is recorded as being in the Rural Area. In the circumstances this is an important issue and we would ask for confirmation that it is common ground the site is tier 2.

Council Response: Support for the Council's site selection hierarchy is welcomed. The Council is of the view that the North West Billingham site falls in to tier 3 - 'adjacent to the conurbation' - as it is a greenfield site which is outside of the existing urban area.

202/4: Para 2.14

NPPF para 47 requires where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20 percent to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. According to Table 19 of the Annual Monitoring Report December 2011, only in one year in the seven period 2004 – 2011 did the LPA meet the RSS minimum requirement. In the circumstances this amounts to persistent under delivery and a 20 percent buffer should be provided in accordance with NPPF para 47.

Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

202/5: Para 2.17

NPPF para 159 states amongst other things that LPAs should prepare a Strategic Housing Market Assessment to assess their full housing needs. Para 159 further requires that the SHMA identifies the scale and mix of housing and range of tenures that the local population is likely to need over the plan period. NPPF para 47 requires that LPAs should 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the Framework'.

The SHMA 2012 provides a range of information in relation to the housing market in Billingham. Table 3.4D finds that the housing market in Billingham is reasonably self contained with 73.7 % of moves taking place within it. Table 4.8D finds for most forms of accommodation in Billingham including 2, 3 and 4 bed detached and semi detached housing, demand exceeds supply and there is some pressure on stock. Table 4.13 finds in the Billingham sub area there are 673 households in need. Table 4.21b finds the total gross annual affordable housing requirement for Billingham is 118 dwellings in the period 2012 - 2017. This figure is again presented at Table D13. The respondents consider this evidence should inform allocations such that the need in the Billingham sub area can be met in accordance with NPPF para 47. Policy H1 only proposes one allocation in Billingham with a capacity of just 30 dwellings, not sufficient to meet the need in either open market or affordable housing terms. Site 116 could contribute towards meeting this need and acknowledging it has been found suitable in the SHLAA, its allocation would be consistent with policies in the NPPF and the evidence base for the Borough.

Council Response: Comments regarding housing need and demand in the Billingham housing sub division are addressed in the Housing Need and Demand Topic Paper

H1 - Housing Allocations

202/6: Policy H1

The respondents consider a 20 percent buffer is required as detailed in representations to policy SP2. The respondents consider allocations should be made in accordance with the site selection hierarchy, SP2 and consider SHLAA site 116 (land at North West Billingham) performs well when assessed against this. Additionally the respondents consider allocations should be informed by housing need and in this respect it is evident that the only proposed allocation in the Billingham sub area is land at Leeholme Road which is proposed to deliver just 30 dwellings in the two year period 2016 – 2018. This scale of development is insufficient to meet the need in the Billingham sub area over the Plan period which lasts until 2029. The SHLAA 2011 North East Developable Sites Map shows that site 116 is the only additional developable site within the Billingham sub area. In the circumstances the respondents consider there is a need for site 116 to be allocated to contribute towards supply and demand. Acknowledging it has been found suitable in the SHLAA, its allocation would be consistent with policies in the NPPF.

Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

Comments regarding housing need and demand in the Billingham housing sub division are addressed in the Housing Need and Demand Topic Paper

H2 - Housing Phasing and Implementation

202/7: Policy H2

The respondents consider there is a need for increased levels of allocation generally to provide a 20 percent buffer. Additionally the respondents consider there is a need for additional allocation in the Billingham sub area to meet the need. The respondents propose SHLAA site 116 for allocation. The SHLAA 2011 North East Developable Sites Map shows that site 116 is the only additional site which is developable in the Billingham sub area. In the circumstances it should be allocated to contribute towards supply.

Following on from the above the respondents consider H2 (2) is not necessary and request its deletion.

Council Response: Comments regarding housing need and demand in the Billingham housing sub division are addressed in the Housing Need and Demand Topic Paper

Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

202/9: Policy H3

The respondents agree that achieving the target for affordable homes is important. As detailed in other representations allocations both in terms of number and in terms of location should be made accordingly.

Council Response: Comments noted. The affordable housing section of the Housing Need and Demand Topic Paper provides a discussion of this topic.

202/10: Conclusion

The above should be taken into account and afforded positive weight in the Council's consideration of alternatives. I would be grateful if I could be kept apprised of progress and would welcome an early discussion with officers.

Council Response: Comments noted.

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203 Mr Matthew Hall

SP1 - Presumption in favour of sustainable development

SP2 - Housing Spatial Strategy

203/0: Paragraph 2.14 of the Regeneration and Environment LDD outlines that over the period of 2004-2012 the Borough under delivered against the housing target by 325 dwellings moving on to detail that the Council believe that, given the housing market conditions, that this is a strong delivery performance and therefore a 5% buffer will be used as the benchmark for maintaining a 5-year supply of deliverable housing land.

The use of this 5% buffer is contradictory to NPPF policy which states that "where there has been a persistent under delivery of housing, local planning authorities should increase the buffer to 20%". The council may believe that this is a strong a delivery performance but in reality it is an under delivery of an average of 40 dwellings per year over the 8-year period and as such the 20% buffer should be applied.

Furthermore, the Housing Supply in the Borough of Stockton-on-Tees 5 Year Deliverable Housing Supply Final Assessment: 2012-2017 relies on annual performance over the previous 5 year period to justify the use of a 5% buffer. However, this relies heavily on 2007/2008 which delivered 1141 net additional dwellings against an annual housing requirement of 600 (190% annual housing requirement delivered). Without this bumper year the housing delivery would not be as strong. As the LDD is unlikely to be Examined in Public until 2013/14 the previous 5-year period will be 2008/2009 until 2012/2013, which is likely to indicate that a 20% buffer would be more reasonable.

The non-application of the 20% buffer would not seem to accord with the Council's stance detailed in paragraph 2.15, and again in 8.2, that they do not regard the additional 5% buffer as a ceiling and wish to plan for higher delivery. If this is accurate then the Council should have no qualms about increasing the buffer to 20% and according fully with paragraph 47 of the NPPF.

Council Response: Comments noted and addressed in the housing delivery section of the Housing Need and Demand Topic Paper

203/2: Strategic Policy SP1 – Presumption in favour of sustainable development

The inclusion of the NPPF's presumption in favour of sustainable development within the Regeneration and Environment LDD is supported and is considered to provide a clear policy to ensure that sustainable development is delivered. The use of the Planning Inspectorates NPPF presumption model wording is also supported.

Council Response: Comment noted

## H1 - Housing Allocations

### H1h - Land East of Yarm Back Lane

203/3: Strategic Policy SP2 – Housing Spatial Strategy (page 14)

The loss of the public investment, which is required to redevelop the Core Area sites identified (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North Sites), means that the Council should no longer rely on these sites to provide the new housing required to allow Stockton-on-Tees to prosper. However, we support the continued promotion of those sites, with the recognition that the sites will not be able to deliver the required housing by themselves.

We support the Council's assessment that urban extensions of sites adjacent to the conurbation offer more opportunity to achieve the scale of development required. We agree that it is unlikely to be possible to achieve the housing target without allocating sites of a significant scale.

Central to the success of the proposed Local Plan is ensuring that allocated sites and proposed sites are 'deliverable' as outlined in paragraph 47 of the NPPF and footnote 11, which states that "to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable".

The supporting text identifies that the allocation of Land to the East of Yarm Back lane will "add to the developer resources available to mitigate the traffic impact at the A66 Elton Interchange" (para. 2.19). If the Harrowgate Lane site is also to come forward then that site will also have a significant impact on the Strategic Road Network and should also contribute to any mitigating works required.

Council Response: Comments noted.

## H2 - Housing Phasing and Implementation

203/5: Policy H2 – Housing Phasing and Implementation

The proposed phasing set out in Policy H2 and the Indicative Phasing Table are considered to be unnecessary. As Part 3) of the policy states, Policy SP2 sets out a sequential approach against which to assess site selection and suitability.

The development of Land to the East of Yarm Back Lane would be an extension to the main settlement and close to existing local services; its early procurement should be a priority.

The Indicative Phasing Table identifies the Land to the East of Yarm Back Lane as commencing 2019/2020 at a rate of 100 dwellings per annum. However, the Housing Supply in the Borough of Stockton-on-Tees 5 Year Deliverable Housing Supply Final Assessment: 2012-2017 sets out in paragraph 19 and 20 that building rates are limited as "demand will limit take up". The indicative rate of 100, even taking into account the potential for 3 or more builders being involved, would seem to be too high. Even a relatively high rate of 75 dwellings per annum would require that the Land to the East of Yarm Back Lane to come forward earlier than proposed in Indicative Phasing Table, if the houses are to be delivered in this plan period.

We would propose to bring forward and align the initial phases of Yarm Back Lane with those of Harrowgate Lane to begin development in 2015/16. This is consistent with Policy H2 4) as the development is required to "contribute to the delivery of the plans and strategies of other service providers such as health and education". Early delivery will generate the funding necessary for service and infrastructure provision.

Secondly with regards to site selection hierarchy within Policy SP2 we believe that there is no reason why Yarm Back Lane (a development adjacent to the conurbation) should begin later than Wynyard Park Phase 1 (a new sustainable settlement) when in line with Policy SP2 the former is considered more sustainable and therefore should be prioritised and be allowed to come forward. The proposal for housing numbers required to meet need and demand within the main settlement be 'used up' in less sustainable peripheral locations would not accord with Policy SP2.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan. Development of the Harrowgate Lane and Yarm Back Lane sites will be phased and designed in accordance with the Development Framework Document (currently under preparation). Comments regarding housing delivery are noted and addressed within the housing delivery section of the Housing need and Demand Topic Paper.

### H1h - Land East of Yarm Back Lane

203/6: Policy H1h – Land East of Yarm Back Lane (page 122)

We support the proposed allocation of 42ha of land for approximately 945 dwellings at Land East of Yarm Back Lane and agree that the site would represent a logical urban extension (para. 8.79).

The requirements of both the adjacent Harrowgate Lane masterplan and the Yarm Back Lane masterplan identify elements that would benefit both sites if delivered in co-ordination. These include;

- Infrastructure improvements
- Public transport integration
- Provision of educational facilities
- Provision of community facilities
- Provision of health facilities
- Provision of leisure facilities
- Connection of pedestrian and cycle networks
- Green infrastructure / drainage
- Approach to affordable housing / on / off site

However, it is noted that no highway requirements are identified for Harrowgate Lane even though its development would lead to pressure on the Strategic Road Network.

The development of Harrowgate Lane and the Land East of Yarm Back Lane could benefit from a CIL approach in order to assist the coordination and delivery of the key infrastructure identified. This is something that we would encourage the Council to consider.

Council Response: The Shared Infrastructure Policy (for the Harrowgate Lane and Yarm Back Lane sites) in the Publication version of the Regeneration and Environment Local Plan identifies that highways improvements will be required at the following junctions:

Elton Interchange  
Darlington Back Lane and Yarm Back Lane  
Durham Road, Junction Road and Harrowgate Lane

203/7: Policy H3 Housing Mix and Affordable Housing provision

We note that the viability work has been undertaken, which concluded that 15-20% is achievable during positive market conditions.” The NPPF states that plans should be deliverable and that sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened” and we support the Council’s indication that the policy will be applied with a flexibility that is sensitive to market conditions.

In relation to the affordable provision specific to the Land to the East of Yarm Back Lane we would encourage consideration of the potential for some of the affordable housing to be provided off-site. This approach would not only benefit future developers through increasing deliverability but would also allow the Council to secure housing investment that could be directed into the deprived areas of the borough which have previously struggled to attract investment. This approach is aligned with the Council’s longer term vision for housing renewal in all areas that require investment outlined in paragraph 8.151 of the Regeneration & Environment LDD.

Council Response: Comments noted. The Council is prepared in principle to consider off-site provision of affordable housing. However, this will be subject to the provision in the Affordable Housing Provision Policy, that off-site provision may be made in exceptional circumstances where the Council considers that there is robust evidence that the achievement of mixed communities is better served by making provision elsewhere.

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## 204 CAMERON HALL DEVELOPMENTS LTD

204/1: INTRODUCTION

These representations have been submitted on behalf of Cameron Hall Developments to inform the emerging Stockton-on-Tees Local Plan Regeneration and Environment Local Development Document (Preferred Options).

Cameron Hall Developments control a large landholding at Wynyard including Wynyard Village and Wynyard Hall and its associated parkland. The aim of these representations is to secure an explicit commitment within the Stockton on Tees LDF/Regeneration DPD to the allocation / delivery of sufficient land to accommodate approximately 550 additional executive dwellings at Wynyard Village together with a range of new community facilities including: a primary school, community hall, community sports provision doctors surgery, public transport links and additional local shops etc.



The overall objectives of these proposed developments, is twofold:

- to deliver a long term sustainable future for Wynyard Village as the North East's premier location for high quality executive housing by providing the necessary community facilities and critical mass in terms of housing and population density necessary to support such the creation of a sustainable settlement; and
- to secure a sustainable long term future of historic Wynyard Hall and the wider historic Wynyard Estate south of the A689 for the benefit of future generations

Although development has been taking place at Wynyard Village for over 20 years it in many respects is still a 'work in progress'. There is a need therefore to put in place through the Local Plan a mechanism to 'complete' the village and ensure that once complete the village preforms as a fully functioning, independent and self-sustaining settlement over the long term. The additional housing and community facilities proposed through these representations are a pre-requisite to this sustainable future.

Equally important in sustainability terms however is the opportunity that such development provides to secure a sustainable future for Wynyard Hall and its historic gardens and estate. Releasing land for additional housing and community development at Wynyard Village, on those parts of the estate land that would have no impact on the key heritage assets or their setting will provide a funding source that will contribute towards the substantial costs associated with urgent restoration works required to some of the key features of the Hall and the estate e.g. stained glass, Lion Bridge, Greek and Roman Temples and the historic landscape and woodland as well as providing a long term income stream to cover on-going maintenance and conservation of these heritage assets in the future for the benefit of future generations. Existing income streams from the Hotel, the village and estate simply do not cover all these outgoings.

In order to justify and fund the delivery of these key components, and secure their long term upkeep, Cameron Hall Developments, through these representations, is seeking an explicit commitment the in the Local Plan further housing and community facilities of the scale now proposed in these representations.

Council Response: Comments noted.

SP1 - Presumption in favour of sustainable development

204/2: DRAFT POLICIES

The Spatial Strategy

Strategic Policy SP1 – Presumption in Favour of Sustainable Development

Cameron Hall would support the inclusion of Strategy Policy SP1 which reflects guidance in NPPF concerning the presumption in favour of sustainable development.

Council Response: Support welcomed.

SP2 - Housing Spatial Strategy

204/3: Strategic Policy SP2- Housing Spatial Strategy

Cameron Hall would generally support the proposed housing spatial strategy detailed in Policy SP2, in terms of the acknowledgment of the need to release further greenfield land around the periphery of Stockton urban area and at Wynyard Village to meet the objectively assessed future housing requirements, and would support the suggested overall level of housing requirement proposed for the Borough. Cameron Hall would however strongly object to the allocation and delivery of land for a 'new settlement' north of the A689 at Wynyard Park (see Policy H1m) before making provision for, and ensuring the delivery of additional housing and community facilities at Wynyard Village aimed at securing the completion of the Wynyard Village 'project' and the creation of a sustainable settlement and community south of the A689.

Paragraph 2.21 suggests, "the allocation of a new a new site for housing at Wynyard on the scale provided by Wynyard Park would represent the creation of a new settlement. Such a new settlement would offer several advantages". These alleged advantages are however not clearly outlined in the document and we would fundamentally question whether any such advantages exist. Little consideration also appears to have been given to the impact of such a new settlement north of the A689 on the future sustainability of Wynyard Village. We consider that the Spatial Strategy current proposed, in so far as it relates to the Wynyard area will have an adverse impact on the long term sustainability of Wynyard village and the its associated heritage assets by restricting the level of future development at Wynyard Village to just 300 dwellings and by drawing potential investment in shops and community facilities away from Wynyard Village to any new settlement at Wynyard Park north of the A689.

Paragraph 2.22 states that the main issue in relation to Wynyard Village is that there are currently very few commercial and community facilities. It is accepted that there is a need to address this issues as soon as possible. The development of approximately 550 additional dwellings at Wynyard Village, as now proposed by Cameron Hall, will fund directly the delivery of these additional services and facilities, and provide the necessary critical mass and population levels to ensure their long term viability, with the effect that there will be significant improvements the sustainability of Wynyard Village as a settlement. The provision of a 'new settlement' to the north of the A689 is not required to deliver the elements of the Wynyard Village Masterplan and as highlighted above will actually make achieving the key sustainability aims for Wynyard Village more difficult by diverting focus and investment away from the more important issue of securing a sustainable future for Wynyard Village.

Securing the completion of Wynyard Village before embarking on the creation of a 'new settlement' at Wynyard Park represents the most sustainable approach to delivering additional dwellings, shops and services to support a sustainable future for Wynyard Village and also to secure the long term future of Wynyard Hall, the registered park and gardens and other associated heritage assets.

We would also challenge the inclusion of proposals for a 'new settlement' north of the A689 at Wynyard Park, as part of the proposed Spatial Strategy, in terms of the impact such a 'change of use' will have on spatial strategy in the longer term i.e. beyond the current plan period. As the Council is aware, the land at Wynyard Park north of the A689 that is allocated/ consented for employment uses is of immense strategic importance for the Tees Valley and the North of England as a whole, and is identified as such in the RSS. Strategic Sites of this scale will inevitably take many years to develop, and much Equivalent examples of Strategic employment sites that have taken 50+ years.

to develop-out, and therefore much longer than the current Local Plan period, include Team Valley and the Wilton estate, which are still being developed. Given Wynyard Park's regional strategic importance as one of the few sites in the north east capable of accommodating large scale inward investment (e.g. recent Clipper Logistics development) it is wholly inappropriate for the Council to compromise/ give-up on the wider long term objectives and potential benefits that such an allocation might deliver in the longer term, at such an early stage in the 'life' of this strategic employment allocation.

The employment allocation at Wynyard Park is a key element of the overall vision of the wider long term Wynyard 'project', helping both to create a balanced sustainable community with housing, employment community facilities etc, and to provide a wider strategic employment land resource for the Tees Valley and the North East region. As such it must be allowed the time to come to fruition and deliver on its potential. Any proposed de-allocation or re-allocation of employment land at this stage is therefore simply premature, lacks strategic vision and contrary to the wider aims for which planning permission was granted at Wynyard in the first instance.

Even if in a review of the future the employment land allocation at Wynyard Park were to be an appropriate in the context of the Local Plan, no consideration appears to have been given in the LDD as to whether part of the existing employment allocation should simply be de-allocated. There is no obligation upon local planning authorities to automatically seek a re-allocation of any such sites for alternative uses. Any alternative uses e.g. residential, would need to satisfy NPPF tests on sustainability before they could be confirmed as a local plan allocation. Cameron Hall Developments would fundamentally question whether the proposed re-allocation of employment land at Wynyard Park to residential development from employment could be considered to be sustainable development.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

SP3 - Limits to Development

204/4: Strategic Policy SP3 – Limits to Development

H1 - Housing Allocations

Cameron Hall welcomes the inclusion of defined settlement limits at Wynyard Village but these should be amended to incorporate the revised development areas at Wynyard Village put forward as part of these representations – see representations submitted in connection with Policies H1 and H2.

H2 - Housing Phasing and Implementation

Council Response: Support welcomed. Issues with policies H1 and H2 discussed in response to representations on those policies.

T1 - Footpaths, Cycle Routes and Bridleways

204/5: Sustainable Transport

Policy T1- Footpaths, Cycle Routes and Bridleways

The delivery of footpaths, cycle routes and bridleways in new major developments, and the provision of new pedestrian/cycle links across the A689, is supported by Cameron Hall and will be a fundamental part of the proposals at Wynyard Village.

Council Response: Support welcomed.

EMP3 - Key Employment at Wynyard Park

204/6: The Economy

Policy EMP3 – Key Employment at Wynyard Park

Cameron Hall would object to the re-allocation of the area to the north for residential development (Policy H1m) and would support the continued allocation of all land at Wynyard Park for employment uses.

SP2 - Housing Spatial Strategy

The employment allocation at Wynyard Park to the north of the A689 is sub-regionally important as recognised in Policy EMP3. Wynyard Park is already subject to a number of recent planning consents for the full range of employment related uses - including the area that is currently proposed for re-allocation for housing. The area of

H1m - Wynyard Park

Wynyard to the north of the A689 has always been identified for employment uses and is perhaps the premier commercial inward investment location for the Tees Valley. The loss of even part of this land to housing would compromise the ability to attract and deliver new inward investment into the Tees Valley and the North East region as a whole.

There are no robust reasons for changing the existing allocation. As outlined in our representations on Policy SP2 Housing Spatial Strategy, we consider that such a change would be wholly premature in that insufficient time has elapsed to date to determine whether this site should be de-allocated/ re-allocated for alternative uses. In addition, any de-allocation would, at this stage, be contrary to regional planning policy and prejudice the well-established long term vision for economic development in the Tees Valley. There is a need to allow sufficient time for such large scale strategic allocations to come to fruition. Any re-allocation at this stage is wholly inappropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

TC7- Local and Neighbourhood Centres

204/7: Policy TC7 – Local and Neighbourhood Centres

The inclusion within Policy TC7 of paragraph 3 which supports new small scale retail stores or new local or neighbourhood centres in major new development is fully supported by Cameron Hall.

Council Response: Support welcomed.

TC9 Small-scale retail and ancillary uses

204/8: Policy TC9 – Small-Scale Retail and Ancillary Uses

Cameron Hall fully support Policy TC9 and welcome the recognition that there is a need for small scale retail uses outside of defined centres in some instances to serve local resident's needs.

It is of vital importance that such proposals are supported in areas where major new development is planned or there is an existing deficiency in small scale convenience shopping provision.

Council Response: Support welcomed.

H1 - Housing Allocations

204/9: Housing

Policy H1 – Housing Allocations

The identification/allocation of additional land at Wynyard Village to accommodate further housing development is firmly supported by Cameron Hall.

The delivery of further housing development at Wynyard Village has a dual objective:

- It will effectively complete the existing village and provide the critical mass and further revenues to provide additional services and facilities making Wynyard Village a more sustainable settlement; and
- It will help providing the funding to secure the long term future for the many heritage assets on the Wynyard Estate for the benefit of future generations.

Cameron Hall also supports the Council's approach outlined in paragraph 8.2 which confirms that they "wish to plan for higher delivery in order to ensure that housing need and demand are fully met and that its aspirations for economic growth are delivered". Clearly, Wynyard Village has a key role to play in providing a living environment which is the key residential destination for the entrepreneurs, professionals and business leaders that are vital to ensuring long term economic growth in Stockton and indeed Tees Valley as a whole.

However, for the reasons outlined both here and in connection with representations submitted in connection with other policies in the draft Regeneration LDD, Cameron Hall Developments consider that it is essential that the draft Regeneration LDD allocates sufficient land at Wynyard Village for the delivery of approximately 550 additional high quality dwellings rather than the 300 dwellings currently proposed in the draft policy H1 and H2. (Cameron Hall would object to the suggested phasing of development detailed in Policy H2 which currently shows development starting at Wynyard Village in 2023/24 and would seek a much earlier start for such works i.e. 2015/16).

Cameron Hall questions the basis for only suggesting a site area of 30 hectares with an approximately dwelling capacity of 300. This does not appear to have been based on any detailed analysis of the available land at Wynyard Village. The detailed analysis of the land potentially available submitted as part of these representations (see Appendix A) demonstrates that over 80ha (gross) is potentially available for development. However taking into account the need to create a very high quality landscaped setting for the proposed development the net developable area is approximately 50ha which is more than sufficient to accommodate the 550 dwellings and community facilities now proposed at an appropriate range of densities commensurate with an executive housing environment. A feasibility study and draft indicative scheme have been prepared and submitted with these representations.

In order to deliver the range of developments that will make Wynyard Village a sustainable settlement in the long term and ensure the long term protection and

conservation of the heritage assets on the Estate, a greater quantum of residential development is required which needs to be brought forward in the short term.

Council Response: General support for the allocation noted. During the consideration of planning applications in the area and through-out the preparation stages of the Publication Draft Regeneration and Environment LDD the Council has re-investigated the suitability of the site, taking in to account the land-owners aspiration for 550 dwellings in the area. It is noted that planning permission has been granted on the site for 500 dwellings. This issue is discussed in more detail in the Wynyard Topic Paper.

H2 - Housing Phasing and Implementation

204/10: Policy H2 – Housing Phasing and Implementation

H11 - Wynyard Village

Cameron Hall would object to Policy H2 and the indicative phasing table provided which suggests that development at Wynyard Hall Estate should commence in 2023/24 at a rate of 50 dwellings per annum for 6 years totalling 300 dwellings.

H1m - Wynyard Park

Cameron Hall would urge the Council to reconsider the proposed phasing and implementation arrangements by bringing forward development at Wynyard Village to 2015/16. There is no logical basis for the suggested phasing of development at Wynyard Hall Estate. As demonstrated below, the land at Wynyard Village is available for development now and subject to planning, there are no insurmountable technical constraints which stop it coming forward in the short term. Moreover, further development at Wynyard Village is required in the short term to deliver a sustainable future for the Village as well as the Wynyard Hall itself, its associated listed structures & monuments and the Registered Park and Garden many of which are in need of early investment.

The proposed phasing and implementation in respect of Wynyard Village should be amended as shown in Table 1 below:

<<<Table not suitable for database format. It shows 0 dwellings delivered in 2014/15 to 2015/16; 30 dwellings delivered in 2016/17, 50 dwellings per year between 2017/18 & 2026/27, 20 dwellings in 2027/28, total in 2029 = 550>>>

Wynyard Village is an existing settlement with a number of shops, services and facilities and further housing development, which delivers clear benefits, is clearly sustainable development and in accordance the definition outlined National Planning Policy Framework.

Having regard to this, Cameron Hall would strongly object the proposed phasing and implementation strategy for Wynyard Park which seeks to develop an entirely new settlement north of the A689 with development proposed to commence in 2016/17- substantially in advance of the release of land for development at Wynyard Village.

Such a phasing strategy is wholly unsound. As it would perpetuate issues of sustainability at Wynyard Village, identified in the Regeneration DPD, by delaying the new investment in the village in terms of new housing necessary to ensure the delivery of new and improved community facilities, delay the delivery of a major funding source to cover the costs of significant heritage and landscape restoration works that are needed to Wynyard Hall, its associated structures and Registered Park and Garden; and result in the creation of a new settlement in an isolated location that for many years will be wholly car dependant and unsustainable, until it achieves the necessary critical mass in terms of houses and population to support the delivery of shops, community facilities etc.

It does not make any sense in planning or sustainability terms to adopt such an approach to the phasing of development in this part of the Borough i.e. to promote the commencement of development of a new standalone residential settlement on employment land north of the A689 when there are still unresolved issues relating to securing the long term future of Wynyard Village as well and the heritage assets at Wynyard Hall and its estate.

It is recognised that any new housing development at Wynyard Park north of the A689 would be aimed at delivering a more conventional mix of housing than Wynyard Village. However, we would question the need to deliver such housing in a location when there appears to be many sequentially preferable sites on the edge of the main urban area where residents would have much better access to shops, community facilities, public transport etc. Conventional housing does not need to be in this location.

In the light of the above, Cameron Hall does not consider there is a need to allocate land for housing development at Wynyard Park through the Regeneration LDD. However, if the Council wish to persist with such an allocation the phasing of its release should be delayed until progress on the new housing and community facilities at Wynyard Village is well underway and approaching completion e.g. post 2026 with the vast majority of any housing at Wynyard Park taking place post 2029.

Amending the proposed phasing and implementation of the land at Wynyard Village will ensure that the Local Plan has planned positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF.

## H1k - Wynyard Masterplan

### 204/11: Policy H1k – Wynyard Masterplan

Cameron Hall would generally support the provision of a comprehensive masterplan but would point out that this work that substantial amount of background work has already been undertaken by Cameron Hall has already been undertaken in respect of Wynyard Village and any masterplan prepared independently must take this into account.

Council Response: Support welcomed. In preparing an SPD the Council would involve all important stakeholders and take all relevant information in to account.

## H1l - Wynyard Village

### 204/12: Policy H1l – Wynyard Village

Cameron Hall would strongly support the proposed allocation of land at Wynyard Village and the acknowledgment in Policy H1L that development proposals will be expected to deliver low density housing. Wynyard Village provides a unique environment developed upon a clear set of successful ideas and principles of what makes an attractive executive housing environment. Wynyard Village is the most suitable place for executive housing in the north of the Borough and its importance to the local and regional economy in providing this type of environment should be fully recognised and is unrivalled in the region.

Whilst the allocation of additional land for residential development at Wynyard Village is clearly welcomed, Cameron Hall would object to the proposed small scale of the allocation and proposed phasing of development (see representations on Policy H1 and H2) as it does not deliver the amount of development required to 'complete' Wynyard Village, improve its sustainability as a settlement and ensure the conservation and management of heritage assets within the estate.

Policy H1L proposes that 30 ha of land is allocated for a western extension to Wynyard Village incorporating up to 300 dwellings. The proposed area and number of dwellings do not appear to be based on any firm understanding of the site and it is unclear how the Council have arrived at this site area.

In order to deliver the range of developments that will make Wynyard Village a sustainable settlement in the long term and ensure the long term protection and conservation of the heritage assets on the Estate, a greater quantity of residential development is required. Cameron Hall would therefore request that Policy H1L is amended to increase the scale of the proposed allocation.

The area of land available for development at Wynyard Village extends to approximately 80 ha (Gross). Background technical studies have been undertaken along with a draft scheme prepared in support of these representations to demonstrate that the land available for development at Wynyard Village is capable of accommodating approximately 550 dwellings along with associated ancillary facilities. A planning summary of the land at Wynyard Village and a copy of a feasibility study prepared by the architect are provided at Appendix A. The main issues have been considered and no insurmountable constraints to stop development coming forward in the short term and key issues such as heritage, ecology, highways and landscape have been fully considered.

The allocation of land at Wynyard Village for an additional 550 new executive dwellings within a sustainable 'garden village' environment will ensure the delivery of the other elements of the masterplan including:

- A new community primary school;
- A community hall;
- Community playing fields;
- Small scale retail units;
- Additional publically accessible species rich woodland and parkland;
- 4.5km of new publically accessible footpaths and cycleways;
- A long term Conservation and Management Plan for the Grade II\* Wynyard Hall, its associated listed monuments and Registered Park and Garden – and the long term funding to support necessary repairs and on-going conservation;
- Funding to restore/repair listed structures within the Wynyard Estate;
- A long term Management Plan for other woodland and high quality parkland within the Estate and the funding to ensure its long term maintenance, vitality and viability; and
- Improved accessibility and access to public transport.

Cameron Hall fully support the recognition in Policy H1L that further development at Wynyard Village should contribute to the sustainability of the heritage asset Wynyard Hall and its parkland. Cameron Hall is committed to ensuring the long term conservation and management of all the heritage assets at Wynyard but as made clear throughout these representations a certain amount of new development is required to ensure this can take place.

A draft Conservation Plan has already been prepared by Simpson & Brown and this will form the basis of future discussion with Stockton Council and English Heritage

before being finalised. The aim of the Conservation Plan is to inform the future conservation, repair, use and management of Wynyard Hall and the estate, including the designed landscape and associated buildings. The condition of Wynyard Hall and the buildings within the landscape have been assessed as part of the Conservation Plan. There are a number of priority works that have been identified through an initial condition assessment of the house and buildings in the landscape. Some of the main works recommended by the draft Conservation Plan in respect of the works to the heritage assets are:

- Comprehensive repairs to the Hall's roof;
- Comprehensive repairs to the stained glass in the Hall;
- Repairs to the gate piers at the Golden Gates;
- Reinstatement of railings around the base of the Wellington Obelisk;
- Reinstatement of the bridge over the lake;
- Comprehensive repairs to the Greek temple;
- Restoration of the walled gardens;
- Repairs are needed to the gates, piers, steps and balustrades within the ornamental garden area;
- Repairs to the Lion Bridge and other bridges on the estate.

The Conservation Plan sets out comprehensive base policies to inform the conservation and management of the estate. It also outlines that a large number of the works to ensure the conservation of the heritage assets are urgent and need to be undertaken in the short term.

Council Response: During the preparation stages of the Publication Draft Regeneration and Environment LDD the Council has re-investigated the suitability of the site, taking in to account the land-owners aspiration for 550 dwellings in the area. This issue is discussed in the Wynyard Topic Paper.

#### 204/13: Consistency with NPPF

The National Planning Policy Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development and that there are three dimensions to sustainable development: economic, social and environmental. The contribution of the proposed developments towards the achievement of sustainable development is summarised below:

#### Economic Role

- Retained expenditure in the Wynyard area helping to support the existing services and facilities;
- Provide new day to day shopping facilities/coffee shop;
- Creation of jobs for local contractors during construction works;
- Job creation within the Hall, estate etc

#### Social Role

- Meet an identified need for low density/high quality housing in Stockton-on-Tees and the Tees Valley;
- Deliver a new community primary school, community centre and sport facilities;
- Improving outdoor recreational facilities by providing 4.5km of linked footpath and trails;
- Deliver additional community facilities and encourage the formation and viability of community groups

#### Environmental Role

- Deliver a high quality residential environment following on from the success of Wynyard to date;
- Support the on-going restoration and conservation of the Grade II\* Listed Hall, its associated listed monuments and Registered Park and Garden;
- Deliver significant biodiversity enhancements and improve the woodland setting.

Overall a range of developments will be delivered that will make Wynyard Village a sustainable settlement in the long term and ensure the long term protection and conservation of the historic landscaped setting and environment. This clearly accords with the aims and objectives of the National Planning Policy Framework.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

## Sustainability Appraisal

### 204/14: Sustainability Appraisal

The revised proposals for Wynyard Village detailed in these representations have been reassessed against the sustainability objectives outlined in the Sustainability Appraisal to take account of the increased site area and phasing arrangements. An updated assessment can be found at Appendix B. It is clear that the proposed allocation scores well against the sustainability objectives in the short, medium and long term.

The Tees Valley Strategic Housing Market Assessment (2012) confirms that, “executive housing is currently under-represented in the dwelling stock in the North East Region.

Although the executive housing market only constitutes a small segment of the overall housing market this lack of supply is considered to acting as a barrier to economic growth and in-migration in the Region”.

Wynyard Village provides a unique residential environment that is unsurpassed in the Tees Valley and its growth to provide further executive housing must be supported. It plays a key role in attracting entrepreneurs, professionals and business leader with the Tees Valley and as a result makes a significant contribution to the overall economic vitality and viability in Stockton-on-Tees, Hartlepool and beyond. The additional development proposed will develop this role further and provide the critical mass necessary to create a vibrant, sustainable, self-reliant community within a ‘garden village’ setting capable of meeting the needs for high quality/lower density housing in Stockton-on-Tees and Hartlepool.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

## H1m - Wynyard Park

### 204/15: Policy H1m – Wynyard Park

Cameron Hall objects to the re-allocation of part of the current employment land allocation at Wynyard Park, north of the A689, and its proposed allocation for residential development under policies H1, H2 and Policy H1m. Cameron Hall would support the continued allocation of this land at Wynyard Park for employment uses to meet the long term needs of Stockton Borough and the Tees Valley for prestige employment sites.

The employment allocation at Wynyard Park to the north of the A689 is regionally important as recognised in Policy EMP3 and RSS. The area of Wynyard to the north of the A689 has always been identified for employment uses and there are no robust reasons for changing the existing allocation. The continued support of the employment uses at Wynyard Park is important to the overall success of Wynyard.

It is only recently that the owners have sought to restructure the existing consents at Wynyard Park and it is premature to now seek to de-allocate this land in favour of residential development. Any decision in favour of residential development would be hopelessly short sighted. The loss of this employment area will fundamentally compromise the original objective for which the land was allocated / consent for employment uses in the first instance i.e. to create a regionally important prestige business park capable of attracting large scale inward investment for the wider benefit of the economy of Stockton and the Tees Valley. This was always intended to be a very long term commitment and the Council should not be blown off this course for reasons of short term expediency.

If the Council really consider there is no need to protect this land for employment uses in the longer term it would be correct to seek its de-allocation. What does not follow however is that the land should be automatically re-allocated for alternative uses such as housing. Housing would only be appropriate in this location if it satisfied the sustainability tests outlined in NPPF. It would not and there are sequentially preferable sites available in the Borough, e.g. on the periphery of the urban area to meet the needs identified in a more efficient and sustainable manner.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

## H3 - Housing Mix and Affordable Housing provision

### 204/16: Policy H3 – Housing Mix and Affordable Housing

Cameron Hall would generally support Policy H3 and in particular that executive housing will be supported at a low density will be supported at Wynyard Village.

Following the success of Wynyard to date, it is proposed that the majority of residential dwellings will continue to be developed at a density reflecting the requirement for high quality lower density ‘executive’ dwellings within Teesside as outlined in the Tees Valley Strategic Housing Market Assessment 2012.

Buildings and plot sizes will generally be large, detached and set within a high quality landscaped environment. The proposed housing development will be design led with the aim of delivering a range of individual residential environments to create character and aid legibility. In certain character areas however a more dense form of development will be delivered in order to achieve the overall design objectives and provide a wide mix of high quality housetypes.

In respect of affordable housing, Cameron Hall welcome the provision within the policy for off-site provision or financial contributions instead of on-site provision may be made in exceptional circumstances. Cameron Hall would however suggest that it is made clear in the policy, to ensure consistency with Policy H2, that a financial

contribution will be made to be delivered off-site in the case of further development at Wynyard Village.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H11 - Wynyard Village

204/17: Appendix 1: Planning Summary (summarised by Stockton Borough Council Officers)

Appendix 1 of the representation provided contextual information regarding a number of supporting and technical reports that have been prepared to demonstrate that the land at Wynyard Village is deliverable. The summary recognises that the supporting work is on-going. Notwithstanding this an indicative scheme is included in the representation.

Additional supporting work which has been commissioned includes:

- Landscape strategy
- Heritage & conservation plan
- Cultural heritage
- Highways
- Tree assessments
- Ecology
- Flood risk work
- Drainage
- Ground conditions surveys

Council Response: Comments noted.

204/18: Feasibility Study (summarised by Stockton Borough Council Officers)

The respondent has also submitted a feasibility study which provides the background behind the initial masterplan for 550 dwellings which is referenced in Appendix A.

Council Response: Comments noted.

H11 - Wynyard Village

204/19: Appendix 2: Revised sustainability appraisal (summarised by Stockton Borough Council Officers)

This part of the representation could not fit in to the Council's format for assessing representations. This summary identifies the main points raised:

SA1 - Compatible with short, medium and long term effects. LPA's assessment is accepted.

SA2 - Compatible with short, medium and long term effects. 'Proposals deliver a new primary school, community centre, playing fields, other shops and services which will significantly improve the sustainability of the existing settlement.

SA3 - Compatible with short, medium and long term effects. 'As above' [see SA2 comments]

SA4 - No relationship. LPA's assessment accepted.

SA5 - No relationship. LPA's assessment accepted.

SA6 - Compatible with short, medium and long term effects. 'Proposals will deliver community facilities, playing fields, and the creation of 4.5km of new dedicated footpaths and cycle routes that will ensure the development is capable [sic] with this objective'

SA7 - Compatible with short, medium and long term effects. 'The proposals will result in the loss of plantation which is now over-mature but will enable the proper long term maintenance of the extensive woodland and parkland within the estates'.

SA8 - Compatible with short, medium and long term effects. 'The proposal will make Wynyard Village a more sustainable settlement in the long-term and ensure the long term protection and conservation of the historic landscaped setting and environment'.

SA9 - Compatible with short, medium and long term effects. 'The proposals will provide the critical mass required to support further transport provision and services improving the sustainability of the existing settlement.

SA10 - Compatible with short, medium and long term effects. 'A key objective of the development proposals is to support the on-going restoration and conservation of the Grade II\* Hall, its associated listed monuments and structures and Grade II\* Registered Park and Garden.



## 205 Partner Construction

### SP2 - Housing Spatial Strategy

205/1: As the draft policies are currently worded, it is considered there is a significant risk of affordable housing sites in rural areas failing to be delivered. Recent discussions with officers at the Council have concluded that the Council will not support affordable exception sites which are cross subsidised by an element of market housing as the adopted Core Strategy (March 2010) policy does not make such an allowance, despite the recognition of such an approach at paragraph 54 of the NPPF.

### SP3 - Limits to Development

### H3 - Housing Mix and Affordable Housing provision

Historically, the HCA has provided grant funding to subsidise such development. All available HCA funding has now been allocated with very little remaining and no indication of any future availability. If affordable housing is to continue meeting demand in rural communities there has to be a recognition that other sources of funding need to be made available, and be considered acceptable in planning terms.

As part of this change in funding, the Core Strategy also needs to recognise that whilst affordable housing exception sites do not yield anything close to the values of market housing sites, it is highly unlikely that land owners will be willing to gift land for such development.

On the basis of the above situation, any affordable exception policy must make an allowance for alternative means of cross-subsidy, including the provision of market housing, as part of any exception site policy.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic paper

### SP3 - Limits to Development

#### 205/2: Strategic Policy SP3 — Limits to Development

Partner Construction supports the principle of a limits to development policy within the emerging Regeneration and Environment LDD which will provide certainty to developers over the forthcoming plan period. However, any such policy must be sufficiently flexible to allow a review in circumstances where there is a shortage of deliverable housing sites and in circumstances of an affordable housing rural exception site.

In the context of the NPPF it is considered that the affordable housing exception within draft Policy SP3 should make explicit reference to the possible need for private market housing to cross subsidise the affordable housing provision. The lack of any recognition of such a requirement poses a significant risk to the future delivery of affordable housing in rural areas, particularly in the absence of any central Government based cross-subsidy funding.

Council Response: Comments regarding rural affordable housing noted and addressed in the Housing Need and Demand Topic Paper

### SP2 - Housing Spatial Strategy

#### 205/3: Strategic Policy SP2 - Housing Spatial Strategy

In order to ensure clarity for developers, it is considered that there should be an additional criteria relating specifically to the delivery of affordable housing exception sites within the identified villages. Such an allowance for affordable housing exception sites should also recognise the increasing need to allow a proportion of private housing to cross-subsidise the affordable provision, in the absence of any Government grant funding.

Such an approach would be consistent with the NPPF, particularly paragraph 54 which relates to affordable housing exception sites.

Council Response: Comments regarding rural affordable housing noted and addressed in the Housing Need and Demand Topic Paper

### H3 - Housing Mix and Affordable Housing provision

#### 205/4: Policy H3 — Housing Mix and Affordable Housing Provision

Point 10 of Policy H3 relates to the provision of affordable housing in the rural areas of the Borough. As set out above, it is absolutely imperative to the success of this policy that there is an allowance for private market housing cross-subsidy in order to ensure the delivery of such affordable housing exception sites.

#### Settlement Hierarchy

Partner Construction continues to support the identification of Stillington as the only Tier 1 village within the villages settlement hierarchy.

We trust the above representations are clear and will be given appropriate consideration in the preparation of the Regeneration and Environment LDD. In the meantime, we would welcome any further discussion and consultation with the Council on these matters.

## 206 Duell Partners

206/1: Our client, Duell Partners own land identified as SHLAA Site 62: Land adjoining Blakeston Lane, Norton, as detailed in the attached plan. We have been instructed to make the following representations to Stockton-on-Tees Borough Council.

Council Response: Comment noted

### SP1 - Presumption in favour of sustainable development

206/2: Strategic Policy SP1 Presumption in favour of sustainable development

The inclusion of the NPPF's presumption in favour of sustainable development within the Regeneration and Environment LDD is supported and is considered to provide a clear policy to ensure that sustainable development is delivered. The use of the Planning Inspectorates NPPF presumption model wording is also supported.

Council Response: Comment noted

### SP2 - Housing Spatial Strategy

206/3: Strategic Policy SP2 Housing Spatial Strategy

The loss of the public investment, which is required to redevelop the Core Area sites identified (Chandlers Wharf, Tees Marshalling Yard and Bowesfield North Sites), means that the Council should no longer rely on these sites to provide the new housing required to allow Stockton-on-Tees to prosper. However, we support the continued promotion of those sites, with the recognition that the sites will not be able to deliver the required housing by themselves.

We support the Council's assessment that urban extensions of sites adjacent to the conurbation offer more opportunity to achieve the scale of development required. We agree that it is unlikely to be possible to achieve the housing target without allocating sites of a significant scale.

Council Response: Comment noted

## New Policy

### H1 - Housing Allocations

206/4: Central to the success of the proposed Local Plan is ensuring that allocated sites and proposed sites are 'deliverable' as outlined in paragraph 47 of the NPPF and footnote 11, which states that "to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable".

It is considered that the Land adjoining Blakeston Lane, Norton can be considered adjacent to the conurbation and would be a suitable for housing as it could contribute towards sustainable, mixed communities in the Norton area of Stockton-on-Tees and would be deliverable within the next 5 years.

Map 9, which accompanies the Regeneration and Environment Local Development Document, does not take into account the adjacent site known as Former West Quarry, Land East Of Blakeston Lane, Norton, which has been granted permission for 148 no. dwellings.

The following planning permissions apply:

- Outline application for residential development and associated means of access (revised application). Ref. 03/2954/OUT. Approved with conditions 13 Jul 2005.
- Reserved matters application for the erection of 148 no. dwellings and associated road and sewer works. Ref. 06/0951/REM. Approved with conditions 30 Jun 2006.

As work has now commenced at this site the urban form already extends north of the railway line.

The Planning Committee Report for application Ref. 03/2954/OUT states that highway works are to be carried out in relation to the approved residential scheme, which was subject to: detailed examination by the Head of Engineering and Transportation. As a result of these discussions an amendment to the access onto Blakeston Lane has been agreed together with a scheme for off-site highways involving improvements to the Junction Road/Blakeston Lane/Ragpath Lane junction.

The Junction Road/Blakeston Lane/Ragpath Lane junction will therefore be improved in relation to the Former West Quarry site, which will also benefit the Land adjoining Blakeston Lane, Norton.

The site is related to the existing urban form and is available for development. The improved access in relation to the Former West Quarry site means that the site is also achievable. Furthermore, SHLAA Site 62 has a number of benefits in terms of accessibility to jobs, shops and services. There are a number of employment opportunities within the Stockton-on-Tees area, including the town centre which would be accessible by public transport. There is a bus stand within walking distance of the site (on

Ragpath Lane), providing access to Stockton town centre and onto other employment destinations. There is a range of shopping and service facilities including schools (primary and secondary), community and health facilities within the vicinity. The comprehensive development of the site for housing would also benefit the area by helping to sustain the existing facilities.

Council Response: To see how the authority has assessed this site see the Housing Site Selection Topic Paper

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## 207 Asda Stores Ltd

### TC1 - Stockton Town Centre Improvements

207/1: Asda has five stores within the borough: four food stores within the centres of Billingham, Stockton and Thornaby, as well as at Portrack Lane; and a Living store at the Teesside retail Park. All of these stores play an important role in the local economy, providing facilities and services for their local communities and supporting job creation within the borough. Asda has invested significantly in its borough-wide portfolio and wishes to ensure that these stores can continue to support sustainable communities.

The following draft policies are of particular interest, and we would comment on each as follows:

#### Policy TC1

The location of the Asda Bath Lane store within the town centre boundary is supported. Asda has invested heavily in this store following the conversion from the previous Netto.

Council Response: Support welcomed

### TC4 - New Town Centre Uses

207/2: Policies TC4 and TC7

### TC7- Local and Neighbourhood Centres

The role of local and neighbourhood centres is noted, but it is important that the scale of retail provision in such centres is carefully controlled to ensure that there are no detrimental impacts arising. We note the Council's approach in that respect.

Council Response: Comments noted

### TC6 - Development and Change of Use within the District Centres

207/3: Policy TC6

### TC2 – Sites for major new retail and town centre use development

We support the ongoing regeneration of Billingham and Thornaby District Centres where it can in turn support the existing facilities and infrastructure. In particular, we support the Council's approach to Billingham to ensure that development is of an appropriate mix and scale in terms of town centre uses and, for Thornaby, that the land at Allensway is identified for town centre uses which complement the centre's offer with any retail provision being small scale. Any redevelopment proposal should be assessed as to its potential to secure regeneration benefits. Incidentally, we note that the Proposals Map makes reference to Policy TC2 although it is not clear whether that policy is of direct relevance to Billingham.

Thank you for providing us with the opportunity to comment on the draft Plan. We would welcome the opportunity to engage further and reserve the right to make further comment, and elaborate on comments made above, during the Plan process.

Council Response: Support welcomed. Retail related allocations in the document adopt the same colour on the policies map. The key for the policies map is clear that this symbol covers policy references in policies TC2 and TC6.

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## 208 Individual

208/1: Sustainable Transport

Our local roads cannot cope with any extra traffic than what we experience at present. More dwellings would generate more traffic and cause even more delays and add to the high amount of toxic fumes; air pollution being already high. The fact that Yarm High Street and its medieval bridge across the Tees is a tiny bottleneck which contributes to long traffic delays, means that traffic would stagnate to such a degree that Yarm would be ignored by shoppers, leaving the traffic chaos to those who have to go through it for work or school. Not only would Yarm bridge be overwhelmed but also the narrow High Leven Bridge and bank approaches.

#### 208/2: Housing

It is gratifying that SBC sanctioned the building on the Visqueen factory site off Yarm Road of hundreds of dwellings by Bellway. This is especially desirable due to it being a brownfield site. This construction is taking place at present and I am told that eventually, when the adjacent factory is demolished in 2015, the site will extend to the A66 when the total number of houses built there will be 474. It is essential that SBC continue to buy up and sell/lease more brownfield sites instead of the indiscriminate approach of allowing greenfield land to be lost under concrete forever. Also commendable is the brownfield construction of houses, as well as University buildings, on the land between Infinity Bridge and Asda at Portrack.

The six sites around Eaglescliffe and Yarm which are under planning applications (3 already approved but one of these on hold) would eventually realise 3000 houses if all were passed, which is a third of the total number of the 9000 dwellings which SBC is proposing to have built in the whole of the Borough during the next fifteen, or so, years. This imbalance of houses to the area must be addressed so that more dwellings are constructed in the areas of the Borough which have a much healthier road infrastructure, unlike Yarm and High Leven with their narrow bottlenecks.

One wonders where the people are coming from to live in these thousands of houses. If, however, the correct forecast has been made and an influx of hundreds of families fill these houses if some of these properties are passed then there would be a shortage of school places and extreme pressure would be put on to medical facilities.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

Comments regarding pressure on infrastructure noted and addressed in the Yarm and Kirklevington Topic Paper..

#### 208/3: Environment Protection and Enhancement

Stockton on Tees' current Core Strategy (policy CS10) is extremely commendable, protecting Green Infrastructure Strategy within a green wedge partnership with 'Friends of Tees Heritage Park'. In a joint pamphlet published by SBC I quote from it: - "A place to enjoy our rich heritage, landscape and wildlife. A place of peace and quiet, away from the hustle and bustle of every day life". However, this praiseworthy ideal would be eradicated if application 12/1595/EIA (Yarm Private School Playing Fields) were granted.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

## 209 Taylor Wimpey and Barratt Homes

### 209/1: INTRODUCTION

1.1 These representations are put forward on behalf of Taylor Wimpey & Barratt Homes, two National House Builders with on going practical experience of house building within the Borough of Stockton on Tees.

1.2 This response follows detailed consideration of the Council's Regeneration & Environment LDD - Preferred Options and the background documents that have informed its preparation, including in particular:-

- The National Planning Policy Framework
- Core Strategy Review – Issues & Options
- Tees Valley 2012 Strategic Housing Market Assessment
- Stockton Strategic Housing Land Availability Assessment 2011
- Housing Supply in the Borough of Stockton-on-Tees - 5 Year Deliverable Housing Supply Final Assessment: 2012 - 2017

1.3 The representations relate to the proposed:-  
- Housing Spatial Strategy;  
- Housing Requirements; and Proposed Housing Allocations

1.4 At a more detailed level, the representations comment on the role that the Land at Harrowgate Lane can play as a sustainable urban extension to Stockton to meet the Council's sustainability and regeneration objectives. To this end this document sets out Taylor Wimpey's & Barratt Homes strong support for the approach of the Council to allocate land at Harrowgate Lane for a strategic scale housing development.

1.5 In particular, this, and the accompanying document, stress the logical role of land to the south of Bishopsgarth School, fronting Harrowgate Lane, to provide a significant mixed housing development of market and affordable housing in the short term (Phase 1) to meet the identified and immediate housing needs of the Borough and to act as a catalyst and positive precedent for the development of the wider allocation.

Council Response: Comments noted

SP2 - Housing Spatial Strategy

209/2: THE HOUSING SPATIAL STRATEGY  
Range of Housing Sites

2.1 In principle, Taylor Wimpey (North Yorkshire) & Barratt Homes generally support the proposed Housing Spatial Strategy, in particular the decision of the Council to provide/allocate a range of housing sites to deliver a wide choice of high quality homes over the plan period instead of a single large site.

2.2 The Tees Valley SHMA (2012), even at the broad sub regional level, identifies a number of differing housing sub areas within the Borough of Stockton with their own individual issues of supply and demand both in terms of existing stock and future requirements. The proposed provision of a range of housing sites to serve the overall needs of the Borough and the specific needs of certain sub areas accords with the advice laid down in the National Planning Policy Framework to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'.

2.3 However, it is not considered, having regard to the scale of the housing requirement (see section below), that the proposed level of allocation will not meet the full, objectively assessed needs for market and affordable housing within the Borough as required by the National Planning Policy Framework.

Council Response: Comments noted and addressed within the Housing Need and Demand Topic paper.

H3 - Housing Mix and Affordable  
Housing provision

209/3: THE HOUSING REQUIREMENT

3.1 The National Planning Policy Framework, at Section 6 (Delivering a Wide Choice of High Quality Homes), makes it explicit that local planning authorities should 'boost significantly the supply of housing' through a number of means, including:-  
'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs of market and affordable housing in the housing market area, as far as consistent with the policies set out in this Framework, including key sites which are critical to the delivery of the housing strategy over the plan period' (Paragraph 47 NPPF (2012))'

3.2 Since the adoption of the Council's Core Strategy in 2010, a further Tees Valley Strategic Housing Market Assessment (2012) has been carried out that provides an up to date position in respect of housing needs and aspirations in respect of market and affordable provision.

3.3 The results of the SHMA in respect of the Borough's Affordable Housing Requirement of 560 dwellings per annum are acknowledged at Section 8.145 (Page 138) of the Preferred Options. However, the document then goes on to explain that the Council's housing strategy being taken forward has a target of only 100 affordable dwellings per annum as this is 'realistic'. It sets out that the anticipated delivery is based on a mixture of the amount of affordable housing (15-20%) from market-led housing schemes and the delivery of affordable housing from the National Affordable Housing Programme ('assuming it is renewed').

3.4 The proposed approach to affordable housing, assuming the allocated market housing sites can viably deliver 20% affordable housing and in the face of significant

uncertainty over the publically funded affordable housing schemes, would amount to less than 20% of the full, objectively assessed affordable housing needs of the Borough.

3.5 There is no reasoned justification provided for the statement 'it is clearly not realistic to set an affordable housing target at around the same level as the total housing requirement for all tenure types' (Section 8.145). There is no evidence that explains why planning for a greater number of houses overall on additional viable/deliverable sites, to deliver greater amounts of affordable housing (as a proportion of the market housing), would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The proposed approach of the Council to plan for only 100 affordable dwellings per annum in the face of a requirement of an annual affordable housing requirement of 560 is not justified in this respect.

3.6 As currently drafted, the Council's proposed Regeneration & Environment LDD/Core Strategy Review will not meet the full and objectively assessed needs of market and affordable housing in the plan area; it is therefore in conflict with national policy. It is therefore unsound.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

## H2 - Housing Phasing and Implementation

### 209/4: DELIVERING THE HOUSING REQUIREMENT Housing Allocations

4.1 Taylor Wimpey (North Yorkshire) Ltd & Barratt Homes welcome the provision of site specific housing allocations through the emerging Regeneration & Environment DPD to deliver the required housing over the plan period. This will identify the key sites critical to the delivery of the Council's housing strategy over the plan period which is in line with the advice set out in the NPPF (Paragraph 47).

4.2 As set out above, and set out in detail below, it is considered that the range of proposed allocated housing sites should be increased over the plan period to accommodate the full evidenced based housing requirements of the Borough and to create a more flexible and response range of sites. We would also question the yield of a number of housing allocations, mindful of the constraints of a number of the sites. For example, the land to the north of the Harrowgate Lane allocation has electricity pylons running across it, this significantly reduces the developable areas due to industry standards.

#### Housing Phasing and Implementation Implementation Strategy & Trajectory

4.3 The provision of a housing implementation strategy and indication of the expected rate of housing delivery (or trajectory) to steer housing delivery over the plan period is compliant with the requirements of the NPPF (Paragraph 47) and is supported in principle by Taylor Wimpey (North Yorkshire) & Barratt Homes.

#### Bring Forward Allocated Sites From Later in the Plan Period

4.4 The provision of a mechanism to 'bring forward' allocated sites in circumstances where there is a shortfall of deliverable supply (against a 5 year requirement + buffer) is supported, and is again compliant with the requirements of the NPPF.

4.5 In the case of Stockton, having regard to the Council's published deliverable housing land supply 2012 – 2017 and a detailed understanding of the market and a number of the sites considered by the Council to deliver housing over the next 5 years, Taylor Wimpey & Barratt are of the opinion that there is a significant shortfall in deliverable housing land (more significant than the Council have estimated).

4.6 There is a need for a number of the proposed housing allocations to come forward much earlier than currently envisaged in the Indicative Phasing Table to 'plug the gap'. As set out in detail below, Harrowgate Lane and in particular the land under the control of Taylor Wimpey & Barratt, offers an opportunity to react positively and sustainably to the shortfall in supply at the very earliest opportunity.

#### 'Rolling' 5 Year Deliverable Housing Lane Supply

4.7 The suggestion that the Council will only apply the mandatory 5% buffer to the 5 year housing policy requirement instead of 20% is unsound.

4.8 The NPPF is clear that in circumstances where:-

'there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land' (Paragraph 47 NPPF).

4.9 Housing delivery across the Borough over the last 9 years, save for one year (2007/08), has, as a matter of fact, been less than the planning policy requirements. This represents persistent under delivery and has resulted in a cumulative shortfall of housing delivery against requirements and therefore requires a 20% buffer to be applied as required by the NPPF.

#### Over Supply of Housing Against Requirements

4.10 The scope to allow a range of housing sites (in excess of the housing requirement) to come forward at any one time is logical, will provide for choice and competition in the market and will assist the Council in 'significantly boosting the supply of housing' across the Borough in line with the requirements of the NPPF. However, there are very serious concerns regarding proposed Policy H2 (5) which states:- 'Land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan period.'

4.11 This suggests that, in the event of windfall (unallocated & uncommitted) housing sites coming forward, that those sites allocated for housing development within the Regeneration & Environment LDD may not be granted an appropriate planning permission to deliver housing – the allocated sites will be 'held back'.

4.12 Paragraph 154 of the NPPF makes it explicit that:- 'Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'

4.13 As drafted, the policy will result in significant uncertainty for developers looking to acquire and deliver allocated development sites (at considerable expense). This will also have a significant negative impact on the Council's aspirations of co-working between developers to create masterplans for the development of the strategic scale housing sites. This uncertainty will result in delay in housing delivery or limited housing delivery.

4.14 Fundamentally, there is no requirement in the NPPF, or indeed any robust justification put forward by the Council, to set a ceiling for housing delivery. Moreover there is no evidence, or logic, to suggest that an overprovision of housing will result in material and unacceptable harm, especially within the context of the Governments clear directive to Local Planning Authorities to 'boost significantly the supply of housing'. The development of brownfield sites in the conurbation, as windfalls, during the plan period should be seen as a significant benefit to increasing the supply of a range of housing sites across the Borough for choice and competition in the market and the associated regeneration and environmental benefits. Seeking to place a 'cap' or 'ceiling' on the amount of housing development to come forward renders the plan not positively prepared and therefore unsound.

4.15 The rate and amount of delivery of new housing and the capacity of the housing market areas is, and will continue to remain, entirely dictated by the market and a commercial decision for the respective housing developers.

Council Response: The Council are working with landowners and developers to prepare a Development Framework Document which will guide the development of the site; this will include phasing.

Comments regarding housing delivery noted and addressed within the Housing Need and Demand Topic Paper.

## H2 - Housing Phasing and Implementation

209/5:

### HOUSING ALLOCATIONS – THE ROLE OF LAND AT HARROWGATE LANE & SUGGESTED PHASING OF ITS DELIVERY

5.1 The Preferred Options LDD, Policy H1g (Harrowgate Lane) allocates around 126ha of land for residential development to deliver approximately 2500 dwellings. The Illustrative Phasing Table (page 106) anticipates housing being delivered at the site from 2016/17 onwards at a rate of 50 dwellings per year. The Phasing Table indicates a 3 phased approach to development on the site with Phase 2 being brought on line from 2021/22 and Phase 3 from 2024/25 with all phases delivering housing development right across the plan period once the development has commenced.

5.2 The reasoned justification of the allocation of land highlights that the development of the site will:-

- Meet Regeneration Objectives
- Support Disadvantaged Communities (Hardwick & Roseworth Wards)
- Supply Housing Need & Demand Identified in the SHMA and/or provide sustainable communities with an appropriate and aspirational housing mix.

5.3 Moreover, the Preferred Options acknowledges that the site has been identified as sustainable, with a number of respondents to the Planning for Housing Issues & Options highlighting the sustainability value of the site, including its proximity to existing schools and facilities, its location upon the Core Bus Route and its linkages with the adjacent residential area. The site is also well related, by public and private transport, to Stockton Town Centre. It is inevitable that the increased population in this location will help support the vitality and viability of the Town Centre.

5.4 An acknowledged benefit of the development of the site is its location near to Hardwick (the most disadvantaged ward outside of the Core Area) and in particular the benefits that arise from investment in an area, including the additional spending capacity in an area resulting from population increase/housing growth. We agree that the benefits upon High Newham Court Local Centre will be significant.

5.5 Taylor Wimpey (North Yorkshire) & Barratt Homes fully support the allocation of the site for housing and agree with the reasoned justification. Indeed, we consider that there are other significant benefits to the allocation of the land for housing and in particular the land the south of Bishopsgarth School fronting Harrowgate Lane, that fully justify the approach of the Council and renders the site the most sustainable and logical extension to the urban area of Stockton. These reasons are fully set out in the accompanying documentation.

#### HOUSING MIX

5.6 Taylor Wimpey (North Yorkshire) & Barratt Homes are fully aware of the housing needs and aspirations of the area as set out in the Tees Valley SHMA 2012 for the Borough as a whole, but most importantly the 'Stockton Outer Core' sub area within which this site falls.

5.7 In respect of general market requirements the SHMA advises that there is particular demand, which exceeds supply with particular pressure on stock, for 4 bedroomed properties and detached properties. It is also noted that demand exceeds supply, with some pressure on stock, for 3 bedroom properties.

5.8 In respect of the affordable needs of the Sub Area, which are the largest of the whole Borough with a requirement of 210 new dwellings per annum, the overriding requirement set out in the SHMA is for 1/2 bedroom properties.

5.9 Taylor Wimpey & Barratt are confident that the site which they have an interest in can deliver the right mix of housing for the sub area, in particular they consider (based on TW experience in the sub area at Willow Gardens – see below) that the site will provide a significant portion of aspirational 3 & 4 bedroom detached properties. The proposals for the site will be able to comply with Policy H3 (Housing Mix & Affordable Housing Provision) of the Regeneration & Environment LDD.

#### PHASING OF HOUSING DELIVERY AT HARROWGATE LANE

5.10 The phasing of housing delivery on the Harrowgate Lane allocation needs very careful consideration. This is both in terms of the delivery of appropriate on site infrastructure to serve a significant volume of housing at the very earliest stage, but also so that the delivery of housing compliments, and does not constrain the Council's on going and future housing regeneration projects in Hardwick.

5.11 If correctly phased the entire development of the Harrowgate Lane Housing Allocation will result in very significant benefits for the locality and the Borough as a whole.

#### Differing Market Areas

5.12 The Harrowgate Lane Housing Allocation, as an urban extension, is unique to Stockton in both terms of its sustainability value and the fact that it falls across two



distinctly different housing market areas of Hardwick and Bishopsgarth & Elm Tree.

5.13 Hardwick is currently undergoing a significant Housing Market Renewal Programme (by Barratt & Keepmoat Homes) and is acknowledged as the most deprived area outside of the Core Area characterised by ex-council housing stock and much lower property values than the Borough average. It is a weak market housing area.

5.14 On the contrary, the other housing market area is located to the south of the Castle Eden Walkway which dissects the allocation, within the Ward of Bishopsgarth & Elm Tree. This is an established and strong private housing market area. Taylor Wimpey have recent experience of development (Willow Gardens, Darlington Back Lane) within this market both before and during the recession and delivered a range of terraced, semi and detached market properties which were sold

5.15 The site started in 2006 and completed in 2009. 108 properties were sold as follows:-

- 10 x 2 bed terrace @ 766 sq ft
- 44 x 3 bed semi / terraced ranging from 815 – 838 sq ft
- 11 x 3 bed detached @903 sq ft
- 43 x 4 bed detached ranging from 1099 – 1276 sq ft

5.16 The average sales rate was 0.6 properties per week (approx. 31 dwellings per annum) which represents good level of interest and good market conditions.

Impact of Phasing Upon On Going Housing Market Renewal

5.17 Officers & Members will be fully aware of the on-going Hardwick Regeneration Programme which, at the end of its life, will have benefitted from approximately £100million of public and private investment.

5.18 Barratt Homes, along with Keepmoat Homes and Endeavour Housing, are the Council's development partners in the construction of 626 dwellings as part of the Housing Market Renewal Scheme. From the first sale on site the development has benefitted from a number of government sales initiatives, including First Time Buyer Initiative, Kick Start and the latest initiative First Buy, all aimed at helping buyers secure a mortgage without/ with a reduced deposit and for people with lower income offering a number of shared equity opportunities. Without the availability of these schemes the site would not have started as the prospective purchaser in this area are low income singles and families who in general have difficulties securing a deposit and/or mortgage without support.

5.19 At the time of writing Barratt have 150 dwellings remaining to complete and Keepmoat have 131. It is envisaged that the entire development will complete in 2017/18.

5.20 In addition to the Hardwick Redevelopment, the North Tees Hospital Site has been put forward for an allocation in the Regeneration & Environment LDD Preferred Options (Policy H1C). The Council consider that the 15ha site will deliver 340 houses at a rate of 50 dwellings per year between 2017/18 – 2023/24. The reasoned justification for the allocation also suggests that there may be potential for a new retail allocation to replace High Newham Court Local Centre on the Hospital site with High Newham Court being developed for housing. The development of the hospital site is of course key to the delivery of improved healthcare services (a 'super' hospital at Wynyard) for the North Tees & Hartlepool Health Care Trust.

5.21 The ongoing housing market renewal programme and the future regeneration of North Tees Hospital are key to the Council's regeneration aims and the Health Trust's service provision. Barratt Homes have significant concerns that the provision of a development within the northern part of the Harrowgate Lane allocation in the short term would undermine, by way of direct competition, the on-going housing market renewal programme at Hardwick given the localised and weak nature of the housing market that they will be located within. Similar concerns would thereafter transfer to the redevelopment of the hospital site which will compete within the same market.

5.22 Given the physical separation and the differing nature of the housing market sub areas, the provision of a mix of housing in the southern part of the Harrowgate Lane allocation would not compete or undermine the on-going housing market renewal at Hardwick or the future development of the hospital site. It is therefore forms a logical starting point for development on the Harrowgate Lane allocation.

5.23 Optima Highway Consultants were commissioned by Taylor Wimpey & Barratt Homes to undertake an access feasibility assessment of the southern part of the proposed Harrowgate Lane Housing Allocation – to the south of Castle Eden Walkway. This is due to the fact that land immediately to the north of the Walkway and to the north of Letch Lane will need to be accessed independently due to physical barriers.

5.24 The assessment has been undertaken having regard to the anticipated quantum of development at this location, the traffic flows along Harrowgate Lane and traffic distribution. The results indicate that the provision of a primary central access point between the south of Bishopsgarth School & north of the Mitre Public House is most appropriate and logical position to serve the vast majority of the southern part of the allocation both in capacity, connectivity and traffic distribution terms – it is noted that the junction to the south of the allocation between Yarm Back Lane and Darlington Back Lane is physically constrained and has limited scope for even traffic distribution across the local highway network.

5.25 Moreover, the provision of a primary access point 'Gateway' to the development from Harrowgate Lane offers the most sustainable and accessible location in respect of pedestrian and public transport links – it is of course adjoining the Core Bus Route and adjacent to key pedestrian and cycle linkages . The envisaged access arrangements and internal primary routes, as indicated in the accompanying initial design documentation, will provide the opportunity for a circular bus route within the site to extend the Core Bus Route (if considered feasible and practical by the operators) from an early stage within the Harrowgate Lane development – or indeed following further expansion of the wider allocation. Of course irrespective of whether or not operators do divert, the site has excellent linkages to existing bus stops on the existing Core Route on Harrowgate Lane.

5.26 Investigations have indicated that the provision of a signalised junction with Leam Lane & Harrowgate Lane with associated local widening from the outset and thereafter the provision of an appropriate secondary junction on the Harrowgate Lane frontage will serve the entire landholding which Taylor Wimpey & Barratts have an interest in but also a significant amount of the wider allocation which does not have direct access to the Public Highway.

5.27 The site offers the most appropriate (in safety & capacity terms), accessible and sustainable point for the creation of a 'Gateway' into the wider southern development from the outset.

#### SUGGESTED PHASING OF DELIVERY

5.28 In light of the above and the sites high sustainability value and lack of physical and environmental constraints, it is clear that the land to the South of Bishopsgarth School represents the most appropriate location for Phase 1 of the Harrowgate Lane Housing Allocation.

Council Response: Comments supporting the allocation of the Harrowgate Lane site noted. Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic Paper. The Council are working with landowners and developers to prepare a Development Framework Document which will guide the development of the site; this will include phasing.

H1 - Housing Allocations

H1g - Harrowgate Lane

H3 - Housing Mix and Affordable Housing provision

209/6: COMPLIANCE WITH POLICY  
Policy H1(g) – Land at Harrowgate Lane

6.1 Taylor Wimpey & Barratt Homes fully support the allocation of land at Harrowgate Lane for a strategic scale housing development. However, they would seriously question the need for the provision of a neighbourhood centre within the allocation given the quality and capacity of the community services and facilities within the locality. They note however that the Council will be investigating such requirements further in due course.

6.2 Taylor Wimpey & Barratt are confident that their site, as far as possible (noting some of the policy requirements are outwith the scope of their land holding), can meet the relevant allocation policy requirements when considered in isolation, and as part of the wider development of the allocation. To this end illustrative proposals have been drafted to demonstrate policy compliance and how the site can integrate with the adjoining land to deliver a high quality accessible and sustainable development.

Policy H3 – Housing Mix & Affordable Housing Provision

6.3 As set out previously, the land that Taylor Wimpey & Barratt Homes are promoting can deliver a mix and balance of good quality market and affordable housing in line with the Tees Valley SHMA, in particular the provision of an aspirational stock of 3 & 4 bedroom detached houses which are in great demand within the Stockton Outer Core

Sub Area.

#### Development Plan

6.4 As demonstrated within the accompanying documentation, save for the location of the site outside of the development limits (which are currently under review), its development is acceptable in all other respects and compliant with the adopted Development Plan, the National Planning Policy Framework and the emerging planning policies set out in the Regeneration & Environment LDD as far as relevant.

Council Response: Comments regarding the need for the provision of a neighbourhood centre noted. The requirement for this provision is detailed within policy and is being incorporated within the Development Framework Document accordingly.

### H1 - Housing Allocations

#### H1g - Harrowgate Lane

#### 209/7: SUMMARY

##### Range of Sites

7.1 Taylor Wimpey & Barratt Homes are fully supportive of the Council's Housing Strategy to include a range of housing sites that will provide choice and competition in the market and meet the individual needs of the sub areas across the Borough – this is consistent with the requirements of the NPPF. In particular, the proposed allocation of land at Harrowgate Lane as an urban extension to the outer core of Stockton is supported. The site is sustainable and deliverable and will contribute significantly to the delivery of high quality market and affordable housing in wholly sustainable manner.

Council Response: Comments noted

### H2 - Housing Phasing and Implementation

#### 209/8: Housing Requirement

7.2 Taylor Wimpey & Barratt Homes would question the Council's proposed housing requirements over the plan period and whether they are compliant with National Planning Policy which require the Local Plan to meet the full and objectively assessed needs of the Borough as required by the NPPF. This relates in particular to meeting the Borough's significant affordable housing needs.

##### Phasing & Delivery

7.3 Taylor Wimpey and Barratt object to Policy H2 (5) of the LDD, which sets a ceiling for housing development and provides potential for allocated housing sites not to be granted a planning permission to deliver housing. This is not justified nor positively planned. This will cause significant uncertainty in developers acquiring and investing in sites and will not assist in 'boosting significantly the supply of housing' as required by the NPPF.

7.4 The phasing of housing delivery across the strategic housing sites is very important in respect of infrastructure delivery and to ensure that development compliments, and not undermine, regeneration aspirations. It is important that the phasing of the strategic sites is identified at the very earliest opportunity and set out in the LDD.

7.5 In light of the deliverability of the site that Barratts & Taylor Wimpey (North Yorkshire) have a legal interest in land at Harrowgate Lane, the sites high sustainability value, lack of physical and environmental constraints and potential to create a significant 'Gateway' and robust primary highway infrastructure to serve a significant amount of the allocation, it is clear that the land to the South of Bishopsgarth School represents the most appropriate location for Phase 1 of the Harrowgate Lane Housing Allocation.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan. The Council are working with landowners and developers to prepare a Development Framework Document which will guide the development of the Harrowgate Lane and Yarm Back Lane sites; this will include phasing. Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper.

### 210 Taylor Wimpey

#### 210/1: INTRODUCTION

1.1 These representations are put forward on behalf of Taylor Wimpey (North Yorkshire).

1.2 This response follows detailed consideration of the Council's Regeneration & Environment LDD - Preferred Options and the background documents that have informed its preparation, including in particular:-

- The National Planning Policy Framework
- Core Strategy Review - Issues & Options
- Tees Valley 2012 Strategic Housing Market Assessment
- Stockton Strategic Housing Land Availability Assessment 2011
- Housing Supply in the Borough of Stockton-on-Tees - 5 Year Deliverable Housing Supply Final Assessment: 2012 - 2017

1.3 The representations relate to the proposed:-

- Housing Spatial Strategy;
- Housing Requirements; and
- Proposed Housing Allocations

1.4 At a more detailed level, the representations comment on the role that Land at Morley Carr Farm, Yarm can play as a sustainable urban extension to meet the Council's sustainability and regeneration objectives. To this end this document sets out Taylor Wimpey's strong support for the approach of the Council to allocate land at West Yarm for a strategic scale housing development.

1.5 In particular, this statement sets out, as demonstrated by the recent results of the outline planning application (12/0980/OUT) for development at Morley Carr Farm, Yarm by Taylor Wimpey, the logical and sustainable role that the site can play in delivering a high quality mixed housing scheme of up to 350 market and affordable dwellings over the early part of the plan period.

Council Response: The Morley Carr Farm site (West Yarm site) has now received planning permission and development has started. It is not therefore being carried forward as an allocation.

SP2 - Housing Spatial Strategy

210/2:

## 2. THE HOUSING SPATIAL STRATEGY

### Range of Housing Sites

2.1 In principle, Taylor Wimpey (North Yorkshire) generally support the proposed Housing Spatial Strategy, in particular the decision of the Council to provide/allocate a range of housing sites to deliver a wide choice of high quality homes over the plan period instead of a single large site.

2.2 The Tees Valley SHMA (2012), even at the broad sub regional level, identifies a number of differing housing sub areas within the Borough of Stockton with their own individual issues of supply and demand both in terms of existing stock and future requirements. The proposed provision of a range of housing sites to serve the overall needs of the Borough and the specific needs of certain sub areas accords with the advice laid down in the National Planning Policy Framework to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'.

2.3 However, it is not considered, having regard to the scale of the housing requirement (see section below), that the proposed level of allocation will meet the full, objectively assessed needs for market and affordable housing within the Borough as required by the National Planning Policy Framework.

Council Response: Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper.

H3 - Housing Mix and Affordable Housing provision

## 210/3: 3 THE HOUSING REQUIREMENT

3.1 The National Planning Policy Framework, at Section 6 (Delivering a Wide Choice of High Quality Homes), makes it explicit that local planning authorities should 'boost significantly the supply of housing' through a number of means, including:-

'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs of market and affordable housing in the housing market area, as far as consistent with the policies set out in this Framework, including key sites which are critical to the delivery of the housing strategy over the plan period' (Paragraph 47 NPPF (2012))'

3.2 Since the adoption of the Council's Core Strategy in 2010, a further Tees Valley Strategic Housing Market Assessment (2012) has been carried out that provides an up to date position in respect of housing needs and aspirations in respect of market and affordable provision.

3.3 The results of the SHMA in respect of the Borough's Affordable Housing Requirement of 560 dwellings per annum are acknowledged at Section 8.145 (Page 138) of the Preferred Options. However, the document then goes on to explain that the Council's housing strategy being taken forward has a target of only 100 affordable dwellings per annum as this is 'realistic'. It sets out that the anticipated delivery is based on a mixture of the amount of affordable housing (15-20%) from market-led housing schemes and the delivery of affordable housing from the National Affordable Housing Programme ('assuming it is renewed').

3.4 The proposed approach to affordable housing, assuming the allocated market housing sites can viably deliver 20% affordable housing and in the face of significant uncertainty over the publically funded affordable housing schemes, would amount to less than 20% of the full, objectively assessed affordable housing needs of the Borough.

3.5 There is no reasoned justification provided for the statement 'it is clearly not realistic to set an affordable housing target at around the same level as the total housing requirement for all tenure types' (Section 8.145). There is no evidence that explains why planning for a greater number of houses overall on additional viable/deliverable sites, to deliver greater amounts of affordable housing (as a proportion of the market housing), would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The proposed approach of the Council to plan for only 100 affordable dwellings per annum in the face of a requirement of an annual affordable housing requirement of 560 is not justified in this respect.

3.6 As currently drafted, the Council's proposed Regeneration & Environment LDD/Core Strategy Review will not meet the full and objectively assessed needs of market and affordable housing in the plan area; it is therefore in conflict with national policy. It is therefore unsound.

Council Response: Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper.

### H3 - Housing Mix and Affordable Housing provision

#### 210/4: 4. DELIVERING THE HOUSING REQUIREMENT

##### Housing Allocations

4.1 Taylor Wimpey (North Yorkshire) Ltd welcome the provision of site specific housing allocations through the emerging Regeneration & Environment DPD to deliver the required housing over the plan period. This will identify the key sites critical to the delivery of the Council's housing strategy over the plan period which is in line with the advice set out in the NPPF (Paragraph 47).

4.2 As set out above, and set out in detail below, it is considered that the range of proposed allocated housing sites should be increased over the plan period to accommodate the full evidenced based housing requirements of the Borough and to create a more flexible and response range of sites.

##### Housing Phasing and Implementation Implementation Strategy & Trajectory

4.3 The provision of a housing implementation strategy and indication of the expected rate of housing delivery (or trajectory) to steer housing delivery over the plan period is compliant with the requirements of the NPPF (Paragraph 47) and is supported in principle by Taylor Wimpey (North Yorkshire).

##### Bring Forward Allocated Sites From Later in the Plan Period

4.4 The provision of a mechanism to 'bring forward' allocated sites in circumstances where there is a shortfall of deliverable supply (against a 5 year requirement + buffer) is supported, and is again compliant with the requirements of the NPPF.

4.5 In the case of Stockton, having regard to the Council's published deliverable housing land supply 2012 – 2017 and a detailed understanding of the market and a number of the sites considered by the Council to deliver housing over the next 5 years, Taylor Wimpey are of the opinion that there is a significant shortfall in deliverable housing land (more significant than the Council have estimated).

4.6 There is a need for a number of the proposed housing allocations to come forward much earlier than currently envisaged in the Indicative Phasing Table to 'plug the gap'. As set out in detail below, land at Morley Carr Farm offers an opportunity to react positively and sustainably to the shortfall in supply at the very earliest opportunity.

'Rolling' 5 Year Deliverable Housing Lane Supply

4.7 The suggestion that the Council will only apply the mandatory 5% buffer to the 5 year housing policy requirement instead of 20% is unsound.

4.8 The NPPF is clear that in circumstances where:-

'there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land' (Paragraph 47 NPPF).

4.9 Housing delivery across the Borough over the last 9 years, save for one year (2007/08), has, as a matter of fact, been less than the planning policy requirements. This represents persistent under delivery and has resulted in a cumulative shortfall of housing delivery against requirements and therefore requires a 20% buffer to be applied as required by the NPPF.

Over Supply of Housing Against Requirements

4.10 The scope to allow a range of housing sites (in excess of the housing requirement) to come forward at any one time is logical, will provide for choice and competition in the market and will assist the Council in 'significantly boosting the supply of housing' across the Borough in line with the requirements of the NPPF. However, there are very serious concerns regarding proposed Policy H2 (5) which states:- 'Land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan period.'

4.11 This suggests that, in the event of windfall (unallocated & uncommitted) housing sites coming forward, that those sites allocated for housing development within the Regeneration & Environment LDD may not be granted an appropriate planning permission to deliver housing – the allocated sites will be 'held back'.

4.12 Paragraph 154 of the NPPF makes it explicit that:- 'Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'

4.13 As drafted, the policy will result in significant uncertainty for developers looking to acquire and deliver allocated development sites (at considerable expense). This will also have a significant negative impact on the Council's aspirations of co-working between developers to create masterplans for the development of the strategic scale housing sites. This uncertainty will result in delay in housing delivery or limited housing delivery.

4.14 Fundamentally, there is no requirement in the NPPF, or indeed any robust justification put forward by the Council, to set a ceiling for housing delivery. Moreover there is no evidence, or logic, to suggest that an overprovision of housing will result in material and unacceptable harm, especially within the context of the Government's clear directive to Local Planning Authorities to 'boost significantly the supply of housing'. The development of brownfield sites in the conurbation, as windfalls, during the plan period should be seen as a significant benefit to increasing the supply of a range of housing sites across the Borough for choice and competition in the market and the associated regeneration and environmental benefits. Seeking to place a 'cap' or 'ceiling' on the amount of housing development to come forward renders the plan not positively prepared and therefore unsound.

4.15 The rate and amount of delivery of new housing and the capacity of the housing market areas is, and will continue to remain, entirely dictated by the market and a commercial decision for the respective housing developers.

Council Response: Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper.

210/5: 5 PROPOSED HOUSING ALLOCATIONS & HOUSING MIX REQUIREMENTS – LAND AT WEST YARM POLICY H1i

5.1 The Preferred Options LDD, Policy H1i (West Yarm) allocates around 15ha of land for residential development to deliver 'up to' 300 dwellings. The Illustrative Phasing Table (page 106) anticipates housing being delivered at the site from 2016/17 onwards at a rate of 50 dwellings per year.

5.2 The Sustainability Appraisal Summary (Para 8.97) stresses that the site is located adjacent to the existing conurbation and the provisions of the policy have led 'to a positive assessment against the majority of objectives within the Sustainability Appraisal. No conflicts or uncertainties were identified'. It is noted that this is one of the best scoring sites in the Borough.

5.3 The sustainability value of the site and its appropriateness for the housing development is acknowledged by the Local Planning Authority by way of the recent resolution to grant planning permission upon it. These matters are dealt with in detail in Taylor Wimpey's planning application and the Officer's Report to Planning Committee.

Quantum of Development

5.4 The reasoned justification for the policy make it explicit (Paragraph 8.93) that the allocated amount of housing is restricted to 300 units because 'initial and immediate concerns in respect of local highway capacity restrict the contribution of this site to around 300 dwellings.'

5.5 Officers and Members will be aware that the Council has recently resolved to grant planning permission at the site (some 22ha Gross) for up to 350 dwellings. The application was accompanied by a detailed Transport Assessment which was considered by the Highway Authority and the Highways Agency. Both consultees raised no objection to the proposals in respect of the impact of up to 350 dwellings upon either the local and strategic highway network.

Masterplan Application 12/0980/OUT

5.6 In light of the detailed consideration on this matter as part of the planning application we must raise an objection to the proposed limitation on the quantum of development to 300 dwellings. As demonstrated the site has scope to accommodate a greater amount of development at densities that are appropriate for the location and housing mix.

Policy Requirements

5.7 As demonstrated in the recent planning application, there is sufficient scope to address all of the requirements set out within the proposed policy, including the provision of pedestrian and cycle improvements from the site to community facilities, the provision of a high quality landscaping scheme along the western boundary and links to the existing Public Right of Way Network.

High Pressure Gas Main

5.8 Again, as evidenced in the recent planning application, a scheme of upgrade works (laying of thick walled pipe) have been agreed with National Grid & the Health & Safety Executive. The Health & Safety Executive have confirmed that they have no objection to residential development on the site subject to the works being carried out at the appropriate time.

5.9 The upgrading works are not required until the development has extended a significant way into the site. The existence of the gas main is not a constraint to the commencement of development or the anticipated rate of delivery of 50 dwellings per annum.

5.10 The development of 350 houses on the site can be undertaken in full accordance with the requirements of the pipeline operations and the Land Use Planning Guidance of the Health & Safety Executive.

HOUSING MIX – POLICY H3 (HOUSING MIX & AFFORDABLE HOUSING PROVISION)

5.11 Taylor Wimpey (North Yorkshire) are fully aware of the housing needs and aspirations of the area as set out in the Tees Valley SHMA 2012 for the Borough as a

whole, and the Yarm, Preston & Eaglescliffe Sub Area.

5.12 Taylor Wimpey are confident that the site which they have an interest in can deliver the right mix of housing for the sub area, in particular they consider, and as put forward in the recent planning application, that a mix of housing including Executive Housing (5+ bedrooms), Bungalows and Terraced, Detached and Semi-Detached Housing of 2,3 & 4 bedrooms can be successfully delivered at the site.

5.13 The proposals for the site comply with Policy H3 (Housing Mix & Affordable Housing Provision) of the Regeneration & Environment LDD both in respect of the housing mix and the amount of affordable housing.

#### COMPLIANCE WITH THE DEVELOPMENT PLAN

5.14 As demonstrated within the documentation submitted with the recent outline planning application, save for the location of the site outside of the development limits (which are currently under review), its development is acceptable in all other respects and compliant with the adopted Development Plan, the National Planning Policy Framework and the emerging planning policies set out in the Regeneration & Environment LDD as far as relevant. This was acknowledged by the Local Planning Authority and evidenced by no objection being raised by any Technical, Safety or Environment Consultees.

#### PHASING OF HOUSING DELIVERY AT WEST YARM

5.15 As acknowledged by the Council in the recent resolution to grant planning permission., the site is deliverable and can deliver a significant amount of housing in the short term to meet the immediate housing needs of the Borough.

5.16 In light of the acknowledged shortfall (against requirements) in housing land supply across the Borough, the site at West Yarm (Morley Carr Farm) should be scheduled to deliver housing from the outset of the Regeneration & Environment LDD plan period.

Council Response: The West Yarm site has been granted planning permission for 350 dwellings.

H3 - Housing Mix and Affordable  
Housing provision

#### 210/6: 6. SUMMARY

##### Range of Sites

6.1 Taylor Wimpey North Yorkshire are fully supportive of the Council's Housing Strategy to include a range of housing sites that will provide choice and competition in the market and meet the individual needs of the sub areas across the Borough – this is consistent with the requirements of the NPPF. In particular, the proposed allocation of land at West Yarm (Morley Carr Farm) as an urban extension to Yarm is supported. The site is sustainable and deliverable and will contribute significantly to the delivery of high quality market and affordable housing in wholly sustainable manner.

##### Housing Requirement

6.2 Taylor Wimpey continue to question the Council's proposed housing requirements over the plan period and whether they are compliant with National Planning Policy which require the Local Plan to meet the full and objectively assessed needs of the Borough as required by the NPPF. This relates in particular to meeting the Borough's significant affordable housing needs.

##### Phasing & Delivery

6.3 Taylor Wimpey North Yorkshire objects to Policy H2 (5) of the LDD, which sets a ceiling for housing development and provides potential for allocated housing sites not to be granted a planning permission to deliver housing. This is not justified nor positively planned. This will cause significant uncertainty in developers acquiring and investing in sites and will not assist in 'boosting significantly the supply of housing' as required by the NPPF.

6.4 In light of the deliverability of the site at West Yarm (which Taylor Wimpey (North Yorkshire) have a legal interest), the sites high sustainability value, lack of physical and environmental constraints and potential to create a significant amount of the right market and affordable housing in the short term it should be allocated for housing development at the very earliest opportunity.

6.6 Full detailed assessments, endorsed by the Council's Professional Officers and Statutory Consultees at planning application stage, have demonstrated that the site and the local and strategic highway network can accommodate 350 dwellings. The proposed limit of 300 dwellings at the site on the basis of a perceived unacceptable



highway impact is not justified.

Council Response: Comments regarding housing need and demand noted and addressed in the Housing Need and Demand Topic Paper. The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.

## H1 - Housing Allocations

### 210/7: 7. RECOMMENDATIONS

## H2 - Housing Phasing and Implementation

7.1 It is recommended that the Stockton Regeneration & Environment LDD is revised to:-

- Increase the amount of housing planned for to meet the full, objectively assessed needs for market and affordable housing in the Borough consistent with the requirements of the National Planning Policy framework.
- Remove Point 5 of Policy H2 to provide confidence/certainty for developers to invest in and acquire allocated housing sites at an early stage to ensure constant delivery of new housing over the plan period to meet the housing needs of the Borough.
- Retain the land proposed to be allocated for housing development at West Yarm (Morley Carr Farm) with housing delivery within Phase 1 of the plan period.
- Increase the allocated quantum of development to 350 dwellings as justified in the resolution to grant planning permission 12/0980/OUT at the site.

## H1i - West Yarm

## H3 - Housing Mix and Affordable Housing provision

Council Response: Comments noted

## 211 English Heritage

211/1: It is now some five years since we were last consulted on an earlier draft of the Regeneration Development Plan Document (DPD). Since that time the Core Strategy has been adopted and the Council has prepared a Supplementary Planning Document No.4: Conservation and Historic Environment Folder, A draft Historic Landscape Character Assessment, and the Stockton Heritage Strategy. Furthermore, the document now includes a revised housing strategy and incorporates the Environment DPD, and the Yarm and Eaglescliffe Area Action Plan.

It is worth noting that the earlier draft of the Regeneration LDD and the adopted Core Strategy predate PPS5: Planning for the Historic Environment. In March 2012 the government issued the National Planning Policy Framework (NPPF), superseding a number of pre-existing policy documents, including PPS5. Most of its principal policies were nevertheless carried forward into the NPPF.

Paragraph 126 and 156 of the NPPF are of particular relevance to this document. Paragraph 156 of the NPPF states that local planning authorities should set out the strategic priorities for their area. Policies should be included to deliver the conservation and enhancement of the historic environment and landscape.

Paragraph 126 states that:

Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic, and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

The Council's Core Strategy contains a Strategic Objective (no.9) which seeks to protect and enhance the historic environment of the Borough. It sets out high level intentions with regard to its industrial heritage, especially the railways and the friction match; the characteristic high streets of Yarm and Stockton; and links to the riverside.

Core Strategy Policy CS3 seeks to safeguard the cultural heritage of the Borough, and advises that opportunities will be taken to constructively and imaginatively

incorporate heritage assets in redevelopment schemes, employing where appropriate contemporary design solutions.

Supplementary Planning Document No.4: Conservation and Historic Environment Folder is a helpful digest of the situation regarding a range of heritage asset types, and although it contains a suite of conservation area character appraisals and consideration of generic management principles, none of its content is drawn upon in either the Core Strategy or this LDD. Nor is it clear whether the recommendation regarding a blanket Article 4 Direction for the Borough's conservation areas has since been imposed.

Similarly, the Stockton Heritage Strategy is a celebration of the value of the cultural heritage of the Borough, and contains information regarding a number of projects recently undertaken, such as those at Ropner Park and Preston Hall. It does not set out in anything other than headline terms the benefit of pursuing further heritage related projects and activities. To be effective as an instrument for change it should ideally be accompanied by an action plan with accountable targets and indicators of success.

In light of this I conclude that, taken together, the various documents referred to above do not amount to a positive strategy of the kind required of paragraph 126 of the NPPF. As a consequence the Council's Development Plan does not yet comply with the Framework and is in my view unsound.

There is, however, an opportunity for this LDD to redress the omissions found elsewhere within the Council's Development Plan documentation and to champion a project-related pro-active approach to heritage protection. Generic or locally specific Development Management policies are re-active, not pro-active. Such a pro-active approach might, I would suggest, identify –

- how the authority would tackle and resolve issues such as heritage at risk from neglect, decay or other threats, including risk to grade II listed buildings and any on a list of locally important heritage assets (not just those on the English Heritage register),
- how it would ensure that heritage assets are put to viable uses consistent with their conservation and how they would be incorporated into regeneration schemes in line with English Heritage's principle of constructive conservation,
- how opportunities would be taken to enhance or better reveal the significance of heritage assets affected by development proposals,
- how it would, going forward, expand its understanding of the historic environment of the area by, for example, producing and/or updating the suite of conservation area character appraisals and management plans (it is now nearly seven years since the SPD folder was adopted/reviewed),
- how it would use these appraisals to selectively consider Article 4 Directions to safeguard vulnerable areas from harm to or loss of significance and value (there is no indication of progress on the making of Directions since 2006),
- how it would improve public accessibility to the historic environment through, for example, Heritage Open Days [perhaps more pertinent to the Leisure and Tourism agenda] and the Historic Environment Record (NPPF paragraph 169),
- How it would respond to the concerns of the local community and the Council's Highways' Department regarding the environmental capacity of places like Yarm to absorb development pressure and increases in vehicular traffic, and possible threats to their historic character.

Each of these activities is well suited to the establishment of performance targets and indicators against which the success or otherwise of the LDD can be measured. The examples I give are not exhaustive. Approaching the issue of the historic environment in this way is more likely to achieve positive sustainable outcomes.

Throughout the document policies advocate development which has the potential to impact upon heritage assets. Nowhere, however, does the document describe the mechanism by which these interventions are informed by and respond to an understanding of the significance of those assets.

Council Response: Policy within the publication draft, combined with policy within the adopted Core Strategy, provides a 'positive strategy' as required by para 126 of the NPPF. Publication policies has been produced in consultation with English Heritage.

Sustainability Appraisal

211/2: Section 4: Sustainable Living

SL2 - Renewable Energy Generation

Policy SL2 - Sustainable development is that which also contributes to protecting and enhancing the historic environment. Development which does not do this is not sustainable and should be resisted. Heritage protection should be a criterion against which renewable energy generation should be judged.

Paragraph 4.7 - the Regional Spatial Strategy has not yet been revoked.

Paragraph 4.14 - depending upon the nature of specific development proposals they have the potential to cause substantial harm to heritage assets, and in this respect there could be a significant relationship between renewable energy generation and the historic environment.

Council Response: Policy SL2 has been amended to take into account the comments. Core Strategy Policy CS3(8) ensures that development will make a positive contribution to the Historic Environment.

EMP3 - Key Employment at Wynyard Park

211/3: Section 5: The Economy

Paragraphs 5.16, 5.26 and 5.32 – development, especially that involving greenfield sites, has the potential to harm archaeological interest if not avoided or mitigated against.

Policy EMP3 – it is interesting to note that in order to safeguard the setting of Wynyard Park it is proposed to exclude development in the North Burn Valley. I shall return to this issue later.

Council Response: Comments noted. The Sustainability Appraisal has been revised following the preferred options consultation.

TC1 - Stockton Town Centre Improvements

211/4: Section 6: Town Centres

TC2 – Sites for major new retail and town centre use development

Policy TC1 advises that in Stockton town centre the Council will support development which complements the 'established' character of the area. It is not clear whether this means the historic character or the character now established, some of which is not particularly complimentary to the former.

TC3 - Stockton Town Centre Primary Shopping Area

Paragraph 6.7 refers to the intention to produce a Stockton Town Centre Urban Design Guide SPD. We are informed that this will constitute the conservation area management plan for the area. In the absence of this, it is not clear how the improvements described in Policy TC1, and already decided upon, have been informed by an understanding of the historic significance of the conservation area. With regard to new buildings and public realm responding positively to the historic environment, the NPPF (paragraph 137) requires local planning authorities to seek opportunities to enhance and better reveal significance, not just urban structure, scale and massing. Elsewhere we have previously expressed the view that this SPD does not conform to English Heritage's best practice guidance on the preparation of management plans for conservation areas.

TC6 - Development and Change of Use within the District Centres

TC7- Local and Neighbourhood Centres

Paragraph 6.13 requires regeneration schemes to 'complement' existing heritage assets, and paragraph 6.16 requires development to respect the 'important characteristics' of the conservation area. Again, the appropriate test is set out in paragraph 137 of the NPPF. It is not always necessary to design buildings which incorporate vernacular features. Overtly contemporary design which respects its historic context has been shown to be very successful elsewhere.

This section of the document affords no commentary or assessment of the extent, if any, to which the town centre policies have been influenced by the character appraisal or management plan for the conservation area. There is no clear evidence to demonstrate that there would be no harm to it as a consequence of the proposals. The planned comprehensive redevelopment of the area bounded by Yarm Lane, High Street, West Row and Ramsgate is a case in point.

Policy TC2 seeks to retain buildings which make a positive contribution to the conservation area. Whilst this is to be welcomed, the policy should seek to make best use of those buildings and incorporate them into regeneration schemes as advocated by paragraph 126 of the NPPF.

Policy TC3 refers to various areas within the town centre. A map would be helpful. TC3(7) seeks to avoid an 'over-concentration' of non-retail uses outside shopping frontages. What constitutes an over-concentration is not explained and remains ambiguous.

Policy TC6 makes welcome reference to the need to support Yarm's historic High Street. Regrettably there is no such overt reference to Stockton's historic High Street in earlier policies. Similarly, there is no reference in Policy TC7 to the important conservation area in which Norton High Street sits and no apparent concession to its heritage status or evidence to demonstrate how the character appraisal has influenced policy.

One omission as regards town centre policy (especially with regard to Stockton High Street) is a strategy for dealing with vacant and underused upper floors. The

desirability of introducing residential uses is one means of meeting the need to introduce variety and vitality into the high street whilst at the same time meeting housing objectives. Responding to this, one of the many concerns to emerge from the recent Portas Review, could also constitute a meaningful component of the positive strategy for the conservation of the historic environment advocated by the NPPF.

Council Response: Comments noted. Policies will be amended where necessary.

#### PF4 - Maximise Civic Space for Community Interaction

211/5: Section 7: Provision of Facilities

Policy PF4 seeks to maximise civic space for community interaction. In paragraph 7.36 there is no reasoned explanation of the possible impact of extensive public realm improvements on the character of the conservation area.

Council Response: Core Strategy Policy CS3(8) and policy contained within the publication draft ensures that development will make a positive contribution to the Historic Environment.

#### H1 - Housing Allocations

211/6: Section 8: Housing

##### H1b - Urray Nook

Paragraph 8.22 reveals community concerns regarding the impact upon the highway network of the development of the Urray Nook Road site for housing, and especially upon Eaglescliffe and Yarm. Paragraphs 8.88 and 8.102 reveal similar concerns regarding the development of West Yarm and South West Yarm for housing. The potential for the character of these conservation areas to be harmed by additional through traffic is not addressed in the reasoned justification for promoting these sites, nor does the sustainability appraisal summary suggest mitigation that could be incorporated into any masterplan for their safeguarding.

##### H1g - Harrowgate Lane

Policy H1g allocates Harrowgate Lane as a substantial urban extension on greenfield land. Commentary is silent with regard to any archaeological interest the site may have. If it has been assessed it would be helpful to know what the results were. If not, its allocation should be dependent upon or at least influenced by such an evaluation.

##### H1i - West Yarm

##### H1j - South West Yarm

Policy H1k concerns a masterplan for Wynyard. Policy H1l seeks to develop 30ha of land for up to 300 dwellings at Wynyard Village. We are informed that development will be required to respond positively to the context and setting of the historic park and contribute to the sustainability of the Hall and its parkland. Support will be given to proposals which better reveal, sustain and enhance its special interest. English Heritage welcomes these intentions, but it is not clear to what extent the principle to develop at Wynyard was informed by its heritage status.

##### H1l - Wynyard Village

##### H1m - Wynyard Park

We are also informed that development in the Wynyard area has benefitted in the past from co-operation with Hartlepool Borough Council. Paragraph 8.113 reveals that there remains a significant amount of undeveloped employment land at Wynyard, and that it may not be deliverable due to impacts upon the strategic highway network. We are not told what those impacts are, but it is assumed that the cost of overcoming those impacts is too expensive. Paragraph 8.124 suggests the de-allocation of some employment land to allow housing.

To the north of this area, a short distance along the A19, lies the Scheduled Ancient Monument of High Burntoft. In its Core Strategy, Hartlepool Borough Council proposes to allocate a large tract of land adjoining it on its eastern and southern sides for prestige employment. English Heritage has strongly objected to this allocation. Were Stockton and Hartlepool Councils to co-operate more closely, it might be possible for Hartlepool's employment needs to be met on the site which Stockton now considers undeliverable, thereby obviating the need for the potentially damaging allocation at High Burntoft. If this scenario is not feasible, it should at least be addressed in the reasoned justification accompanying this section of the LDD.

Paragraph 8.134 remains silent with regard to any assessment of development in relation to the historic environment of Wynyard.

Paragraph 8.140 helpfully promotes the view that housing densities should respect existing character where it makes a positive contribution to local distinctiveness. This basic tenet is equally applicable to any form of development.

Council Response: The Council are undertaking an heritage assessment of sites to be allocated as part of the Sustainability Appraisal. This will ensure that all impacts upon the historic environment have been fully considered and policies amended where identified as being necessary.

ENV1 - Green Infrastructure

211/7: Section 9: Environmental Protection and Enhancement

ENV6 - Re-Use And Replacement Of Rural Buildings

Paragraph 9.3 acknowledges that there are numerous definitions of Green Infrastructure. Which of them the Council has chosen to adopt is not made clear, although from paragraph 9.10 it is possible to conclude that it is one that includes the historic environment. English Heritage supports this, but is concerned that Policy ENV1 makes no reference to it as a component. This is all the more concerning inasmuch as the policy allows for the replacement elsewhere of green infrastructure lost as a consequence of developmental activity – something which it is not possible to do in respect of heritage assets. Nor is it acceptable to allow the loss of one element of green infrastructure by replacing it with another, for example the loss of archaeology and its replacement with a sports pitch.

ENV7 - Farm Diversification

Paragraph 9.17 identifies no significant relationship between green infrastructure and the economy-, employment- and education-related sustainability objectives. English Heritage would contend that the safeguarding, and enhancing of heritage assets (whether or not they form aspects of green infrastructure) can confer economic advantage on an area competing in a global jobs market, can give rise to opportunities for the development of conservation skills and crafts, and is an aid to life-long learning.

Policy ENV6 – many of the rural buildings the subject of this policy may be heritage assets (whether or not they are designated as such). Where this is the case, it is desirable to consider re-use before replacement, and for any scheme of re-use to be respectful of what constitutes its heritage significance – the presumption being in favour of its retention.

Policy ENV7(f) refers to 'local' farms, but what constitutes local is not defined.

Council Response: The definition of Green Infrastructure which will be included within the Regeneration and Environment LDD is that contained within the NPPF. Policy ENV1 has been significantly amended and resolves concerns regarding replacement provision.

It is not appropriate to state what is considered to be a 'local farm'; this is considered to be a matter of fact and degree

HE1 - Historic Landscape

211/8: Section 10: Historic Environment

HE2 - Character Areas

English Heritage welcomes the inclusion of a suite of locally specific heritage-related policies in this document. We especially welcome those pertaining to historic landscape character, the local list, and the Stockton and Darlington Railway. In general terms, however, these policies are re-active as opposed to pro-active, and do not in themselves amount to the positive strategy required of paragraph 126 of the NPPF. They are in essence Development Management policies.

HE3 - Local List

Paragraph 10.18 refers to the NPPF, and policy guidance in respect of locally important non-scheduled archaeology. Non-designated archaeology could potentially be of national significance and of equal status to that which is scheduled.

HE4 - Stockton and Darlington Railway

Paragraph 10.30 refers to paragraph 53 of the NPPF in support of the policy to resist the development of residential gardens. Paragraph 157 of the NPPF also allows local planning authorities to identify land where development would be inappropriate, for instance, because of its effect on historic significance.

Council Response: Amendments to policies and justification have been made where necessary. The Council have provided a 'positive strategy' as required by para 126 of the NPPF. It is not considered that the application of paragraph 157 of the NPPF to character areas is necessary as paragraph 53 provides the local planning authority the ability to consider whether development would cause harm.

R2 - North Shore

211/9: Section 11: Regeneration and Gateway Sites

G4 - Boathouse Lane

We are advised in paragraph 11.70 that the Church Road area now forms part of the Town Centre/North Shore development scheme, yet there is no consideration of its heritage significance in this section of the document. The intention to introduce a tree-lined boulevard appears unsupported by any appraisal of conservation area character. No mention is made of the wider regeneration potential for this area of the town centre that might flow from the repair and reuse of the Globe theatre.

Policy G4 deals with Boathouse Lane. It requires development to respond to the scale and massing of adjacent listed buildings. The requirement should be to safeguard their significance and where possible enhance their setting. This policy should pro-actively seek the appropriate re-use of heritage assets.

Council Response: The Council are undertaking an heritage assessment of sites to be allocated as part of the Sustainability Appraisal. This will ensure that all impacts upon the historic environment have been fully considered and policies amended where necessary.

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## 212 Individual

H1h - Land East of Yarm Back Lane

212/1: I object to proposed plans H1h, H1i and H1j as there will simply be too much traffic in an already congested area. Yarm can barely cope now and with the proposed plans it will completely ruin the area and what makes it an appealing place to live.

H1i - West Yarm

Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

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## 213 Individual

H1b - Urlay Nook

213/1: I object to Planning Application 12/2047/OUT Urlay Nook. I believe more housing would be detrimental to the area and is unsustainable for the current traffic problems this area has had to endure for years. Indeed, if any of the other developments planned take place I would very much doubt if existing public services would be able to support such development.

Council Response: Objection noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

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## 214 Individual

SP2 - Housing Spatial Strategy

214/1: Paragraph/Policy - Comment I have a number of points but my three main concerns concern the housing requirements and the transport infrastructure. Firstly the options seem to have been drawn up to meet housing requirements that were assessed some time ago (2004?) and are therefore based on out of date data. The economic recession must have affected the plans and yet we have not refreshed the underlying data used to estimate the housing requirements, nor do we make any reference to the accuracy of the forecasts that were made (as evidenced by actual data for 2004 to 2011) to give confidence that the plans are based on reasonable underlying assumptions. This is a fundamental point. Secondly, we are planning to build houses that may not be needed, particularly when no new jobs are being created in the area. Without new employment there will be no incoming migration, and there is more likely to be emigration in search of jobs. For the existing jobs in the area, at best you will encourage the migration of residents from one local area (say Middlesbrough) to Stockton. A unified view of the whole Cleveland Area is needed housing and employment. Thirdly, the transport infrastructure is mentioned for consideration at later stages despite recognising that the proposals will cause local difficulties that will need to be mitigated. Transport must be considered in tandem, not after the event.

Council Response: Comments regarding the housing requirement are noted and addressed in the Housing Need and Demand paper

214/2: In detail my comments are as follows: 2.34 Consultation statement - Having sought opinions on the development of Yarm and Eaglescliffe the views are now being subsumed into the main document where the views risk dilution and comparison with conflicting priorities that may not apply to Yarm and Eaglescliffe. The argument for this is that a separate YEAPP Planning statement would be simply be repeated in other districts. I contend that there is nothing wrong with repetition as it confirms consistency of views.

Council Response: Comment noted

214/3: 2.40 Consultation statement - "At this stage no proposals are made regarding transport and car parking." I contend that infrastructure provision should not be an afterthought and MUST be considered in tandem, not after the event.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

214/4: 3.16 Consultation statement - Where can we obtain a copy of the latest Green Blue Heart Strategy? To what degree can the strategy be changed without consulting the public?

Council Response: Comment noted

214/5: 3.55 Consultation document - The Council's Employment Land Review and the Regional Spatial Strategy identified a potential surplus of employment land in the Borough, meaning that more land was allocated for employment than would actually be utilised for this purpose, if the take up rate was maintained. Respondents were asked to consider whether the Borough's employment land portfolio should be rationalised to remove this surplus. If we don't think that we will generate further employment then who do you think will buy the new homes that are being built? There is likely to be a migration to areas where there are jobs which is not necessarily

Teesside. This view is supported by respondents in para 5.13.

Council Response: The Council and the Local Economic Partnership have aspirations to grow the economy of Stockton on Tees Borough and the Tees Valley. It is vital that a significant level of land employment land is available to allow for relocation and growth of existing businesses (ie Nifco) and new inward investments in to the area. In order to enable this growth, the Council recognises that it may be necessary to encourage new migrants in to the area that have the skills profile to fill these jobs. New homes are also essential in driving economic growth as a shortage in the supply of new homes may discourage business / employee decisions to locate in the area. If the Council were to adopt an approach which plans for an inadequate supply of land, this would lead to further challenges to businesses, the potential loss of important jobs and further economic decline.

214/6: 5.10 Consultation statement - In order to allocate sites for development, the Council must be satisfied that they are sustainable (or can be made sustainable), that they are viable development options and that they will delivered within the plan period. Ensuring that these requirements are met has been a significant factor in the selection of sites for allocation for residential use in the Regeneration and Environment LDD Preferred Options draft. Unless transport options are thought through then the sustainability conclusions will not have fully considered all options . e.g. the proposal preference for Yarm South West v Yarm South East.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

214/7: 5.16 Consultation document - "Since the Issues and Options consultation began in July 2011, it has become apparent that the outstanding housing requirement has risen to 4,200 dwellings, 1,400 more than the outstanding requirement identified previously. This has increased because the delivery of some existing planning permissions is considered likely to be less than previous estimates, whilst the scheduled date of adoption for the Core Strategy Review has moved forwards to January 2014, meaning a further 555 dwellings will be required as the Council must plan for 15 years from the date of adoption." - The housing requirement has not risen. Reading between the lines this paragraph states that developers do not want to build in the previously proposed sites so attention is now being turned to those sites that the developers feel are lucrative. However have the assumptions behind the housing requirement estimate been validated recently? Is the demand there (particularly in view of the economic climate) and will new housing developments in Yarm simply encourage the migration of residents from, say, Middlesbrough, to Yarm. i.e. thereby self-fulfilling the demand for new homes.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement

Housing need and demand is discussed in the Housing Need and Demand Topic paper.

214/8: 5.76 Consultation statement - Land South of Preston Farm – "Whilst this site would accommodate a relatively large number of dwellings and would be deliverable within the time-frame, it is problematic in terms of its role in the green wedge, its heritage potential and its poor relationship with existing developments. It has not, therefore, been allocated for residential development in the Regeneration and Environment LDD. It is acknowledged that the site makes up a significant part of the Tees Heritage Park, being almost entirely within its boundary. As the Tees Heritage Park is supported by both Core Strategy Policy 10 and the draft Stockton-on-Tees Green Infrastructure Strategy, allocating a significant part of it for housing development would impact negatively on both those strategies." - This site and the site in Ingleby Barwick have been discounted even though they would cause less upheaval and traffic congestion than the Yarm sites.

Council Response: For how the Land South of Preston Farm Industrial Estate site has been assessed, see the Housing Site Selection Topic Paper.

214/9: 5.93 Consultation document - South East Yarm is rejected yet South West Yarm is proposed when both sites have the same issues. The only reason for favouring South West Yarm is that it is next to the railway station. However the single lane railway bridge is a bottle neck that can not cope with the planned developments.

Council Response: The reasons why the South East Yarm site has been discounted are stated in the Housing Site Selection Topic Paper..

214/10: 5.106 Consultation document - West Preston is not being pursued because "a large number of small sites is preferable to a large site." What is to stop a small / medium site being developed here? Transport issues are mentioned but this will apply to other sites too i.e. South West Yarm.

Council Response: For how the West Preston site has been assessed, see the Housing Site Selection Topic Paper.

214/11: Draft proposals – Evidence section - P206 Housing Trajectory - What has been the quality of past projections that would support the faith being placed in this forecast? Has the evidence been reviewed and validated since the economic downturn? Where are the jobs that will encourage people to stay in the area?

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

214/12: Draft proposals – P198 Appendix 1 - Strategic Housing Assessments are mentioned in the list of Evidence based documents. What is the basis for the projected housing demand? What is its demography and is it based on recent data in light of the economy?

Council Response: The Strategic Housing Market Assessment was undertaken by experienced consultants and used the most up-to-date data available.

214/13: Draft proposals – page 12 Housing Spatial Strategy - The wording on this page implies that the 2004-2024 plan has been used as the foundation for the plan 2014-2029. i.e. that the housing strategy is based on data that is 8 years old and pre the economic depression. What has been done to confirm that the data compiled in 2004 is still relevant, how did the forecasts made for the years 2004 to 2012 compare to actual, and what confidence can we have in the quality of forecasting?

Council Response: Comments noted and addressed in the Housing Need and Demand Topic paper

214/14: Draft proposals – page 12 para 2.6 - How have we assessed the “identified housing requirement”? How do the public gain confidence that it is robust? It is unprofessional to proceed without validating your data and reviewing your underlying assumptions?

Council Response: Comments noted and addressed in the Housing Need and Demand Topic paper

214/15: Draft proposals P17/18 para 2.20 - The report notes that “the Council’s Highways team have identified that there are significant issues regarding the local road network and car parking in Yarm Town Centre that would need to be mitigated. - I contend that infrastructure must be a delivered pre-condition before any development.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

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## 215 Individual

H1j - South West Yarm

H1i - West Yarm

215/1: Planning application 12/1990/EIS I object to the above mentioned planning application for a variety of reasons;

1. There will be a large increase of traffic in an area which is already congested.
2. The main road into the area, Green Lane has traffic lights at the bridge over the railway line which will be a bottle neck for traffic and could cause major disruption to other roads in the area at peak times.
3. The existing infrastructure will be put under enormous pressure, the health centre in Yarm has barely enough parking spaces to cater for existing residents. The pressure on local schools will be enormous and may lead to a drop in standards.
4. Yarm doesn't have enough parking spaces at the moment and more houses will only increase this problem.
5. Getting into Yarm is a nightmare at present and more local residents will increase this problem.
6. As a resident of Kirklevington I object to the size of the Parish being doubled and the whole nature of the village being spoiled.
7. There will be a major effect on the wildlife corridor of the area.
8. The development is outside the limits of development and erodes the strategic gap between Yarm and Kirklevington.
9. The consultation period on the Regeneration and Environment Local Development Document - Preferred Options had not been completed before the application was accepted by Stockton Borough Council.
10. The Council has already approved plans for 350 dwellings at Morley Carr and 143 dwellings at Tall Trees. These developments will put more than enough pressure on the area without adding to the problems on Green Lane.

I hope that you will think very carefully about the existing residents of Yarm and Kirklevington and how this development will impact on their lives in a very negative way.

Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper

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## 216 Individual

H1b - Urray Nook

216/1: With regard to the Regeneration and Environment Local Development Document Preferred Options Draft, I object to further development in the Yarm and Eaglescliffe area for a number of reasons.



H1i - West Yarm

Firstly, the plan is for REgeneration and therefore should only be considering previously developed land and not new Greenfield sites around the borough.

H1j - South West Yarm

Secondly, The geography of the yarm and Eaglescliffe and it's road infrastructure are not compatible with large scale development due to already high levels of road congestion and air pollution specifically in Yarm High Street where there is a bottle neck for road users.

Thirdly, further development of the Yarm and Eaglescliffe area will result in a loss of the towns character. The small market town will be no more and in its place will just remain a sprawling housing estate similar to Ingleby Barwick with no real historical appeal.

Fourthly, The development of Green Spaces around Yarm will impact on the local environment and wildlife. Currently, there is a wide range of flora and fauna living in the belts of land between Yarm and the outlying villiages. This would be damaged or lost if developers are given free range to build on the Green Belts.

Lastly, In the Yarm and Eaglescliffe area, there is already a lack of leisure and community amenitites when compared with other areas around the borough. I would summise that this is due to the council spending money in less affluent areas where residents are less able to provide for themselves. It would surely make sense to plan further development near these amenities as opposed to building where there is already a lack of them. Private housing developers will only pay lip service to the creation of amenities. They won't provide new schools, a swimming pool, shops, sports halls etc...

I hope the officers preparing the final document will base their decision of logic and reason as opposed to bowing down to the developers in order to allow them to build where they think they can make the most profit. Morley Carr Farm for example, where planning was approved despite being outside planning limits and prior to this report being written.

Council Response: Green Belt is a national designation. There are no areas of Green Belt within Stockton-on-Tees or the wider Tees Valley area. Stockton-on-Tees has a local 'Green Wedge' designation, which is intended to prevent the coalescence of communities and maintain their individual identities. Other Comments are noted and addressed within the Yarm and Kirklevington Topic Paper.

217 Individual

H1i - West Yarm

217/1: i would prefer no more housing in yarm but sbc have not intention of listening to the people of yarm

H1j - South West Yarm

Council Response: Comments noted

218 Individual

H1i - West Yarm

218/1: why are you wasting time asking the people of yarm to be involved you have made up your mind and morleycarr farm has been approved this is a total waste of time

H1j - South West Yarm

Council Response: Comments regarding Morley Farm and the Regeneration and Environment LDD Preferred Options consultation are noted and addressed in the Yarm and Kirklevington Topic Paper .

Consultation

219 Individual

H1i - West Yarm

219/1: why are you wasting time asking the people of yarm to be involved you have made up your mind and morleycarr farm has been approved this is a total waste of time

Consultation

Council Response: Comments regarding Morley Farm and the Regeneration and Environmet LDD Preferred Options consultation are noted and addressed in the Yarm and Kirklevington Topic Paper

220 Individual

H1i - West Yarm	220/1: this is a waste of time for people in yarm , morley carr farm is on list but yet been approved, sbc do not listen and the sooner we get back into yorkshire the better
Consultation	Council Response: Comments regarding Morley Farm and the Regeneration and Environment LDD Preferred Options consultation are noted and addressed in the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	220/2: i would prefer no more housing in yarm but sbc have not intention of listening to the people of yarm
	Council Response: All views expressed through the Regeneration and Environment LDD Preferred Options consultation are taken into consideration.
<b>221 Individual</b>	
H1i - West Yarm	221/1: I disagree with this plan since morley carr farm is included in options but yet has been passed , I am going to speak to my MP to make it clear SBC are doing this without taking the views of people in yarm into consideration
Consultation	Council Response: Comments regarding Morley Farm and the Regeneration and Environmet LDD Preferred Options consultation are noted and addressed in the Yarm and Kirklevington Topic Paper . All views expressed through the Regeneration and Environmet LDD Preferred Options consultation are taken into consideration.
<b>222 Individual</b>	
H1i - West Yarm	222/1: As a newcomer to the area I feel that further development to Yarm will spoil its identity. The traffic congestion is unacceptable as it is without adding thousands more cars to the roads. The A19 was shut last Saturday and it took a long time to get out of Yarm to go shopping. Stockton borough Council have already accepted proposals that are out for consultation therefore ridiculing the consultation process, no point in consulating if this is how stockton borough council is going to work. I object to further development in Yarm and feel that you should be developing areas such as Stockton that need it.
H1j - South West Yarm	Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper
<b>223 Individual</b>	
H1i - West Yarm	223/1: I oppose to all development in Yarm but this survey is POINTLESS as you do not listen to people and BREAK THE LAW by having people on the voting committee who have personal buisness in Yarm! Bloody disgraceful Council!!!! Make me sick!
H1j - South West Yarm	Council Response: Comments noted
<b>224 Individual</b>	
H1i - West Yarm	224/1: The area around Yarm is being over developed at the expense of wildlife, unspoilt green wedges. Why all of a sudden do councillors and planning committees seem in favour to give the green light to most planning applications. Yarm cannot accommodate the extra traffic, this would only deter people from wanting to visit the area. The idea of a 50 plus retirement fortress is utterly ridiculous, nobody wants it except for the people who are going to get rich from it plus the foreign investors who have little or no interest in the area but will take much needed money out of the country back to Dubia. Come on Stockton Council listen to the people, we don't want this over development.
H1j - South West Yarm	Council Response: Comments regarding wildlife, traffic, Green Wedges and the Mount Leven retirement village planning application are noted and are addressed in the Yarm and Kirklevington Topic Paper .
<b>225 Individual</b>	
Consultation	225/1: As part of Environmental Protection and Enhancement, protection of the green infrastructure is highlighted as being a priority and includes the assets of water bodies and trees. The area applied for by Yarm School for playing pitches is diverse in tree species which are in excess of hundreds of years old and are at risk. This is not in accordance with the councils approach to mitigating and adapting to climate change and reducing carbon sinks. The Leven Valley can also be added to this category of woodland containing mature trees. There are two development applications seriously threatening to impede this wildlife corridor and mini national park - Yarm School playing pitches and the Mount Leven Retirement Village on the Leven Valley. All matters of traffic, infrastructure, ecology, biodiversity, landscape, agricultural land, wildlife,

pollution, historical aspects and above all the public comments should be taken into account when considering these applications.

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper .

SP1 - Presumption in favour of sustainable development

225/2: I wish to start with the purpose of the consultation: - Para 1.8 : The National Planning Policy Framework states that 'early and meaningful engagement and collaboration with neighbourhoods' is essential. The key word here is 'essential', by dictionary definition that means 'absolutely necessary'. I would point out that this consultation has not been given the credence of that definition. In terms of the total population of Stockton Borough I suspect that the number of residents responding to this document will be a very low percentage of that population. The reasons for that is because of poor advertising. The use of Free publications and 'Stockton Council News' is not the best method of advertising for a full public response on such an important consultation, invariably they will not be read or even opened in the majority of households. The poorly attended 'Drop in ' sessions appeared to all intents and purposes to be just a tick in the box exercise. So ultimately what people are not aware of they cannot comment on, one could be led to believe that was the intended 'Preferred Option' given the current surge in planning applications to build on greenfield sites?

The lead taken by Durham County Council demonstrated their wish to maximise public response to their consultation document by repeatedly advertising in the Northern Echo with full page spreads. For Stockton to have ensured a full and proper consultation, the leaflet that was produced (but obviously in limited supply) should have been delivered to every household, when it comes to matters of census information or C.Tax this is achieved with ease. I will put forward my comments on the consultation in the hope that they are considered in light of the concepts of the Localism Bill, to quote The Right Hon Eric Pickles MP upon the introduction of the bill "Powers for councils will be accompanied by greater powers for local people to hold their local authorities to account and to shape their local area".

Council Response: Comments regarding the consultation are noted and are addressed within the Yarm and Kirklevington Topic Paper .

SP2 - Housing Spatial Strategy

H1i - West Yarm

225/3: Section 2 - The Spatial Strategy Strategic Policy SP1 - Presumption in favour of sustainable development Point 1 - Given that there are greenfield sites recommended for development within this Local Plan and which some will undoubtedly be approved, how can that be reconciled with 'improving environmental conditions'? In regard to sustainable development that would also suggest that wherever applications are approved then there would have to be the infrastructure available to match the level of development. In the case of Yarm & Eaglescliffe this needs to be seriously taken into consideration.

H1j - South West Yarm

Council Response: The development of greenfield sites is required in order to meet the housing requirement. The impact of development on environmental conditions is taken into consideration. Infrastructure is seriously taken into consideration.

SP3 - Limits to Development

225/4: Strategic Policy SP2 - Housing Spatial Strategy Point s 2 & 3 - Follows on in regard to 'sustainability' that it will be at the heart of the site selection process which prioritises in the following order:

'Core Area sites - the most sustainable sites, in accordance with CS1.2 which states that priority will be given to previously developed land within the core area'. I raise the question in regard to this 'why are greenfield sites being preferred to brownfield and arguably in unsustainable areas such as Yarm?

'The wider conurbation - the next sites in terms of sustainability in accordance with CS1.3 which states that the remainder of the housing sites will be located elsewhere within the conurbation, with priority given to sites that support regeneration' Whilst it is recognised that funding may be an issue for remediating the land on brownfield sites every effort must be made to do so and adhere to this Spatial Strategy Policy. Failing to do so will only disregard further the 'Blue, Green Heart' policy which will effectively create a hollow ring around a heavily invested regenerated Stockton Town Centre. A town centre that is in danger of being a ghost town. There is likelihood also that given the site hierarchy comment made in the policy that priority will be given to 'sites located adjacent to the existing conurbation' Is just giving the Developers the green light to target sites away from Core Area sites and opt instead for greenfield sites adjacent to the conurbation.

Delivering the Housing Requirement 'Sites adjacent to the conurbation' 2.17 : The criteria stated here is akin to the proverbial carrot, particularly in regard to provision of executive housing. Developers will be falling over themselves to persuade the Council to grant them the right to build on sites adjacent to conurbations ie;- green spaces. The criteria appears too 'general' and not enough emphasis is placed on encouragement of regeneration of previously developed land or brownfield sites as suggested in the National Policy Framework Document - core strategy 17 - point 8

Delivering the Housing Requirement 'Sites adjacent to the conurbation' - 2.18 & 2.20 : I am struggling to see how demand exceeds supply in light of the current financial climate, particularly for expensive executive housing. How is TVSHMA's assessments data arrived at? Where is the substantial increase in population coming from, out of the area? Where are the large scale business investments in the Borough providing employment to sustain or support this population increase? This is particularly

applicable to the Market Town Of Yarm.. There is no doubting Yarms attraction for developers and 'executive' housing but this does not make it sustainable. I would question again the TVSHMA's sustainability appraisal of Yarm. I would suggest for a more accurate appraisal to undertake a survey of the towns residents and ask them if they think additional housing is sustainable. It would be interesting to know what the community benefits are that would be provided by these developments as in reality they will have the reverse adverse effect upon the small businesses of Yarm High Street. Residents will be discouraged from visiting the high street to avoid traffic and parking issues. Many residents even now choose to go to other outlying villages or towns such as Stokesley and Northallerton in preference of easier shopping, with the addition of the quoted housing numbers in this report the situation will undoubtedly be made much worse. The Highways assessment clearly cannot be based on the minor roads through Kirklevington, Yarm and Eaglescliffe to declare there will be no impact issues from these developments, I am assuming that they have considered the major arterial routes accessed from outside of Yarm such as the A19 & A66. It is reassuring therefore to see that the Council's Highways team have at least identified that there are significant issues regarding the local road network and car parking in Yarm Town Centre that would need to be mitigated, however there is no explanation as to how Highways intend to mitigate it. As this is something which has not been addressed in the past with already existing road network problems, how are we to assume that it will be addressed in the future? Yarm High Street itself is beyond mitigation as it cannot be widened nor circumvented. Any bypass is not conceivable in the current financial climate and it is unlikely that central Government would support it which leaves the developer, the most unlikely financial contributor as it will be far beyond their means and would far outweigh any profits they would make from these developments.

Council Response: Comments regarding the loss of greenfield land and previously developed land as an alternative, traffic and parking are addressed in the Yarm and Kirklevington Topic Paper. Comments regarding housing need and demand are addressed in the Housing Need and Demand Topic paper. The Tees Valley Strategic Housing Market Assessment (SHMA) has not undertaken a sustainability appraisal of Yarm as this is not the purpose of a SHMA. The sites identified for housing allocation in the Regeneration and Environment LDD Preferred Options draft have been the subject of sustainability appraisal undertaken by the local authority.

#### SP4 - Green Wedge

225/5:

Guiding the location of development: Strategic Gaps, Green Wedges and Limits to Development, Introduction – 2.28 I totally support the Environmental Protection and Enhancement which seeks to maintain the separation between settlements in the form of Strategic Gaps, which are reflected in the limits to development and Green Wedges as declared in Core Strategy Policy CS10. There should be no fudging on this issue of boundaries to provide loopholes for planners and the opportunity to remove Green Wedges in order to offer up a site for development. There should be unreserved protection for Green Wedges and Strategic Gaps. I second 'Remove the Green Wedges from the limits to development thereby strengthening their protection from development' Wildlife corridors should be particularly protected, the Leven Valley between Yarm and Ingleby Barwick is one such wildlife corridor as well as Strategic Gap and Green Wedge. and therefore should remain outside the limits to development. Strategic Policy SP3 - Limits to Development and Green Wedge I would point out that the criteria listed is quite clear in regards to the type of development that would be allowed in rural areas and this is anything but housing developments particularly in the form of executive housing. This policy should remain and be adhered to.

Council Response: Comment supporting the removal of Green Wedges from limits to development welcomed. When land which is currently outside the limits to development is allocated for housing it will inevitably become urbanised. Therefore, as is stated at paragraph 2.40 of the Preferred Options, the limits to development will be revised as required by the housing site allocations that are made through the Regeneration and Environment LDD process.

#### T4 - Portrack Relief Road

225/6: Strategic Policy SP4- Green Wedge As with policy SP3 the criteria is specific about type of development to be allowed within Green Wedges., which is not housing of any kind. I fully support this directive in particular maintaining the purpose of a Green Wedge which is to prevent the coalescence of communities within a built up area thereby retaining its appearance and openness. This can be particularly attributed to the Leven Valley between the communities of Ingleby Barwick and Yarm.

Council Response: Support for Strategic Policy SP4 is welcomed.

#### EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites

225/7: Section 3 - Sustainable Transport - Highway Network Improvements 3.26 - 3.28 The Core Strategy has outlined support for a number of highway network improvements and although not all of your schemes are developed to sufficient detail to be included in LDD Preferred Options, I note that the improvements indicated are in the vicinities of Stockton, Billingham and Thornaby not Yarm. Particularly relevant to this is in point 3.28 which clearly states that 'any new developments should take their potential impact on local and strategic road networks into account' and further 'that land allocations in this plan may require improvements to the highway network to support their delivery'. This does not seem to be evident in referring to the developments currently approved and applied for in the Yarm and Eaglescliffe areas. The delivery of these sites are not supported by a future sustainable plan for road network or traffic management. This issue needs to be addressed and considered before any planning approval is granted. Traffic surveys should be compulsory and independent of the interests of a developer.

Council Response: Comments regarding traffic are noted and are addressed within the Yarm and Kirklevington Topic Paper .

ENV1 - Green Infrastructure

PF1 - Open Space, Sport and Recreation Facilities

225/8: Section 5 - Employment Sites Strategy 5.46 - 5.50 As a bird lover and member of the RSPB I am always a little nervous when mention is made of including sites of wildlife habitat within a development plan. The key points for concern here are those mentioned in 5.48 'The Council has therefore sought to identify an area of strategic mitigation for use by birds which are displaced by development'. Where one should be encouraged by this fact of mitigation it is by its very nature an action of huge concern. Birds with their own built in navigation systems cannot compute diversions to an alternative destination. They will instinctively always follow the routes taken over aeons of time by their ancestors. Many bird species and wildlife are already threatened by the 'squeezing' or eradication of their habitats in favour of land developments. In areas of such sensitivity we should be exploring and utilising every means possible to preserve existing habitats and biodiversity. The earths whole ecology and wonderful diversity depends upon our interaction and our working in harmony with nature, not destroying it with planning agendas. Clearly the areas of industrial developments mentioned here are complex and I hope that the RSPB and other environmental bodies are at the forefront of the consultation process.

Council Response: Comments noted

H1 - Housing Allocations

225/9: Section 7. Provision of Facilities - 7.12 Encouraging to see that the Tees Heritage Park and Portrack Marsh are supported for protection and that it is widely accepted that these sites provide an essential part of the Boroughs Green Infrastructure Policy and are therefore protected as such. It is further to be commended in recognising the Tees Heritage Park as outside the limits to development and within a green wedge as designated in Core Strategy Policy 10, point 7. This is commendable in as far as long as it is a policy which is followed. I make reference here to the Tees Heritage Park and the current threat it is under from developer applications at two points within its boundaries. Notably the banks of the Tees opposite Yarm School and the Leven Valley, Mount Leven Farm. I am at pains to point out that such provocative planning applications are not exactly discouraged by the fact of allowing them to proceed through the planning process whilst conducting a public consultation such as this one. It is patently obvious that developers are attempting to pre-empt any outcome of public opinions expressed in response to this document. The Localism Bill was designed to allow the public chance to shape their own future environments not developers.

Council Response: The Council cannot refuse to validate and assess planning applications that provide the required information and pay the required fee. Comments regarding the Mount Leven retirement village planning application and the planning application to develop land north of the River Tees are noted and addressed within the Yarm and Kirklevington Topic Paper .

H2 - Housing Phasing and Implementation

225/10: Section 8. Housing Housing Allocations and Phasing - 8.2 The indication that the council does not regard the additional 5% buffer as a ceiling and wishes to plan for higher delivery in order to ensure that housing needs and demand are fully met is nothing short of alarming. A 20% buffer is indicated to ensure this is met and economic growth is delivered but I would argue that moving towards that figure is seriously putting at risk the future of green fields on sites already on a phased development. It is highly questionable in the current financial climate as to the validity of the assumption that Stockton needs an additional 550 houses per annum for the next 15 yrs and that is without the buffer. I put forward that there is argument for deferring granting any further planning applications particularly on green field sites until the economic situation improves, or at the very least until this public consultation is completed. Giving approvals now may prove to be knee jerk reactions as when the economy dictates slow movement in house sales and developers are reluctant to carry on their phased building, we will be left with a wasteland environment. Overall there seems to be an air of uncertainty about the figures and projections which may be led by low confidence in the possible house trends over the plan period I would also argue strongly for planning led development and not developer led development

Council Response: Comments regarding housing delivery are noted and addressed in the Housing Need and Demand Topic Paper (under preparation)

The Council's preference is for plan-led planning and not developer-led planning. However, planning applications that are submitted now have to be determined now.

H1b - Urray Nook

225/11: Housing Phasing and Implementation - H2 I sincerely hope than the Council will adhere to its SP2 tiered policy where development on brownfield sites in the Core Area and wider conurbation takes precedence over development on greenfield land. Could the New Homes Bonus not be used to finance the decontamination of brownfield sites?

Council Response: Strategic Policy SP2 identifies that the Core Area is the highest tier for the location of housing sites, followed by the wider conurbation. However, if the housing requirement cannot be met in these tiers which is why sites have also been identified in the next tier - adjacent to the location.

The total sums projected from the New Homes Bonus are not of the required scale and have been identified in the Council's financial plans to support the provision of essential services.

H1i - West Yarm

225/12: Urray Nook Road - H1b Although within the Limits to Development this site will consume a large hectarage of agricultural farmland. I would argue the importance of our countryside, including agricultural land, is an issue that should concern us all. The possible future consequences of removing such land forever as a vital food source

in the face of anticipated shortages due to climate change does not seem to appear high on the list of concerns for developers and planners. As a nation we are barely self sufficient now, relying on imports. This is a risky and precarious attitude we have towards good productive farm land, if countries we import from have a catastrophe whereby they cannot or will not honour that export then we are very much up a creek without a paddle. The argument of 'well we all live on what was once farm land, so what's the problem?' holds true up to a point. However nationally at some point we have to stop this juggernaut of green foiled building or we will just keep going on until all we are left with is a concrete country. It has come to the point of lines need to be drawn not lines need to be crossed in this matter, local planning authorities do have it in their power to ensure that the countryside is protected for future generations in its beauty, diversity, heritage and wildlife preservation. That also includes making sure that we have reliable food sources well into the future. I would add to that that the farming industry needs those assurances as well. The Uraly Nook site very much comes under this umbrella of concerns and is also a site of special interest due to the presence of Great Crested Newts, the line quoted in 8.29 that states that 'these issues can be overcome', illustrates the low regard in which nature and wildlife is held. Even re-location of a species cannot be guaranteed to be 100% successful and flies in the face of the 'protected species' policy. The same infrastructure concerns and sustainability are relevant for this site as for the other sites identified around Yarm. What evidence is there of detailed independent traffic surveys on the surrounding roads and pollution monitoring on Yarm High Street itself?

Council Response: Comments noted. Planning approval has been granted for 145 dwellings on part of the Uraly Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Uraly Nook allocation has not been included within the Publication Draft.

H1i - West Yarm

225/13: West Yarm - Morley Carr - 8.88 Although planning permission has already been agreed for this site, it should be noted this application was outside the Limits to Development and appears in contradiction to the use of such land as stated in Strategic Policy SP3 - Limits to Development. It appears from previous consultations that responses have clearly defined the concerns over traffic and highway issues that would only exacerbate an already congested road infrastructure around Yarm. The promotion of cycleways will not overcome the need for people to use their cars particularly for commuting to work outside of the area. The fact that these responses and concerns have been totally ignored is a concern in itself as we are talking about residents who are speaking from experience. It is imperative for the Council to honour the consultation process and its claim to take into account the public's views. Evidently this appears not to have happened in this case with an apparent lack of foresight of the cumulative effects other future applications would have on the Yarm area. In light of the strong arguments put forward against this application the decision to approve and to do so before this consultation has been completed is nothing short of disappointing and does not put the Council in good light.

Council Response: Comments regarding limits to development, traffic and the Morley Carr Farm planning application and the R&ELDD consultation are noted and addressed within the Yarm and Kirklevington Topic Paper.

H1j - South West Yarm

ENV1 - Green Infrastructure

225/14: South West Yarm – 8.98 The application submitted for 480 houses has now increased to 735. My comments in the above paragraph are relevant to this updated application also. Reiterating the cumulative effect of more than one approved development in the Yarm and Eaglescliffe area, we are now looking at potentially upwards of an additional 2K to 3K cars on the roads of Yarm. There seems to be some burying of heads in the sand over this patently obvious issue in the hope that it will just go away. I note that in every LDD document policy relating to development around Yarm and Eaglescliffe that there has been concern raised over the traffic and capacity of the roads infrastructure. Added to that is the loss of agricultural land again and the effect upon the rural landscape which separates Yarm and Kirklevington. The use of this land for housing presents a further knock on effect of Yarm School effectively wishing to relocate their playing pitches onto land opposite the school near to Egglecliffe village. Not only is this appearing to be a location of convenience by Yarm School it is also land which is within the Tees Heritage Park and is of historic and wildlife importance. I would kindly remind Stockton Council that they are supporters of the Heritage Park for which they deserve to be commended for, however supporting roles need to be carried through and demonstrated as such to the wider community that benefits from such projects. The Tees Heritage Park is a fantastic achievement of what can be brought about by the will of people wishing to preserve a beautiful stretch of the River Tees and Leven. The benefits to the wider community at large in having a place of peace and tranquility within countryside close enough to access are immeasurable. The fact also that the Heritage Park is a strategic wildlife corridor and is part of the greater corridor that stretches from the North Yorkshire Moors to the Pennines adds to its appeal and diversity. This route is actively used by wildlife in particular Deer which migrate the entire route.

Council Response: Comments regarding traffic, the loss of agricultural land, the Strategic Gap and Tees Heritage Park are noted and addressed within the Yarm and Kirklevington Topic Paper.

ENV3 - Local Sites

225/15: Section 9. Environmental Protection and Enhancement Policy ENV1 - Green Infrastructure - Item 2 of the policy is totally at odds with the concept of what a green infrastructure is which is an environment of natural beauty, landscape, ecology, biodiversity and wildlife. An example is the threat to a section of the Tees Heritage Park by the Mount Leven Retirement Home proposal. Once the land is given over to the developer the whole context of the Tees Heritage Park would be irreversibly damaged. Natural Green infrastructure cannot be lost and simply replaced with anything of greater or equal value as indicated in this policy, particularly if dwellings are put on it. 'Natural' means untouched by man, not interfered with. 911

Council Response: ENV1 has been significantly revised

## ENV3 - Local Sites

225/16: Sites of local importance - 9.27 I am staggered that this list of specific designated sites within the borough does not include the Tees Heritage Park!. I would suggest it is essential that this mini National Park be included in this list to prevent developers taking advantage of its omission. The Tees Heritage Park is strongly supported by Stockton Borough Council and is very active in the partnership which has developed the Park. Everyone involved in the establishment of the Park would I'm sure be delighted if there was recognition and protection of the Park in LDF policies thereby safeguarding it for future generations to enjoy.

Council Response: The list of sites includes numerous designated sites many of which fall within the Tees Heritage Park. Delivery of the Tees Heritage Park is supported through the Core Strategy and the Regeneration and Environment Local Plan seeks to protect the site as green wedge, outside the limits to development and as a part of the green infrastructure network. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

225/17: Policy ENV3 - Local Sites I find this policy as concerning as ENV1 in as much as it is very ambiguous and a far too flexible. As mentioned previously this lays bare the potential for the Mount Leven Retirement Home proposal to completely damage the infrastructure of the Tees Heritage Park. Sites of such importance and sensitivity, should be protected by policies contained within the LDF.

Council Response: Comments noted. In accordance with the NPPF the council must include a criteria based policy concerning locally designated sites. The sites covered by policy ENV3 are those meeting the criteria to be designated as local sites. Numerous local sites fall within the Tees Heritage Park. Delivery of the Tees Heritage Park is supported through the Core Strategy and the Regeneration and Environment LDD seeks to protect the sites as green wedge, outside the limits to development and part of the green infrastructure network. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

## SP2 - Housing Spatial Strategy

### RG1 - Regeneration and Gateway Sites

### R1 - Green Blue Heart

225/18: Rural Environment - Introduction 9.68 I very much support the countryside and environmental protection as contained in the Core Strategy Policy CS10 (Environmental Protection and Enhancement) which seeks to maintain the separation between settlements and recognises the amenity value of Strategic Gaps, Green Wedges and the Limits to Development. Again I would mention the Leven Valley as one such site and currently under threat from development.

Air and Water Quality - 9.60 & 9.62 'The air quality legislation aims to ensure that pollutant emissions into the atmosphere are not released at concentrations that would seriously damage our health or the environment.' I observe that as the last air quality review was done in 2009 and the next one is due now in 2012. I am a little surprised that all the pollution targets had been met within the Borough and indeed are confident of meeting them in the future, In relation to Yarm High Street I have to be sceptical of this statement as it is understood that the air quality monitoring station is positioned away from the high street and nearer Eaglescliffe. This cannot possibly reflect true readings of the everyday traffic flow through the high street nor its effects on people (and childrens) health. Further this statement does not take into consideration the cumulative effects of the already approved housing developments in Yarm and Eaglescliffe with potential for more which will add significantly more cars to the high street route. The very nature of 'stop', 'start' driving is well known to increase pollution emissions. Therefore in light of the current swathe of developments I endorse a request for independent detailed traffic survey accompanied by pollution monitoring on Yarm High Street itself. To ensure the integrity of the Council's Core Strategy Policy 11 which seeks to improve air and water quality through the reduction of pollution, it is in the Council's interests to ensure this is undertaken as soon as possible.

Council Response: Comments regarding the rural environment are noted. The 'Yarm and Kirklevington Topic Paper ' provides a response to the points raised regarding traffic and air pollution.

## New Policy

### ENV1 - Green Infrastructure

### RG1 - Regeneration and Gateway Sites

225/19: Section 11- Regeneration and Gateway Sites The Green/Blue Heart vision was, pardon the pun a 'heartening' prospect . With investment and regeneration of Stockton High street secured the remediating of brownfield sites around the town for housing would serve to provide the much needed retail influx so badly needed. Unfortunately that is not appearing to be the prospect any more., which is a pity. As a result Stockton's flagship new town centre is in danger of sinking like the Titanic on its maiden voyage. With no inner city housing developments the prospect of a boom town is bleak. It will be akin to a polo mint, the town at the centre with a band of wasteland around it. Another name for it could be Planning Of Lost Opportunities. Pushing these lost development options further out into areas such as Yarm will not provide the influx of visitors Stockton retailers need, most residents of Yarm choose to go to outlying villages and towns to shop, such as Stokesley and Northallerton not Stockton. The all but abandonment of the Green/Blue Heart building programme at the Marshalling Yards (policy R1) is disastrous, every effort must be made to ensure this policy is not abandoned. The mere nature of its use suggests that it may not be as expensive to clean up as some other sites, has this been explored fully before redirecting its housing yield to somewhere else in the Borough to ensure the required housing stock is deliverable?

Council Response: Tees Marshalling Yard has been assessed through the Strategic Housing Land Availability Assessment. The assessment is that it is not currently a deliverable site for housing. There is very limited public funding available to contribute to this and developers are very unlikely to self-fund its development.

225/20: Conclusion Overall the regeneration of the North Shore and the River Tees closest to Stockton Centre is highly commendable. The transformation is a credit to the Council and what can be achieved in reclaiming brownfield land. Having recently travelled the River on the Teesside Princess there is nothing not to like about any stretch of it and can be fully appreciated from the river. The work that has obviously gone in to clean the river up is evident for all to see. I understand that The Tees heritage park have played a significant role in this as well as Stockton Council, Groundworks, Community Spaces, British Waterways, Natural England and is Lottery Funded. The whole concept of the Tees Heritage Park is something Stockton can be proud of. It has huge potential for tourism and for providing the community a green space of real value, a mini national park. For that reason, out of all the policies presented within this document the one that is missing is the one which will offer the park a deserved place on the list of 'sites of local importance'. I hope that you see fit to change that in the next draft

Council Response: The list of sites includes numerous designated sites many of which fall within the Tees Heritage Park. Delivery of the Tees Heritage Park is supported through the Core Strategy and the Regeneration and Environment LDD seeks to protect the sites as green wedge, outside the limits to development and as part of the green infrastructure network. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

ENV2 - Urban Open Space And Local Green Space

225/21: I would endorse point 2 - ENV2 in that 'The Council will not support proposals for development on Local Green Space except in very special circumstances'

Council Response: Comment welcomed.

## 226 Individual

H1 - Housing Allocations

226/1: I will comment generally on Policy H1 - Housing Allocations and then on specific sites. In general I disagree with the creation of urban "sprawl" this in effect is the development of land adjacent to existing housing without creating natural habitat, green or recreational space between developments. I am supportive of any proposals for the creation of new villages in rural locations and the development of small sustainable communities. In Stockton's case I could see an advantage in developing on the North side of the A66 taking advantage of the newly constructed interchange at Long-Newton. There are clear advantages in utilising existing transport links that do not create congestion in the urban core.

Council Response: The development of all of the sites allocated in the New Housing Sites Policy will need to fully take into account factors such as the loss of wildlife habitat and impact on biodiversity.

The location that the respondent suggests as an alternative location for housing allocation would not be well related to existing residential communities and does not provide accessibility to services and facilities.

H11 - Wynyard Village

226/2: Although I would prefer any future housing development not to include areas North of the A689 I appreciate that the precedent has been set by Hartlepool and that the proposals for H1m - Wynyard Park will enable additional mitigation of transport difficulties in that location through Sec.106 and CIL contributions. However, to assist in this I believe that additional capacity should be allowed in Wynyard Village in line with their Master Plan i.e.; 750 properties. This would enable investment in educational facilities and the creation of a much more sustainable community as well as assisting in maintaining the heritage of the Park and Hall

Council Response: Comments noted and addressed in the Wynyard Topic Paper.

New Policy

226/3: If it was accepted that additional development was possible at Ingleby Barwick, in line with the aspirations of local Councillors, to aid in the financing of a "Free School" then this would prevent the need for further housing developments in Yarm and Eaglescliffe.

Council Response: The planning application for a free school and 350 houses at land to the west of Little Maltby Farm was granted planning permission by the Secretary of State and has been taken into account when calculating housing supply.

H1b - Urlay Nook

226/4: The proposed sites at South West Yarm - H1j and Urlay Nook - H1b will create additional traffic congestion at all of the "pinch points" and unsustainable educational and health requirements

H1j - South West Yarm

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1g - Harrowgate Lane

226/5: In respect of H1g-Harrowgate Lane I have concerns regarding the build opportunities at the A177 end if there is insufficient consideration given to the retention of sufficient land to allow significant improvements to the junction at the Junction Road/A177 intersection.

Council Response: Extensive highways modelling and designed improvements to key junctions at the following locations as part of the collaborative working have



established a maximum quantum of housing that can be delivered to the acceptance of the Highways Agency and Local Highway Authority:

Elton Interchange  
Darlington Back Lane and Yarm Back Lane  
Durham Road, Junction Road and Harrowgate Lane

H1h - Land East of Yarm Back Lane

226/6: In respect of H1h, Yarm Back Lane, the impact of additional traffic at the Elton interchange and the Darlington Back Lane junction is of significant concern but if accepted I would consider the number of properties approved to be considerably reduced to ensure sufficient space is allowed between the existing housing and new development to create a green corridor for wild life, woodland and recreation.

Council Response: Yarm Back Lane is allocated for up to 900 dwellings. Extensive highway modelling work has informed this total by establishing the maximum quantum of housing that can be delivered to the acceptance of the Highways Agency and Local Highway Authority. A Development Framework Document is currently being prepared by the Council, developers and landowners working collaboratively for both the Yarm Back Lane and Harrowgate Lane sites. This document will take into account factors such as green infrastructure.

## 227 Individual

H1i - West Yarm

H1j - South West Yarm

227/1: I would like to make the following comments with regards to the Regeneration and Environmental Local Development Document. Regards to Section 8 Housing – West Yarm and South West Yarm. I start by taking an extract from the recent minutes of the meeting of Stockton Borough Council's Planning Committee held on 22 August 2012, in particular the 'preamble' section P43/12 for the decision made on Morley Carr Farm in Yarm, application no. 12/0980/OUT whereby the decision was approval of the 350 homes application. 'It was considered that in the planning balance, the proposal would not be premature or prejudicial to the Local Planning Authority's work on the Regeneration and Environment DPD which sought to properly compare the long term sustainable alternative locations for housing developments and give local residents an opportunity to influence the planning of their own communities and therefore pre-empt the proper operation of the Development Plan process.' Surely the approval of Morley Carr Farm by Stockton's Local Planning Authority, ie the Planning Committee, is an exact contradiction of that paragraph? They have not allowed residents that opportunity to influence the planning of their own community, because they have already made that decision for them without waiting for the consultation period for the Development Plan to end. Is the same going to happen when Bellway Homes and Yarm School have their application (no. 12/1990/EIS) heard on a possible new 735 homes in Yarm? I also read the Section 106 Agreement Heads of Terms which were the conditions of the Morley Carr Farm approval, and apart from the usual financial contributions for schooling and car parking in Yarm High Street, I do not see where Taylor Wimpey have offered, or indeed where Stockton Borough Council have demanded funding towards more dentist places, or doctor places, or offered ideas to ease traffic congestion through Yarm (it's not just about trying to get parked in Yarm High Street). Or what measures are to be taken to reduce air pollution within Yarm due to all the extra queuing traffic trying to pass through Yarm High Street from all directions, and at all times, it's not just peak times.

It frustrates me that so many developers are taking advantage of Stockton Borough Council's failure to initially deliver a 5 year housing supply plan, and using that as an excuse to get these developments through, before the consultation has finished on this new development plan. What is worse is that SBC's planning committee is positively encouraging this behaviour by accepting large scale applications from developers, and then approving the first one before the public can submit their views on the new development plan.

Everywhere in the Borough will have to take its fair share of new housing developments, and it would be arrogant to suggest that Yarm shouldn't take any of it, just because of its heritage and history, but it is equally unfair to fail to meet the needs of Yarm's current residents by subjecting them to even longer traffic queues, longer waiting times for dental/doctors appointments and to further reduce the quality of the air we breathe with all the vehicle pollution. The scale of the 3 already approved applications and a further 3 proposed applications in and around Yarm and Eaglescliffe accounts for approx. 2,500 new homes, which can mean anything up to an extra 5,000 vehicles on the road. The thought of that much extra traffic travelling around in what must be a radius of only 2-3 miles is horrific. Surely Stockton Borough Council has a duty of care to all its residents to ensure that the infrastructure is in place in its towns and villages, to sustain all this extra housing, but I don't see that that is being addressed in any of these applications. Regards to Section 2 The Spatial Strategy - Strategic Policy SP4 – Green Wedge. Finally, in the same vein that Stockton's planning committee have already endorsed this development plan by approving Morley Carr Farm at Yarm, I hope they will demonstrate an endorsement of the strategic policies on Green Wedges and Strategic Gaps they say they wish to retain and support when it comes to development applications outside the Local Plan such as Mount Leven Farm in Yarm, application no. 12/1546/OUT, when it comes before the planning committee. It is on hold at the moment whilst an Environmental Impact Assessment is carried out. I hope that this very important policy is adhered to and fully supported. Thank you for your time.

## 228 Individual

SP2 - Housing Spatial Strategy

228/1: Stockton on Tees Regeneration and Environment Local Development Document – Preferred Options Consultation.

Response from Mr Shane Sellers

The Housing Spatial Strategy – Paragraph 2.6 Within the housing spatial strategy, reference is made to “a buffer of 5% will be used as the benchmark for the maintenance of a ‘rolling’ 5-year supply of deliverable housing land. However, this will not be regarded as a ceiling for the supply of deliverable housing land in order to ensure other objectives are met”. I am concerned that Stockton Council appears to be seeking to exceed the 5% buffer, when there is no requirement to do so.

Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

H1b - Urlay Nook

228/2: Housing - Section 8 I do not believe that the following proposed development sites should be permitted to go ahead:

Policy H1b - Urlay Nook;

Policy H1i -Morley Carr

Policy H1j - Green Lane

H1i - West Yarm

H1j - South West Yarm

With the exception of the Urlay Nook site, the other remaining sites are currently outside the limits of development. I do not believe there has been sufficient work undertaken to identify the contamination levels of the Urlay Nook site and to approve the proposed development before this is fully completed would be unacceptable. The three housing developments I have identified are to be situated on green field sites even though the local authority have previously located an abundance of previously developed land suitable for local regeneration. Moving away from the current Core Strategy 2010, will be detrimental to the vision of Stockton Borough Council to achieve a vibrant, healthy and economic town centre and will result in a 'doughnut effect' around the Borough. This means that the centre of Stockton will become hollow through lack of investment and the over development of green field sites in other areas of the Borough will become congested. Each of the proposed sites around Yarm and Eaglescliffe will be assessed individually and the developers will not consider the accumulative effect of their developments.

This will result in an adverse impact on the local communities due to the following reasons:

- 1.A lack a road infrastructure, particularly the roads surrounding Yarm and Eaglescliffe;
2. Traffic congestion on the roads leading towards and through Yarm and Eaglescliffe;
- 3.An increase in the level of pollution on Yarm High Street;
- 4.Insufficient school places for the children of those persons seeking to move to the Yarm area should these new houses be built;
- 5.A lack of doctors, dentists and other similar services throughout the local community;
- 6.The loss of green fields that are beneficial to wild life and their habitats;
- 7.A significant reduction in the strategic gap between villages;
- 8.The loss of identity of villages such as Kirklevington as the strategic gap reduces through over development;
- 9.The over development of houses that does not meet local housing needs;
10. A reduction in house prices due to the over development of houses in one community that will impact economically on homeowners.

The local policy document must ensure that the Tees Heritage Park is identified as its own entity and that it is protected from development within its boundaries. The Tees Heritage Park would be significantly damaged if there was insufficient protection against such development and a message must be sent to developers that the Heritage Park is off limits.

Council Response: Comments relating the impact of residential development at Morley Carr and Green Lane are noted and addressed within the Yarm Topic Paper. With regards to Urlay Nook, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft. However, the potential for development to impact upon house prices is not a material planning consideration.

Land contamination is a valid consideration. The Council has identified points of potential contamination from historical mapping and other records. In addition, a contaminated land survey has been submitted with the current planning application on the site. Development will not proceed unless it is considered that any land contamination has been identified and can be mitigated against.

Comments relating to the Tees Heritage Park are noted. Delivery of the Tees Heritage Park is supported through the Core Strategy and the Regeneration and Environment LDD seeks to protect the sites as green wedge, outside the limits to development and as a green infrastructure corridor. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

## 229 Individual

H1i - West Yarm 229/0: Para 8.86 I do not support development of up to 330 homes at Morley Carr Park. Para 8.98 I do not support development of up to 480 dwellings at Green Lane.

Council Response: The loss of identity of villages such as Kirklevington as the strategic gap reduces through over development;

SP4 - Green Wedge 229/1: Para. 2.45 I support Option 2 to protect Green Wedges from further housing development.

Council Response: Comment noted

## 230 Individual

H1i - West Yarm 230/1: I wis to make the following comments of the consultation document: 8.88 Yarm cannot cope with further traffic that developments on this site would bring. The High Street is already congested at rush hour and at other times of the day. Further cars in the estate would create 'rat runs' and the risk of serious accidents. 8.89 Extra residents would put pressure on dentist and doctors and dentist surgeries and more importantly the local schools. Parents will expect their children to be admitted to the local schools however they will not be able to cope with the influx of young families. 8.91 To build additional housing here would ruin the quaintness of Yarm and create a 'monster' of a housing estate similar to Ingleby Barwick. 8.92 I strongly agree that this area is not suitable for development. 8.95 Surely it would make more sense to build cheap affordable housing for first time buyers and people on low incomes on already designated brownfield land which is near to the town centre. This would kick start the economy and help to regenerate the town centre. 8.102 I agree that further development would create massive traffic issues and congestion. 8.104 I agree that any development would ruin the character of Yarm. I recommend that Stockton Council considers other sites appropriate for development and not the areas that would 'bring more money into the councils' coffers'. Over 1000 new homes on the Morley Carr and Yarm playing fields sites would millions of pounds in revenue for Stockton Council. Think of the needs of your existing residents and how their lives can be improved before you bow to pressure from housing developers !! You will create a monster !

Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper .

## 231 Individual

H1i - West Yarm 231/1: Preferred Options Doc. page 127. Site at South West Yarm. In the preferred options paper the potential housing yield is listed as 480, but quickly moves on to 735 on the direction of a developer. Policy H1j refers to 735 house with 4 vehicular accesses on to Green Lane; however the policy on site H1i which also accesses on to Green Lane is restricted to 300 houses due to highway capacity, H1i has already been agreed by the LPA for nearly 300. There is no comment on limitation of numbers for H1j, although the access is very similar on to the same surrounding road network, and numbers of houses proposed have increased from the original numbers proposed. Please explain. The Parish Council already have a freedom of information reply saying that no accesses will be allowed on to the A67.

Council Response: Comment regarding the estimated dwelling capacity of the South West Yarm site is noted and addressed within the Yarm and Kirklevington Topic Paper .

H1i - West Yarm 231/2: Strategic Gap: The strategic gap between Yarm and Kirklevington will be eroded, this affects the wildlife corridor as well as maintaining the historic separation between communities. National Policy Framework, para. 114, 117 and 118 refers to impacts on biodiversity and wildlife, advising that alternative sites should be sorted with less harmful impact. - no comment other than mitigation is made in the preferred option document. The impact on a wildlife corridor of 735 houses with direct access will be very high.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper

H1i - West Yarm 231/3: Housing need. The housing need identified in TVSHMA 2012 is not proved and the numbers quoted for the Yarm and Eaglescliffe areas are catered for in recent planning approvals.

H1j - South West Yarm Council Response: Comments noted and addressed within the Housing Need and Demand Topic Paper.

H1i - West Yarm	231/4: "High landscape capacity for change" comment. please explain in full? A wildlife corridor does not need to change and if it does the wildlife will be affected, both in our area and adjoining Counties. there is no comment from adjoining authorities. This site according to your guidelines fails on a number of points, it totally ignores the importance of the site and that it should remain as it is. Your reasoned justification states that it could be made sustainable. it also states that it could be used to supplement more sustainable locations. Both statements indicate that given that other sites are more sustainable and have much less impact I suggest that this site should be removed from the Council's list of preferred options.
H1j - South West Yarm	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper . The Stockton on Tees Landscape Character Assessment and Capacity Study has been used to assess the development capacity and sensitivity of the site allocations. The West Yarm and South West Yarm sites were assessed as having high landscape capacity.
<b>232 Individual</b>	
H1i - West Yarm	232/1: Paragraph 8.86 To further develop this estate would create massive traffic problems for existing residents and possible new home owners. The current road infrastructure cannot accommodate thousands more cars.
	Council Response: Comment noted and addressed within the Yarm and Kirklevington Topic Paper
H1i - West Yarm	232/2: Paragraph 8.89 Further homes would create thousands more people putting further pressure on doctors, dentists and schools, Yarm cannot cope with its current residents.
	Council Response: Comment noted and addressed within the Yarm and Kirklevington Topic Paper
H1i - West Yarm	232/3: Paragraph 8.91 Further development would ruin Yarm and its quaintness as it will become just another massive housing estate like Ingleby Barwick. Paragraph 8.92 I agree that this is not a suitable place for a development such as this.
	Council Response: Comment noted and addressed within the Yarm and Kirklevington Topic Paper
H2 - Housing Phasing and Implementation	232/4: Paragraph 8.5 Surely it makes more sense to build housing in town centre areas where land is already 'brownfield' land which would create affordable housing for people on low incomes or first time buyers and would in turn kick start the local economy and create regeneration of Stockton town centre.
	Council Response: Comment noted and addressed within the Yarm and Kirklevington Topic Paper
H1j - South West Yarm	232/5: Paragraph 8.102 People who live in Yarm don't necessarily work in Yarm therefore people will need to travel by car creating more traffic. Creating cycle tracks and increasing parking will not prevent this. People will not cycle to work (I work 10 miles away from my home) and the trains are not frequent enough or early enough for me to use (first train arrives at Yarm to Middlesbrough after 8am and I start work at 7am).
	Council Response: Comment noted and addressed within the Yarm and Kirklevington Topic Paper
H1j - South West Yarm	232/6: Paragraph 8.103 Again, Yarm cannot cope with thousands more residents, which would create long waiting times for dental and doctors appointments and frustrated parents not being able to get their children into the admission zone school due to lack of capacity. paragraph 8.103 Local wildlife would suffer due to over development. paragraph 8.106 I totally agree that this area is not suitable for this type of development. PLEASE BEAR THESE COMMENTS IN MIND WHEN CONSIDERING THIS PLANNING DOCUMENT.
	Council Response: Comments are noted and are addressed within the Yarm and Kirklevington Topic Paper .
<b>233 Individual</b>	
H1b - Urray Nook	233/1: I object to further development in Yarm and Eaglescliffe as it does not have the infrastructure to cope with thousands of more cars. It takes me 40 mins to get home from work by going through Yarm high street and I only work 9 miles away. There are never any parking spaces to go shopping in Yarm. Affordable housing needs to be built in places in Stockton Council where it will be affordable. Furthermore there is no point consulting on something that has already been accepted by yourselves.
H1i - West Yarm	Council Response: A response to the comments is provided within the Yarm Topic Paper. With regards to development at Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the
H1j - South West Yarm	

H1b - Urlay Nook	234/1: I object strongly to the proposed developments in and around Eaglescliffe and Yarm. Eaglescliffe and Yarm have become almost gridlocked over the years with no capacity to improve the road infrastructure. Our children face increasing danger from traffic not to mention the air and noise pollution. The existing roads around the planned developments and in Eaglescliffe and Yarm are not suitable for the potential increase in traffic and will make a bad situation unacceptable.
H1i - West Yarm	
H1j - South West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay
H1b - Urlay Nook	234/2: We need more school places as it stands, so how can we accommodate a further increase to intakes. There are few new facilities proposed for the new developments which will stretch the already stretched dentist/doctors services. What will the kids have to do? Where are the parks and play areas? The existing levels of antisocial behaviour are bound to increase as the kids trawl the streets. An increase in crime rates is bound to follow.
H1i - West Yarm	
H1j - South West Yarm	Council Response: Comments are noted. Comments relating to education provision are addressed within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application
H1b - Urlay Nook	234/3: We are not experts in wildlife, but I am sure damage to the very fragile eco-structure would bound to be a result of these developments. Enough is enough. We look to the council who are there to look after and protect the citizens of the local Boroughs to put the needs of the people above the profits of the developers.
H1i - West Yarm	
H1j - South West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

### 235 Individual

H1b - Urlay Nook	235/1: Our objections to the future planning development of Yarm and Eaglescliffe. We are totally against the building of houses on green field sites. 1. The local infrastructure we feel cannot take more traffic. The Spital at school times is an accident waiting to happen, with all traffic having to drive up the centre of the road. It can take 20min-30min to get into Yarm at present. 2. Could the school build a pavillion on the present playing fields. I am sure the pupils would benefit from the walk up the road. 3. We moved here 25years ago and have enjoyed living in a market town in a semi rural area. Please do not destroy a beautiful place.
H1i - West Yarm	
H1j - South West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

### 236 Individual

H1i - West Yarm	236/1: West Yarm Housing development 8.86. I wish to endorse the comments made in notes 8.88,8.89,8.90,8.91, and 8.92. Council Response: Comments noted and are addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	236/2: South West Yarm 8.98. I wish to endorse the comments made in notes 8.102,8.103,8.104,8.105 and 8.106 Council Response: Comments are noted and are addressed within the Yarm and Kirklevington Topic Paper .
New Policy	236/3: I would also like to make a general comment that the old Vinegar works site should be used for long stay car parking. This brown field site has not been noted or considered in the document for future development. Council Response: Sites for long stay parking in Yarm have been considered as part of a Yarm parking strategy.

### 237 Individual

H1i - West Yarm	237/1: West Yarm 8.86+ and South West Yarm 8.98+ As a member of the public and resident of Yarm I find it depressing to note that despite totally valid representations from other members of the public on traffic congestion, infrastructure saturation and desire not to lose the distinctive small country town character and charm of Yarm as well as the wildlife corridors that surround it Stockton Borough Council intends to go ahead anyway and unnecessarily include a considerable chunk of greenfield land at the edge of the countryside for development, instead of focussing solely on redevelopment of Teesside's mainly urban brownfield sites. How I wish Yarm still fell within the boundaries of North Yorkshire, where it would be appreciated and enhanced, rather than being 'milked' by Stockton Borough Council until it merges completely into Ingleby, Eaglescliffe and Greater Stockton and has nothing unique left to offer. Already Yarm has lost much of the appeal that attracted me as an outsider to Teesside
H1j - South West Yarm	

some 25 years ago. It seems there is little point in being asked to comment on documents by SBC when they go ahead and do what they (and the property developers) want to do anyway. (It just ticks the boxes for SBC to show they have 'consulted' the public.) And the idea that shoppers from outside the area would use the out-of-town parking proposed for Yarm Playing Fields site is laughable! In any event, please note my complete opposition to your resulting Policies and supposedly 'Reasoned' Justifications in H1i and H1j.

Council Response: Comments are noted. Those relating to infrastructure, character, greenfield development and wildlife are addressed within the Yarm and Kirklevington Topic Paper .

## 238 Individual

SP2 - Housing Spatial Strategy

238/1: I notice that the preferred options document (2.20)says that there is an identified need for 97 affordable houses annually in Yarm, Eaglescliffe and Preston and that demand is greater than supply for executive houses. Land is allocated for 1035 houses. There is no justification then for the current number of planning applications which is way over that number. The level of over-development of Eaglescliffe and Yarm will also stop it being a suitable area for executive housing.

H1b - Urlay Nook

Council Response: The comments are noted and addressed within the Housing Need and Demand Topic Paper.

H1i - West Yarm

H1j - South West Yarm

PF1 - Open Space, Sport and Recreation Facilities

238/2: I note that the Council support the green wedge and the Tees Heritage Park (7.12) as not available for development. I disagree that an area which has been developed for sport is still an open space because the restrictions which have to be put on the area prevent it being environmentally useful for wildlife and sport will naturally generate noise. As Levens Bank and the land beside the Tees opposite Yarm School are in the green wedge and the Tees Heritage Park, I trust they will remain undeveloped.

SP4 - Green Wedge

ENV1 - Green Infrastructure

Council Response: Comments noted. However, proposals for development on land adjacent to the River Tees and at Leven Bank have been submitted as separate planning

H1b - Urlay Nook

238/3: I disagree strongly that the statement (2.20) from the Highways Agency that developing the land at Yarm will not affect traffic because all those houses will need cars. I live on Urlay Nook Road and suffer from air pollution from stationary traffic every day. I fail to understand why high land values in Yarm enable the Yarm sites to be deliverable within a highways context. I do not see how these developments will be sustainable unless it is because people in executive houses are expected to run two cars and therefore do not need shops, community centres, buses, libraries, youth clubs etc within walking distance. In which case, I feel it is short-sighted as executives can lose their jobs, grow older and need services, stop being able to drive cars in just the same way as everyone else.

H1i - West Yarm

Council Response: Comments are noted. Comments relating to highways infrastructure, access to services and air pollution are addressed within the YarmTopic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

H1j - South West Yarm

PF3 - Bowesfield Marina

238/4: 7.32 & 7.33. It is unfortunate that the rarer birds such as Golden Plover prefer the area designated as suitable for a marina in Bowesfield rather than the designated nature reserve. This might be something to do with the number of dogs off leads in the nature reserve. Any further development in this area will seriously damage the birds who visit the area unless the nature reserve is developed further to include scrapes and bushes which are not accessible by dogs or children

Council Response: Concerns relating to biodiversity and protected species are valid. The biodiversity potential of the proposed allocations have been fully considered and, where necessary, mitigation will be required.

H1b - Urlay Nook

238/5: 8.28. The fact that a green field is next to a residential area cannot possibly be a justification for making it suitable for a housing development. Carry that logic to the end and there will be no green fields left anywhere. Where are the shops and buses at the far end of Urlay Nook?

Council Response: Comments noted.

H1b - Urlay Nook

238/6: 8.101. The public identified an increased need for green open space in Yarm and Eaglescliffe. This means new areas of green open space: it does not mean taking one of the available green open spaces and turning it into private sports fields and sports pavilions where walkers, dogs, fishermen, wildlife etc will no longer be welcome. The public also asked for a support of the heritage in Egglecliffe but the response is going to be an increase in traffic and cars parked going to a private sports pavilion in an area which is currently open space.

H1i - West Yarm

H1j - South West Yarm	Council Response: A response to the comments is provided within the Yarm Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings
H3 - Housing Mix and Affordable Housing provision	<p>238/7: Policy H3. Housing mix and affordable housing. It is important to remember that, although everyone would like to live in a bungalow, they are expensive to maintain and to heat. They also take up a lot of land and therefore cost more to build. It would be easy to build a lot of bungalows because people want them and then find that they are too expensive. They are the opposite of affordable housing.</p> <p>Council Response: It is acknowledged that bungalows require a significant land take. It is important to identify them as part of the housing mix as they contribute to ensuring appropriate housing provision for the Tees Valley's growing older population.</p>
HE2 - Character Areas	<p>238/8: Policy HE2. I am pleased to see that there is a recognition of the character of Yarm Road and an intention to preserve what is left after all the recent garden grabbing. A lot of hard work has gone into this plan and largely it should benefit the area. However, it does need to be followed and not ignored whenever the political will or the grants change. The current policy was, I believe, to develop brown field sites first but that has been ignored recently and I am afraid that the same thing might happen to this plan whenever it is convenient to do so.</p> <p>Council Response: Support for HE2 is welcomed.</p>
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<b>239 Individual</b>	
SP2 - Housing Spatial Strategy	239/1: Comments on draft LDD 1.Paragraph 2.5 –Although paragraph 1.7 states that all LDDs will need to be founded on an up to date and robust evidence base the housing need figures quoted in paragraph 2.5 are a forecast made in 2004 to cover 2004 to 2024 and our being rolled out to 2029 on the same basis. I have questioned Mr Clifford about this, he seems unable to provide any document showing how these estimates were come by and has told me that the figures will not be revisited. How can these figures be considered “up to date and robust” when it is nationally recognised that the economy has changed over the last few years in a way that never could have been forecast. This must have an impact on housing need and the figures should be reviewed in this light.
H2 - Housing Phasing and Implementation	Council Response: Comments noted and addressed within the Housing Need and Demand topic paper (under preparation)
H1i - West Yarm	<p>239/2: 2.Paragraph 8.97 – there seems very little point in commenting on this as Stockton BC has already decided to approve a development on this site while the LDD is out to consultation. This makes a mockery of the process especially as the results of the consultation do not come into place until 2014. This site is not sustainable as Yarm does not have the infrastructure to support it. Use of this site is also against Stockton BC policy in that it is development of a green field site.</p> <p>Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper</p>
H1j - South West Yarm	<p>239/3: 3.Paragraph 8.111 – as with the above this makes a mockery of the consultation as Stockton BC has encouraged a developer to apply for planning permission for this site already. Again the site is not sustainable because of the lack of infrastructure to support it. Additionally water pours off the site when it rains, floods green lane and runs down Kingsdale Close. Development of any sort can only make this worse.</p> <p>Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper</p>
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<b>240 Individual</b>	
H1j - South West Yarm	<p>240/0: 8.102 – The A67 into Yarm is already heavily congested and any large development in this area is going to simply add to the congestion and pollution. Yarm bridge is a bottle neck that cannot be overcome.</p> <p>Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .</p>
H1j - South West Yarm	<p>240/1: 8.101 – The Current school playing fields are substantial and it is completely unnecessary to relocate them to arable land at egglescliffe which is within the Tees Valley Heritage Park, Despite the developers plans this will reduce public open space in the area</p> <p>Council Response: The proposal for sports facilities to the north of the River Tees has been submitted as a separate planning application and is not proposed through the Regeneration and Environment LDD.</p>
H1j - South West Yarm	240/3: 8.103- I believe that the current drainage and sewer system is currently incapable of supporting additional houses without massive expenditure and works taking place. This would mean that any planned houses would be unobtainable in the foreseeable future.

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

240/4: 8.104 This development would more than double the housing stock for Kirklevington and would significantly narrow the strategic gap between yarm and Kirklevington. It would destroy the rural nature of Kirklevington.

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

240/5: Policy H1j Vehicular access onto Green lane would lead to more traffic and pollution especially given that Morley carr planning has already been granted for 350 homes with a potential of 700 vehicles. Many of the cars from both developments will want to turn down spitall bank towards Yarm. Yarm High street can not cope with additional traffic at peak times. Given my earlier comments regarding flooding and the sewerage system and its lack of capacity this site is not deliverable any time soon. Due to the issues with the road network neither is it sustainable.

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

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## 241 Individual

SP2 - Housing Spatial Strategy

241/1: Responding for myself - after speaking to SBC employees @ Layfield School I am concerned about the building in the Tees Valley. Once this area is built on it will be lost forever. It would appear that any houses can be built, rather than what houses are required and where! Stockton needs housing or it will die. For the size of town the shopping is not good. as recognized by central government. Please remember that Teesside Park is in Thornaby.

Council Response: Comments are noted. Comments relating to building in the Tees Valley are considered within the Yarm and Kirklevington Topic Paper ..

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## 242 Individual

H1i - West Yarm

242/1: I must strongly object to your proposals in the Regeneration and Environment Local Development Document Preferred Options Draft. I am a Yarm resident, and travel through the town most days, regularly encountering long traffic tailbacks. The approved and proposed developments of up to 2,700 dwellings would exacerbate the already significant traffic problem. It would appear that the Highways Agency have not carried out a survey during peak traffic times, as they could not have sensibly stated that 'development of sites in Yarm would be unlikely to have a significant effect on the Strategic Road Network'. I must also disagree with the Council, in that I do not believe that the Yarm sites to be deliverable, given the current highways structure.

H1j - South West Yarm

Council Response: Comments relating to highways infrastructure are addressed within the Yarm Topic Paper.

H1b - Urlay Nook

242/2: The council appear to be favouring the over development of greenfield sites in Yarm and Eaglescliffe. There are a large amount of unsold residential dwellings in both areas, so why is there a need to build more housing. I understand that the government are offering councils a carrot of money, to press ahead with these unnecessary housing developments. I suppose that our dear council will grab it with both hands.

H1i - West Yarm

Council Response: Comments relating to the development of greenfield land are addressed within the Yarm Topic Papers. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft. Comments relating to housing need and demand are addressed in the Housing Need and Demand Topic Paper

H1j - South West Yarm

H1i - West Yarm

242/3: The development proposals also impact on our wildlife corridors, and areas of natural beauty. You appear to be looking to destroy all that is great about this area, and replace it with a concrete and brick jungle. The council destroyed Stockton high street, and now you want to do the same to Yarm.

H1j - South West Yarm

Council Response: The comments are addressed within the Yarm and Kirklevington Topic Paper .

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## 243 Individual

H1i - West Yarm

243/1: I must strongly object to your proposals in the Regeneration and Environment Local Development Document Preferred Options Draft. I am a Yarm resident, and travel through the town most days, regularly encountering long traffic tailbacks. The approved and proposed developments of up to 2,700 dwellings would exacerbate the already significant traffic problem. It would appear that the Highways Agency have not carried out a survey during peak traffic times, as they could not have sensibly stated that 'development of sites in Yarm would be unlikely to have a significant effect on the Strategic Road Network'. I must also disagree with the Council, in that I do not believe that the Yarm sites to be deliverable, given the current highways structure.

H1j - South West Yarm



Council Response: Comments relating to highways infrastructure are addressed within the Yarm and Kirklevington Topic Paper.

H1b - Urayl Nook

243/2: The council appear to be favouring the over development of greenfield sites in Yarm and Eaglescliffe. There are a large amount of unsold residential dwellings in both areas, so why is there a need to build more housing. I understand that the government are offering councils a carrot of money, to press ahead with these unnecessary housing developments. I suppose that our dear council will grab it with both hands.

H1i - West Yarm

Council Response: The comments are addressed within the Yarm Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urayl Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urayl Nook

H1j - South West Yarm

H1i - West Yarm

243/3: The development proposals also impact on our wildlife corridors, and areas of natural beauty. You appear to be looking to destroy all that is great about this area, and replace it with a concrete and brick jungle. The council destroyed Stockton high street, and now you want to do the same to Yarm.

H1j - South West Yarm

Council Response: The comments are addressed within the Yarm and Kirklevington Topic Paper .

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#### 244 Individual

H1i - West Yarm

244/1: I must strongly object to your proposals in the Regeneration and Environment Local Development Document Preferred Options Draft. I am a Yarm resident, and travel through the town most days, regularly encountering long traffic tailbacks. The approved and proposed developments of up to 2,700 dwellings would exacerbate the already significant traffic problem. It would appear that the Highways Agency have not carried out a survey during the day, as they could not have sensibly stated that 'development of sites in Yarm would be unlikely to have a significant effect on the Strategic Road Network'. I must also disagree with the Council, in that I do not believe that the Yarm sites to be deliverable, given the current highways structure.

H1j - South West Yarm

Council Response: Comments are addressed within the Yarm Topic Paper.

H1b - Urayl Nook

244/2: The council appear to be favouring the over development of greenfield sites in Yarm and Eaglescliffe. There are a large amount of unsold residential dwellings in both areas, so why is there a need to build more housing. I understand that the government are offering councils a carrot of money, to press ahead with these unnecessary housing developments. I suppose that our dear council will grab it with both hands.

H1i - West Yarm

Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urayl Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urayl

H1j - South West Yarm

H1i - West Yarm

244/3: The development proposals also impact on our wildlife corridors, and areas of natural beauty. You appear to be looking to destroy all that is great about this area, and replace it with a concrete and brick jungle. The council destroyed Stockton high street, and now you want to bring Yarm down to the same level.

H1j - South West Yarm

Council Response: The comment is addressed within the Yarm and Kirklevington Topic Paper .

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#### 245 Individual

H1i - West Yarm

245/1: I wish to express my objections to all the proposed development plans in the Yarm areas.I share peoples concerns on traffic saturation and the overloading of services.Green wedges will be lost and the uniqueness of Yarm will disappear.

H1j - South West Yarm

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

H1 - Housing Allocations

245/2: People chose to live in this area for specific reasons and their elected representatives are ignoring them .People function better in smaller communities;they are less stressed and identify with others around them who share their view of what makes a community.I cannot believe that so many houses are needed or will be needed in an area in recession.Who will buy these houses?It is the powerful building lobby with the government trying to build a way out of recession at our expense.

Council Response: Comments are addressed within the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

245/3: There are parts of the borough which need to be redeveloped but said to be too costly.In my mind a false economy.One does not let such areas rot. It is grossly unfair to the people living there or nearby. I simply wanted to state my objections to these plans but will write a more detailed letter to the Planning office which i will post.

Council Response: Comments are noted.

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#### 246 Individual

H1b - Urlay Nook	246/1: New housing is obviously needed in the borough of Stockton but it needs to be in the right place with the correct infrastructure. Yarm's High Street and surrounding streets, including those coming from both directions through Eaglescliffe, are always gridlocked at peak times. This has been getting worse over the years and another several thousand houses can only make this much worse. A proper bypass and many more car parking spaces would be needed. As would new schools to accommodate the many children moving in to the area. The health centres are full at the moment and could not cope with many new patients.
H1i - West Yarm	
H1j - South West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.
	246/2: £600,00 has been spent on the Tees Valley Heritage Park. It would not be right to now build houses on here or to change some of the area in to sports pitches, to include a pavilion, for the sole use of one school (Yarm School). Other housing proposed for Green Lane and Leven Road, Yarm, would be built on green areas. Brown areas should be built on before considering green areas. We are losing our green areas at an alarming rate. The council has said they want to preserve the green areas so should continue to do so and not give in to the builders.
	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
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<b>247 Individual</b>	
H1i - West Yarm	247/1: against development in Yarm and pointless consulting on something when they have already a accepted developments that are proposed, wasting councils money and time aswell as those who went to the meeting, and took time off work etc.
H1j - South West Yarm	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
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<b>248 Individual</b>	
H1i - West Yarm	248/1: Policy HI i 8. 92 Policy states that 15 ha are being considered but permission has already been given to build on 22ha. Not only is that site outside current development limits and only contained in a draft policy, but you have given permission for a site half as big again . This extra farm land juts out even further into the countryside than the 15ha originally contemplated.
	Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper
H1i - West Yarm	248/2: 8.97 Justification This is typical of the document's willingness to dismiss objections to this site in preference for the Council's apparent determination that the whole of this site-and more- should be developed, notwithstanding its patent drawbacks. The Justification admits that development of this site fails a number of objectives within the Sustainability Appraisal. The prematurity of the application and the permission is breath-taking and undermines the whole consultation process. Indeed, it makes a mockery of the democratic process, in our view.
	Council Response: Comments are noted.
H1j - South West Yarm	248/3: Policy HI j Apart from the inherent undesirability of this proposed development, there would be knock-on effects as it is linked with the Egglecliffe Village Arable Field - sports pavillion and sports pitches development 12/1595/EIS. In your Justification, there is no mention of the playing field re-location and the dire consequences of that.
	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper . However, the proposal for sports pitches to the north of the River Tees has been submitted as a separate planning application and has not been proposed as through the Regeneration and Environment Local Plan.
H1b - Urlay Nook	248/4: Stockton Borough Council needs to be advised by its Planning Department that the accumulative impact of all the proposed development in the Yarm and Eaglescliffe area are serious on the local infrastructure : the proposals need to be considered together so that Stockton has a sustainable strategy for the area rather than a piece-meal approach done for short-term solution for the housing stock statistics and for the interests of developers.
H1i - West Yarm	
H1j - South West Yarm	Council Response: Comments are noted. Comments relating to infrastructure are addressed within the Yarm Topic Paper.

Consultation	249/1: I would like to make the following points :- 1 - Very few residents know about this consultation, notification should have been posted to each household. Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
Consultation	249/2: Decisions are already being made by the council ( ie :- Morley Carr in Yarm ) and local residents are being totally ignored. Council Response: Comments noted. Comments relating to planning applications have been addressed within the Yarm and Kirklevington Topic Paper .
SP2 - Housing Spatial Strategy	249/3: Unsightly brownfield sites should be developed rather than beautiful countryside greenfield sites. Council Response: Comments have been noted and a response is included within the Yarm Topic Paper.
H1 - Housing Allocations	249/4: Infrastructures should be in place before any approval to develop. Council Response: Comments noted.
H1 - Housing Allocations	249/5: Road infrastructure and safety should be properly assessed before any approval, this should be carried out by the council, not by the developers, as in the case of Morley Carr in Yarm. Council Response: Comments relating to highway infrastructure have been addressed within the Yarm Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Uray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Uray Nook allocation has not been included within the Publication Draft.
H1i - West Yarm	249/6: We should be protecting the Environment and Ecology, not destroying it ( Leven and Tees valleys ). Council Response: Comments noted. Comments relating to wildlife have been addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	
H1i - West Yarm	249/7: We should be protecting our heritage and historic towns like Yarm, not destroying them. Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
H1j - South West Yarm	
H1 - Housing Allocations	249/8: We should be improving the area we live in, not destroying it and casing permanent damage for future generations. Council Response: Comments noted.
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<b>250 Individual</b>	
H1h - Land East of Yarm Back Lane	250/1: The planned changes for Yarm Back Lane will be a disaster unless Yarm Back Lane is replaced with a multi-lane highway. This road is already blocked with half mile tail backs at peak periods in the morning and evening. There is no way this road can cope with the traffic from additional housing, or the extra traffic during construction. The road would need to be widened and the exit to Darlington Back Lane modified prior to any other works. Council Response: Extensive highways modelling and designed improvements to key junctions at the following locations as part of the collaborative working have established a maximum quantum of housing that can be delivered to the acceptance of the Highways Agency and Local Highway Authority:  Elton Interchange Darlington Back Lane and Yarm Back Lane Durham Road, Junction Road and Harrowgate Lane  Therefore, the Shared Infrastructure Policy in the Publication version of the Regeneration and Environment Local Plan requires highway improvements at the above junctions to be delivered.

**251 Individual**

H1i - West Yarm	251/1: We as a family including myself wish to object to the planned developments in Yarm. Having lived here for 40 years I have witnessed the changes to the detriment of the town already. Traffic is very stop start through the High St causing pollution. More houses will be a drain on current resources eg doctors, dentists, schools, police, fire service. Wildlife will have habitat destroyed
H1j - South West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

## 252 Individual

TC1 - Stockton Town Centre Improvements	252/0: Additionally, a lot of our money is planned to be spent on the regeneration of Stockton town centre. Because of issues of lack of road infrastructure around Yarm it will be the retailers of Northallerton and Teesside Park who will benefit most by these developments. It is probable therefore that Stockton town centre will remain as is today, the money spent a waste and the council having an embarrassing white elephant on its hands. Council Response: Comments noted.
H1i - West Yarm	252/1: Reference Policy H1i West Yarm: I completely agree with all the statements made in section You Told Us paragraphs 8.88-8.92 Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
H1j - South West Yarm	252/2: Reference Policy H1j South West Yarm: I completely agree with all the statements made in section You Told Us paragraphs 8.102-8.106 Council Response: Comments noted.

## 253 Redcar and Cleveland Borough Council

PF3 - Bowsfield Marina	253/1: Redcar & Cleveland Borough Council supports the development of the Regeneration and Environment Local Development Document. However, the Council would wish to make the following comments in relation to the policies and text within the document. If you have any questions regarding the comments, please do not hesitate to contact us and we will be happy to discuss further. Council Response: Support welcomed. Discussions with Redcar and Cleveland Borough Council have been on going through out the plan preparation process.
T2 - Tees Valley Metro	253/2: Section 3: Sustainable Travel - Tees Valley Metro (Para 3.15 to 3.20) Increased emphasis should be placed on ensuring the delivery of the Tees Valley Metro. The Tees Valley Metro will provide essential links between communities, employment sites and premises, transport hubs and leisure and recreation sites throughout the Tees Valley. We would particularly like the document to highlight the strategic importance of improving these links to locations not just within the Borough of Stockton, but also the wider role in promoting and enhancing other settlements within the Tees Valley to facilitate sustainable commuting and access to leisure and employment opportunities. The document could also be improved if it recognised the importance of delivering improved links between Durham Tees Valley Airport and Teesport to improve links for business travellers and also improved connectivity from the Tees Valley population centres to London and other city regions to strengthen the business case for making rail improvements. Developer contributions could be used to help fund these improvements in addition to other funds.  There will be opportunities in 2014 to improve the frequency of services, when the rail franchise is due for renewal, and this could be highlighted and encouraged. Emphasis should also be placed on making improvements to the rail infrastructure to improve connections and access from Teesport to other commercial sites in Stockton Borough where there are business opportunities. Council Response: SBC recognises the important role that transport will play in facilitating growth in the Borough. The plan makes reference to protecting and maximising opportunities for sustainable transport for both passenger travel and freight, and safeguards land for schemes intended to widen transport choice. It also includes reference to key highways infrastructure which will enable future development in Stockton and the sub-region in the future.
T5 - Sustainable Freight	
EMP7 - Airport Related Uses	
T4 - Portrack Relief Road	253/3: Section 3: Sustainable Travel – Para 3.26 (Highway Network Improvements) This section states that impact on the local and strategic highway network has not been assessed for a number of development allocations. There is a risk that allocating housing sites without assessing the possible impact on road infrastructure throughout the Tees Valley will have a detrimental impact on the highway network. The impact of the housing allocations should be assessed and checks should be made to ensure that any infrastructure required to mitigate the impacts can be delivered during the plan period. Developer contributions should be used to deliver the required infrastructure where possible. Council Response: Comments noted. This work has been undertaken whilst preparing the Publication draft of the Regeneration and Environment Local Plan

SP2 - Housing Spatial Strategy	253/4: Policy SP2: Housing Spatial Strategy (The Housing requirement) and Section 8 Housing. The Plan states that during the process of producing the Preferred Options, it has become apparent that the housing delivery gap had increased to about 4,670 dwellings. The Plan goes on to state that there is a requirement for 555 dwellings per year and a total of 8,250 dwellings over the plan period (2014 to 2019). However, if Stockton's current commitments are also taken into account, this will deliver up to 9,760 dwellings over the plan period. It is unclear how this requirement has been devised and it is recommended that further evidence is provided to clarify how these figures have been formulated; and to demonstrate their deliverability.
H1 - Housing Allocations	Council Response: This is addressed in the Housing Need and Demand Topic Paper.
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<b>254 Individual</b>	
H1i - West Yarm	254/1: The proposed planning application as given by Theakston Estate Ltd, is to be built upon green belt land. Yarm has been inundated with planning applications to build houses, both this side, and in Yarm and Eaglescliffe. The town cannot take on this amount of houses without a by-pass and new schools and shopping centre. It would destroy a lovely rural country town and become an urban sprawl similar to Ingleby Barwick. There are not enough jobs to sustain this great influx of householders. Roads would be grid locked during peak periods. It is not a good idea, but we suspect the deal will be done as it has in the past. But then when did Stockton council ever listen to comments, this looks like just a paper exercise, to get out the way so building can start.
H1j - South West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
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<b>255 Individual</b>	
H1b - Urlay Nook	255/1: 2.42 (Consultation Statement)The document states that it contains policies to protect urban open space and green wedges. These spaces are not being protected around Yarm. The Yarm community is not being allowed to maintain its individual identity which is important to an historic town. Its status will be eroded away and this will have a direct impact on the local economy and visitor numbers to the town. Yarm and Eaglescliffe are being chosen for development for financial benefits to developers and the council. The high prices of housing stock and the subsequent monetary value to the council, which is higher value than most other areas in the borough.
H1i - West Yarm	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
H1j - South West Yarm	
ENV2 - Urban Open Space And Local Green Space	
SP3 - Limits to Development	255/2: Limits to development – concern about urban sprawl and the need to maintain openness of countryside. Yarm is at saturation point, with traffic, housing in respect of infrastructure, facilities and road and public safety.
H1i - West Yarm	Council Response: Comments are noted. Comments relating to infrastructure are addressed in the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	
H1i - West Yarm	255/3: Local Residents – further development of Yarm will impact on the lives and properties of the local community and their quality of life. Job creation would be minimal and on a temporary short term basis.
H1j - South West Yarm	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
H1i - West Yarm	255/4: 4.20(Consultation Statement)Specific areas of agricultural land – protect from piecemeal development. In particular provision made for bats, barn owls and birds. These species also need the space to feed otherwise there is no point in protecting nest/ roosting sites. Morley Carr Farm, Yarm, is such an area and yet planning consent has been approved.
H1j - South West Yarm	Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper
SP2 - Housing Spatial Strategy	255/5: 5.16 (Consultation Statement) Outstanding housing requirement. Does this take into account the old / new houses currently for sale and over 2,000 homes currently empty or abandoned in the borough? 5.17Housing need Where do these figures come from – increase in local residents or migrants? Why should this area be spoiled to provide housing for migration?
H1 - Housing Allocations	Council Response: Comments relating to housing figures will be addressed within the Housing Need and Demand Topic Paper

H1j - South West Yarm	255/6: 5.89 (Consultation Statement)South West Yarm In whose eyes is this good for development? It is detrimental to the existing community of Yarm. Council Response: Comments noted.
H1i - West Yarm	255/7: 5.113 (Consultation Statement) West Yarm – Morley Carr Farm More residents disagree than agree. On meeting council representatives at the open session at Layfield School they stated that the council had not done a comprehensive traffic management survey and consultation exercise and yet the planning consent for this site was granted. The Planning Committee therefore could not have made their decision based on all of the facts. Therefore the planning process is flawed and this does not give local residents faith in this system or indeed the Council as a whole. It raises a lot of questions. Development is detrimental to wildlife, it is their world too. Council Response: Comments noted. Comments relating to infrastructure and wildlife are addressed within the Yarm and Kirklevington Topic Paper .
SP2 - Housing Spatial Strategy	255/8: Your Frequently Asked Questions Note- The area his high unemployment. We should be encouraging companies to invest in the area, moving into the many empty business premises which are all over the borough. New sites are being built, whilst existing sites are becoming derelict eye sores. Any new identified areas should be used for housing not businesses. We should be providing jobs for existing residents, protecting our towns and villages from further development, supplying needed affordable housing only for existing residents, not spoiling the borough by encouraging migration and the increase in housing numbers to support this. Council Response: Comments noted.
SP2 - Housing Spatial Strategy	255/9: Contaminated land at Middlesbrough Docks was successfully built on by capping over the area at an affordable cost, therefore negating the need to remove contaminated materials. Council Response: Comment noted.
H1i - West Yarm	255/10: The congestion in Yarm should have been thoroughly investigated before this consultation document was issued and planning approval was given to Morley Carr Farm, as it does not give all of the necessary information for people to give an informed view. All local residents should have been surveyed not just the odd few as in the recent Yarm Town parking consultation.
H1j - South West Yarm	Council Response: Comments relating to the consultation are noted. Concerns relating to infrastructure are addressed within the Yarm and Kirklevington Topic Paper .
SP2 - Housing Spatial Strategy	255/11: In my view a new area for a small town would be the best course of action. To replicate a successful town such as Yarm, by creating a small town/village design. A village look to houses of a traditional style, as Prince Charles model town with a mix of modern eco-build around the outskirts. A road free high street with a village style green, car parking at each end, and roads around the outside of the high street with additional parking spaces. This should attract a mix of businesses and properties. Use any existing buildings on the site as a starting point giving history to the town. Use an area with good road links or space to extend existing roads. Close to Stockton town centre would give a boost to the town's economy and facilities. For example site 4150 West Preston.
New Policy	Council Response: To see how the authority has assessed the West Preston site see the Housing Site Selection paper. The Housing Spatial Strategy allocates a sustainable new settlement at Wynyard. However, the Council does not consider that a new town would be appropriate for the Borough at the present time.
TC1 - Stockton Town Centre Improvements	255/12: Putting the history back into Stockton Town Centre and more housing along the riverside would certainly improve the area. Homes with a river frontage are very desirable in major towns and cities. Council Response: Comments noted.
RG1 - Regeneration and Gateway Sites	
H1i - West Yarm	255/13: School places and the ability to supply such should have been projected before this consultation document was drawn up and Morley Carr Farm planning consent agreed to. Council Response: Comments relating to education infrastructure have been addressed within the Yarm and Kirklevington Topic Paper .
Consultation	255/14: The plan is flawed due to the number of people who do not respond to such surveys as they say "What is the point? They will do what they want anyway." Council Response: Comments noted.

H1i - West Yarm	256/1: I am a resident of Yarm, travelling through the town morning and evening five days a week, and regularly encountering long traffic hold ups. The approved and proposed developments of up to circa 2,500 dwellings would bring the town to a standstill. It would appear that the Highways Agency have not carried out a survey during the day, as they could not have sensibly stated that 'development of sites in Yarm would be unlikely to have a significant effect on the Strategic Road Network'. I must also disagree with the Council, in that I do not believe that the Yarm sites to be deliverable, given the current highways structure.
H1j - South West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.
H1b - Urlay Nook	256/2: The council appear to be favouring the over development of greenfield sites in Yarm and Eaglescliffe. There are a large amount of residential dwellings for sale in both areas, so why is there a need to build more housing. Could it possibly be the offer of money from the government? Heaven forbid!
H1i - West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.
H1j - South West Yarm	
H1i - West Yarm	256/3: The development proposals also impact on our wildlife corridors, and areas of natural beauty. You appear to be looking to destroy all that is great about this area, and replace it with a concrete and brick jungle. The council destroyed Stockton high street, and now you want to bring Yarm down to the same level. I must strenuously object to your proposals in the Regeneration and Environment Local Development Document Preferred Options Draft.
H1j - South West Yarm	Council Response: Comments are noted. Concerns relating to wildlife are addressed within the Yarm and Kirklevington Topic Paper .

## 257 Individual

257/1: I object to these planning applications due to the following reasons. The traffic on Yarm already is problematic due to high volume and the natural bottleneck of the high street. To add to this with the additional 800 + houses to be built on the old Admiralty site, the proposed 350 houses at Morley Carr farm and now 700 + houses proposed at the south of Yarm, this will only ascerbate this already traffic nightmare. Where will the approximately 4000 children from these homes be schooled, will they be ferried in cars and buses to their place of education, again adding to the traffic. I have not heard of any new schools being proposed, where are the school places to come from? The pollution levels surely will increase due to the high volume of traffic in the area so our children are going to be the ones to suffer if they are to be expected to walk to these non-existent schools. Parking in this area has already been highlighted in this area, therefore I don't see how adding more cars will help? If the proposed building goes ahead I can't see how this will help this area as new businesses need a good transport infrastructure, but the gridlock which will ensue will ensure any new investment in the area will keep new enterprises well away.

Council Response: Comments regarding traffic and parking, pressure on schools, and pollution are noted and are considered within the Yarm and Kirklevington Topic Paper .

## 258 Tees Valley Wildlife Trust

T4 - Portrack Relief Road	258/1: Policy T4 Portrack Relief Road The Wildlife Trust objects to the policy to safeguard the route of this road. The policy conflicts with Policies ENV1 on green infrastructure and ENV3 which gives protection to Local Sites. Portrack Marsh is a nature reserve owned and managed by the Tees Valley Wildlife Trust and our efforts to safeguard and manage biodiversity and deliver green infrastructure benefits to the Borough at this site should take precedence over plans for a relief road for a development which has yet to be substantiated and which is unlikely to be achievable within the plan period.
Sustainability Appraisal	Paragraph 3.33 Sustainability Appraisal [for Portrack Relief Road] This statement fails to address a number of environmental issues relating to Policy T4. Council Response: The Council and Tees Valley Wildlife Trust are working together to develop a scheme which would deliver the objectives of both the Portrack Marsh Local Wildlife Site and the Protrack Relief Road. This could include adjustments to the road and accomanying cycle way's alignment, screening and other mitigation work to improve the Local Wildlife Site's value as a habitat. The part of the scheme which extends to Teesside Barrage has been removed as it would have the greatest impact on Portrack Marsh but is no longer required to deliver the Borough's development aspirations and regenrataion sites.
ENV1 - Green Infrastructure	258/2: Policy ENV1 Green Infrastructure- The Wildlife Trust supports this policy. Council Response: Comments noted

ENV1 - Green Infrastructure	<p>258/3: Paragraph 9.10 The definition of Green Infrastructure components or assets might be improved by modifying the references to 'Brownfield Sites' and 'Industrial and Commercial Sites' which in certain circumstances are GI assets although this is clearly not always the case. A better definition might strengthen the GI policy.</p> <p>Council Response: This policy and its justification have been significantly revised.</p>
ENV3 - Local Sites	<p>258/4: Paragraph 9.27 For the purpose of clarity, this list might be amended by removing the first five 'Other Sites' listed, which are all Tees Valley Wildlife Trust nature reserves and therefore already covered by an earlier statement in the list. Also, by not stating the number of Local Wildlife and Geological Sites as this is subject to the changes correctly described in Paragraph 9.55 (and which puts the number of LS at 58!)</p> <p>Council Response: Comments noted, the list of 'other sites' is no longer included within the document.</p>
ENV3 - Local Sites	<p>258/5: Policy ENV3 - Local Sites The Wildlife Trust supports this policy.</p> <p>Council Response: Comments noted</p> <p>258/6: Paragraph 9.52 The statement at the end of this paragraph needs to be amended to include the Wildlife Trust nature reserves and 'Other Sites' as described in Paragraph 9.27. Suggested wording is "This policy also covers the 11 sites designated as Local Nature Reserves and the Borough's non-statutory nature reserves." Without this change the policy protection will fail to address the issue of Saltholme described in Paragraph 9.43 Question 7.</p> <p>Council Response: Comments noted. The NPPF states that at para 113 that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or affecting protected wildlife or geodiversity sites or landscapes will be judged. The NPPF continues to identify that distinctions should be made between the hierarchy of international, national and locally designated sites; referencing Circular 06/2005 which states the following regarding Local Sites:</p> <p>"Defra will be issuing separate guidance on sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites. The guidance will provide advice on the development and management of systems to identify these sites. It will propose frameworks and standards for their operation as well as for the selection, protection and management of the sites themselves."</p> <p>It is therefore considered appropriate that the policy for local sites covers the Borough's Local Nature Reserves and Local Sites (namely Local Wildlife Sites and Local Geological sites.). The Wildlife Trust nature reserves and 'other sites' are covered by this policy where they are designated as Local Sites.</p>
ENV3 - Local Sites	<p>258/7: Paragraph 9.54 The Tees Valley Biodiversity Partnership has been replaced by the Tees Valley Nature Partnership. This is a government approved 'Local Nature Partnership' formed under an initiative of its natural environment white paper. The TVNP has agreed to take on the role of Local Wildlife Sites Partnership from the TVBP.</p> <p>Council Response: Comments noted. Reference to Tees Valley Biodiversity Partnership will be replaced with Tees Valley Nature Partnership.</p>
<hr/>	
259 Individual	
H1i - West Yarm	<p>259/1: Firstly, I find it questionable that the Council sought to pre-empt its own consultation process by attempting to approve the Morley Carr application and by what appears, prima facie, to be a "done deal" with the applicants i relation to planning applications 12/1595/EIS and 12/1990/EIS.</p> <p>Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper</p>
Consultation	
SP2 - Housing Spatial Strategy	<p>259/2: Strategic Policy SP2 paras 1 and 2 - gives little emphasis to the need to regenerate the central core of the Borough and appears to give a green light to developers to develop greenfield sites in its periphery, thereby exacerbating further Sockton's doughnut syndrome.</p> <p>Council Response: The Housing Spatial Strategy in the Publication Draft of the Regeneration and Environment Local Plan continues to support housing development within the Core Area and the conurbation. However, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is suitable, available or achievable in the period up to 2030 to meet our housing requirement. Therefore greenfield sites have had to be identified to meet the housing requirement.</p>
SP2 - Housing Spatial Strategy	<p>259/3: Para 2.5 - the council's proposal to exceed the required buffer of 5% is questionable.</p> <p>Council Response: Comments noted and addressed within the Housing Need and Demand Topic Paper</p>
H1j - South West Yarm	<p>259/4: Policy H1j (see my introductory comment) this policy statement flies in the face of the responses listed in paras 8.102 to 8.106 (and the veritable tsunami of</p>



opposition that has greeted planning application 12/1990/EIS and its interdependent application 12/1595/EIS. In terms of housing need, the proposal to allocate 49 acres of land in South West Yarm for a development of four+ bed detached houses is contrary to the Tees Valley 2012 Strategic Housing Market Assessment (table 4.8D)

Council Response: Comments noted. Comments relating to the SHMA are addressed within the Housing Need and Demand Topic Paper

#### ENV3 - Local Sites

259/5: Para 9.27: The Council's previous commitment to the Tees Heritage Park appears to have been substantially diluted in the current document: specifically, it is not mentioned in para 9.27 as a 'specific designated site'.

Council Response: Comments noted. The Tees Valley Heritage Park is protected in the Regeneration and Environment Local Plan as Green Wedge and as part of the green infrastructure network. A specific policy has been included within the publication draft to recognise the aims and objectives of the Heritage Park.

#### 260 Individual

##### H1j - South West Yarm

260/1: I OBJECT to 12/1990/EIS - Land South of Green Lane, Kirklevington Ruin green belt between Yarm and Kirklevington - will actually join them together!! Traffic on A67 to and from A19 already heavy with no enforcement of 40mph speed limit through Kirklevington - as someone who lives on this road can assure you that it is already like a race track - despite what the council says! At the very least Yarm School could have picked a higher quality standard builder who would build larger executive type homes instead of trying to cram 735 Bellway homes onto a site that is not large enough and will bring low quality housing and the problems that come with it!

Council Response: Objection noted. Comments are addressed within the Yarm and Kirklevington Topic Paper .

#### 261 Individual

##### H1b - Urlay Nook

##### H1i - West Yarm

##### H1j - South West Yarm

261/1: Firstly, how the Council can consult upon a matter it has already determined is beyond me ref Morley Carr. The enthusiasm to approve that scheme I am afraid confirms the real intentions of the Council. Nevertheless, and for what it is worth, I deplore the priority given to looking for sites on the edge of the Borough (ref MCarr report). In particular, the urban sprawl to the south and west of Yarm will have huge adverse impacts on the town. I have previously commented that I do see merit, if SBC insist on building further homes in Yarm, with the Mount Leven retirement village. But you have jumped the gun with Morley Carr in the most disgraceful manner. I hope you dont make same mistake to the south of Yarm and in Egglecliffe village, Urlay Nook etc. Yarm is special - dont ruin it or it stops being special and SBC as well as residents will lose out in the long run.

Council Response: Comments noted. The Yarm Topic Paper include response to issues raised in relation to these sites.

#### 262 Individual

##### H1i - West Yarm

##### H1j - South West Yarm

262/1: Please stop the plans to destroy Yarm. The influx of people will make travelling through Yarm intolerable. What about the doctors -it is already difficult to get an appointment and with an added population the situation will be worse. Also of concern is the selfish attitude of yarm school and its latest planned venture which will destroy a village, make more traffic problems as well as putting playing fields on an ecology site which will affect wildlife. the only people to benefit will be the minority privileged few many of whom do not life in Yarm.

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper .

#### 263 Individual

##### SP2 - Housing Spatial Strategy

263/1: The Housing Spatial Strategy Para 2.5 states that the requirement is 8,250 over the period 2014-2029 (15 years), the figure is derived from RSS and the Core Strategy of an annual requirement of 555. This over a 15 year period should be a figure of 8,325 not 8,250 as stated.

Council Response: Comment noted. The housing requirement is discussed within the Housing Need and Demand Topic Paper.

##### SP2 - Housing Spatial Strategy

263/2: Para 8.1 The intention of this document to replace CS7 gives the Council an opportunity to calculate its own housing requirements in line with the NPPF which states that the Local Plan should be based on adequate, up-to-date and relevant evidence base and that the scale and mix of housing should among other things -meet household and population projections, taking into account of migration and demographic change.

This document appears to be without justification following the RSS target in the full knowledge that it is the Governments stated intention to revoke RSS and it highly likely

that this will have happened prior to examination. I contend therefore that the approach is flawed in that the document does not demonstrate that you have objectively assessed the housing need of the Borough. I would draw the Council's attention to City of Newcastle and City of York whom have both recently withdrawn Core Strategies as it had become evident that they had not taken into account population projection evidence that had become available after adoption of their relevant RSS's. I would also draw you attention to the Selby Core Strategy EIP which has been re-convened twice and the Inspector is giving strong weight to the use of the most recent evidence base and the likelihood of finding the Strategy unsound on this basis.

Council Response: Comment noted. The housing requirement is discussed within the 'Housing Need and Demand Topic Paper'

## SP2 - Housing Spatial Strategy

263/3: The document is also silent on what contribution windfall will make to meet the Borough's housing requirement. The NPPF has recognised that windfall should be considered where there is clear evidence it has significantly contributed to housing completions. On preparing the next stage of the plan the Council needs to clearly show what contribution windfall has historically provided and make an allowance within the plan for an amount it will contribute throughout the plan period. In para 8.2 the document again refers to a figure of 8,250 when the requirement you are suggesting should be 8,325.

Council Response: Comment noted. The housing requirement and contribution from windfalls is discussed within the Housing Need and Demand Topic Paper.

## SP2 - Housing Spatial Strategy

### H1 - Housing Allocations

### H2 - Housing Phasing and Implementation

263/4: In Policy H1 the figures suggested for the site do not equate to the ones suggested in the phasing table nor policies H1a - H1m. In particular H1e and H1g, there needs to be consistency within the plan. Notwithstanding that there is no objective assessment of need to show the housing requirements I object to the over reliance on greenfield sites. From my calculations it shows almost 92% of the allocations are on greenfield sites with the majority been large extensions into open countryside. If we take the North Tees Hospital site out of the equation as its deliverability at this time is still uncertain then that would push the greenfield allocation up to 96%. I would contend that this is a wholly unsustainable strategy for delivering your housing figures and does not accord with your own Core Strategy or the RSS.

It does not accord with paras 1, 2 and 3 of CS1 in relation to its allocation of the sites at Yarm, Yarm Back Lane, Harrowgate Lane and particularly any development at Wynyard.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan.

The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

## Sustainability Appraisal

263/5: I would also wish to object to the sustainability appraisal on all the greenfield sites, generally because the 1 paragraph summaries are paying lip service to sustainability and more specifically they are factual incorrect and misleading. A greenfield allocation must conflict with objective S17 of the sustainability appraisal as it is not making the best use of our natural resources i.e. land. Therefore the comment in many of your site specific sustainability appraisal summaries that 'there are no identified conflicts between the policy and the Sustainability Objectives' is incorrect.

The Core Strategy in para 6.5 states "Stockton Borough has an abundance of unused or under-utilised previously developed land, focused mainly within the river corridor, a legacy of industrial decline in the second half of the twentieth century. By focusing development here and elsewhere within the urban area, the Council will be making best use of resources, thus minimising the need to make further allocations of greenfield land." For the reasons above I would suggest that if the Council pursues Policy H1 and its constituent elements in its current form that the Plan would be considered unsound as it is not 'justified and it is not 'consistent with national policy'.

Council Response: Comments noted. It is assumed this refers to SA7 as there is no objective S17. The assessment criteria involved in SA7 looks at a range of issues and also the degree of conflict and it does not automatically follow that a greenfield site must be against SA7.

The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited

public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

263/6: Guiding the location of development: Strategic Gaps, Green Wedges and Limits to Development Para 2.26 - 2.51 Whilst I support the inclusion and justification for a Green Wedge policy I have a specific objection to one of the boundaries and in particular in relation to the Plans justification and how that relates to the boundary. Para 2.29 This states "On this basis the Council has decided that both policies are still relevant, but that the physical boundaries required some adjustment owing to changes in the Housing Spatial Strategy as well as Ordnance Survey base mapping, improvements in Geographic Information Systems technology and physical changes on the ground. It appears you can adjust the green wedge boundaries to accommodate housing allocations but ignores a physical change that has happened sometime ago and has been repeatedly brought to the attention of the Council.

The area I refer to is the land to the west of the realigned A19. This land has previously been referred to as land at Chesham Road. The land in question is now physically separated from the 'wider' green wedge by a 6 land road and a sound barrier. There is no justification for its continuing inclusion as it plays no part in as the document states in its reasoned justification to its policy SP4 para 2.50 "The function of the Green Wedge is to prevent the coalescence of communities within the built-up area (thus maintaining their individual identities). The policy seeks to improve the appearance of the Green Wedge by maintaining its openness." The land in question does not meet this test as its removal would not result in the coalescence of settlements as there is a wide main road and a larger area of Green Wedge, a defined Local Nature Reserve and a defined Local Wildlife that all adequately meet that function. As The road and a high physical sound barrier separate this site from the rest of the Green Wedge and cannot be seen from the greater area it does nothing to improve its appearance or maintain its openness. I therefore request that the boundary of the Green Wedge as shown on Map 10 is redefined to take into account the situation on the ground and should follow the line of the sound barrier or the A19. In relation to Development Limits I support the use of these and the fact that Green Wedges where possible should be excluded. In relation to my previous comments on Green Wedges I would request that in line with redefining the extent of the Green Wedge adjacent to the Land at Chesham Road, Norton that the Development Limit is similarly redefined to reflect that change and ensure consistency.

Council Response: Please see the Green Wedge Review and Housing Site Selection Topic Paper which detail how this site has been considered.

263/7: If you consider these changes to be both logical and reasonable this would give an opportunity for a housing development site and would reduce the need for some purely greenfield allocations in unsustainable locations on the edge of settlements. I accept that this site is greenfield by definition but is vacant derelict which is of little formal use but it could prevent the need for development on agricultural land.

The site is approximately 2 ha and is bounded on the north, west and southern boundaries by exosting residential development and on its eastern boundary by an embankment, a high sound barrier and the A19 dual carriageway. An existing cycleway/footpath runs along the eastern edge of the site which gives excellent sustainable transport access to employment opportunities and a full range of services.

Vehicular access to the site is primarily from Chesham road but there are also opportunities to create a vehicular access from Ramsey View and Beaumont View. I would contest that this site would score favourable in sustainability terms to the majority of the greenfield sites currently shown in Policy H1.

I would welcome the opportunity to discuss my representations prior to publication of your final document for consultation if you consider this will be of assistance.

Council Response: Please see the Green Wedge Review and Housing Site Selection Topic Paper which detail how this site has been considered.

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## 264 Kirklevington Property Co Ltd

### SP3 - Limits to Development

#### 264/1: Introduction

### SP4 - Green Wedge

The following responses are made on behalf of Kirklevington Property Co Ltd [the Respondent] in relation to draft Policies SP4 and SP3, insofar as they apply to land comprising the former tannery site, Aislaby Road, Eaglescliffe. The responses should be read and considered together. Strategic Policy SP4 Green Wedge

No issue is taken with the principle of the designation of Green Wedges in appropriate circumstances under Policy SP4. However, the Respondent considers that the

application of this policy designation to land comprising the former tannery site, Aislaby Road, Eaglescliffe as shown on Map 23 is inappropriate. There are two reasons for this view, as follows.

First, the site comprises previously developed land, within which the cleared site of the former tannery buildings [including foundations and footings, rubble and artificial filled ground] remain. These features, together with the scrub vegetation on much of the remainder of the site, detract from its appearance, particularly when viewed from the immediately adjacent Teesdale Way footpath. Whilst the larger, mature trees adjacent to the river bank and the hedges along Aislaby Road serve to maintain views in the landscape from external areas, the site as a whole does not warrant designation as a Green Wedge. Indeed, having regard to the acceptable forms of development listed in Policy SP4, the proposed Green Wedge designation will be counter productive in terms of the character and appearance of the site because in its present form the policy would not permit 'enabling' development which would facilitate the treatment of dereliction, and the improvement of the site as a whole.

The second reason for the Respondent's concern is that the proposed designation of the former tannery site as Green Wedge is inconsistent with the Core Strategy. Whilst Core Strategy Policy 10 provides [inter alia] for a Green Wedge along the 'River Tees Valley from Surtees Bridge, Stockton to Yarm', the Core Strategy Strategic Diagram clearly indicates that this should extend to the eastern edge of Yarm, with adjoining areas forming part of the Tees Heritage Park Core. Neither designation applies to the area in which the former tannery site is located. In this regard, whilst it is recognised that it is not always appropriate to seek to identify individual sites on a key diagram, in this case the extent of the proposed Green Wedge designation as shown on the Strategic Diagram is entirely clear. There is no strategic intention that the designation should apply to the former tannery site.

For these reasons, the proposed application of Green Wedge policy to the site should be deleted. In the alternative however, and without prejudice to the above points, if the Green Wedge designation of the former tannery site were to be retained, the Respondent's concerns could be met by expanding the categories of acceptable development listed in Policy SP4 to include: development of previously developed sites necessary to bring about the treatment of dereliction and/or the improvements of the character of the Green Wedge and/or the provision of facilities appropriate to the Green Wedge'.

In the case of the former tannery site, the Respondent considers that the long term future of the site can best be secured through the redevelopment of the tannery building site with a limited number of dwellings [approximately 4 no. houses] together with the provision of a public car park [possible capacity 60 to 70 cars] which would fulfil the dual purpose of meeting the acknowledged need for parking to serve the nearby Yarm centre, and provide parking for users of the Teesdale Way footpath route. Taken together with proposals for a landscaping scheme and the protection and maintenance of mature trees on the river bank, such an approach would produce a high level of public benefit whilst contributing to the improvement of the appearance of the area [irrespective of whether the Green Wedge designation is retained].

#### Strategic Policy SP3 Limits to Development

No issue is taken with the principle of the designation of Limits to Development in appropriate circumstances under Policy SP3. However, the Respondent considers that the proposed change of approach in respect of land comprising the former tannery site, Aislaby Road, Eaglescliffe is inappropriate. The reasons for this view are as follows:

As indicated on Map 23, it is proposed that the former tannery site should be located outside the Limits to Development. This represents a change from the approach adopted in the Local Plan, under which the development limit was drawn along the western edges of Yarm and Eaglescliffe, leaving the site within the limit.

In the event that the proposed Green Wedge designation in this area is eventually confirmed [subject to the amendment suggested by the Respondent], then a change in the Development Limits would be unnecessary and ineffectual, because the types of acceptable development would be dictated by Policy SP4 rather than Policy SP3. Indeed to have two policies specifying forms of development that would be supported could be contradictory and confusing.

On the other hand, if the Green Wedge designation is deleted, then the proper, logical approach would be to retain and maintain the former Local Plan Limits to Development, thereby providing the potential for an appropriate scheme for the reclamation, re-use and improvement of the former tannery site in a manner which delivers a high level of public benefit.

On either basis therefore, the Limit to Development [as shown on Map 23] should be re-drawn to exclude the former tannery site.

Council Response: To see how the site has been assessed please see the review of the green wedge and limits to development.

The Core Strategy strategic diagram is a diagrammatical representation of strategic policies contained within the Core Strategy and is not intended to show the precise boundaries of designations.

Any proposal would need to be considering against the Green Wedge policy amongst other considerations including impact on landscape character and heritage assets.

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## 265 Tees Valley Local Access Forum

265/1: The Tees Valley Local Access Forum has no comment to make.

Council Response: Response noted.

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## 266 Individual

H1h - Land East of Yarm Back Lane

266/1: To suggestions of developing Yarm, sections H1h I object To H1i I object To H1j I object

H1i - West Yarm

Council Response: Objections noted.

H1j - South West Yarm

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## 267 Individual

H1j - South West Yarm

267/1: I object to the inclusion of Kirklevington renamed South West Yarm H1j within the proposed Preferred Options document 2012 . How many of the people involved in the preferred Options have walked our boundaries and our wild life corridors? There are a considerable number of conflicts and uncertainties within the justification document . Limits to development ,a natural ancient boundary, a strategic gap all protect a strategic wild life corridor/ green infrastructure network ,corridor H which crosses counties hence should be redesignated as a primary natural wild life corridor.

Council Response: Comments are noted. Comments relating to the Strategic Gap and wildlife corridors are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

267/2: Policy H1j South West Yarm preferred options .SHLAA The site is contrary to the adopted core strategy plan and cannot be included in the 5 year plan. It will not be a logical extension to the urban area. It will increase flood risk to properties in North Yorkshire and interfere with a delicate eco system and will damage a corridor on which N.Yorkshire and the Tees Valley depend in order to reach the 2020 Aichi bio diversity targets .It will impact on flora and fauna protected internationally by the Bern Convention. The corridor is maintained and protected by local people and farmers and should be protected within the planning framework to ensure survival of species.

Council Response: Comments noted.

H1j - South West Yarm

267/3: Infrastructure , the sewage network cannot take the flow from the proposed development of 750 houses on the land still under discussion. Planning document re Appendix A ,letter from NWL to JBA consulting Planning submission re site H1j. SHLAA 2011 Regarding West Yarm ,South West Yarm ,South East Yarm and Tall Trees Highways and assessment of building land along Green Lane Strategic Housing Land Availability Assessment Document 2011 Quote,' the two most important risks are public funding and to mitigate risk to highway network ' Clearly stated within the SHLAA 2011documents Appendix re South East Yarm, Morley Carr and South West Yarm Major perceived network implications which the highways cannot overcome are unlikely to be resolved by planning obligation. Highway constraints Yarm High Street, Cross Roads, Leven Bank and Crathorne Intechange.

Council Response: Comments relating to infrastructure are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

267/4: Sustainable if left as farm land , the only undamaged corridor for large mammals to pass under the A19 thus ensuring the safety of all, a small price to pay. Building on land south and west of Yarm will eventually cause a by pass to be built from the A19 to the west between Kirklevington and Worsall and will result in a bridge across the Leven to take Low Lane ,all at tax payers expense with the destruction of countryside . The cost of the infrastructure will result in more land for housing outside the limits to development.

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

Sustainability Appraisal	<p>267/5: Preferred Options The justification for inclusion within development land appear to be contrived or a tick exercise ,inconsistent . Comparing the sustainability assessment of H1i and H1j there is an anomaly regarding SA5 . The SHLAA assessments are confused with developments along Green Lane being within 2 km of employment and neighbouring ones not within 2 km. I am not aware of large employers in the vicinity this should have been a negative tick.. I was assured that the change in policies would protect the wildlife corridor by maintaining the limits to development and the strategic gap. .No conflict is seen within the scoping and no recognition of historic parkland.</p> <p>Council Response: Comments relating to the Sustainability Appraisal are noted. The appraisal report has been revised for the Publication Draft</p>
ENV1 - Green Infrastructure	<p>267/6: Planning documents are full of EN's but no Stockton documents carry natural ,RURAL ,wild life corridors through and give them the protection they deserve ,even corridor H Appendix7 fails to note the Tees to Leven connection. This should be rewritten. and given protection .It is not a Saltergill to Leven corridor but a Tees to Leven corridor essential for resilience of species. Natural England states the Green Infrastructure GI is a material consideration when discussing planning. .In recent Stockton planning documents the green networks which should have been areas for animals to move freely have become cycle routes and tarmac walkways and the bio diversity element the reason for the policy seems to have been lost. The sports field should return to farm land or be for community use</p> <p>Council Response: Comments noted. A Strategic Wildlife Corridor was identified in the 2004 Tees Valley Structure Plan. However, this no longer has any status. Whilst land within the river corridor is no longer protected as a wildlife corridor, it is identified as a Green Infrastructure Corridor within the Stockton on Tees Green Infrastructure Strategy; the Regeneration and Environment Local Plan seeks to protect and enhance the green infrastructure network.</p>
Appendix 7: Stockton-on-Tees Borough Green Infrastructure Network	
H1j - South West Yarm	<p>267/7: The justification for inclusion of H1j is incorrect as the words direct and indirect are within NPPF guidelines. also a cornerstone to development is sustainability, economic, social and environmental. Adverse impacts of granting permission will significantly and demonstrably out weigh the benefits</p> <p>Council Response: Comments noted. Issues relating to South West Yarm are addressed within the Yarm and Kirklevington Topic Paper .</p>
H1j - South West Yarm	<p>267/8: Page 129 ,8.107The Site is outside the limits of development ,agricultural land and parkland see 1985 O.S maps Policy HE.2 .Change of boundary is envisaged, the present boundary is a pre conquest division between Yarm and Kirklevington over a thousand years old possibly a Roman Road from the ford at High Worsall,the tidal limit. THE PEOPLE OF KIRKLEVINGTON WILL NOT GIVE UP PART OF THEIR PARISH /MANOR .MOVING BACK INTO NORTH YORKSHIRE MAY BE THE ANSWER.</p> <p>Council Response: Comments noted.</p>
Sustainability Appraisal	<p>267/9: 8.108 Development on the site is not sustainable SA1 Will not strengthen Stockton's economy it will aid the surrounding area and N.Yorkshire.</p> <p>Council Response: Comments noted.</p>
H1j - South West Yarm	
Sustainability Appraisal	<p>267/10: SA2.The land is an aquifer easily polluted causes flooding ,clay ,sand ,clay,sandstone , the stream Saltergill Beck /Hole Beck will be directly affected drainage from the site SUDs planning proposals suggest 12500 metric cubes of water in storage ponds with run off and over spill into the beck which will raise the water level and impact on a natural wild life corridor H , farmland and soil (protected under NPPF) ,three bridges ,a culvert and a house in flood zone 3 within Kirklevington and North Yorkshire will be at risk.</p> <p>Council Response: Comments noted. Comments relating to flooding are addressed within the Yarm and Kirklevington Topic Paper .</p>
Sustainability Appraisal	<p>267/11: SA3.8.109 Affordable housing requires easy access to employment there are no major employers south of Yarm. Yarm as a shopping centre is not affordable for lower income families emphasis placed on restaurants ,cafes and designer shops within the Preferred Options.</p> <p>Council Response: Comments noted.</p>
Sustainability Appraisal	<p>267/12: SA4 The development will not improve the employment market in Stockton.</p> <p>Council Response: Comments noted.</p>
Sustainability Appraisal	<p>267/13: SA5 Close proximity to schools is not a key factor for education travel costs and ease of travel are .The station will not be on the proposed metro line</p> <p>Council Response: Comments noted.</p>
Sustainability Appraisal	<p>267/14: SA7 The site will not enhance the environment .It will reduce productive farm land ,interfere with bio diversity. It will damage and reduce foraging land and</p>

damage the Strategic Wild life Corridor ref Tees Valley Structure Plan adopted 2004 by all councils along the Tees Valley , transferred from the Cleveland County Council 1993 Wild life strategy document which identified for protection the Tees corridor and the Tees /Leven corridor south of Yarm ,north of Kirklevington. An ancient natural wild life area .

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

Appendix 7: Stockton-on-Tees  
Borough Green Infrastructure Network

267/15: Pref Options document Appendix 7 GREEN INFRASTRUCTURE NETWORK CORRIDOR .The wild life areas in Kirklevington serve a number of beneficial purposes in attracting visitors, ornithologists and walkers. Protecting the bio diversity and maintaining the limits to development will aid disadvantaged areas of Stockton a rural setting is already found beneficial for prisoner rehabilitation at Kirklevington Grange.

Council Response: Comments noted.

Sustainability Appraisal

267/16: SIGNIFICANT IMPACT 8.110. I HAVE GRAVE RESERVATIONS CONCERNING THE CONFIDENCE WITH WHICH THE WHITE, YOUNG ,GREEN, CHARACTER ASSESSMENT WAS USED AS A JUSTIFICATION FOR ALLOWING LAND TO BE SUITABLE FOR BUILDING ,one of only 4 justifications ,the consultant expresses caution ,the photos re landscape on which assessment was made were taken on a wet misty March day when it was too misty to see to the far hedge clearly .The landscape assessment is merely a tool developed for urban areas. NPPF requires the landscape as a whole to be assessed. The field is a productive field in an area of mature parkland beside a wooded valley see description in Rev,Graves' History of Cleveland 1803 Kirklevington Picton Stell/ Saltergill Beck/Hole Beck. The Parish promotes and enhances the culture and heritage of Stockton .Ref Kirklevington Township and Parish. The Stockton sign at the southern entry to the Borough at Picton Lane /A67 is surrounded by wild orchids..Kirklevington and Castleavington is an area of amphibians ,Great crested newts ,otter, badger. a link which allows resilience. Ingleby Barwick is no longer part of a natural wild life area, the fauna have lost a large habitat area they have to go some where or die ... .

Council Response: Comments noted. Comments relating to landscape and wildlife are addressed within the Yarm and Kirklevington Topic Paper .

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## 268 Individual

H1i - West Yarm

H1j - South West Yarm

268/1: There is one important comment to make regarding this report and its relationship to all the housing proposals which are arising around both to the south and north of Yarm. I object to the advice given on page 17/18 (para 2.20) that there do not appear to be any significant highway issues in relation to the housing propels around Yarm. I fundamentally object to this point of view and see no real analytical data to back up these comments. My understanding that the consequences of all these housing proposals have not been fully studies and the option of a new by-pass to Yarm has been ignored. Consequently I believe that no more new Housing development be allowed to the south of Yarm until there is a clear study of the highway, access to Yarm Town centre and parking are fully studies and consequences/possible solutions reported on. At the very least Developers of these sites should be required contribute to highway solutions. There is much detail in the report which has much to commend it but I will go away with it for my holiday reading and may well have further comments to add when I return.

Council Response: Comments relating to highway infrastructure are addressed within the Yarm and Kirklevington Topic Paper .

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## 269 Individual

H1b - Urlay Nook

H1i - West Yarm

H1j - South West Yarm

269/1: H1b Housing - Urlay Nook H1i Housing - Yarm H1j - Housing - Yarm I object to the housing proposal in this area. The document refers to objections already made in relation to the impact that such developments would have on traffic in the Yarm and Eaglescliffe areas, however nothing is proposed as to how the road infrastructure would be improved in order to accommodate the extra vehicles that this housing would create. This is housing in an affluent part of the borough, so each house would have at least one vehicle, and many, two. Since there is little employment locally, those who chose to live in the area will have to commute to their place of work. Traffic in the area is not just busy at peak periods during the week, with queues often building up on weekends too. A plan needs to be developed to work out how the road infrastructure can be improved to take the additional traffic BEFORE any housing is built. Otherwise Yarm and Eaglescliffe will end up as another Ingleby Barwick, which still lacks enough community facilities for its size. Developers everywhere need to be forced to take responsibility for creating a community with shops and schools, not just putting up as many houses as they can in return for a fat profit.

Council Response: Comments relating to the Yarm sites are addressed within the Yam Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

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## 270 Individual

H1i - West Yarm 270/1: I WISH TO OBJECT Against the developments in Yarm PA 12/0980/OUT PA 12/1546/OUT PA 12/1990/EIS PA 12/1565/EIS On the following grounds 1. Green belt development 2.No suitable infrastructure 3. All roads inadequate

H1j - South West Yarm Council Response: Comments are noted. Green Belt is a national designation; there are no areas of Green Belt within Stockton or the wider Tees Valley. However, comments relating to development on greenfield sites, and other issues, are addressed within the Yarm and Kirklevington Topic Paper .

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## 271 Individual

H1i - West Yarm 271/1: Morley Carr Farm and Yarm School Playing Fields proposals: My objections to these schemes remain the breaching of the boundary to the South formed by Green Lane, so that developmental sprawl can then join up with Kirlevington all the way to the A19. This will have significant impact on traffic on the A67 - already a huge problem for those who have to get through Yarm at certain times of day; services such as health (already difficult to get to see doctors); schools; not to mention the impact on landscape and local ecology.

H1j - South West Yarm Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm 271/2: I also strongly object to the breaching of the natural boundary of the Tees in the idea of putting playing fields and parking on the opposite bank to Yarm School. This will impact on the Teesdale Way and the quiet enjoyment of Yarm as a rural market town.

Council Response: The proposals to build sport facilities to the north of the River Tees are the focus of a separate planning application and have not been proposed through the Regeneration and Environment LDD Preferred Options.

H1b - Urray Nook 271/3: With so many large brownfield sites available for building in the vicinity e.g., Allens West, it is disingenuous to suggest that developing these greenfield sites is anything other than an attempt to build executive homes for those who can afford them and pay the consecutive higher Council Tax banding

H1i - West Yarm Council Response: Comments relating to greenfield development have been addressed within the Yarm Topic Paper.

H1j - South West Yarm

H1i - West Yarm 271/4: I do not believe there will be anything like the kind of affordable housing that will enable young people to stay in Yarm, where house prices are higher than local average and have held well even during the recession. I very much hope that my cynicism is ill-founded and that these projects, which will fundamentally alter the nature of Yarm & Egglecliffe, will not be passed. After all, this is the same Council that refused to allow Yarm School to re-locate to the South of Green Lane, and sell the Friarage Site for housing - which would have made considerably less of an impact in all respects than what has been incorporated in the current local development preferred options document.

H1j - South West Yarm Council Response: All housing developments of 15 dwellings or more have to provide affordable housing within a target range of 15-20% unless robust evidence is provided to support a lower rate than the standard target. This assists first time buyers get on the housing ladder or those who need social housing by providing affordable homes to meet their needs.

The Yarm School site has previously been the subject of a planning application to redevelop it for housing. A number of site specific issues were identified that would have to be addressed before any scheme could be accepted as suitable by the planning service. These included flood risk, listed building status, Conservation Area status, trees, ecology and archaeology. Moreover since this time there has been significant capital investment in the site in order to enhance it as an education facility. It would not appear therefore, that there is a reasonable prospect of the site becoming available for housing redevelopment.

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## 272 Individual

H2 - Housing Phasing and Implementation 272/1: 1 Housing Allocations and Phasing paragraph 8.2  
The housing requirement of 555 dwellings per annum to year 2029 is based on an assumption of economic growth of 2.8% as identified by RSS figures. I believe this requirement is not a true reflection of the housing needs of Stockton Borough. This 2.8% growth has not materialised and there is no evidence to suggest that this will happen in the short term future. Therefore, this requirement of 555 dwellings per annum based on this historic figure is not justified and does not reflect current local circumstances in the Borough of Stockton on Tees. The Localism Act will abolish RSS and should enable the local authorities i.e. Stockton Borough Council to determine their own particular individualities in deliverable housing needs.



Council Response: Comments addressed in the Housing Need and Demand Topic Paper

H2 - Housing Phasing and Implementation

272/2: 2 Economic Climate Effects

Lending bodies of banks and building societies are asking for deposits of up to 25% of the house price (Which) before mortgages are agreed. Less deposit means usually higher borrowing fees. This leads to a stagnation at the bottom end of the property ladder.

Home owners wishing to move on to larger properties are, in many cases, opting for extensions to their homes (reflected by the Governments very recent ideas to free this area of planning from unnecessary delay and restriction). This is another area of stagnation. Home owners often prefer to stay put and extend, they do not move to another property.

Council Response: Comments addressed in the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

H2 - Housing Phasing and Implementation

272/3: 3Local Economic Effects on House Supply

Uncertainty of local employment security in the SBC area also plays a very important role in this stagnation. A recent local example is the 500 jobs due to be lost from Direct Line insurers. Stockton Borough has a higher than national average unemployment figure. This is not a buoyant economic situation to encourage the buying of new homes.

Those in employment delay a decision to buy or move on until the economic situation in the country as a whole improves and they feel more secure in their future. Therefore, a figure of a need of 555 houses per annum, to 2029 and to answer a 5 year rolling programme is based on figures from the past that are no guide to present local circumstances in the Borough of Stockton on Tees.

Council Response: Comments addressed in the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

H2 - Housing Phasing and Implementation

272/4: 4 If Stockton Borough Council continues with this assumption of 555 per annum housing requirement it will risk being forced to grant planning permission on green field sites to meet the 5 year rolling target. It will also risk an accusation of developer led planning. Of course, for the developers, it is easier and more profitable to build on greenfield sites and goes against the National Planning Policy Framework Core planning principle bullet point 8.

Council Response: Comments addressed in the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

H1 - Housing Allocations

272/5: 5 Stockton Borough Council has a strategy for developing its Core Area. It has identified brownfield sites that are developable. Indeed it identifies 9,760 dwellings that is delivered as required and committed will give an average of 650 per annum and this exceeds the RSS based figure of 555 by 95 per annum. (Paragraph 8.2 in the Options Document).

This is plan based development. I would suggest that Stockton Borough Council seek ways of actively encouraging this brownfield development, especially the sites which have the potential for delivery and where developers are not keeping to their original commitment.

This would keep Stockton Borough Council within the NPPF guidelines. It would continue to add to the regeneration aspirations of the Core Area.

Council Response: The Housing Spatial Strategy in the Publication Draft of the Regeneration and Environment Local Plan continues to support housing development within the Core Area and the conurbation. However, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is suitable, available or achievable in the period up to 2030 to meet our housing requirement. Therefore greenfield sites have had to be identified to meet the housing requirement.

H1i - West Yarm	272/6: Specific Planning Applications The pressure to grant planning permissions on greenfield site around Yarm is a result of paragraph 4 above.
H1j - South West Yarm	Stockton Borough Council had previously (2007) recognised the need to protect this area of heritage and unique character with its Yarm and Eaglescliffe Area Action Plan (YEAAP). In the YEAAP document respondents stated that large scale greenfield developments should be discouraged, no building should be allowed outside limits to development. SBC decided that in 2010 the YEAAP should be incorporated into the Environment and Regeneration LDD's as no significant change was scheduled within the area. Council Response: Comments noted. Comments relating to greenfield development are addressed within the Yarm and Kirklevington Topic Paper .
H1i - West Yarm	272/7: Yarm is a unique place in the SBC area. It has an important place in history (ref George Stephenson) and has a peculiar geographical position which does not afford a realistic alternate route around the High Street for commuters.
H1j - South West Yarm	The applications for huge developments are consequently an increase in commuters, around this small town are totally out of proportion. They do nothing to regenerate the Core Area. They will cumulatively create potentially huge problems for the future in traffic congestion and attached pollution, strains on water and sewage disposal. Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	272/8: The sites are greenfield sites outside the limits to development. The proposed site at South West Yarm crosses the Strategic Gap.
H1i - West Yarm	Are these proposed sites planning led or developer led?  The connected application for playing fields for Yarm School also impeaches on greenfield sites, it is also outside limits to development and would impinge also on the conservation village of Egglecliffe. The Heritage Park will also be affected by the proposition, Council Response: Comments regarding planning applications, Tees Heritage Park, limits to development and Strategic Gap are addressed in the Yarm and Kirklevington Topic Paper .
SP2 - Housing Spatial Strategy	272/9: I would suggest that an urgent review of the YEAAP was included in the Options Document.
New Policy	The preferred options quotes policy CS10 as one of its guides to planning.  The document is comprehensive and thorough but is being challenged by these proposals for large developments into greenfield sites, led by the out of date demand for a 5 year rolling housing availability. Council Response: Comments noted. Policies proposed for inclusion within the YEAPP have been incorporated within the Regeneration and Environment Local Plan and are being reviewed as part of the Local Plan process.

## 273 Individual

H1i - West Yarm	273/1: I strongly object to the seemingly large scale proposed development of Yarm and Eaglescliffe. It would seem the concerns of the residents in previous consultations has not really been considered or addressed. Namely, the capacity of the road infrastructure to accommodate the extra traffic, from the proposed sites in the vicinity. The centre of Yarm already has access problems through the town and more homes would add to those problems. The local infrastructure and facilities is incapable of supporting the expansion of population on this scale. Schools, leisure facilities, and public transport would need to be addressed. On top of this consideration needs to be given to the wildlife corridors, Special Landscape Areas and areas of biological interest. It would seem the council has already decided to go ahead with this decision and this consultation is merely an attempt at paying lip service to local residents. It is noted Yarm is considered "the jewel" yet the council seem insistent of stripping it of its value and instead seeing it and Eaglescliffe of providing high Council tax bracket housing. I am not opposed to development but surely at this scale and magnitude in a relatively close proximity is ridiculous.
H1j - South West Yarm	Council Response: Comments are addressed within the Yarm Topic Papers. With regards to development at Urray Nook, planning approval has been granted for 145 dwellings on part of the Urray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the

potential Urlay Nook allocation has not been included within the Publication Draft.

#### 274 Individual

H1i - West Yarm 274/1: I OBJECT TO THE PLANS FOR HOUSING IN WEST YARM AND SOUTH WEST YARM. THIS IS DUE TO THE STRAIN IT WILL PUT ON THE SCHOOLS, ROADS AND LOCAL AMENITIES.

H1j - South West Yarm

Council Response: Comments noted and addressed within the Yarm and Kirklevington Topic Paper .

#### 275 Individual

H1i - West Yarm 275/1: With reference to decisions on the housing policy around the Yarm area (H1i/j) - I have major concerns that the already-overloaded road network will simply become gridlocked. The various transport assessments carried out in relation to the various planning applications all look at only their own planning application ( and in a very biased and unduly favourable manner as would be expected) however if the data is reviewed cumulatively then it shows that the road network will become overloaded. No viable solutions have been proposed in any of the planning applications. I believe the policy should be to refuse further significant housing developments in the Yarm area.

H1j - South West Yarm

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .

#### 276 Individual

H1b - Urlay Nook 276/1: Policies H1b/H1i/H1j- I object to these policies as current traffic congestion in yarm is already a major issue and further housing developments of this nature will lead to total gridlock in and out of the town.

H1i - West Yarm Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

H1j - South West Yarm

#### 277 Individual

H1b - Urlay Nook 277/1: Policy H1b/H1i and H1j- I object to these proposed developments as I feel that the road infrastructure will not support any further developments of this nature. The roads into and out of Yarm are already severely congested at various times throughout the day, as well as parking in Yarm being extremely difficult; more houses means more cars means more problems.

H1i - West Yarm Council Response: Objectins noted. A response to the comments is provided within the Yam Topic Paper. With regards to Urlay Nook, Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the

H1j - South West Yarm

#### 278 Individual

Consultation 278/1: While I appreciate that you should always have a plan, supported by sound and reasoned policy statements, I have grave concerns about this 'Preferred Options' document. To expect the general public to read, digest, and fully understand the implications of a 208 page document that will impact on their future, and the future of the area they live in, in such a short space of time is, I believe unfair, unreasonable and unrealistic. The vast majority of the general public will not even be aware of the document, due to low key publicity towards it, and the associated consultation process. This contrasts with a similar process in other regions. For example I noticed that Durham council have placed full page notifications in the local/ regional press. I haven't seen this from Stockton Council. I feel that this consultation process should be extended and given much wider publicity than we have seen, with much greater clarity in layman's terms. In dealing with the many planning issues 'in play' at the moment, there are many documents that must be referred to when making comments and objections, and I believe that all the confusion between current documents and the way they are written leaves too much to interpretation by developers and planning officers.

Council Response: The following consultation activities were undertaken:

an article was be published in the July edition of Stockton News magazine signposting the consultation;  
a formal notice was placed in the "Herald and Post" newspaper;

a press release was issued, targeted at local newspapers;  
letters and emails were sent to consultees on the Council's Local Plan Consultation Database, informing them about the consultation, the availability of documents and the opportunity to make representations;  
parish councils received a letter inviting comments;  
community and residents groups were informed of the consultation through the Catalyst newsletter;  
the Council's Facebook and Twitter accounts were used to publicise the consultation period;  
presentations were given to the Urban and Environment Task Group and the Partnership Boards of the Local Strategic Partnership;  
a consultation web page holding copies of all consultation documents for download and information on how to make comments was made available;  
copies of all consultation documents were made available for public inspection in all libraries, including the mobile library;  
a short explanatory leaflet detailing the document's purpose, content and how to comment was made available; and  
drop-in sessions were held at a number community venues throughout the borough. These sessions provided an opportunity for members of the public and other stakeholders to view the documents, discuss matters of concern and submit representations.

As a result of this consultation activity, 331 representations were received by letter and email, from residents, statutory consultees, developers and landowners.

These representations will be used to inform the Regeneration and Environment Local Development Document as it is developed towards its Publication stage, at which point it will be subject to further detailed consultation. This consultation is currently scheduled to commence from May 2013.

The evidence detailed above clearly demonstrates that consultation has been undertaken in a very comprehensive and inclusive manner, and responses received have been - and will be - used effectively to produce an important strategic planning document.

SP1 - Presumption in favour of sustainable development

278/2: Strategic Policy SP1 - Para 2 : The employed term 'unless material conditions indicate otherwise'. I consider this to be too wide a term which developers could easily use to their advantage within their application assessments. The NPPF does not provide sufficient definition to protect locally sensitive environmental areas. Also, devolvement down to policies in neighbourhood plans is not a practical device. It seems if a neighbourhood doesn't have an active community association of some sort, they can be easily bullied by planners & developers alike. Strategic Policy SP1 - Para 3 : Again, what is the definition of 'adverse impacts'.

Council Response: The policy is a national requirement

H1 - Housing Allocations

278/3: Delivering the Housing Requirement — Sites adjacent to the conurbation - para 2.20 : I am pleased that the Council states that a number of sites adjacent to the conurbation in the Yarm area would not meet regeneration objectives or support disadvantaged communities. It does worry me that the way that the Councils planning officers have judged the recent Morley Carr development, they are not living up to expectations. This paragraph also continues on to highlight the anticipated difficulties as identified by the Council's Highways team on the local road network. Yarm is almost unique in that very little mitigation could be carried out on the existing traffic problems through the town, from either end. Existing traffic delays on the approaches to Yarm, particularly from the South, are discouraging even Yarm residents from using shops in the High Street, in favour of going to Northallerton and Stokesley. Any further development in Yarm will exacerbate this situation.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

H1i - West Yarm

H1j - South West Yarm

T4 - Portrack Relief Road

SP3 - Limits to Development

278/4: Guiding the location of development: Strategic Gaps, Green Wedges and Limits to Development, Introduction - para 2.26 : I agree with the statement regarding retention of Strategic Gaps, Green Wedges and Limits to Development as already expressed in the Councils Core Strategy Policy. All existing Green Wedges and Strategic Gaps must be upheld against the many threats from developers currently targeting these areas, especially as many of these areas are also within the boundary of the Tees Heritage Park.

SP4 - Green Wedge

Strategic Policy SP4 - Green Wedge This policy is very specific in its purpose. IE to be used for agricultural & leisure, and to prevent the coalescence of communities. (Para 2.50).

Council Response: Comments noted

H1j - South West Yarm

278/5: Policy H1j - South West Yarm - While all of the Yarm & South West Stockton area is a major concern to me, South West Yarm policy seems to contradict all that has gone before in this Preferred Options document. This has major implications on the existing overburdened highway infrastructure around Yarm, the Green Wedges,

Wildlife Corridors and coalescence of existing communities. The document doesn't even mention the proposed development of a Retirement Village in the Leven Valley (Green Wedge & Tees Heritage Park), with proposed access via a new roundabout at the top of Leven Bank! Para 8.106 - Its no wonder that 'Overall, the respondents did not agree that South West Yarm would be a good place to put new housing'. The planners must listen to the residents! Again, I repeat that developers must be resisted from gaining even a small foothold in these areas. The Green Wedges and The Tees Heritage Park contain many of the 'Jewels in the Crown' of our area, which attract tourism and commerce to the region. These must be maintained and protected. I am aware that local government is under pressure to make savings but we shouldn't abandon the long term strategic ambitions of regeneration of brown field sites, for a short term gain. Remediating ex industrial despoiled land and providing necessary infrastructure, is crucial to the future of the Tees Valley and the North East in general. These areas continue to influence our image across the rest of the country and the business world as a whole.

Council Response: Comments noted and addressed in the Yarm and Kirklevington Topic Paper

## 279 Individual

H1i - West Yarm 279/1: I object to the following sections of the Regeneration and Environment Development Plan Document, Preferred Options Policy H1i, West Yarm. This development would have a detrimental effect on the local road network around the Yarm area, a concern stated in paragraph 8.92 of the document. It will also have a detrimental effect on the local Green Infrastructure Network and put pressure on local services, schools, doctors, dentists etc.

Council Response: Objections noted. Comments are addressed within the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm 279/2: I also object to Policy H1j, South West Yarm. The extra traffic that would be generated by 735 dwellings would have a huge detrimental effect on the local road network around the Yarm area.. The configuration and unique character of the area do not allow for sufficient mitigating measures to be employed to reduce this detrimental effect to an acceptable level. The development also seems contrary to Policies ENV1 and ENV2 of the document as it part of the Green Infrastructure Network, and does not contribute to the regeneration and revitalisation of other parts of the Borough.

Council Response: Objections noted. Comments are addressed within the Yarm and Kirklevington Topic Paper .

## 280 Individual

H1b - Urlay Nook 280/1: Yarm and Eaglescliffe cannot support more residential development. Try living here and having to add on 15 minutes minimum to your journey time and that is with the housing we have ! The whole area will become more polluted with congestion and fumes. More housing developments will have a disastrous effect on our wildlife habitat. Yarm is going downhill as it is and looking very scruffy. Put that together with even more congestion and people will move away and the prestigious name it has held as a historic market town for centuries (where I was brought up) will disappear and become simply a traffic queue of longer proportions than at present. Local businesses will suffer because residents will choose to take their business elsewhere. Why do we have to have more development when we do not the infrastructure to support it. A way of bypassing Yarm needs to be thought through first to alleviate present problems before additional devastation is passed by your council

Council Response: Comments have been noted and are addressed within the Yarm and Kirklevington Topic Paper .

## 281 Individual

H1b - Urlay Nook 281/1: I would like to respond to the proposed developments in the Yarm and Eaglescliffe area. I feel that these developments will have a dramatically negative effect on the infrastructure and destroy the local environment. I have recently made Eaglescliffe my home and chose it as an established community of older properties built in appropriate locations. I am devastated to hear of these proposed new developments and the manner to which they will damage the existing community.

H1i - West Yarm Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay

H1j - South West Yarm

## 282 Individual

H1 - Housing Allocations 282/1: Despite the farcical nature of this consultation (after the politically driven approval of a housing development at Morley Carr) I feel that I must contribute to the process. The title of the consultation (section 1.1) is "Regeneration and Environment". As such, all 'preferred' options which include the development of green belt land should automatically be ruled out as sites, as they would fit to neither "Regeneration" nor "Environment".

Council Response: Comments are noted. Green Belt is a national designation and there are no areas of Green Belt within Stockton Borough or the wider Tees Valley area.

However, comments relating to the development of greenfield land have been addressed within the Yarm Topic Paper.

H1i - West Yarm	282/2: Stockton Borough Council wish to drive the redevelopment of Stockton town centre (section 6.1 states that the plan is to “drive up footfall and stimulate investment within the town centre”) and the only way in which this can be achieved is to focus all new housing developments within Stockton (or within a mile or two of Stockton). It is not beyond the wit of man to realise that developments in Yarm WILL NOT help in the regeneration of Stockton town centre and so these should be relegated to the bottom of the list of ‘preferred option’ sites.
H1j - South West Yarm	Council Response: It is acknowledged that housing development in Yarm will not assist in driving up footfall and stimulating investment within Stockton Town Centre. However, the Council continues to support the regeneration of central Stockton including the Town Centre. Consistent with this, the Publication Draft of the Regeneration and Local Plan Publication has allocated housing sites in central Stockton. However, the housing sites in urban brownfield locations that are deliverable do not provide a quantity of housing that would meet the housing requirement. Therefore the Council has also allocated housing for greenfield sites.
H1 - Housing Allocations	282/3: Section 8.2 states “However, the Council does not regard the additional 5% buffer as a ceiling and wishes to plan for higher delivery in order to ensure that housing need and demand are fully met and that its aspirations for economic growth are delivered.” In the current financial climate, and with the predicted five year economic forecasts, is this a wise move? In Ireland, before their banking collapse, money was invested in housing developments in order to try and drive the economy. This failed and now 3000 housing developments lie empty. In addition to this, the preferred option sites located in the area of South West/West Yarm should be the least preferred options as they are is located outside the established urban limits
H1i - West Yarm	Council Response: Comments are noted. Comments relating to the housing requirement are addressed within the Housing Need and Demand Topic Paper.
H1j - South West Yarm	282/4: Sections 8.93 and 8.107 clearly states that “This site, Adjacent to the Conurbation, outside the limits to development”) of Yarm and as such, one believes that development would normally be resisted unless it focussed on the continuation of farming and forestry, it contributed to rural diversification or catered for tourism, sport or recreation.
H1i - West Yarm	Council Response: It is acknowledged that the site is adjacent to the conurbation and is not the first priority within thr Site Selection Hierarchy. However, It has not been possible to find sufficient sites within the Core Area or wider conurbation to satisfy the housing requirement.
H1j - South West Yarm	282/5: The sites considered to be least preferred (am I allowed to add NOT WANTED AT ALL?) at both West Yarm and South West Yarm, would affect the following: 1)Transport in to and out of Yarm – already the transport link through the centre of Yarm is overwhelmed. Queues of traffic regularly build up at both ends of the High Street, extending for significant lengths from these points, preventing viable access through the town centre and affecting the access of residents along these main routes. This is not a one-off occurrence and is a regular feature of the ‘Yarm rush hour’ and a Friday afternoon and all day Saturday. This traffic chaos would only increase if additional houses were permitted in this area. An INDEPENDENT traffic survey should be completed of the High Street in Yarm to ascertain the CORRECT problems that exist. There should also be an analysis of traffic pollution levels on the High Street before ANY consideration takes place for these sites. Section 2.20 CLEARLY states that “the Council’s Highways team have identified that there are significant issues regarding the local road network and car parking in Yarm Town Centre”. Your own document states that there are issues with this aspect. Section 8.88 also states there are traffic issues.
H1i - West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	282/6: 2)Parking in Yarm – already the parking within Yarm is highly restricted. (section 2.20) Some of the traffic problems are exacerbated by cars trying to find a parking space. The businesses along the High Street will be affected by a greater build up of traffic which could result in business loss as people ‘stay away’ from the centre.
H1i - West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	282/7: 3) Schools – there is a local primary and high school located at the south/west end of Yarm, which, one believes, would be swamped by a huge influx of additional students. Do these schools have the capacity to take on, what could be, a huge number of extra individuals? If this is not the case, where are the children of the families moving in to these houses meant to attend school?
H1i - West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1j - South West Yarm	

H1i - West Yarm	282/8: 4) Other services, such as Doctors, Dentists etc – in a similar vein to the Schools, do these services have the capacity to cope with the influx of people? (section 7.50 “Core Strategy Policy 6 identifies the need to support the provision of new health care facilities.”)
H1j - South West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1i - West Yarm	282/9: 5) Transport links – there is only one real access route to the proposed sites from the main route in to Yarm from the A19 and the A1044 – which is the B1264. The increase in traffic along these routes will, no doubt, cause a subsequent increase in traffic congestion at this point. Situated on the B1264 is Conyers High School. An increase in traffic from the commuting families from these two proposed sites will affect the safety of the students accessing the High School. Also on the B1264 is a small, humped back bridge over the top of the railway line. This is a single file road which would obviously be affected by a huge increase in traffic from the proposed developments and would cause congestion at this point.
H1j - South West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1i - West Yarm	282/10: 6) Noise pollution – In the short-term there would be significant disruption caused by the building on these proposed sites. In the long-term, also, associated with the increase in traffic, there would be an increase in noise pollution for those individuals living on the housing estate which these proposed developments would surround. This will have an impact on the value of all houses on this estate.
H1j - South West Yarm	Council Response: Comments are noted and addressed within the Yarm and Kirklevington Topic Paper .
H1i - West Yarm	282/11: 7) Personal well being – at present there is a significant contingent of dog owners on the estate around which these proposed houses are planned. These dog owners, and other individuals such as runners and cyclists, regularly access the green spaces around the estate to exercise their dogs and improve their own health and wellbeing. By building additional housing on these sites, the owners and users of these spaces will be negatively impacted upon by this reduction in green areas. Section 8.110 states that there would “inevitably be a loss of rural character” – how is this an acceptable thing?
H1j - South West Yarm	Council Response: Comments are noted. Concerns relating to the loss of character are addressed within the Yarm and Kirklevington Topic Paper .

### 283 Individual

H1 - Housing Allocations	283/1: I object to paragraph 8.2 in the document on the grounds that the housing target numbers cannot be justified in the present economic circumstances. In particular, I do not think that the numbers are justified taking into account the inability of both first time buyers and those who already own properties to obtain mortgages. Taking both these into account I do not believe that Stockton has justified objectively the stated requirement for 8,250 dwellings in the plan period. I am very concerned that the target is overstated and that green field land will be irretrievably lost as a result of the granting of unnecessary planning permissions.
	Council Response: Comments relating to the housing requirement are addressed within the Housing Need and Demand Topic Paper

### 284 Individual

H1 - Housing Allocations	284/1: I object to the housing numbers in paragraph 8.2 on the grounds that they are based on numbers in the outdated Regional Spatial Strategy and are not objectively justified by reference to current and anticipated economic conditions. Target housing numbers based on potentially false assumptions may result in the granting of planning permissions on green field sites which are not justified by reference to current demand. Such permissions would result in the loss of green field land unnecessarily.
	Council Response: Comments relating to the housing requirement are addressed within the Housing Need and Demand Topic Paper (

### 285 Individual

H1i - West Yarm	285/1: I object to Policies H1j and H1i The need is not demonstrated Green open land is invaded.
H1j - South West Yarm	Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper .

### 286 Individual

H1i - West Yarm	286/1: I object to Policies H1j and H1i because 1) Need not proven 2) invasion of Green Belt
H1j - South West Yarm	Council Response: Comments noted. Green Belt is a national designation and there are no areas of Green Belt within Stockton Borough or the wider Tees Valley. Comments relating to the loss of greenfield land area addressed within the Yarm Topic Paper.
<b>287 Individual</b>	
H1b - Urlay Nook	287/1: At a time of recession I 'm not sure where all the people will be coming from to buy these new houses. House sales are slow at the moment & people are choosing to improve their current homes rather than move. I understand that the Green Wedge is intended to prevent coalescence of communities so why is such land being considered for development. Building is still continuing in Ingleby Barwick which can surely provide the vast amount of new housing needed. You talk of only 3 sites being considered in the Yarm/Eaglescliffe area but there are already 5 housing applications inplus 2 sites that you have already given approval for. Those 2 sites alone provide over 1000 homes & the potential for 2000 + cars & people. Builders are not going to provide "affordable" housing in this area when they know they can build luxury housing which they know will sell so that is not an argument you can use. People want to come to live in this area (Yarm/Eaglescliffe) because they are lovely little towns with beautiful scenery & the lure of good schools. They will not want to come when this area becomes one large housing estate where parents can't get their children into the schools they want due to overcrowding, when the town is choked with traffic & when the beautiful scenery is no more.
H1i - West Yarm	
H1j - South West Yarm	Council Response: Comments are noted. The Regeneration and Environment LDD does not propose any development for the Green Wedges. However, concerns relating to the development of greenfield land, and the other comments, are addressed within the Yarm Topic Papers.
ENV1 - Green Infrastructure	287/2: The wildlife corridor does still have status as the Tees Heritage Park has been supported by you & has achieved lottery funding because of that.
H1j - South West Yarm	Council Response: Comments noted. The land has been identified as part of the Strategic Green Infrastructure Network and comments relating to its status as a wildlife corridor have been addressed in the Yarm and Kirklevington Topic Paper.
H1b - Urlay Nook	287/3: The infrastructure inYarm & eaglescliffe cannot support any more people or traffic. The road system is not wide enough & in most cases cannot be improved. To add any more housing to this area will only serve to "kill" the town.
H1i - West Yarm	Council Response: A response to the comments is provided within the Yam Topic Paper. With regards to Eaglescliffe, planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.
H1j - South West Yarm	
<b>288 Canal &amp; River Trust</b>	
T1 - Footpaths, Cycle Routes and Bridleways	288/1: Policy T1 - Fully support Council Response: Support welcomed.
TC1 - Stockton Town Centre Improvements	288/2: Policy TC1 & TC2 - Fully support the proposals to connect the town centre with the riverside. Council Response: Support welcomed. Significant regeneration work has been undertaken in Stockton Town Centre since the Preferred Options draft, including the demolition of Lindsay House, which has introduced new views of the river from High Street.
TC2 – Sites for major new retail and town centre use development	
PF3 - Bowesfield Marina	288/3: Policy BF3 - Fully support the plans to develop the Marina. Council Response: Support welcomed.
ENV1 - Green Infrastructure	288/4: Policy ENV1 - Fully support Council Response: Support welcomed.
R1 - Green Blue Heart	288/5: Policy R1 - Fully support the proposals for the Green Blue Heart and the Trust, as a major landowner within this area, would like to be closely involved in future discussions and consultations relating to the development of this area. Council Response: Support welcomed. The Local Plan no longer contains a specific site allocation for the Green Blue Heart - due to the scale of the site and the inclusion of



land requiring significant remediation, the site is not considered to be developable within the timescale of the plan. However, a number of elements of the regeneration scheme are supported through other generic policies in the document.

R2 - North Shore	288/6: Policy R2 - Fully support Council Response: Support welcomed. The North Shore site allocation has been included as a mixed use site under Policy TC3 - Development for Town Centre Uses.
289 Persimmon Homes & Yuill Homes	
H1g - Harrowgate Lane	289/0: Policy H1g Harrowgate Lane & Policy H1h Land East of Yarm Back Lane We agree with paragraph 8.62 in that Harrowgate Lane has the potential to provide a strategic scale housing development, however given the geographical proximity to Yarm Back Lane we believe that the combined western extension sites favour a 'strategic site / policy priority' status. As indicated above we feel that this needs a comprehensive masterplanning exercise which can then assess impacts, recommend mitigation and ensure it can be viably delivered. Cross referencing between the requirements of the Harrowgate Lane masterplan and the Yarm Back Lane masterplan it is clear that there are some mutual elements that would benefit all parties if delivered in co-ordination under a single, all encompassing plan providing further support for the synchronisation of the two developments. These include; Infrastructure improvements Public transport integration Provision of educational facilities. Provision of community facilities Provision of health facilities Provision of leisure facilities Connection of pedestrian and cycle networks Green infrastructure / drainage Approach to affordable housing / on / off site As noted in paragraph 8.72 we agree that evidence needs to be provided as to the extent of the requirement for education, neighbourhood centre(s) and community facilities. For the reason mentioned above we again believe that this evidence should relate to the two sites as a singular strategic extension and should provide detail on what facilities are demonstrably required by the Western Extension in accordance with S106 tests. For example is there a requirement for new education provision (can extensions be made to existing facilities)? What is the requirement (Primary, Secondary school, both)? Is it required to be met on-site or off-site? Etc It could well be that the approach towards the western extension would benefit from a CIL approach in order to assist the coordination and delivery of key infrastructure. This is something that we would be happy to work with you on and assist with viability modelling to seek to ensure effective delivery. Whether S106 / CIL or as is likely both a coordinated approach would benefit all. Council Response: Note has been taken of the contention that the site should be assessed jointly with the Harrowgate Lane site as a single strategic West Stockton extension. The Publication version of the Regeneration and Environment Local Plan includes a Shared Infrastructure Provision Policy for the sites. A Development Framework document is currently being prepared by the Council, developers and landowners working collaboratively for both the Yarm Back Lane and Harrowgate Lane sites. Comments regarding CIL approach noted.
H1h - Land East of Yarm Back Lane	
New Policy	
SP1 - Presumption in favour of sustainable development	289/1: Strategic Policy SP1 – Presumption in favour of sustainable development We are pleased to see the inclusion of the NPPF's presumption in favour of sustainable development within the Regeneration & Environment LDD and believe that the use of the Planning Inspectorates NPPF presumption model wording ensures that the Council have a clear policy to guide how the presumption will be applied locally. Council Response: Comments noted.
SP2 - Housing Spatial Strategy	289/2: Strategic Policy SP2 – Housing Spatial Strategy We endorse the policy of allocating further housing sites to help meet future need and demand following the failure of delivery in the core regeneration areas. Indeed this is essential and we applaud the Council for making this positive step which is in full alignment with NPPF. We support the fact that the core regeneration area sites should continue to be promoted as preferred housing sites however in themselves they will never be able to deliver quantified need and demand. A wider allocation of land is crucial if delivery is to be achieved creating the opportunity for more outlets, more choice, wider market penetration and the resultant increase in affordable homes which need to be delivered without grant aid. Central to the success of this policy review is ensuring that allocated sites and proposed sites are 'deliverable' as outlined in footnote 11 of NPPF which states that "to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable". In relation to point 3 of Policy SP2 we agree with the site selection hierarchy particularly with regards to the positioning of sustainability as the central driver of the process. We are pleased that sustainability appears to have been considered inline with NPPFs three dimensional definition. It is imperative that applications are considered against these three dimensions of sustainability as a whole so as to facilitate the development of sustainable sites. Council Response: Comments noted and welcomed
SP3 - Limits to Development	289/3: Strategic Policy SP3 – Limits to Development We are of the opinion that Policy SP3 is essentially a rural exceptions policy. Whilst we agree that this aligns with NPPF guidance we would like to ensure that this policy is also adaptive to the allocation of new sites. Where applicable settlement boundaries will need to be revised to accommodate those sites chosen as being best placed to

sustainably meet need and demand.

Council Response: The Council's preferred approach is to amend the limits to development as required by the housing site allocations that are made through the Regeneration and Environment Local Plan process

## H2 - Housing Phasing and Implementation

289/4: Policy H2 – Housing Phasing and Implementation We have a number of issues in relation to the indicative phasing table outlined below Policy H2 with regards to Yarm Back Lane. The simple truth of the matter is that the site is needed; that it is capable of supplying multiple outlets and that there is no logic to seek to delay its ability to deliver. Indeed as a strategic extension to the main settlement, close to local services, adjoining regeneration areas we believe that its early procurement should be a priority. We agreed that its does need to be strategically planned and that this be done in partnership with you. In relation to timing you provided comfort that the table was indicative and in need of developer input. In this regard we would propose to bring forward and align the initial phases of Yarm Back Lane with those of Harrowgate Lane to begin development in 2015/16. This is consistent with Policy H2 4) as the development is required to 'contribute to the delivery of the plans and strategies of other service providers such as health and education'. Early delivery from multiple outlets will generate the funding necessary for service provision. Secondly with regards to site selection hierarchy within Policy SP2 we believe that there is no reason why Yarm Back Lane (a development adjacent to the conurbation) should begin later than Wynyard Park Phase 1 (a new sustainable settlement) when in line with Policy SP2 the former is considered more sustainable and therefore should be prioritised and be allowed to come forward, additionally it should be noted that the Wynyard Park development will meet a specialised sub-regional market for high value 'executive' dwellings therefore the proposed earlier phasing of Wynyard Park in preference over Yarm Back Lane delays the imperative delivery of homes meeting the general needs of the area. Perhaps this could be clarified however it is fundamentally wrong that housing numbers required to meet need and demand within the main settlement be 'used up' in less sustainable peripheral locations. With regard to the indicative phasing table we have a minor issue with the 100 units per annum delivery rate proposed for Yarm Back Lane. In line with bringing forward the site to start in 2015/16 we propose an initial annual delivery rate of 25 units for year 15/16, rising to 75 units per annum for 2016/28 and fulfilling the sites total yield with the remaining 20 units in the final 2028/29 plan year. We are of the opinion that this delivery rate of 75 units per year is a more representative and realistic projection, based on two developers building on site in the current economic climate, given that the indicative 100 units per annum is approximately what would be expected in a scenario involving a third developer. Using this principle the table should be adjusted to 'massage' the potential output of the wider western extension. A further concern we hold with Policy H2 regards the implementation / practical / justifiable logic behind the suggested phasing restriction should housing completions exceed the 20% buffer at any given point in the plan period. We seek further clarification upon this, how it would work in practice, how it would effect long term planning and associated infrastructure provision which amongst other things requires certainty. Your comments would be welcomed.

Council Response: The Housing Phasing and Implementation Policy has not been carried forward to the Publication version of the Regeneration and Environment Local Plan

## H3 - Housing Mix and Affordable Housing provision

289/6: Policy H3 – Housing Mix and Affordable Housing provision We acknowledge that the Council has carried out viability work in establishing their affordable housing provision target of 15-20% on schemes of 15 dwellings or more. However, central to ensuring deliverability, it is important to note that the key finding of this work, detailed in paragraph 8.143, was that this target of 15-20% affordable housing is "achievable during positive market conditions". We are pleased to see that the Council recognise that since this evidence base was collated market conditions have fluctuated and therefore support the approach of incorporating a degree of flexibility that is sensitive to the market conditions at the time a planning application is submitted. In relation to the affordable provision specific to the Western Extension we are happy to work with the Council to seek to meet the housing targets but wish to explore the potential for some of this to be provided off-site. We feel that this approach would not only benefit the developers through increasing deliverability but would also allow the Council to secure housing investment that could be directed into the deprived areas of the borough which have previously struggled to attract investment. This approach is aligned with the Council's longer term vision for housing renewal in all areas that require investment outlined in paragraph 8.151 of the Regeneration & Environment LDD. Stockton Western Extension – Collaborative Approach Progression For the reasons outlined above we believe that Harrowgate Lane and Yarm Back Lane should be viewed as a strategic western extension of Stockton and should progress as such. Preliminary approaches have been made towards the land owners and developers concerned and an agreement has been reached that a collaborative approach would be beneficial to all parties, including the LPA, and would result in a far more integrated development as a consequence of the implementation of an overall masterplanning process. As the Council have welcomed the principle of a collaborative approach and agreement has been reached between parties additional weight should be given to the issues raised above regarding the synchronisation and integration of the two sites as from this point we shall be working in association with each other in the delivery of the western extension of Stockton. Conclusion We trust that the above comments are helpful in the evolution of the Council's Regeneration & Environment LDD document and that we would welcome the opportunity for further dialogue with the Council both in terms of policy formulation and in terms of the progression of partnership work on masterplanning.

Council Response: Comments noted. The Council is prepared in principle to consider off-site provision of affordable housing. However, this will be subject to the provision in Policy H3 - Housing Mix and Affordable Housing provision, that off-site provision may be made in exceptional circumstances where the Council considers that there is

robust evidence that the achievement of mixed communities is better served by making provision elsewhere.

Comments regarding the principle of a collaborative approach noted and welcomed. The Council concurs with the comments regarding the need to view the Harrowgate Lane and Yarm Back Lane sites as a strategic western extension of Stockton to progress them within this context.

## H1 - Housing Allocations

### H1g - Harrowgate Lane

### H1h - Land East of Yarm Back Lane

289/7: Policy H1 – Housing Allocations In relation to the Borough’s housing requirements we agree with the use of, RSS based, Core Strategy Review figures as the target. The emerging status of this document has given flexibility to the setting of target figures as evidenced in Paragraph 2.13 with the revision of the housing delivery gap from 2,800 to 4,670 between the Issues and Options stage and the Preferred Options stage. With regards to the housing numbers we agree with the Council’s calculation of a housing requirement over the plan period of 8,250 dwellings. Additionally we are pleased to see Stockton Borough Council taking a pro-growth stance, inline with NPPF, in not regarding the additional 5% buffer as a ceiling. In reference to Policy H1 we believe that the Harrowgate Lane and Yarm Back Lane sites should be viewed, not as two separate allocated sites with disconnected and distinctive issues, but as a strategically significant West Stockton Extension. Whilst this would still allow discrete ‘sub sites’ / appropriate phasing etc. delivery and certainty would benefit in an approach which shared impacts and necessary mitigation via a single co-ordinated approach. A combined approach to the development of these allocated sites will benefit all developers and landowners allowing fair apportionment of cost and effective mitigation / phasing etc. The approach would be conducive to holistic master planning which could be undertaken alongside policy formulation / development brief work. Further site specific benefits are discussed under the Policy H1g & H1h heading.

Council Response: Comments regarding the housing requirement noted and addressed in the Housing Need and Demand Topic Paper. The Council concurs with the comments regarding the need to view the Harrowgate Lane and Yarm Back Lane sites as a strategic western extension of Stockton. The Housing Spatial Strategy Policy in the Publication Draft of the Regeneration and Environment Local Plan allocates a strategic urban extension to the west of Stockton.

## 290 Individual

### H1b - Urayl Nook

### H1i - West Yarm

### H1j - South West Yarm

290/1: I wish to object to the proposed development at Morley Carr Farm, and other areas in the Yarm vicinity. These are yet more developments that will further erode the previous pleasant environment in the Yarm area, resulting in the loss of green field habitat and overload already stretched transport system. There can be no expectation that these additional dwellings will result in an increase in use of public transport, with the consequential increase road congestion, particularly in the Yarm area. We have already seen approval of developments beyond that which the area can sustain and therefore cannot perceive how this proposed development (nor indeed in any other) can be considered to be of benefit to the Yarm area and especially its current residents.

Council Response: Objections noted. Comments are addressed within the Yarm Topic Paper.

## 291 Individual

### H1b - Urayl Nook

### H1i - West Yarm

### H1j - South West Yarm

291/1: I object to the proposed development at Morley Carr Farm, and other areas in the Yarm vicinity. These are yet more developments that will further erode the previous pleasant environment in the Yarm area, resulting in the loss of green field habitat and overload already stretched transport system. There can be no expectation that these additional dwellings will result in an increase in use of public transport, with consequential increase road congestion, particularly in the Yarm area. We have already seen approval of developments beyond that which the area can sustain and therefore cannot perceive how this proposed development (nor indeed in any other) can be considered to be of benefit to the Yarm area and especially its current residents.

Council Response: Objections are noted. Comments are addressed within the Yarm and Kirklevington Topic Paper.

## 292 Individual

### H1j - South West Yarm

292/1: Concerns about proposed development on the former Yarm School sports field site (Green Lane):- The proposed development of up to 750 homes on top of the 350 already approved for the Morley Farm site constitutes a disproportionate provision of the local housing needs for the south of Yarm area, especially if the Mount Leven Farm development also goes ahead. It is unlikely that new residents will be working locally with the majority seeking to travel to work by car. The additional car use associated with these 1100 homes will produce unacceptable additional traffic flow though Yarm High Street which is already intolerable at most times of the day. This will further reduce trade for the already hard-pressed Yarm businesses. The death of Yarm High Street would be a severe blow to perceptions of the borough. There will be further traffic bottlenecks produced at the traffic lights at Yarm Station and the roundabout with the A67 (“Shell” Roundabout) particularly if further developments towards Leven Bank go ahead. There is already substantial congestion around these areas at school times due to car and bus use for Conyers School. These are already extremely dangerous areas for cyclists (of which I am one), particularly crossing the Shell Roundabout and along the A67 towards the A19. The development will

endanger the long established wildlife corridor south of Green Lane. There are currently insufficient parking facilities at Yarm Station to encourage use of rail for commuting. This development is likely to limit the allocation of space for additional parking facilities. Also, in my experience the few trains stopping at Yarm Station at peak times are already packed and it is unlikely that the potential attraction of local rail facilities will limit the amount of car use for the new residents.

Council Response: Comments are noted and are addressed within the Yarm and Kirklevington Topic Paper .

#### SP2 - Housing Spatial Strategy

292/2: The proposed development sites are almost exclusively green field sites outside of the current development limits. This is despite the statements in policies CS1 and CS7 of the Core Strategy Review that the Council will prioritise the use of brown field sites in the Core Area and that no sites will be allocated for housing in rural parts of the borough. It is clear that the Council has had no intention of keeping to these policies nor has it any intention of fulfilling its environmental responsibilities. I am sure this will be reflected in future local elections.

Council Response: Comments are noted. The Yarm and Kirklevington Topic Paper provide some explanation of the reasons for not allocating sites within the Core Area.

#### H3 - Housing Mix and Affordable Housing provision

292/3: With the relaxing by the Government of requirements for affordable housing to be included in new developments, how does the Council propose to provide this housing?

Council Response: All housing developments of 15 dwellings or more have to provide affordable housing within a target range of 15-20% unless robust evidence is provided to support a lower rate than the standard target. This assists first time buyers get on the housing ladder or those who need social housing by providing affordable homes to meet their needs.

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### 293 Environment Agency

#### PF3 - Bowesfield Marina

293/1: We are supportive of the policy PF3: Bowesfield Marina which seeks to develop a marina/similar water activity that will enhance recreational use and increase access to the river. The consultation document states that parts of the site is located in flood zone 2. As outlined in the National Planning Policy Framework (NPPF), the council should steer associated related development in flood zone 1. Should any of the uses be located in flood zone 2, consideration should be given to the use of flood risk mitigation and compensatory measures.

Council Response: Comments noted. The nature and location of any ancillary facilities is not known at this stage. Any proposal for ancillary facilities will be considered against Core Strategy Policy CS10(9) and the NPPF/PPG.

#### EMP1 - General Employment Land

293/2: Having assessed the proposed allocations against our constraints map, we wish to offer the following comments:

#### EMP4 - Process Industries Sites

EMP1. 1 (e): the eastern section of the site is located in flood zone 2 and 3.

#### EMP6 - Port and River Based Uses

EMP1. 4 (a): parts of the site is located within flood zone 2 and 3.

EMP 1. 4 (d): the site is located within flood zone 3.

EMP 1.4 (f): the north west section of the site is located within flood zone 2 and 3.

EMP 1. 4 (g): the eastern section of the site is located within flood zone 2.

EMP 4.1 (a): the site is located within flood zone 2 and 3.

EMP 4.1 (b and c): parts of the site is located in flood zone 2 and 3. Contaminated land is also recorded on the site.

EMP6 1 (a, b, c and d): all four sites are located in flood zones 2 and 3.

Where development is allocated in areas at risk of flooding, it should be supported through the application of the Sequential Test and where necessary, the Exceptions Test in accordance with the NPPF. It is recommended that you update existing Sequential Test and Exceptions tests are updated to reflect the NPPF.

Some of the sites proposed in the DPD are identified in Stockton-on-Tees Strategic Flood Risk Assessment (SFRA) as being at risk from flooding. The SFRA identified that development in these areas has the potential to increase flood risk in other areas. Therefore policies relevant to these sites should highlight the need for compensatory flood plain storage.

Council Response: Comments noted. The Council have undertaken a sequential and exception test for sites where necessary. This is available within the Sustainability Appraisal for the Publication draft of the Local Plan. Where appropriate policies for site allocations highlight the need for compensatory flood plain storage.

#### 293/3: Tees Valley Water Cycle Study

Please note that work is currently being undertaken on the Tees Valley Water Cycle Study (WCS). The draft report, published in August 2012, initially indicates that there are no major potential constraints on housing and employment growth in Stockton.

The Tees Valley WCS is only partially complete, the findings and policy recommendations of the final WCS should be reflected in the next iteration of the Regeneration and Environment DPD.

Council Response: Comments noted the WCS forms an important part of the evidence base to the LDD.

### ENV1 - Green Infrastructure

#### 293/4: Green Infrastructure

We welcome the inclusion of policy ENV1 - Green Infrastructure, which takes a strategic approach to delivery and protection of green infrastructure. A well planned and managed green infrastructure network can perform multiple functions and can provide multiple benefits and services for communities such as managing surfacing water and flood risk and improving water quality.

Council Response: Comments noted

#### 293/5: Biodiversity

We would like to reiterate that any schemes to develop or alter sites which incorporate, or are adjacent to, the River Tees, River Leven or other watercourses should aim to protect and enhance the wildlife corridor value of the river or watercourse.

The presence of the invasive and dangerous plant Giant Hogweed in Yarm and Eaglescliffe needs to be addressed in order to ensure that the safety of the public when they are using open space.

Council Response: Comments noted. Policy within the Regeneration and Environment Local Plan seeks to protect and enhance the strategic green infrastructure network. Giant Hogweed has not been specifically addressed within the Local Plan.

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### 294 Individual

#### Consultation

294/1: The Council's Consultation Strategy – 'How Stockton Council consults' highlights "All Local Authorities have a statutory duty to consult on a variety of services. In the Borough of Stockton-on-Tees we go far beyond any statutory duty and aim to consult local people on many aspects of our service planning and delivery. Consultation is crucial in helping the Council and its partners make decisions which will affect the Borough. The Council considers consultation to have a key role in informing and influencing its decision making and activities". Recent decisions made by the Planning Committee show little evidence of this being reality.

The Council has undertaken preferred options consultation in respect of the Regeneration and Environment Local Development Document (LDD) in order to shape development in Stockton-on-Tees until 2029. The stated intention of the consultation is to guide decision making on planning applications throughout the Borough. However it is difficult to understand how the consultation can be meaningful and effective when the Planning Committee is granting planning permission on an ad-hoc basis without waiting for completion of the consultation, without considering all relevant factors, and without listening to the views of local residents and their representatives.

Council Response: Comments noted.

H1 - Housing Allocations

SP2 - Housing Spatial Strategy

294/2: I am aware the National Planning Policy Framework was adopted by Government in March 2012. I believe the framework maintains the requirement for local planning authorities to demonstrate a 5 year supply of deliverable housing land and in response Stockton Council has produced a report entitled '5 Year Deliverable Housing Supply Final Assessment: 2012 – 2017'. I understand the report concludes that Stockton has a supply of deliverable housing land of 4.08 years. This raises two points. One, if this is the case how has the situation been allowed to develop; and two, on the Council's own information (supplied by Matthew Clifford - Principle Planning Officer) planning permission existed for 8595 dwellings (developments over 10 dwellings on 52 sites) and 266 dwellings (developments under 10 dwellings) as of 1 April 2012. This appears to the lay person to be in excess of the requirement.

Council Response: The requirement of the NPPF is that local planning authorities should identify and annually update a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. This is a requirement of the planning system and it is clear from decisions by the Secretary of State that the Government attaches significant weight to it. The total number of dwellings with planning permission exceeds the five year requirement. However, the key point about the requirement is that it is an assessment of the total number of dwellings that will be delivered within five years. The latest Five Year Supply Report uses a base date of June 2014 and estimates that the deliverable supply is 4.87 years.

H1 - Housing Allocations

H1i - West Yarm

H1j - South West Yarm

H1b - Urray Nook

294/3: The need for some development is not in question and all areas of the Borough should be considered. However development should be proportionate. Yarm has a population of approximately 8,700 (out of a total population for the Borough of approximately 191,000). Approval for the development of 735 dwellings at Green Lane in addition to applications already approved at Morley Carr Farm (350 dwellings), Tall Trees (140 dwellings) and Level Bank (36 dwellings) could see the population increase by up to 50%. The infrastructure in the local area was never designed for this level of development and without significant investment will be unable to cope. The situation is further exasperated by the approval for some 845 dwellings at Allens West and the proposal for 350 dwellings (and a 100 bed retirement home) at Mount Leven and for 160 to 570 dwellings at Urray Nook.

Council Response: A response to the comments is provided within the Yarm Topic Paper. With regards to Eaglescliffe, Planning approval has been granted for 145 dwellings on part of the Urray Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urray Nook allocation has not been included within the Publication Draft.

H1i - West Yarm

H1b - Urray Nook

294/4: A report 'Yarm Car Parking Research Report' commissioned by the Council in 2011 highlighted the following: "Yarm, with its cosmopolitan feel and variety of attractions makes it a very popular town with both locals and visitors alike. This popularity has resulted in a long history of traffic congestion and parking problems". The attractions of Yarm and what it brings to the Borough will be lost if all the proposed development is allowed. In addition to the traffic problems the area does not have sufficient provision in respect of schools, doctors, dentists etc to cope with the development proposed.

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper

H1j - South West Yarm

294/5: The application for development at Green Lane is linked to the application by Yarm School for sports fields in Egglecliffe Village in what is part of the Tees Heritage Park and both applications should be viewed together. The Heritage Park is a visionary concept stretching between Yarm and Stockton. It takes in the open land along the River including the Leven Valley and Bassleton Beck. The park has been created thanks to a partnership between the Friends of Tees Heritage Park, Environment Agency, Canal & River Trust, Stockton Council, Tees Valley Wildlife Trust and Groundwork North East. More than £600,000 has been invested to date. Phase 1 has seen new gateway features installed, improved footpaths and landscape artworks and rest areas created to help turn 2,000 acres of natural environment into a facility for people to appreciate and enjoy.

Doug Nicholson, Chair of the Friends of Tees Heritage Park, has said: "It is wonderful to see a dream we had eight years ago now turned into reality. Tees Heritage Park is driven and supported by the community and we want it to be a haven for generations to enjoy our fantastic heritage and landscape." Councillor Ken Dixon, Stockton Council's Cabinet Member for Arts, Leisure and Culture, has said "The vision for Tees Heritage Park has been made possible by great partnership working and the commitment of the Friends of Tees Heritage Park. It is exciting to have the park officially launched for people to enjoy. The river is at the heart of Stockton and Tees Heritage Park is a celebration of our natural asset."

Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper

295 Individual

Introduction

295/1: Section 1 Introduction

There are many changes occurring in Stockton-on-Tees which makes the development of the new Local Plan desirable. In relation to the area in which I live which is Egglecliffe, they include the following

i) The time that the YEAPP Action Plan was developed in 2007 (then abandoned ) is very different from now. At that time no significant change was expected for the Yarm and Eaglescliffe area, but now a large number of housing developments are planned causing great concern to local residents. This is because a considerable number of these are proposed to be on green wedge sites which were assumed to be protected under the previous Local Plan. As a result it is sensible that the new Plan should be based on the latest evidence base. This is particularly important in relation to the assumptions made in the Plan about the operation of the local housing market. This is being subjected to very changed economic circumstances and radical national Coalition Government driven policy changes.

ii) Stockton Council's support for the development of Tees Heritage Park which aims to preserve the character, historic environment, landscape and countryside has also been established with the enthusiastic support of the Council and has gained widespread support of the local residents of the borough despite its relatively short life. It needs to be a more prominent element in your Plan.

iii) There are new local resident's groups and local forums in the area who would like a greater opportunity to participate in democratic decision-making about the future of their areas. I would recommend that time and support should be given to them to develop their own neighbourhood plans as specified in the new Localism Act. The development of these plans could run concurrently with and inform the next stage of the development of the latest Stockton Local Plan.

Council Response: Comments are noted. The policies intended for the YEAPP have been incorporated into the Regeneration and Environment LDD and will be reviewed as part of the process for the LDD. The Tees Heritage Park has been protected within the LDD as Green Wedge and a Green Infrastructure Corridor and Policy ENV3 has been included to support the park.

#### SP2 - Housing Spatial Strategy

295/2: Section 2 The Spatial Strategy

I would like the Plan to spell out in more detail what the Council's interpretation of "sustainable" is under NPPF. I also want to express concern about the phrase "unless material conditions indicate otherwise" which could simply become a developer's charter. It is essential that the Council is publicly known for taking into account the weight of local opinion. I welcome the opportunity for neighbourhoods to develop their own plans, but recognise that the difficulty and expense of them doing this could act as a significant deterrent to any being produced. Active encouragement and support for this democratic process (including financial) by the Council in this process could very much help their successful delivery.

Council Response: Comments noted.

The Council maintains the definition of sustainability as set out by the NPPF and has not adopted its own definition.

#### ENV1 - Green Infrastructure

295/3: Green Infrastructure and Sites of Local Importance.

#### ENV3 - Local Sites

As a result of my views expressed above, I contend that Policy ENV1 item 2 does not give a proper degree of protection for valuable green space. Also para 9.27 which lists specific designated sites (Sites of Local Importance) does not include Tees Heritage Park by name. I consider it essential this Park is included to prevent developers claiming ignorance of it. This would bring proper recognition of its importance to the borough. The Park has considerable support from the Council which is an active member of its Partnership, and also has widespread support among local residents.

Council Response: Comments noted. ENV1 has been revised and it now includes specific reference urban open space and Policy ENV3, relating to the Tees Heritage Park, has been included.

#### SP2 - Housing Spatial Strategy

295/4: The Housing Spatial Strategy

The housing requirement baseline data in the Plan seems to be based on a range of assumptions derived originally from the Regional Spatial Strategy which was developed in a completely different national economic environment and housing market era. It is also now defunct. I would question whether the increased population forecasts for Stockton are correct. Reasons for this include the current poor economic climate where people are unlikely to move, demographics that show a decline in the number of young people in the population and entering the housing market, the lack of finance for house buyers. I contend that all these will negatively effect the housing

demand forecasts in the report.

It is my view that the Council should reject the RSS targets and substitute forecasts which more correctly reflect current economic and demographic circumstances. If my calculations are correct, substituting objectively justified targets may well mean that there is no shortfall in potential housing delivery during the period 2012-2017. The assumption that housing demand will continue at 555 dwellings per year is not objectively justified and to continue with this false assumption brings the risk that more planning permissions on greenfield sites will be unnecessarily granted. There is evidence that other authorities are rejecting the RSS targets and similarly adjusting their housing targets.

However, even without any adjustment as suggested above, the implementation of the 5% buffer results in 8662 dwellings for the Plan. The Plan also states that the commitments deliverable over the Plan period is 9760, this being 118% of the housing requirement. Limiting this to 105% in line with a 5% buffer would result in the need for 1098 less housing planning permissions. This is even before amending the housing requirement to a more justified basis as recommended earlier. I contend that the forecasts in the plan are unreasonably optimistic and over-inflated and that the implementation of a 5% rather than the unnecessary 18% buffer would mean the housing requirement for the authority would be both more practical and realistic.

Council Response: Comments relating to the housing requirement are addressed within the Housing Need and Demand Topic Paper

SP2 - Housing Spatial Strategy

295/5: Core Area and Greenfield Development Strategies

Delivery of the 1200 houses for the next 15 years needed in the Core Area of Stockton is highly desirable. However this will only happen if the Council continues to publicly support a positive strategy for Stockton's Core Area in this Plan. To deliver this I suggest the following. Council/developer partnerships are established, finance for the pre-development of brownfield sites is obtained from whatever sources that are available with pressure put on the Coalition Government to reinstate the previous grant support for these areas, the Council itself looks to develop affordable housing, increased liaison is made with landlords to improve their stock and empty houses, greater support and advice for people who rent in the Core Area is provided, the town centre is opened up for greater residential use especially for the young, single people, students and first time buyers. Stockton Council has a great record for successfully developing brown field sites and I contend that with the implementation of a range of creative regeneration strategies, the Council could continue this good work bringing considerable advantage to the more disadvantaged populations in the borough.

The statement that the Council will open up opportunities for development in greenfield areas adjacent to the conurbation means developers will desert investing in the Core Area and move onto green field sites. There is now considerable evidence that this is already happening, and spectacularly. The Council needs to acknowledge in the Plan that a positive greenfield strategy will simply condemn the Core Area population to living in an increasingly derelict and highly undesirable poverty stricken environment.

In relation to the areas adjacent to the conurbation, I reject the proposed removal of the Green Wedge area from protection and the allowing of building on protected green field areas. There is now significant national evidence that despite the large number of planning applications granted, this does not necessarily result in the development of these sites for housing. As a result there is no help for the local authority to meet its local population needs and to deliver on local housing requirements. Indeed, another disastrous consequence is already happening which is that the developers are leaving their undeveloped green field sites, with or without planning permission, to increasing neglect and dereliction too. For an authority like Stockton, this strategy will simply increase the abandonment of its town centre with the probability of replicating this dereliction in the outer areas leaving the whole town in far worse condition. Indeed, these policies could well be disastrous for the economic sustainability of the whole borough and send large areas of it into catastrophic decline.

The reasons for lack of new housing does not come from lack of available sites of which there is already an excess in Stockton ( current Local Plan). To believe that an increased supply of sites fairly automatically brings new housing development as implied in the new plan means that when this does not happen more sites are released. These will then additionally be stored into ever larger land banks until large swathes of greenfield land with unnecessary planning permissions are simply taken out of use until the housing market recovers. When this happens massive urban sprawl will result with the authority facing the permanent loss of its environmentally high value and wildlife rich, green areas. In short, a period of housing under-performance will be followed by over-performance.

It is my view that, wherever possible, the granting of planning permissions on protected greenfield sites should be rejected or deferred. This should be at least until the Local Plan is approved in 2014 when the economic situation and the position of the housing market might be clearer. If this is impractical, given the present Government's presumption in favour of sustainable development, then the planning permissions approved should be limited to the minimum required to comply with Government policy



and there should be great resistance by the authority to allow unnecessary planning permissions on predominantly greenfield sites.

Council Response: Comments are noted. Comments relating to greenfield development are addressed within the Yarm Topic Paper.

The Regeneration and Environment LDD maintains protection for the Green Wedge and does not include proposals for residential development within these areas.

## 296 Individual

H1j - South West Yarm

296/1: The proposed development in South West Yarm is outside the Limits to Development (Para 8.98). Although the Council intends to re-visit the evidence for the Review of the Limits to Development and Green Wedges in the context of the subsequent review of the Housing Spatial Strategy (para 2.39) it would appear that the proposed development at South West Yarm is being led by interested parties - the land owner and the developer – and not by Stockton Council. Land at South West Yarm was identified in the Issues and Options Document as a site of 21 hectares with a potential yield of up to 480 dwellings (para 8.98) Presumably, the Council arrived at this decision after due consideration of all relevant factors by professional planners and other specialists. A representation received by the Council on behalf of the land owner promotes the development of the site for 750 homes (para 8.101). Subsequently, Policy H1j – South West Yarm states '49 hectares of land is allocated at South West Yarm for up to a total of 735 homes'.

The proposed development does not comply with the Council's preferred approach to supporting developments outside the limits to developments, which would be allowed only to support developments relating to farming, forestry and rural based enterprises and other proposals associated with the Countryside (para 2.41 Strategic Policy SP3 Limits to Development).

In any case, the proposed development is not in South West Yarm. It is in the Parish of Kirklevington , which is a Rural Area, not an Urban Area.

The proposed development would not contribute to the regeneration and revitalisation of more disadvantages areas of the Borough (para 8.109).

Council Response: Comments regarding the estimated dwelling capacity of the South West Yarm site are addressed in the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

296/2: Section 8 – Housing Flooding

The proposed development in South West Yarm lies in Flood Zone 1 (para 8.108). However in Paragraph 103 of the National Planning Policy Framework (NPPF) it is noted that "the development should not increase the risk of flooding elsewhere'. Rain water would flow from the proposed development site, via storage ponds, to the Flood Zone 3 ground at Saltergill Beck, potentially affecting on house and three bridges.

Council Response: Comments regarding flood risk are addressed in the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

296/3: Section 8 – Housing Sewage

The sewage network in Yarm is incapable of accepting the sewage output from the proposed development at South West Yarm. The proposed development would not be sustainable until such time as an appropriate sewage infrastructure was established, therefore the development (or any such development) would not be deliverable in the foreseeable future.

Council Response: Comments regarding the sewerage disposal capacity are addressed in the Yarm and Kirklevington Topic Paper .

H1i - West Yarm

296/4: Section 8 – Housing Traffic

H1j - South West Yarm

The proposed development in South West Yarm (and at West Yarm para 8.8)) would have an adverse impact on traffic. The cumulative development proposals in the Yarm area would lead to increased congestion in Yarm High Street. SBC accepts that Yarm High Street is congested and at present, and according to the Council's Car Parking Strategy there is a current shortage of 80-100 car park spaces. The survey indicates that any alleviation measures will be effective for only a short term. Congestion in Yarm High Street is detrimental to the business economy of Yarm. The proposed development in South West Yarm would worsen the situation. I agree with the statement made in Para 8.89 that any new development would be for commuters. This would apply to the proposed development at West Yarm and South West Yarm. I note that in Policy H1j – South West Yarm, the proposed development is expected to include 'the means to secure off-site improvement works to the capacity and layout of the junction of the A1044 (Green Lane) and A67 (Yarm Road)'. However, many additional commuters would come off the A19 onto the A67 , exacerbating the

already dangerous situation at the junction of the A67 and Forest lane at Kirklevington (at the Crown Hotel).

In its reasoned justification for the land identified at West Yarm, the Council states that 'However, initial and immediate concerns in respect of local highway capacity restrict the contribution of this site to around 300 dwellings.' (para 8.93). That being the case, how can the Council contemplate allowing the construction of up to 735 houses literally across the road, at the proposed South West Yarm site, which would be subject to the same concerns regarding local highways capacity.

Council Response: Comments regarding traffic and parking are addressed in the Yarm and Kirklevington Topic Paper .

H1j - South West Yarm

296/5: Section 9 – Environmental Protection and Enhancement

ENV1 - Green Infrastructure

The proposed development in South West Yarm runs counter to the stated aims of the Council in Policy ENV1 – Green Infrastructure. The development would be built on the strategic gap between Yarm and Kirklevington, and there is no justification for this. If the proposed development were to proceed, the Green Infrastructure Corridor (Wildlife Corridor) would not be protected. This corridor runs between the River Tees and the River Leven, not between Saltergill and Leven Bridge as stated in Appendix 7. Further, the corridor is identified as a secondary corridor in Appendix 7. It should be a primary corridor as it runs across County boundaries. The proposed development at South West Yarm would not be able to replace the existing natural diverse habitat.

Appendix 7: Stockton-on-Tees  
Borough Green Infrastructure Network

Council Response: Comments regarding the strategic gap and wildlife corridor are addressed in the Yarm and Kirklevington Topic Paper .

## 297 Individual

H1h - Land East of Yarm Back Lane

297/1: I attended Stockton Library on 20th September 2012. Hoping to find out where and how development would impact on my household. This being of particular interest to me as my property borders the farmland that it is proposed to develop. I was most disappointed and at this point in time found it to have been a complete waste of my time having taken time off work to attend only to find out that the officers present could not answer my specific questions:

- 1) where will the houses be in relation to the existing housing along the urban fringe
- 2) will there be a green buffer zone between the new houses and the existing ones
- 3) where will the access roads be

- 4) what effects will the proposed developments have on the present infrastructure in respect to increased traffic through the main thoroughfare of Surbiton Road and beyond.

Without having answers to these questions I wish to object to this development on the grounds that it will impact on my privacy and quality of living. I bought this property because of its location and the fact that I had open land and views to the West, even when there was pylons at the same time. The pylons whilst still there were a vital restriction to the application to planning and building. Since their removal this is the second application to have been made. The first apparently having being withdrawn.

I hope that my views and those of other residents will be taken into account and not discarded out of hand as NIMBY.

Council Response: Comments noted requesting detailed information about the proposal. A Development Framework document is currently being prepared by the Council, developers and landowners working collaboratively for both the Yarm Back Lane and Harrowgate Lane sites. When this is complete more detailed information about how the sites will be developed will be available.

Extensive highways modelling and designed improvements to key junctions at the following locations as part of the collaborative working have established a maximum quantum of housing that can be delivered to the acceptance of the Highways Agency and Local Highway Authority:

Elton Interchange  
Darlington Back Lane and Yarm Back Lane  
Durham Road, Junction Road and Harrowgate Lane

Therefore, the Shared Infrastructure Policy in the Publication 2011 of the Regeneration and Environment Local Plan requires highway improvements at the above

junctions to be delivered.

The design and layout of proposed housing development will need to provide adequate amenity and privacy for existing and future residents.

## 298 Individual

### H1k - Wynyard Masterplan

298/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable

justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## H1k - Wynyard Masterplan

298/2: 2. Development at Wynyard Park

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in

sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## H1k - Wynyard Masterplan

298/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

298/4: 4. Conclusion

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

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299 Individual

H1k - Wynyard Masterplan

299/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings

in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 “There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy”. No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton’s Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the ‘Core Area’. An approach I would support and thus welcome Stockton’s Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard “would tend to deflect growth away from more sustainable more central.....sites”. The Inspector also stated in paragraph 3.103 “Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport”. Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

299/2: 2. Development at Wynyard Park

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated “in order to assist in the regions accelerated economic growth”. In addition in paragraph 7.1.10 the council states “The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance”. This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states “Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital”. The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key

employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

299/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to



intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

299/4: 4. Conclusion

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

### 300 Individual

H1l - Wynyard Village

H1k - Wynyard Masterplan

H1m - Wynyard Park

300/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other

alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1l - Wynyard Village

300/2: 2. Development at Wynyard Park

H1k - Wynyard Masterplan

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

H1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options <sup>964</sup>paper also considers Wynyard Park to be an unsustainable location for housing; I

would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1l - Wynyard Village

300/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

H1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1l - Wynyard Village

300/4: 4. Conclusion

H1k - Wynyard Masterplan

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

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### 301 Individual

H1k - Wynyard Masterplan

301/1: 1. Principle of development at Wynyard

H1l - Wynyard Village

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach

than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1k - Wynyard Masterplan

301/2: 2. Development at Wynyard Park

H1l - Wynyard Village

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

H1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

EMP3 - Key Employment at Wynyard Park

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

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2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that

employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

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Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

301/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1l - Wynyard Village

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

H1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at

Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure” This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods’s road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton’s Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village “The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape.” This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

301/4: 4. Conclusion

H1l - Wynyard Village

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

302 Individual

H1l - Wynyard Village

302/1: 1. Principle of development at Wynyard

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.



1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

302/2: 2. Development at Wynyard Park

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

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2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

2.9 Paragraph 3.125 of the SBC housing Issues and Options paper also considers Wynyard Park to be an unsustainable location for housing; I would strongly agree with the council and can see no robust and credible planning reason for such a step change in approach to the Wynyard Park housing allocation.

## H11 - Wynyard Village

302/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduced for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

3.3 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes housing development on the Wynyard Hall Estate site as a "poor use of environmental resource". When discussing the Wynyard Park proposal the Council states "Unlike the Wynyard Hall Estate Site, it is not considered that development at Wynyard Park has the potential to result in a negative impact upon the boroughs environmental infrastructure" This directly implies that the Wynyard Hall Estate Site has a negative impact that is not demonstrated on the other potential Wynyard sites.

3.4 I consider that the site east of Wynyard Village is more suitable as it is an open cleared site (open field land). This site could be accessed from the existing roundabout on the A689 and thus reducing any detrimental impact upon existing residents in all areas of Wynyard. For the site east of Wynyard Village, there are suitable access solutions which are not evident in the proposals at the Wynyard Hall Estate site; Wynyard Woods's road network has already had to have traffic calming measures installed and does not have the capacity to cope with an additional 300 dwellings.

3.5 Developing the site land East of Wynyard Village would not have as severe detrimental impact which the site at Wynyard Hall Estate would have.

3.6 It is acknowledged that the Land East of Wynyard Village site is within the Strategic gap between the A19 and Wynyard. However, the limit to development does not go beyond the employment allocation north of the A689 boundary and therefore allocating the land East of Wynyard Village would leave an equal size strategic gap as exists north of the A689. The aim of a strategic gap is to separate urban areas to assist in maintaining their individual identities. Due to the buffer of the A19 there is no risk that the urban area at Billingham would encroach on Wynyard. Moreover it is considered that such a strategic gap would be sufficient to protect residential amenity and to provide a visual buffer along the A19. Therefore there is no argument to protect a strategic gap in preference to destroying historic woodland.

3.7 Stockton's Planning for Housing: Core Strategy Review Issues and Options documents describes in paragraph 3.130, Land East of Wynyard Village "The development site is located on green-field land within the strategic gap and will result in some impact on the landscape. However it has been identified that the area has medium landscape capacity for development, so there is potential for a development on the site to avoid significant negative impact on the landscape." This clearly demonstrates that the Land East of Wynyard Village site has a less detrimental impact on the environment and landscape than that of the Wynyard Hall Estate site.

3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low

density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1k - Wynyard Masterplan

302/4: 4. Conclusion

H1m - Wynyard Park

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1l - Wynyard Village

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

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### 303 Individual

H1l - Wynyard Village

303/1: 1. Principle of development at Wynyard

H1k - Wynyard Masterplan

1.1 Wynyard was originally created to provide a high quality residential area to assist in bringing high earners and executives into the Tees Valley along with providing a sub regional employment location.

H1m - Wynyard Park

1.2 This is still the case and Wynyard has an important role to play in uplifting the Tees Valley and I would not like to see this opportunity reduced.

1.3 It is accepted that Wynyard is within an isolated location detached from the urban areas of Stockton and Hartlepool and cut off by the A19. Residents are reliant on the private car as a means to access, employment (even that in Wynyard as the A689 has no safe crossing points for pedestrians), shops and services. To some extent this is acceptable as the size of Wynyard is relatively small and therefore the amount of car trips is limited. To add more dwellings to this area (1300) which is a significant proportion of Stockton's housing need is wholly unacceptable as such an increase in dwellings would lead to a significant increase in car trips.

1.4 Wynyard as a whole is unsustainable; there is no public transport provision, no access by foot or bicycle to the existing urban area at Billingham or Hartlepool. The likelihood of any foot or cycle links is limited as any link would have to cross the A19 and would not be an attractive or safe route for those wishing to commute to an area for shops and services. There are a small number of shops within Wynyard Village and it is noted that a local centre(s) could be provided at Wynyard Park however that does not detract from the fact that the majority of services are located within the main areas of Stockton and Hartlepool and residents would have to access such services by private car.

1.5 Development at Wynyard would not reduce the need to travel by private car and public transport in the area would not be a viable and sustainable option. Public transport was available in the past but is no longer running due to lack of custom. Ingleby Barwick has grown over the years yet the bus service has reduced significantly to one bus per hour – so proving that more homes would not improve an already unsustainable location. It would be more advantageous and sustainable to locate dwellings in an area already served by public transport or in an area that could sustain a public transport link; Wynyard is none of the above.

1.6 This same argument was put forward by the Council in 2009 during the Core Strategy examination in their response to Matter 7. The Council stated in paragraph 7.1.24 "There is no evidence to suggest that the alternative strategy would deliver improved accessibility and transport choice or would be a more sustainable approach than the spatial strategy". No evidence was provided in 2009 as to how the area could be more sustainable and there is no further evidence within your Preferred Options document on how this position has changed since 2009.

1.7 The Inspectors report on the examination into Stockton's Core Strategy dated 27th May 2009, paragraph 3.81-3.84 supports the Councils overall strategy to concentrate development within the 'Core Area'. An approach I would support and thus welcome Stockton's Hierarchical approach to development as set out in Policy SP2 (however I would disagree with the creation of new settlements, it would be more sustainable to add to the urban area or increase the allocations along Harrogate Lane and Yarm Back Lane by 1300). In paragraph 3.86 the Inspector states that further development at locations outside of the urban core including Wynyard "would tend to deflect growth away from more sustainable more central.....sites". The Inspector also stated in paragraph 3.103 "Wynyard as a whole is not in a sustainable location; is in the rural area away from the conurbation and is not serviced by public transport". Again I do not see how this position has changed, and I would dispute any argument that adding more homes to an isolated location could improve sustainability. Residents would have no other way of getting to work other than the private car.

1.8 The option to locate housing development in the urban core and the adjoining urban area is the most sustainable option, creating a new significantly sized settlement in the rural area is not a sustainable alternative to other sites that have been put forward in your Issues and Options paper.

1.9 There are more sustainable sites available within the borough than those at Wynyard, for example Land at Ingleby Barwick (1530 capacity) Land at Durham Lane Industrial Estate (630 capacity), West Preston (4150 capacity), North West Billingham (100 capacity). There is no reasonable justification for the allocation of sites at Wynyard above these more sustainable sites that are well connected to the main area with access to local facilities. It could be argued that West Preston lies within the strategic gap between Eaglescliffe/Preston and the main Stockton conurbation however developing part of the site i.e. for 1300 dwellings would be more sustainable than developing land at Wynyard and would still have the capacity to leave a strategic gap and therefore this site (West Preston) is a more sustainable option for Stockton when considered against all other alternatives.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

H1l - Wynyard Village

303/2: 2. Development at Wynyard Park

H1k - Wynyard Masterplan

2.0 The allocation of 1000 mid-range family homes at Wynyard Park is not a sustainable and desirable option for the borough when considered against all other alternatives.

H1m - Wynyard Park

2.2 Wynyard Park is classed as Key Employment Land within the RSS, and even once the RSS is revoked the employment allocation should still remain as Wynyard Park is a driver for economic growth and employment, it performs a unique role within the borough and the sub regions employment land portfolio.

2.3 This same argument was put forward by SBC during the Core Strategy examination, in your submission to matter 7, the council stated in paragraph 7.1.2 that Wynyard was allocated "in order to assist in the regions accelerated economic growth". In addition in paragraph 7.1.10 the council states "The Councils Employment Land Review Stage 2 (EC2.2) recommends that the employment land at Wynyard should be recognised because of its regional/sub-regional significance". This sub regional significance was confirmed in Para 3.102 of the inspectors report 3.02.2010.

2.4 The report also makes reference to potential hospital development at Wynyard but paragraph 7.1.14 states "Any requirements for staff accommodation associated with the hospital should be provided within the urban area rather than on site. This would provide residents with greater access to services and amenities, regeneration benefits and the potential to create a sustainable green travel plan for employees. There is no evidence that residential properties are required in this location to support the operation of the hospital". The Inspectors report clearly demonstrates that residential development at Wynyard Park is unnecessary and that employment uses remain essential to enhancing the economy of Stockton.

2.5 Paragraph 3.120 of your Housing Issues and Options paper also states that the Employment Land Review recognised the importance of Wynyard as a key employment location and recommends retaining the use. There is no sound evidence in which to base de allocation of employment land, in fact the contrary is true.

2.4 It is acknowledged that there are significant highway implications associated with the allocated business park commitments, however it is put forward by the council in paragraph 2.23 of the Preferred Options DPD that it is unlikely that all the land identified for employment will be fulfilled, reference is also made to the NPPF stating that employment land should be reviewed regularly. However the NPPF does not state that if employment allocations will not be fulfilled the land should be used for housing, in fact it is true that the most appropriate housing sites should be considered on their merits not because land it unfulfilling in its role and is in fact undeliverable.

2.5 It is noted that SBC consider the option of housing to be more sustainable than the employment commitments and they make a weak argument that housing could make the area more sustainable and have less of an impact than if the business commitments were fully built out.

2.6 If it is argued that the employment allocation is undeliverable and therefore it is unlikely that such an extent of highway implications would materialise, then locating homes here instead of employment would bring about further development that may not have occurred as the employment allocations are undeliverable and therefore the negative highway implication would come forward sooner than if the business park were left as it is. Therefore housing should be located with the most appropriate locations and that Wynyard Park should be allowed to develop as a business park.

2.7 The employment allocation is significant to assist in attracting inward investment and growth to the Tees Valley.

2.8 The Tees Valley Strategic Housing Market Assessment (SHMA) 2012 identifies Wynyard as an area for executive housing, this unique location assists in attracting high earners and wealth creators. The area would lose its exclusivity if general market housing is to become available. To water down this product would be to the detriment of the Tees Valley as wealth creators would locate in more desirable areas such as North Yorkshire and Durham, as opposed to an over developed watered down Wynyard. It would be more sustainable and appropriate to locate general market housing within the urban area or adjoining the urban area in sites such as Ingleby Barwick or West Preston, this would ensure that the unique offer at Wynyard remains. There is a lack of evidence and no sound planning reason for the allocation of mid range housing in such an unsustainable and isolated location.

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Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1l - Wynyard Village

303/3: 3. Wynyard Hall Estate is not the most reasonable alternative when compared with Wynyard East

H1k - Wynyard Masterplan

3.1 Although I considered there to be more sustainable sites within the borough than those proposed at Wynyard, should housing development occur at Wynyard then the most appropriate site should be chosen. I consider that site Land East of Wynyard Village to be more appropriate than land at Wynyard Hall Estate. Land at Wynyard Hall Estate includes an area of woodland named Black Squares which is a significant mature tree plantation that has been there approximately 50 years.

H1m - Wynyard Park

3.2 I don't consider it acceptable to remove this woodland area for a number of reasons:

- The woodland provides a form of carbon sink which can assist in mitigating against climate change; any trees that are re planted as a compensatory measure would take time to develop and thus the capacity sink would be reduce for a number of years.
- It provides a habitat for a number of rare birds including the Cross Bill, Great Spotted Woodpeckers and Marsh Tits, along with other wildlife including Deer, Badgers and vole species.
- The woodland is an area of high visual amenity that assists in providing an attractive setting for the wider Wynyard area. Removal of the woodland could substantially change the character of this unique area that serves to attract inward migration of high earning wealth creators that can assist in boosting the local economy.
- The woodland at present compliments the designated parkland surrounding Wynyard Hall Estate which is of significant historic importance.
- The woodland provides a habitat corridor to the Woodland at Castle Eden Walkway and beyond.
- The principle of removal of woodland is morally unacceptable especially when there are other sites suitable for development of less environmental quality.
- It will result in changing the character of the area.
- The estate already suffers from significant drainage issues given the ground is mostly clay and therefore removing this tree cover will serve to intensify the problem.

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3.8 If development should occur at the Wynyard Hall site the woodland should be retained. It is also essential to retain the executive nature of the area and provide low density residential units. The current proposals of 300 units at the Wynyard Hall is excessive and not comparable to surrounding residential development and should be reduced to ensure executive dwellings are constructed. The dwellings should be located within a high quality setting with substantial green infrastructure provided to continue the open nature of the estate. More detailed proposals for local facilities would also be welcomed.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

H1l - Wynyard Village

303/4: 4. Conclusion

H1k - Wynyard Masterplan

4.1 To conclude I would state that at present the DPD is unsound as there is no robust and credible justification for de-allocation of regionally important employment land at Wynyard Park. The employment allocation will assist in attracting inward investment and boosting economic growth in the whole of the sub-region. I would further argue that just because the land is not developing out as anticipated that does not mean that an isolated location detached from the urban area is the most appropriate location for residents.

H1m - Wynyard Park

4.2 There are more sustainable sites that were put forward in the Issues and Options paper that should be developed over housing at Wynyard; the hierarchical approach to housing development is supported, however the plan would be sound if the Wynyard sites were removed and sites close to the urban area i.e. Ingleby Barwick and West Preston were included within the plan.

4.3 Most importantly I would further argue that the Wynyard Hall Estate site and specifically the removal of the woodland is morally wrong, nonsensical and that if a site must be developed in Wynyard south the A689 the land east of Wynyard Village is most appropriate.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper, which is currently being prepared.

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304 Individual

H1j - South West Yarm

304/1: The Economy - Key Location at Wynyard, why then is housing development required south of Yarm.

Council Response: Comments noted. Concerns relating to the provision of housing in Yarm have been addressed in the Yarm and Kirklevington Topic Paper.

H1j - South West Yarm	304/2: Major housing developments, south of Yarm will result in traffic chaos in the area from Yarm School, the Railway Bridge in Green Lane and the bridge crossing the river Leven on the A1044 Road.
H1i - West Yarm	Council Response: Comments are addressed within the Yarm and Kirklevington Topic Paper .
H1 - Housing Allocations	304/3: Housing - Interested in, who is wanting to invest in housebuilding projects in this area. The demise of manufacturing e.g. the chemical industry, the steel industry and others has reduced the employment prospects for many young people and hence the demand for houses since people will leave the area. First time buyers are finding it difficult to obtain mortgages and the financial outlook is not bright. A recent article in the Daily Telegraph claimed that money from the third world was being invested in UK house building. One is entitled to question the origin of such monies. Council Response: It is acknowledged that current economic circumstances present challenges for housebuilders. However, the clear expectation of the NPPF that local planning authorities plan positively for new development to support growth and thereby contribute to recovery.
<b>305 Individual</b>	
H1j - South West Yarm	305/1: Currently, according to my calculations approximately 2,500 dwellings have either received planning approval or are proposals now under consideration for the future construction of dwellings in Yarm and Eaglescliffe in particular.
H1b - Urray Nook	
H1i - West Yarm	I consider that the existing infrastructure of Yarm in terms of its road network, including access by road from the west and from the east especially including the huge residential developments in Ingleby Barwick, the antiquated cobbles in the town centre and the pondering by motorised transport across the road bridge over the River Tees, which was originally constructed in 1806. Traffic congestion is acute and atmospheric pollution is a problem. Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper
<b>306 Individual</b>	
H1i - West Yarm	306/1: How do you see Yarm and Eaglescliffe in 2021?
H1j - South West Yarm	With Allen's West Development and other proposed housing developments, Yarm will be excessively congested – residents of Eaglescliffe and Yarm would state that it is already congested. Eaglescliffe will need further access to the rail station from the west to permit it to be a transport hub. Ideally, Yarm and Eaglescliffe character should be retained. That of a very green suburbia, that has good transport links to major hubs of Stockton, Darlington and Middlesbrough, which: facilitate transport for commuters during peak and socialising for locals during the offpeak enable Yarm and Eaglescliffe to maintain small and unique centres that ideally offer less of the major franchise names and more of the small independent business owned shops that are attractive to Teessiders as a location for relaxation and socialising through eating and meeting that preserve the local history of the area and the local greenspaces Council Response: Comments noted. These issues are addressed in the Yarm and Kirklevington Topic Paper .
TC6 - Development and Change of Use within the District Centres	306/2: How could Yarm and Eaglescliffe be developed as tourist destinations? Do they need to be developed as tourist destinations? Why can they not be for local people to enjoy living in and leave tourism for key areas such as Preston Park. When I think of tourism, I see the Moors, the NYM railway, the coast, the castles etc. Or museums.
ENV1 - Green Infrastructure	Yarm, Eaglescliffe have a rich local history which is intertwined with that of Teesside, but will not draw people specifically from other areas such as Durham, York, Whitby etc. The key history of Yarm is connected to the river, Eaglescliffe is perhaps the railway. The river should be a larger part of Teesside tourism/experience- a focus on day trips along there and peak transport? Although Ingleby Barwick is not a great view.
HE4 - Stockton and Darlington Railway	Yarm is noted for its evening vibrancy and to provide the option of using the river for arriving in Yarm would be different (alcohol restricted).
H1i - West Yarm	Yarm history is about being able to access the areas via walking. Witness the Tessedale way, the river frontage from Yarm to Preston Park, the border to the farmland. Stockton can offer industrial history (rail and port and mech engineering).
H1j - South West Yarm	Teesside river history and Yarm's history of 1600 forward is probably not captured very well. A small museum in the town hall or in a preserved building may be good. The information should be more accessible. Council Response: Comments noted. These issues were originally raised in 2007 in relation to the Yarm and Eaglescliffe Area Action Plan, which has since been incorporated into the Regeneration and Environment LDD. Numerous policies in the Regeneration and Environment LDD address Yarm and Eaglescliffe's relationship with



the River Tees, its heritage and its evening economy.

H1 - Housing Allocations

306/3: What type of housing will be needed over the coming years?

More singles and smaller families do not require larger houses. An ageing population does not require larger houses to heat and service. Modern day sees music and books in electronic form. Ergo, smaller houses – consider over next 10yrs, the world economy will be somewhat depressed so less of the young can afford to buy houses (even hard now with low interest rates).

Transport fuels will make transport more expensive, the mix of housing as apartments should be integrated with shops, more akin to urban centres – thus freeing up more land for local green spaces or allotments (more popular now)– not more (Ingelby Barwick) housing. Apartments over shops and relaxed dining that provide vibrancy to developments should be considered.

Council Response: Comments noted. These issues were originally raised in 2007 in relation to the Yarm and Eaglescliffe Area Action Plan. The Publication Draft of the Regeneration and Environment includes a Housing Mix Policy.

H1 - Housing Allocations

SP2 - Housing Spatial Strategy

306/4: Where should new residential development be situated?

Housing should be considered in conjunction with neighbouring boroughs, such as the Middlehaven harbour plan that was for significant development. Middlesbrough and Stockton centre are far better located for more intensive development for the future, when centralised development is preferable. Once water views are offered people will buy – witness Manchester, Leeds etc. Stockton should focus on capitalising on their river frontage for renewal for apartment builds and even some terrace housing.

The recent trend for (proposed/approved) housing estates on green field sites in Eaglescliffe /Yarm remove the uniqueness of the area, and will lead to over population of an area that does not have the infrastructure to permit it, especially in terms of transport.

Council Response: Stockton-on-Tees and Middlesbrough Borough councils have faced similar issues with regards to the deliverability of brownfield regeneration sites in the urban core and both councils have reached similar conclusions.

TC6 - Development and Change of Use within the District Centres

306/5: How can Yarm's role as a commercial centre be strengthened?

Focus on delivering incentives for small business operators, not franchisees, not 2nd hand stores and seek a blend of culinary eateries and retain the pubs– not become a high st of late night eateries for the inebriated. Yarm lost butcher, numerous stores (gentlemen and women clothers) in recent times – parking, expensive rents and no new generation coming through preserving local customs. It would no longer qualify as the best UK High St due to what has been lost. The Yarm markets on Sunday are one of the better things to have happened recently. Yarm can offer a semi-rural village within suburbia. How many other areas within Stockton can offer that? Consider offering incentive for COOPs (local meat or vegies/produce) or local providers (council rate reductions) to focus on preserving and delivering local produce to market. Eg. incentivise someone to restock local butcher (Riggs) with local meat. That is the history that should be preserved.

Council Response: These issues were originally raised in 2007 in relation to the Yarm and Eaglescliffe Area Action Plan, which has since been incorporated into the Regeneration and Environment Local Plan. The Regeneration and Environment Local Plan includes Policy TC6 District and Local Centres, which recognises Yarm's role as a District Centre and seeks to ensure that it continues to offer a range of shops and other services, whilst maintaining its character as a historic market town.

HE1 - Historic Landscape

306/6: How can Yarm and Eaglescliffe's historic buildings, structures and features be preserved and enhanced?

Prevent further housing development in central Yarm and removal of older homes in Yarm and Eaglescliffe for replacement with apartments, units etc. Preserve the history through the housing and area. Do not obscure the buildings with more and more parking and traffic. Insist housing should retain the historical look of the area. The old bricks have more character and “warmth” than modern day glass and steel.

\* Do not approve the development of Yarm School of the land north of the Tees river – surrounding Yarm with development will ruin it. The key characteristic of Yarm/Eaglescliffe is its relationship with the river, the local agriculture (farms still in place), and the historical buildings. Surrounding it with modern infrastructure will bury it.

Council Response: Comments noted. These issues were originally raised in 2007 in relation to the Yarm and Eaglescliffe Area Action Plan, which has since been incorporated into the Regeneration and Environment LDD. This document includes a Borough wide policy on the historic landscape (HE1), makes reference to the Borough's Conservation Areas and designates a number of site specific character areas.

HE1 - Historic Landscape

306/7: What are the main issues regarding vehicles and traffic in Yarm and Eaglescliffe?

Parking for residents – must be maintained and free or minimal annual cost for a permit.

Through traffic. More housing on either side of Yarm will exacerbate problem, not decrease it. Build a bypass? No. High cost. Only route (without taking over further farmland to west of Yarm) would be a bypass from A66/A19 on the dual carriageway extension through Ingelby Barwick, and back on to A67 (at Shell roundabout) to A19.

So objective must be to provide enhanced public transport into town from parking, and encourage through traffic around on A66/A19.

Increasing parking in Yarm High St will have minimal effect to resolve current problem. Increasing the problem with overdevelopment will either drive local people away to Tesco or other major stores for food and fail to support the town businesses. Encouraging public transport is preferred from hubs – Yarm rail station, Eaglescliffe station, Stockton and Boro. Allens West in future

Council Response: Highways and parking issues are discussed in the Yarm and Kirklevington Topic Paper .

306/8: What changes should be made to car parking in Yarm and Eaglescliffe?

None. It works, people get parking or find that they have to park further out and walk. Paying to park deters local visitors and encourages them to go to large shopping centres.

Council Response: Parking is discussed in the Yarm and Kirklevington Topic Paper.

306/9: How can public transport be improved?

Yarm and Yarm Rd well served by buses at frequent intervals. Light rail would be a boost but need population density to capitalise. Eg Allens West development (if it goes ahead) should allow for apartments and shops at station. Return tickets preferred on buses but not offered. Consider a solution to the transport/parking Yarm congestion: more stops of trains (Pennine express) at Eaglescliffe, which becomes a main station. Maintain Yarm Station as a bus hub and future light rail potential hub. Introduce a bus loop from Yarm station to Allens West on 10 minute interval (perhaps have parking at recently burned out shops)– Park and ride for 150 cars and free transport into Yarm. Library and Sainsbury can stay. The #7 continues to provide the frequent service b/w Yarm and Eaglescliffe and Stockton. Making Eaglescliffe a busier hub justifies redevelopment of west side/pedestrian bridge, car park etc. Together, you have sufficient frequency to provide long term parking. The Yarm “bus” station can then support a redevelopment at Tall Trees.

Council Response: Comments noted. Policies within the Core Strategy and Regeneration and Environment Local Plan support the Tees Valley Bus Network Improvement Scheme and the Tees Valley Metro, as well as the provision of mainline train services. Parking issues are discussed in the Yarm and Kirklevington Topic Paper .

T2 - Tees Valley Metro

T3 - Tees Valley Bus Network Improvements

306/10: What are the main issues for pedestrians and cyclists in Yarm and Eaglescliffe?

Traffic speed on roads – people driving erratically and well over limit on Yarm Rd (taxis especially). Consider Avg speed cameras from Eaglescliffe Station to Yarm  
No main issues

Council Response: Issues raised not within the scope of the Local Plan process.

306/11: Is the provision of open space in Yarm and Eaglescliffe sufficient?

Generally yes. Would be disappointed with farmland being converted to housing.

Council Response: Comments noted - these issues are addressed in the Yarm and Kirklevington Topic Paper .

SP2 - Housing Spatial Strategy

ENV1 - Green Infrastructure

306/12: Could access to open spaces be improved?

Yes, school grounds are under utilised for local children to kick a ball. Eg Links primary school. Remove the insurance issue for simple flat green open space so that kids and adults can kick a ball around for a healthier life style.  
Otherwise Yarm Eaglescliffe has good river access, and good access to walkways

Council Response: Comments noted.

PF1 - Open Space, Sport and Recreation Facilities

306/13: Do some places need increased or better recreation facilities? Are some facilities under used?

Allens West development should include recreation buildings. Light rail will provide access in future.

Otherwise, schools should be encouraged to open up their fields for out of hours access for children. Waste of a resource otherwise. A frequent bus service through to Yarm station might permit a better use of facilities at Conyers school if they were upgraded for community after hours access. Same said upgrade might permit Yarm school to share the same facilities and obviate the need for their proposed removal of green space near Yarm centre.

Council Response: Comments noted.

PF1 - Open Space, Sport and Recreation Facilities

306/14: What type of development should be encouraged in Yarm and Eaglescliffe? What should be discouraged?

Apartments discouraged in existing independent houses

Apartments on Yarm High St (southwest corner) only if shops underneath and tenant parking provided. And done preserving look of town, not a modern looking building  
Preserve green space, be it public or local (preserve garden space else flooding may become an issue from runoff).

Council Response: Comments noted. The Core Strategy and Regeneration and Environment Local Plan include borough wide policies on the type and mix of dwellings which should be provided in the Borough and encourage the use of upper floors in town and district centres. There are also policies protecting designated open space.

H1 - Housing Allocations

306/15: Where should development in Yarm and Eaglescliffe be encouraged? Where should it be discouraged?

Development should not be encouraged in current areas. In terms of offering a range of suburban areas, Eaglescliffe has its character equivalent to Hartburn area in Stockton, and that is not being altered. Should be discouraged on greenfield sites as land may be important in future for food

Where realistically, on brownfield sites along transport corridors so east of Uray Nook road.

Eaglescliffe along Yarm Rd has history of area and should be preserved. Eaglescliffe to west of rail-line is more modern. Apartments around Allens West together with shops would be a useful solution. Removing light industry not a good idea as it is local employment. South of Yarm should be preserved as is.

Ingelby Barwick will satisfy demand for many years yet for large houses

Council Response: Comments noted - these issues are addressed in the Yarm and Kirklevington Topic Paper .

H1i - West Yarm

306/16: Are there any other Key Issues you feel should be considered in preparing the YEAPP?

Continue consulting residents, focus on quality not quantity and supporting the local businesses and shops – the money of which stays in the local economy. And all development proposals should have to include analysis of the impact of other proposals (contained in the YEAPP or proposed) on impact rather than focusing on their own small impact. Eg. Uray Nook proposal only looks at traffic impact of its development, ignoring the impact of the Allens West development as well on traffic.

Public transport is preferable but has to be frequent to coax people from cars

Council Response: Comments noted. These issues were originally raised in 2007 in relation to the Yarm and Eaglescliffe Area Action Plan, which has since been incorporated into the Regeneration and Environment Local Plan. The impact of development on the highways network is assessed cumulatively.

H1i - West Yarm

306/17: On housing, the Regeneration and Development plan appears to ignore the comments of residents that point (validly) that centres such as Yarm can not absorb more people living in it and around it. And certainly not 2700 more dwellings.

H1j - South West Yarm

Sustainability – not defined. Just used.

SP2 - Housing Spatial Strategy

Sustainability is about meeting the needs of society for today and in the future without impacting on the quality of life of the future generation that is enjoyed by those of today. Building on greenfield agricultural land, whilst throwing in a few car parking spots or playing fields to address a perceived problem is not sustainable development. Ignoring the views of residents who actually live in a local environment and can recognise the issues (principally transport and infrastructure to cater for the estimated 2700 dwellings) and instead just incorporate housing to meet a perceived need (that is clearly not existent in a flat economy judging by the number of houses for sale) raises serious question as to why residents should bother reviewing said plans.

Sustainability demands that brown field sites that have been developed once should be regenerated, rather than leaving the contamination and unusable land to the next generation to foot the bill for its clean up. And section 3 with the SP2 states this, however in all the housing planning mentioned, it is not core area sites, nor regeneration sites that are listed but greenfield sites (predominantly). I would challenge Stockton council to demonstrate that indeed all brownfield sites that can be regenerated have indeed been so before you need consider building on agricultural land. This comment is made on the back of recent development applications which are not consistent with this but are within your development strategy area.

Council Response: Comments regarding Yarm are addressed in the Yarm and Kirklevington Topic Paper .

The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify. There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

Each year the Council updates a study called the Strategic Housing Land Availability Assessment (SHLAA). The update is incorporated in the Authority Monitoring Report. The SHLAA is a technical background paper that forms part of the evidence base for the Regeneration and Environment Local Plan by identifying potential housing sites. The sites are then assessed within a framework of their suitability, availability and achievability for housing development. The SHLAA shows that we do not have sufficient brownfield land that is suitable, available or achievable in the period up to 2030 to meet our housing requirement. Therefore greenfield sites have had to be identified to meet the housing requirement.

### 307 Individual

307/1: I agree with the proposals in the document on the understanding that housing developments incorporate mixed types of dwellings including bungalows/extra care schemes to provide for elderly residents. Large developments need shops, schools and community facilities with excellent transport links.

Council Response: Comments noted. Policy CS8: Housing Mix and Affordable Housing Provision requires developers to provide a mix and balance of good quality housing of all types and tenure inline with the Strategic Housing Market Assessment. In addition, the Regeneration and Environment Local Plan policies set out both generic and site specific requirements to ensure that sustainable residential communities are created and maintained. There are further comments regarding the ageing population and the needs of vulnerable groups in the Housing Need and Demand Topic Paper.

### 308 Individual

308/1: I have lived in Yarm for 16 years, moving here as it is a nice market town, big enough to support the High Street yet small enough to retain its character and individuality.

The traffic through Yarm is a major problem putting many people off from visiting, the parking problems are well documented in the local press, I am lucky and am able to walk into town. I accept the recent bad weather was virtually unprecedented but it just shows the traffic nightmare that unfolds when a major road closes in the area, gridlock, why encourage 6000 more cars to the south of our region.

The housing developments that have been given the go ahead so far 850 houses at Allens West and 80 (approx) at Tall Trees will increase the number of cars in the area by up to 2000.

There are plans in the offing for 350 houses and a retirement home at Leven Bank, 350 houses at Morley Carr Farm, 750 houses on Yarm School laying fields and somewhere in the region of 850 houses on other land south of Green Lane. This is nearly 3000 new houses around Yarm of which 2000 are on Green Belt. That's an increase of anything up to 6000 extra cars trying to negotiate the small roads and traffic bottlenecks which exist already. I haven't even considered schools, doctors, dentists and all the other services to cover an extra 10-12,000 people.

Council Response: Comments noted. Concerns relating to development in Yarm have been addressed within the Yarm and Kirklevington Topic Paper

308/2: I welcome the money being invested in Stockton town centre but where are the people coming from to support this investment, to use the high street shops, new housing should be considered on sites closer to Stockton than the new town centre might get used.

Council Response: The Council continues to support the regeneration of central Stockton including the Town Centre. Consistent with this the Publication Draft of the Regeneration and Local Plan Publication has allocated housing sites in central Stockton.

308/3: Property developers are bound to try and develop around Yarm as the houses are worth more and their profit margins are greater, what is the demand for housing in the region is it for cheaper or more expensive houses? Does the council suggest possible development sites for developers or do you just bow to pressure from them?

Council Response: There is housing need and demand for a range of house types. The preference of the Council is for a plan-led approach to development.

308/4: I hope those of you in the Planning department will think very carefully about the future of Yarm and Stockton and not bow to the pressure of developers, as once these areas of green belt have been built on there will be no going back and a lovely market town will be destroyed forever.

The recent press items suggesting Yarm residents should consider changing to Hambleton Council seem a good idea as it would appear that our present council in Stockton aren't listening to us.

### 309 Individual

H1i - West Yarm	309/1: I object to the Regeneration and Environmental Local Development in the Yarm Area, including the retirement village and the houses which are proposed to be built in the Yarm Area.
H1j - South West Yarm	I object to all redevelopment in Yarm. It is a unique historical town which needs to be kept in its present state. An OAP retirement village will detract from the present vigilant respect of residents OAP scooters will be nuisance. There will be no employment for the additional householders and traffic will pose jams and air pollution. I strongly object to all house buildings and development in the Yarm area.
	Council Response: Comments are noted and are addressed within the Yarm and Kirklevington Topic Paper . However, the proposed retirement village at Mount Leven has been submitted as a separate planning application and is not proposed through the Regeneration and Environment Local Plan.

### 310 Ingleby Barwick Town Council

H1 - Housing Allocations	310/1: We are content with the above documents as there are no additional housing sites proposed in IB under these documents. IB still has around 1,000 properties still to construct. The proposed Housing sites are in other parts of the borough, which effectively gives potential purchasers more choice to select a place to live in the most popular Borough to live in within the former Cleveland County Council area.
	Council Response: Comments noted.

### 311 Wynyard Park Ltd

H1k - Wynyard Masterplan	311/1: 1.0 Introduction
H1m - Wynyard Park	<p>This document, prepared by Nathaniel Lichfield &amp; Partners (“NLP”) on behalf of Wynyard Park Ltd, presents a response to Stockton Borough Council’s (“SBC”) Regeneration and Environment Local Development Document: Preferred Options (REPO).</p> <p>The purpose of this document is to outline the case for the provision of 1,000 dwellings on the Stockton land at Wynyard Park and to support its allocation for housing through draft Policy H1m. This allocation will form part of a wider allocation at Wynyard Park which also includes 70 hectares of land for prestige employment uses.</p> <p>Wynyard Park will create a sustainable future for the Wynyard Park area, integrating the individual approved development schemes and facilitating the creation of a mixed, sustainable community.</p> <p>Wynyard Park provides a unique opportunity to deliver one of the largest mixed-use sites which will drive forward the sustainable economic growth of the Borough.</p> <p>This report should be read alongside the following accompanying documents:</p> <ul style="list-style-type: none"><li>- Employment Land Assessment prepared by Storeys Edward Symmons</li><li>- Economic Impact Assessment prepared by NLP</li></ul>
	Council Response: Comments noted.

### h1k - Wynyard Masterplan

H1m - Wynyard Park	311/2: 2.0 Planning Policy Context
	<p>Guidance in the National Planning Policy Framework (NPPF) emphasises the importance of:</p> <ul style="list-style-type: none"><li>-Significantly increasing the supply of housing</li><li>- Using an evidence base to ensure that Local Plan’s meet the full, objectively assessed needs for market and affordable housing, including identifying key sites critical to the delivery of the housing strategy;</li></ul>

- Delivering a wide choice of high quality homes that people want and need
- Widening opportunities for home ownership
- Creating sustainable communities
- Recognising and seeking to address potential barriers to investment including a lack of infrastructure;
- Avoiding the long term protection of allocated employment sites where there is no reasonable prospect of a site being used for that purpose.

At the heart of the NPPF is a presumption in favour of sustainable development. The planning system should contribute to building a strong economy, provide the supply of housing to meet present and future needs, whilst also protecting and enhancing the natural, built and historic environment.

The Stockton Council Core Strategy was adopted in March 2010. However, by 2011 the Council acknowledged that:

- not enough housing sites have been identified [in the Core Strategy] that are compliant with the adopted Core Strategy and which can deliver the number of homes that need to be built in the Borough by 2028.

The Council published a Core Strategy DPD Document Review: Issues and Options document in July 2011, which sought to review the housing element of the adopted Core Strategy and to identify how the shortfall at the time of 2,800 dwellings can be met and by which sites. This document also specifically reviewed the future of the Wynyard area in terms of whether the land designated as a 'Key Employment Location' should all come forward for employment use or whether there is scope to allocate some of this employment land for housing.

Three potential housing allocations were identified in the Wynyard area, including land to the north of the A689, which currently forms part of the 'Key Employment Location'. It was recognised that a mix of uses, rather than employment uses alone could help to resolve future traffic problems and contribute towards addressing the housing shortage.

Council Response: Comments noted

h1k - Wynyard Masterplan

311/3: 3.0 Does Housing in Stockton Meet Local Needs?

H1m - Wynyard Park

What has been provided in the past?

For many years the Borough's housing strategy has been to focus house building on the brownfield sites in Stockton's main "Core Area". However, many of these sites are difficult to develop and economically unviable.

Stockton Borough Council's Core Strategy DPD, Policy CS7 states that the authority wishes to achieve a target of 75% of dwelling completions on previously developed land.

However, the Tees Valley Strategic Housing Market Assessment (TV SHMA) (2012), para 4.25 states:

In the current risk averse market developers perceive the need to make available a more balanced supply of land for development

During the period 2004 to 2012, 4,405 dwellings have been delivered against a housing requirement of 4,730 dwellings. Stockton has therefore provided 325 fewer homes than were required.

<<<Representation includes a graph titled, "Figure 3.1: Stockton on Tees new homes built by private developers 04/05 - 11/12.

Source: Shelter Housing Databank">>>

What is the Economic Impact of the Undersupply?

Stockton has missed on significant economic benefits by not building enough homes including:

- Nearly £470,000 per annum in Council Tax Payments

- Almost £950,000 net additional expenditure per annum in the local area- supporting c.10 new retail and leisure jobs in Stockton;
- More than £3.0m in GVA (economic output) from the construction of new homes
- The delivery of around 270 person years of construction employment and 30 FTE jobs in the supply chain.

What is the Current Supply and Composition of Existing Stock?

Figure 3.2 shows that of the existing homes in Stockton:

- 43% are in Council tax Band A;
- 78% are in Council tax Bands A -C;
- 17% are in Council Tax Bands D and E, compared to 25% in England;
- 4% are in Council Tax Bands F – H, compared to 9% in England
- This represents a dominance of lower value properties.

<<<Representation includes table titled 'Figure 3.4: Stockton Dwelling Stock by Council Tax Band (2011) Source: ONS Neighbourhood Statistics'>>>

Council Response: Comments noted.

H2 - Housing Phasing and Implementation

SP2 - Housing Spatial Strategy

h1k - Wynyard Masterplan

H1m - Wynyard Park

311/4: 4.0 How Much Housing is Needed in Stockton?

The Housing Requirement as Defined by the Council Core Strategy Stockton Borough Council's Core Strategy Policy 7 – Housing Phasing and Distribution states that between 2011 and 2016 there is a need for 2,650 dwellings across the borough, equating to the construction of 530 dwellings per annum. In the longer term, between 2016 and 2021 there is a need for 2,625 equating to 525 dwellings per annum.

Regeneration and Environment LDD

This document sets a housing requirement over the plan period 2014 to 2029 of 8,250 dwellings, which equates to an annual requirement of 550 dwellings over the 15 year plan period. We understand that the housing requirement set is based on the RS requirements rolled forward to 2029. The housing requirements incorporate a 5% buffer, to ensure choice and competition. There is scope to argue for a 20% buffer given the persistent under delivery of housing over the past 8 years.

Historic Land Supply and Delivery

Stockton Borough Council acknowledges in its Core Strategy Review (CSR) that there may not have been enough housing sites identified which are compliant with the adopted Core Strategy and that can deliver the number of homes that need to be built in the Borough by 2028. The exact shortfall is illustrated below in figure 4.1, which shows a 2800 dwelling gap between cumulative net completions and the Borough's cumulative housing target by 2027/2028.

<<<Representation includes table titled, Figure 4.1: Cumulative Housing Trajectory within the Stockton Borough Source: Stockton Borough Council's Core Strategy DPD Review – Issues & Options Consultation>>>

The REPO confirms that during the process of preparing the document it has become apparent that the housing delivery gap had increased to about 4,670 dwellings. This is because the delivery of some existing planning permissions is considered likely to be less than previous estimates, whilst the scheduled date of adoption for the CSR has moved forwards to January 2014".

Table 4.1 summarises the net completions versus the Council's housing requirements. As can be seen the housing requirements have been exceeded in only one year and, in the round, the completions have been consistently under the annual housing requirements, including during the period prior to the recession. In terms of past performances on delivering a 5 year supply, Figure 4.3 illustrates that over the previous 5 year period the Borough fell short of delivering its housing requirement.

As previously noted, there is scope to include a 20% buffer given the persistent under delivery of housing over the past 8 years.

<<<Response includes two tables 4.1 and 4.2 which show housing performance against the RSS target>>>

Council Response: Comments regarding housing delivery noted and addressed in the Housing Need and Demand Topic Paper.

## SP2 - Housing Spatial Strategy

### H1 - Housing Allocations

#### h1k - Wynyard Masterplan

#### H1m - Wynyard Park

## 311/5: HEaDROOM Assessment

NLP has developed a robust model for defining the quantum of housing that should be planned for through a Development Plan.

The HEaDROOM model analyses a wide range of evidence and statistical sources in a transparent manner, fully in line with the requirements of the NPPF. Central to HEaDROOM is an understanding of the role of housing both in ensuring that the future population of an area can be accommodated and in securing economic growth.

Specifically, by modelling the outcomes of different

economic and demographic scenarios, it examines the number of homes needed to support projected population and job growth.

### Scenarios

HEaDROOM has been used to model the projected housing requirements for Stockton over the 15 year plan period from 2014 to 2029. Four housing requirement scenarios are presented based on demographic, economic and housing evidence:

#### Scenario 1: Baseline

This scenario represents the 'baseline' housing requirement for Stockton which is underpinned by the latest (Subnational Population Projections (2010) and ONS Household Projections (2008)) population projections (including the most recent projected births and deaths and internal and international migration rates).

#### Scenario 2: Zero Job Growth

The economic-based scenarios model the housing requirement generated by the population structure required to sustain a given number of jobs (assuming certain characteristics of economic activity, unemployment and commuting rates).

Scenario 2 assumes there is no job growth in Stockton over the period to 2029. It is included to identify the lowest housing requirement needed sustain the existing number of jobs in the Borough only.

Scenario 3: Modest Job Growth In the absence of any detailed job growth forecasts, Scenario 3 models the housing requirement needed to support the number of jobs forecasted by the Employment Land Review (ELR) (2008).

The ELR sets out three economic growth scenarios over the 16 year period from 2005 to 2021; the Bronze Scenario (which assumes economic growth of 2.3% per annum); the Bronze/Silver Scenario (2.8% per annum); and the Gold Scenario (4.9% per annum). These scenarios correspond to annual job growth in the region of 252, 992, and 2158 jobs respectively. It is assumed that the Bronze scenario at 2.3% growth per annum averaged across the plan period represents a realistic scenario for the Borough given the prevailing economic conditions and future outlook. A housing requirement scenario has therefore been produced which takes the 2010 mid-year population estimates and projects these forward to take account of the number of houses you would need to achieve 252 jobs per annum.

#### Scenario 4: Historic Job Growth Rate

Scenario 4 models the housing requirement based on alignment with past rates of employment growth in Stockton of 744 additional jobs per annum (average job growth since 1995). This scenario reflects the level of housing needed to maintain this rate over the plan period.



Figure 4.2 shows the housing requirements generated by HEaDROOM for each of the Scenarios. The housing requirements are presented within the context of the adopted RS requirement and past net completions in Stockton.

Scenario 1 shows the net number of new dwellings needed to sustain predicted population growth. This baseline housing requirement indicates that a minimum of 773 net dwellings per annum are required to house projected population and household growth over the period. However, the Regeneration and Environment DPD requirement falls short of this scenario by 3,345 dwellings over the plan period.<sup>1</sup>

Scenario 2 is based on zero job growth over the plan period. Therefore, relative to the growing population in the Borough, this scenario assumes a steady economic decline in the Borough. Given Stockton's past performance in terms of job creation, it would not be a sound approach for the Development Plan Document to plan for economic decline. Nevertheless, this scenario forecasts that 610 dwellings per annum would be required to meet the demands of a stagnant economy. This is 900 dwellings more than the DPD is providing over the plan period. It can therefore be assumed that the DPD is planning for a net reduction in jobs in the Borough

Scenario 3 shows the net number of dwellings required to sustain the job growth predicted by the Council's ELR Bronze Scenario (868 net additional dwellings per annum). This economic evidence supports a significantly higher housing requirement than that proposed within the Regeneration and Environment DPD. Stockton's housing provision needs to be aligned to take into account the economic and job growth.

Scenario 4 shows the housing requirement needed to support the average annual job growth since 1995 at 744 jobs per annum (1,372 net dwellings per annum). The Borough's strong track record for job growth (when compared to surrounding Authorities such as Hartlepool where the number of jobs grew by, on average, 32 jobs per annum over the period from 1995) is something which should be supported in the future with sufficient number and range of housing.

Council Response: Comments noted. The 'Housing Need and Demand Topic Paper' sets out the reasoning behind the housing requirement.

h1k - Wynyard Masterplan

311/6: 5.0 Does Stockton have sufficient employment land?

H1m - Wynyard Park

The supply of employment land within Stockton is assessed within the Employment Land Assessment (March 2012) prepared by Storeys Edward Symmons. This document accompanies these representations. Key findings are as follows:

- Stockton has a significant oversupply of employment land
- Around 320ha (gross) or 267ha (net) is available for commercial/industrial uses
- This provides an implied supply of 26 years, based on historic uptake of 10.2ha per annum (more than 1.5 times the amount required for the 15 year period)
- Stockton would require 153ha for a 15 year plan period and thus has a surplus of 114ha
- An excess of employment land is available at Wynyard Park
- At Wynyard Park, including the North Burn Area there is 189.89ha of available employment land. When measured against past take-up, which has averaged 10.2ha per annum in Stockton and 2.07 in Hartlepool, the portfolio of available land at Wynyard Park equates to around 58 years supply
- The over supply of available employment land at Wynyard Park could be substantially reduced without any detrimental affect on the prospects for economic development in the sub-region, Stockton and Hartlepool Boroughs and at Wynyard Park. In conclusion it can be seen that Stockton has more than sufficient employment land.

<<<Response includes a table titled Figure 5.1: Available Employment Land at Wynyard Park Source: Employment Land Assessment, Storeys Edward Symmons (March 2012)>>>

Council Response: The Council's employment land requirement was adopted in the Core Strategy (2010). With regard to general employment land, this document required 70 hectares of land to be identified at Wynyard and 235 hectares to be identified elsewhere in the Borough. There has been 24 hectares of take-up in the Wynyard area creating a requirement for 44 hectares of prestige employment allocation. As a result, the Council has de-allocated surplus land at Wynyard in order to meet the 70 hectare requirement, this leaves 57 hectares of land in the area, 13 hectares more than the requirement. However, this area can be considered as contributing to the general employment land supply.

Furthermore, employment land take-up of 77 hectares has reduced the 235 hectare requirement to 178 hectares. General employment allocations, surplus land at Wynyard, and the potential re-occupation of existing commercial floorspace provide enough land to meet this requirement.

The document therefore allocates sufficient employment land sites to meet the Core Strategy requirement.

h1k - Wynyard Masterplan

311/7: 6.0 What is Wynyard Park's Future  
Wynyard Park as a Key Employment Location

H1m - Wynyard Park

Wynyard Park is an established business location of regional significance. Saved Local Policy IN4 allocates 72ha of land at Wynyard Estate as a Prestige Employment Site. This allocation covers Site W2, as shown on Figure 6.1. 70ha of land at Wynyard Park is allocated as a Key Employment Location (KEL) in Policy CS4 – Economic Regeneration of the Stockton Core Strategy DPD.

Policy EMP3 – Key Employment at Wynyard Park in the REPO sets out the Council's revised approach to providing employment land at Wynyard. It confirms that "70 hectares of land are allocated as a sub-regionally important prestige employment location within the Wynyard One and Wynyard Two sites"

The key difference between the approach in the Local Plan and Core Strategy and the REPO is that the 70ha is to be provided partly on Site W2 and partly on Site W1 (including the former Samsung site), thus leaving additional land in the northern part of Site W2 for 1,000 new homes.

The Future of Wynyard Park

The Employment Land Assessment (March 2012) prepared by Storeys Edward Symmons demonstrates the following:

- Substantial infrastructure provision is required to bring forward future development plots at Wynyard Park
- The abnormal costs will undermine the viability of their development for employment uses, particularly the plots to the rear
- With severe reductions in public spending and a withdrawal of grant funding for property development, infrastructure provision to serve future phases of development at Wynyard Park will have to come from different sources
- Without sufficient cross-subsidy from more valuable uses, future phases of employment development will be held back
- The development of further employment premises will therefore, more than ever before, rely on cross subsidy from more valuable uses, including residential;
- Increasing the amount of housing development will enable infrastructure provision across the wider Wynyard Park area, reduce the abnormal costs of developing new employment premises, and potentially allow the financing of new employment floorspace;
- Given the huge amount of employment land in this location, the proposed scale of reduction will have no detrimental effect on the economic prospects of the subregion;
- The overall impact of reallocating some employment land at Wynyard Park for residential development will be beneficial not only to the overall development of the scheme but also to the provision of employment floorspace; and
- Given its location and scale Wynyard Park will continue to be regarded by the market as a key employment location of regional importance.

The Storeys Edward Symmons advice is therefore crystal clear. More housing is needed at Wynyard Park to deliver the infrastructure which is crucial to its short and long term success. Reallocating some of the rear plots to housing will have no harmful effect on the ability of Stockton to have enough land to meet its employment needs.

The REPO arrives at a similar conclusion.

Paragraph 2.24 states:

-A mix of housing and employment at Wynyard Park will have less of an impact on the Strategic Road Network than employment dominated development. However, the Highways Agency has identified that any additional housing development, over and above existing provisions, is likely to cause additional implications on the highway network. It is important for this reason that land is allocated on a sufficient scale to generate the considerable developer funding that will be needed for the mitigation of highways issues in the Wynyard area. [It is therefore proposed to [allocate] the Wynyard Hall Estate for 300 dwellings and Wynyard Park for mixed-use development inclusive of 1,000 dwellings. The allocation of these sites will provide an opportunity to improve the sustainability of Wynyard, which currently has few facilities and no public transport links and has the potential to make a significant contribution to the Tees Valley

economy”.

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

h1k - Wynyard Masterplan

311/8: 7.0 Wynyard Park - The site and its planning history  
The Site

H1m - Wynyard Park

This section covers the whole of Wynyard Park. The area comprises 358 hectares of prestige development land set within a strong and mature woodland framework. It mainly comprises two former farmsteads, mature field boundaries, and plantation woodland. The A19 and A689 run close to the site and provide access to Durham, Sedgefield, Hartlepool and the Tees Valley.

Fingers of woodland run north-south through the site, dividing it into three sub-areas. These areas have previously been named as follows and for consistency these names shall be retained:

- Wynyard 1 (W1) - the eastern area containing the majority of the built development. It lies within the administrative area of Stockton Borough Council;
- Wynyard 2 (W2) - the central area, partially developed with offices and light industrial. It also lies within Stockton; and
- Wynyard 3 (W3) - the western and largest area which is yet to be developed. It has planning permission for a new hospital and a minded-to-grant decision for 200 houses. This land lies within the administrative area of Hartlepool Borough Council.

Wynyard Park is now the home to over 60 businesses, employing around 1,500 people. They include AMEC, Cleveland Police, Conoco Phillips, Hertel, Huntsman, NFU Mutual and SEMTA. Wynyard Village to the south of Wynyard Park is an exclusive executive development, developed in the 1990s and 2000s. Wynyard Village forms part of the larger Wynyard Estate, a 13th Century historic estate with Wynyard Hall as its centrepiece.

#### Planning History

Planning permissions were granted across the whole site for employment uses in the 1990s and have subsequently been renewed. Some of these have been built out in the eastern area. The current situation is as follows:

- 685,150sqm of employment floorspace (offices and industrial) have permission, of which nearly 90,000sqm has been built out;
- A £15m 343,000sqft warehouse for Clipper Logistics is under construction and is due to be operational in September 2012;
- A £300m world-class hospital for the North Tees and Hartlepool NHS within the heart of W3 has permission. It merges outdated facilities in both Stockton and Hartlepool; and
- Plans for 200 new homes within the western extent of W3 were approved by Hartlepool Borough Council on 4 November 2011, subject to conditions and a legal agreement.

Wynyard Park is emerging as a vibrant community. Further allocations of housing are required to increase this vibrancy and sustainability.

Council Response: Comments noted.

h1k - Wynyard Masterplan

311/9: 8.0 Wynyard Park - Constraints and Opportunities

H1m - Wynyard Park

In contrast to Section 7, this section relates to the draft allocation for the 1,000 houses on the Stockton land. A more detailed analysis across of the whole of Wynyard Park, including land within the administrative area of Hartlepool, can be provided, if required, to supplement this site specific analysis.

#### Constraints

The existing site and its surroundings feature a number of potential development constraints. A central principle of design has been to view potential constraints such as

existing landscape features and watercourses as an opportunity of design. The retention and enhancement of these features will help to preserve the 'green character' of the site.

#### Opportunities

The site benefits from high landscape value and proximity to mature woodland. A central driver of design is to ensure the proposed development forms a positive relationship with the woodland areas which provide enclosure to the northern, western and eastern boundaries. The positive approach to existing landscaping will be augmented by an informal network of 'woodland walks'.

<<< Representation includes a constraints and opportunities map>>>

Council Response: Comments noted.

h1k - Wynyard Masterplan

311/10: 9.0 Wynyard Park - The Vision

H1m - Wynyard Park

#### The Aims

- To create an exciting, new mixed-use community;
- To deliver a new built environment and public realm of the highest design standard to accommodate contemporary life;
- To establish Wynyard Park as the Region's premier business park;
- To provide a mixture of house types and tenures of the highest quality to meet needs and aspirations;
- To capture the area's natural features to maximise opportunities, particularly the landscape and wooded setting;
- To embrace sustainability at all levels: economic, environmental and community

#### The Proposals

The proposals are to deliver:

- 355,000sqm of prestige business / industrial space (B1/B2/B8), of which around 90,000sqm of class B1/B8 floorspace has already been built
- 1,850 high quality new homes, which will comprise a full mix of houses including 2, 3, 4+ bedroom family / executive houses and affordable housing. Of these:
  - \* 1,000 homes are proposed within the administrative area of Stockton Borough Council
  - \* 850 homes are proposed within the administrative area of Hartlepool Borough Council. These comprise 200 homes on the area allocated for 200 homes within the CSPD and 650 homes on the area to the north and north-west of the new hospital site
- Local neighbourhood centre including shops, community facilities and a transport hub
- £300m new world class hospital containing 626 beds, which will employ around 3,800 people
- 13,000sqm for further health related investment, which together with the new hospital will form a 'Medical Hub'
- Opportunities to extend public transport into the site through initiatives being pursued within the sub-region
- Enhanced biodiversity and habitat creation
- Landscaping to integrate the site into the surrounding woodland setting

The 'Indicative Vision / Masterplan' on page 41 indicates how these proposals could potentially be developed across Wynyard Park, which includes the administrative areas of both Hartlepool and Stockton Borough Council's. The future development site in Stockton, which is subject to these representations, is identified on this plan.

#### The Concept

Design proposals at Wynyard Park relate to the delivery of approximately 1000 dwellings. Consistent with the overall grain and aesthetics of the Wynyard area, the proposed development will be designed to 'executive housing' principles. These principles broadly apply to a predominantly 'low-density' design approach with a predominance of detached dwellings. These dwellings will be located within considered framework of landscape and open space.

The development cells have principally been guided by the position of the existing woodland, historic hedgerows and field patterns. Additionally, pedestrian movement and

connectivity has also been carefully considered. This has led to the creation of a highly permeable network of distinctive street types and green spaces, with different characters. Figures 10.2 and 10.3 shows the links and desire routes through the site, which relates to woodland walks, field patterns and hedgerows.

The village fabric will reflect the local vernacular and character of the traditional villages of South Durham, Tees Valley and North Yorkshire, of which extensive studies have been made and which have informed the formulation of the Wynyard Park brand

values of:

- Quality
- Tradition
- Sustainability
- Responsiveness
- Social Inclusiveness
- Human Scale
- Landscape Priority

A key component of the Wynyard Park development, is the location of the proposed 'Retirement Village' element of the scheme. The location of the Retirement Village has the potential to act as the 'Village Centre' of the development, with generous areas of open space appropriately 'framed' by carefully considered built form.

Although conceived as being a higher density element of the development, with a predominance of apartments, the design and layout of the Retirement Village element will still embrace the principles of an 'executive approach' Human scale and the informality of village life will be further achieved by a coherent system of landmark buildings and a clear traditional hierarchy of linear and centralised spaces ranging from wider streets on principal routes, to narrower lanes and mews. A key principle of the scheme design is the inclusion of smaller more informal areas of open space. These smaller areas provide a consistent 'green route' through the proposed scheme.

#### Design Code

It is crucial that the values and quality being sought are controlled by a consistent design mechanism. Wynyard Park have chosen to accomplish this by means of a design code, currently under preparation, which, when combined with particular development briefs, will guarantee delivery of quality standards.

<<<Representation also includes images of an 'indicative vision plan', 'Potential Pedestrian Linkages' and 'Potential Vehicular Linkages'>>>

Council Response: Responses to Wynyard specific issues are dealt with in the Wynyard topic paper.

## h1k - Wynyard Masterplan

### 311/11: 10.0 Wynyard Park - Landscape and Green Infrastructure

## H1m - Wynyard Park

An integral and important part of the overall masterplan, together with the proposed new residential development would be a strong, accessible green infrastructure, making significant connections with the woodland habitats that surround most of the site, some of which are designated as Local Wildlife Sites.

Existing tree groups within the site would be retained and used within the masterplan to establish green links and wildlife corridors through the development site, connecting green spaces within the heart of the development to the surrounding woodland. They would also serve to assist in creating distinct character areas within the development.

New wetland habitat, possibly part of a Sustainable Urban Drainage system, would be formed within public open space within the north west and south eastern sectors, making a major contribution to the enhancement of the site's biodiversity.

As well as helping define the distinct character of the residential zones, a tree lined loop road would mark the boundary of the area to the centre of the development which is likely to have a more dense urban grain, and in which hard and soft landscaping would combine to generate a mosaic of 'homezone' style living spaces. Outside this

loop road, the hierarchy of green corridors would facilitate informal recreation and access to the attractive surrounding woodland in the less ecologically sensitive areas. These areas also have the potential to be developed as natural play areas, outdoor learning spaces or small community events spaces within the new urban landscape.

A new recreational route is planned along the alignment of an existing track through the woodland on the north bank of Close Beck and this would connect with the footpath network at the north eastern corner of the site.

In summary, the landscaping scheme will:

- Create a vibrant environment where people will chose to live, work, relax and socialise
  - Deliver a safe and visually attractive setting for the residential development
  - Include sustainable drainage, flooding swales and wetland creation
  - Provide significant tree planting and landscaping, using native trees, shrubs, grassland and wetland species
  - Form spaces for formal and informal recreation, outdoor learning, small community events
  - Deliver informal paths and walkways throughout the masterplan area and into the attractive surrounding woodland in the less ecologically sensitive areas
  - Facilitate accessibility to people with disability and mobility difficulties
- Importantly, the masterplan will also accord with the aims and objectives of the Tees Valley Green Infrastructure Strategy which identifies that Wynyard Woodland Park forms part of a strategic

green corridor. Within this corridor, the key priorities are to:

- \*increase planting / management to increase the value of woodland, hedgerows and open spaces to the local community and for local community and for biodiversity
- \* improve/ provide a good network of access routes

Environmental quality and quality of place are increasingly seen as playing an important role in improving economic performance and urban competitiveness.(Tees Valley Green Infrastructure Strategy, para. 1.9)

Council Response: Comments noted.

h1k - Wynyard Masterplan

311/12: 11.0 Wynyard Park - Social Benefits

H1m - Wynyard Park

It is a central tenet of the proposals at Wynyard Park that the social benefits of the Masterplan extend far beyond the boundary of Wynyard Park and contribute to the socio-economic wellbeing of the Stockton and Hartlepool Boroughs as a whole. As a sustainable mixed-use new community of the highest quality, it will rapidly become the region's exemplar new residential and business community.

Meeting Local Housing Needs

Wynyard Park will deliver a mix of modern high quality housing types. It will help to address the shortfall of 3 to 4+ bedroom dwellings and will focus on achieving a balanced community at Wynyard and in the wider Stockton Borough area.

Affordable Housing

Wynyard Park will be an inclusive mixed community, with intermediate and social housing forming an important part of that vision. Affordable housing could be provided in line with SBC's policies and local need, which can include homes for first time buyers.

Linkages to Housing Market Regeneration

New housing at Wynyard Park could play a significant role in supporting the regeneration initiatives within the Borough, through providing off-site affordable housing contributions.

Community Facilities

The overall Wynyard Park masterplan includes a local centre which will provide small-scale shops and facilities to satisfy the day-to-day needs of residents and businesses.

A primary school is proposed on land within W3. It includes playing fields which will be available for wider community use out of school hours.

Across Wynyard Park, a range of open spaces, parks and play areas, linked into the cycle and walking network will be provided to ensure residents are active and can socialise and engage with each other.

Council Response: Comments noted. The appropriate location and mechanisms for delivering community facilities has been agreed in the various planning applications in the area.

## h1k - Wynyard Masterplan

### 311/13: 12.0 Wynyard Park - Economic Benefits

## H1m - Wynyard Park

The Wynyard Park proposals will have significant economic benefits for both Stockton and Hartlepool Borough Councils. The benefits of the proposal to be captured within Stockton are now provided. These benefits will only be realised if the site is allocated and delivered of residential uses.

### Jobs

Building new homes creates significant numbers of new jobs. These occur in the construction industry and in the supply chain, as well as other related services, such as in shops and leisure centres. Based upon industry standard employment densities, it is estimated that the development will generate the following:

- 825 permanent Full Time Equivalent (FTE jobs) during the construction phase, including jobs in the supply chain (this is drawing upon Government-backed figures);
- 8,750 gross FTE jobs on the development's completion. This figure does not take account the displacement or multiplier effects (which are difficult to isolate for Stockton given the complexity and location of the scheme).

### Spending Power

In providing high quality family homes, Wynyard Park will help to attract new, economically active households to the area. These households will spend their disposable income in local shops and services, providing a boost to existing businesses in the area. It is estimated that the 1000 new households could generate spending of £2.6m every year. This level of expenditure would support many new jobs in local shops and restaurants.

### Increased Council Revenues

The proposals will result in a substantial increase in Stockton's revenue base. It is estimated that the 1000 new homes would result in:

- £12.4m from the Government's New Homes Bonus
- £2.2m every year in additional Council Tax

This will provide a massive benefit to the Borough at a time when Local Authority funding from the Government is being reduced. The funds could be used to build new or support existing community services or support regeneration initiatives in the Borough.

### GVA Impact

The development will make a huge contribution to local Gross Value Added (GVA), which is a common measure of economic output. It is estimated that the construction phase will result in an additional £21.5m of GVA. A significant proportion of this will be captured locally.

### Employment / Training Plan

Paragraph 2.4 of SBC's adopted Core Strategy acknowledges that the Stockton Borough has:

- A lower than national average employment rate;

- Low rates of new business start-ups;
- [the] potential to improve educational achievements, and to retain and attract more highly qualified people; and
- A wide disparity of opportunity

Wynyard Park will create a substantial number of jobs during both construction and following the completion of the development. In order to ensure that the benefits are maximised within the local community, Wynyard Park Limited would be agreeable to an Employment / Training Plan whereby employment opportunities at all stages of the development would be designed to ensure that local people would be employed during both the construction and life of the development, where possible. This plan would also include work experience and training opportunities for the new jobs created.

The Employment / Training Plan would be of great benefit to the local community through increasing employment and diversifying the existing skills base. In addition to these benefits, significant benefits will also be delivered from the section of the development that lies within the administrative area of Hartlepool Borough Council

Council Response: Comments noted.

h1k - Wynyard Masterplan

311/14: 13.0 Wynyard Park - Sustainability

H1m - Wynyard Park

Creation of a Sustainable Development

The main objective of the Wynyard Park Masterplan is to create a sustainable development that takes into account the needs of society, the economy and the environment.

Wynyard Park will deliver a prosperous community with high quality housing that meets the needs of the local community, as well as attracting and retaining highly skilled / professional workers. The further development of the prestige business park will drive forward Stockton's economic growth.

By increasing the population of Wynyard Park and providing local services, employment and health care opportunities, Wynyard Park will create an increasingly self-sufficient community, where public transport, local shops and services have access to the necessary population to grow.

Equally important will be the delivery of a high quality, green environment that protects and enhances biodiversity.

An Integrated Landscape / Green Strategy

The Masterplan will provide an integrated network of green corridors and open spaces to deliver an environment of the highest quality. New trees, landscaping and open spaces will be provided that are designed so as to accommodate recreation as well as ecology, ensuring that local wildlife sites are enhanced.

Enhancing Biodiversity

The protection and enhancement of wildlife is central to the aims of the overall masterplan and will include:

- Protection of legally protected species and Biodiversity Action Plan habitats and species such as bats, otters, water voles, badgers, breeding birds
- Protection and enhancement of Local Wildlife Sites (Wynyard Woods and High Newton Hanzard Wildlife Sites) and species from the adjacent Local Wildlife Site (North Burn Marsh)
- Creation of new habitats including wildflower meadows, wetlands, scrub and grassland, as well as bat and bird boxes, to deliver a high quality of habitat and to encourage birds, mammals, amphibians and invertebrates into Wynyard Park
- Management of existing woodland to provide a greater diversity of age and structure, including the creation of small clearings and open ridges, to improve biodiversity
- Provision of sustainable drainage, through the creation of wetland areas, to provide a low carbon ecologically sound method of managing surface water on-site



- Landscaped, woodland and wildlife areas will provide a fantastic recreational and educational resource for the area and could include nature trails with interpretation boards

#### Access and Recreation Improvements

The Wynyard Park Masterplan provides significant opportunities to provide access and recreational opportunities for local residents, business park workers and visitors. Links for walkers / cyclists will be provided into the Wynyard Park woodland and the wider green network. Opportunities will also be provided for exercise, sport, active recreation within the masterplan area.

Overall, the access and recreational opportunities provided at Wynyard Park will help support a healthy and active population. Developer contributions could also be provided to facilitate improvements to the wider Public Right of Way network.

#### Sustainable Transport

As the population of Wynyard Park grows and committed development such as the hospital at Wynyard Park is constructed, the result will be significant improvements to public transport infrastructure and provision. As part of the hospital development, a new shuttle service will operate between Wynyard Park, Billingham railway station and the bus interchange at The Causeway, Billingham running along Coal Lane, A1185 and Marsh House Avenue. It is proposed that this service will operate 7 days a week. The development of 1,850 homes at Wynyard Park will stimulate further demand for public transport, increasing the financial viability of more varied and frequent services.

The Masterplan provides a permeable, legible composition to the residential development, ensuring that new residents can walk to the local centre, play areas and parks. A fully integrated network of cycle ways will be provided, linking committed development such as the hospital and recently permitted housing development at the western end of Wynyard Park.

Streets will be designed to reduce traffic speed and provide attractive, green landscaped areas encouraging residents to walk, play and be active. A Green Travel Plan will be created to integrate the transport objectives of the all committed and planned development within Wynyard Park and ensure a coherent sustainable transport strategy for the area.

#### Sustainable Housing

Sustainable design can significantly reduce the Carbon Footprint of residential developments. It is proposed that Wynyard Park will be an exemplar low carbon development, combining multiple areas of best practice to provide the best practicable standards of design. This masterplan seeks to adopt a number of solutions which will reduce the energy requirement of Wynyard Park. Solutions considered include;

- Ensuring that homes will achieve efficiency performance of at least Code for Sustainable Homes 4 and will incorporate low and zero carbon technologies;
- The provision of onsite and offsite renewable energy, including futureproofing buildings and structures so as to enable adaption to future requirements; and
- The reduction of potable water consumption across the development.

"At the heart of the planning system is a presumption in favour of sustainable development (NPPF, para. 14)

Council Response: The 2011 SHLAA states that the, "The site is not suitable as the location is considered to be unsustainable. This is without reference to the possibility of a wider masterplanning exercise to achieve a satisfactory performance against the access by sustainable means criteria." The comments noted in the response are noted, it is essential that the site is masterplanned to achieve a sustainable development. The Regeneration and Environment LDD adopts a strategy which seeks to increase the sustainability of the Wynyard settlement. Further information is provided in the Wynyard Topic Paper.

h1k - Wynyard Masterplan

311/15: 14.0 Wynyard Park - Its Suitability for New Housing

H1m - Wynyard Park

#### Introduction

This section considers the suitability of Wynyard Park as a location to provide the new homes required in order to fulfil Stockton's housing needs. It examines how the allocation of additional land at Wynyard Park for housing can help to achieve the overarching aspirations and objectives of the Core Strategy and the REPO.

The Site and its Suitability Wynyard Park provides a most valuable and unique opportunity to deliver a comprehensively planned and sustainable community that incorporates contemporary new homes, high quality businesses, a new hospital, local shops and community facilities, all within a woodland

setting. In total, 1,850 new homes could be delivered, of which 1000 dwellings would fall within the administrative area of Stockton Borough Council of the Future Development Site (shown on the Indicative Vision on page 41) and which is the subject of these representations.

#### Deliverability

The NPPF (Footnote 11) sets out that a site is deliverable when it is:

- Available now;
- Suitable for development now;
- Achievable – the site is achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the site is viable Each of the above are now considered in turn, in respect of the Wynyard Park

#### Availability

The site is available now and is within the control of Wynyard Park Ltd. The site is being actively promoted for development. There are no legal issues which would prevent the delivery of housing at this site.

#### Suitability

The NPPF does not define what makes a 'suitable' housing site. However, Stage 7a of the CLG Strategic Housing Land Availability Assessment Practice Guidance (paragraph 37), which is still relevant, states:

“a site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities”

Paragraph 38 of this document also identifies the following factors which should be considered when assessing a site's suitability for housing now or in the future:

- Policy restrictions
- Physical problems or limitations
- Potential impacts
- The environmental conditions, which would be experienced by prospective residents.

An assessment of the suitability of the Wynyard Park site is set out below, based on the definitions and factors set out above.

Sustainable, Mixed Community The Wynyard Park Masterplan is committed to delivering a sustainable mixed-use development with high quality low carbon design and access to public transport. Further details are provided within Section 13 of this report.

#### Policy Restrictions

The employment allocations relating to the Wynyard Park site are currently being reviewed by both Stockton and Hartlepool Council, on the basis that not all of the land is required for employment use (see Chapters 5 and 6) and there is un-met need for housing in both Boroughs, which in turn could help fund the employment development.

#### Physical Problems or Limitations

The site is agricultural land. There are no known constraints or risks that would prevent development, including any ground conditions or stability issues.

#### Potential Impacts

There are no potential significant impacts, including landscape or highways impacts that could not be mitigated through good design and mitigation measures incorporated into the Masterplan and delivered via planning conditions or Section 106 Agreements at the planning application stage.

#### Environmental Conditions

The housing element of Wynyard Park will be sensitively designed with adequate landscaping to ensure that prospective future residents would not be affected by neighbouring employment developments.

Achievable

There are no physical or environmental limitations which could preclude the development of Wynyard Park. The Masterplan is deliverable and the site has the potential to deliver houses within the next five years and over the longer-term period of the Core Strategy and REPO.

As explained in Section 6, housing is required to cross-subsidise the next phase of the substantial infrastructure required to enable the continued development of the business park. Without the housing / funding, the delivery of the business park is put at risk.

Additionally, following the decision by Hartlepool Borough Council to approve plans for the 200 houses within their boundary at Wynyard Park (subject to conditions and a legal agreement) Wynyard Park Limited has received healthy interest from several of the country's top house builders. This demonstrates a current and live interest in a residential development at Wynyard Park. Evidence suggests that the development of Wynyard Park is viable.

Council Response: Comments noted. The 2011 SHLAA found that the site is available and achievable, subject to overcoming highway constraints. The site is not considered suitable in the SHLAA; however, masterplanning work could achieve a more sustainable development.

h1k - Wynyard Masterplan

311/16: 15.0 Next Steps

It is clear that the quantitative supply of employment land at Wynyard Park could be reduced without any detrimental affect on the prospects for economic development in the local area, district and sub-region.

H1m - Wynyard Park

This representation document provides details on how new housing can be delivered at Wynyard Park as part of a comprehensive masterplan. The new housing will be low carbon and built to the highest architectural design standards. Overall the Wynyard Park Masterplan will deliver a step change in the Borough's economic performance and will ensure the creation of a sustainable community at Wynyard Park.

Wynyard Park Limited is supportive of the strategy for Wynyard Park identified in the REPO and looks forward to working alongside SBC in order to progress the Wynyard Park Masterplan and would welcome any feedback.

Council Response: Comments noted and support welcomed.

312 Highways Agency

SP1 - Presumption in favour of sustainable development

312/1: The Agency is generally supportive of the strategic policy and taking a positive approach that reflects the presumption in favour of sustainable development particularly where sustainable access to housing, employment and other services and facilities is encouraged. The Agency is keen to continue working with the Council to ensure that only the most appropriate sites are taken forward and that full consideration is given to the impacts on existing infrastructure and the level and type of mitigation which may be required to ensure that new development will be sustainably delivered and will not have a detrimental impact on the safe and efficient operation of the SRN. Comment on the specific housing allocations are provided in response to policy H1 (and its site specific sub-policies).

Council Response: The Council welcomes the Highways Agency's support in ensuring that the most appropriate sites are taken forward as site allocations.

SP2 - Housing Spatial Strategy

312/2: The Agency is supportive of the housing spatial strategy site selection hierarchy which prioritises Core Area Sites as the preferred location for housing. As previously stated, existing central urban areas, such as the 'Core Area', are generally recognised as providing the most sustainable location for delivering new housing development, given that they generally have the best access to services, facilities, employment opportunities and easy access to more sustainable means of transport and therefore are likely to have less of an impact on existing transport infrastructure.

Council Response: Support welcomed. The approach set out at the Preferred Options stage has been continued in the Publication Draft; however, the hierarchy put forward at that stage has been replaced by site specific locations. The Council continues to support sites in the Core Area and conurbation, recognising the Highways Agency's statement that these generally have the best access to services, facilities, employment opportunities and easy access to more sustainable means of transport and therefore are likely to have less of an impact on existing transport infrastructure.

In addition, sites in West Stockton, Wynyard Village and Wynyard Park have been identified and proposals developed. The Highways Agency have been involved in developing these proposals.

SP3 - Limits to Development	<p>312/3: The Agency is supportive of the intentions of this policy in providing facilities adjacent to villages which are essential to their social and community needs, particularly those on previously developed land.</p> <p>Council Response: Support welcomed.</p>
SP4 - Green Wedge	<p>312/4: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
T1 - Footpaths, Cycle Routes and Bridleways	<p>312/5: The Agency is generally supportive of initiatives which aim to improve the provision and access to more sustainable modes of transport, particularly the walking and cycling provisions of this policy which would specifically support access to new developments.</p> <p>Council Response: Support noted. This policy has been developed into Policy T1, which seeks to encourage the protection and use of existing sustainable transport infrastructure, and Policy T2 which supports new footpaths, bridleways and cycle ways generally and safeguards the routes of proposed developments which are considered important for developing Stockton's sustainable transport infrastructure.</p>
T2 - Tees Valley Metro	<p>312/6: As previously stated, the Agency would be supportive of all sustainable transport proposals, including that for light rail, given that they would assist in meeting sustainable transport objectives and reduce the need to travel by private car, particularly on the SRN.</p> <p>Council Response: Support noted. Policy T1 supports the protection and take up of sustainable Transport across the Borough.</p>
T3 - Tees Valley Bus Network Improvements	<p>312/7: As previously stated, the Agency would be supportive of bus schemes that would assist in meeting sustainable transport objectives and in particular where it would help to reduce the need to travel by the private car on the SRN.</p> <p>Council Response: Support noted. The Tees Valley Bus Network Improvement Scheme is now largely complete however Policy T1 supports the protection and take up of sustainable transport across the Borough.</p>
T4 - Portrack Relief Road	<p>312/8: While the Agency supports the safeguarding of the Portrack Relief Road against development which would prevent or impair its development of functioning, the Agency would wish to consider the benefits of such as part of the wider package of measures required to support the spatial aspirations of the plan. The Agency is keen to continue working with the Council to ensure that only the most appropriate sites are taken forward and that full consideration is given to the impacts on existing infrastructure and the level and type of mitigation which may be required to ensure that new development will be sustainably delivered and will not have a detrimental impact on the safe and efficient operation of the SRN. A clear evidence based approach in this respect is essential.</p> <p>Council Response: Comments noted. The route of Portrack Relief Road continues to be safeguarded in the Publication Draft. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required is being addressed by detailed analysis and modelling work and joint working between the two organisations.</p>
T5 - Sustainable Freight	<p>312/9: The Agency notes that Option 2 is not to be implemented due to previous concerns raised. Based on previous considerations, the Agency is therefore supportive of protecting the functionality of railway sidings and the use of wharves for sustainable freight transport.</p> <p>Council Response: Support welcomed. This policy's objectives have been incorporated into Policy T1, which along with Core Strategy Policy 2 encourages the use of sustainable freight for the delivery of goods and supplies.</p>
T6 - Aerodrome Safeguarding Zones	<p>312/10: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
T7 - Public Safety Zones	<p>312/11: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
SL1: Development and Amenity	<p>312/12: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
SL2 - Renewable Energy Generation	<p>312/13: The Agency is supportive of the recognition that renewable energy generation should not cause any adverse impacts by virtue of the associated traffic generation levels. In this respect, as with any development proposals, the Agency would require to be consulted when an impact could occur at the SRN.</p>

Council Response: Comments noted.

#### EMP1 - General Employment Land

312/14: As previously stated, the Agency considers that priority should be given to the most sustainable sites, particularly those within existing centres on previously developed land which have good access to a wide variety of services, facilities and public modes of transport. In relation to the employment allocations, while one of the aims of the Agency is to support economic growth, it is also concerned with seeking to ensure that such growth is delivered sustainably and with appropriate consideration of the impacts at the SRN, to ensure that it continues to serve its purpose, not only in supporting the aspirations of Stockton, but the wider region. Given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required. The only transport related evidence base identified is that of the Local Transport Plan and it is not clear as to how this considers, and responds to, the specific development aspirations contained in this plan, in assessing the impacts and identifying solutions. This is considered essential at this stage of allocating sites.

Council Response: Comments noted. The Tees Valley Strategic Infrastructure Plan has provided much of the transport evidence for the plan. This is a constantly evolving transport planning response to the changing development aspirations of the Tees Valley, developed through collaboration between the Highways Agency, Tees Valley Unlimited and the five Tees Valley local authorities. This work has been used to identify the impact of site allocations on existing infrastructure and the level and type of mitigation which may be required. In addition, consideration has been given to the implication of each site allocation policy within the document and measures to mitigate these have been included in policies where required.

#### EMP2 - Principal Office Locations

312/15: The Agency previously stated that they would prefer sites that are sequentially preferable for office development over locations that were previously considered suitable. Should a sequentially preferable site be located where its development could lead to a detrimental impact upon the SRN, then the Agency would wish to be consulted at the earliest opportunity to discuss any potential mitigation measures which may be deemed necessary. Further, if businesses are to be located to other industrial estates, these should also not lead to a detrimental impact on the SRN. Where the relocation of businesses could impact on the SRN, the Agency would again wish to be consulted. It is also noted that the scale of development proposed at these sites is only provided for Teesdale (3ha). This site is not contained in the policy EMP1 allocations and clarification within the policy should be provided to identify if this is an additional allocation and it should be clarified if the scale of development at the other identified sites also needs to be stated.

Council Response: Comments noted. Policy relating to offices is now contained within EMP1, alongside other employment land allocations, giving greater clarity regarding the status of each site and the land available for development. The Highways Agency will continue to be consulted on specific proposals where necessary through the development management process.

#### EMP3 - Key Employment at Wynyard Park

312/16: As recently stated in the Agency's response to the Housing Review Issues and Options in 2011, the Agency has concerns with the allocation of significant development at Wynyard Park. The policy identifies that new infrastructure is required to reduce the impact of the development on the SRN, which the Agency welcomes. However, the requirements and viability of such improvements needs to be determined and appropriately detailed in policy and supporting Infrastructure Delivery Plan (informed by a sufficient evidence based analysis), to ensure that such proposals are deliverable. This is critical given that the deliverability of such measures will have implications on the deliverability of this strategic employment location and the soundness of the strategy as a whole. Again as previously stated, and as emphasised by the NPPF's 'duty to cooperate', it is considered that a coordinated approach with Hartlepool Borough Council (given their aspirations for development impacting at this same location) and the Agency is essential to ensure that an appropriate and robust strategy for the Wynyard area is developed.

Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required is being addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council. The Council recognises the importance of working with Hartlepool Borough Council to address the issues identified regarding development at Wynyard. Several planning applications in the area are minded for approval, the Highways Agency has considered the impact of these developments and has not objected. The widening of the A19 between Norton and Wynyard, as announced in the Autumn statement, will also create additional highway capacity to allow additional development.

#### EMP4 - Process Industries Sites

312/17: As previously stated, the Agency currently has no particular concerns in principle to the allocation of these sites for industrial processes, but given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required in line with the comments made in relation to policy EMP1.

Council Response: Comments noted.

EMP5 - Important Bird Populations and the Seal Sands and North Tees Sites	312/18: The Agency has no particular comment. Council Response: Response noted.
EMP6 - Port and River Based Uses	312/19: The Agency currently has no particular concerns in principle to the allocation of these sites for port and river based uses, particularly should there be opportunities to utilise the ports and waterways for sustainable transportation. However, given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required in line with the comments made in relation to policy EMP1. Council Response: Comments noted.
EMP7 - Airport Related Uses	312/20: Given the location of Durham Tees Valley Airport, there exists the potential for significant implications at the SRN arising from the 50ha + 20ha allocations. Given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required in line with the comments made in relation to policy EMP1. Council Response: Comments noted. It is noted that planning permission has already been granted for the level of development identified in the document.
TC1 - Stockton Town Centre Improvements	312/21: The Agency has no particular comment but is generally supportive of these initiatives which aim to improve the provision and access to more sustainable modes of transport. Council Response: Support welcomed.
TC2 – Sites for major new retail and town centre use development	312/22: Whilst the Agency is generally supportive of locating large scale major retail and town centre uses within the existing centre, where access to public transport opportunities is at its greatest, the Southern Gateway site is located in close proximity to the SRN with the A66(T) immediately to the south. Such a level of development will require detailed assessment in terms of its impact on the SRN, in line with the provisions of the GTA and Circular 02/2007 or any subsequent guidance. The Agency would expect that as the site is brought forward, measures to improve its sustainability are also brought forward, and whilst the Agency supports measures to improve pedestrian and cycling access, depending on the level of impact at the SRN, the requirements of further sustainable measures may need to be reassessed and further supplemented. Council Response: Comments noted. The Council is seeking to allocate additional land in Stockton Town Centre, to prevent developments having to locate in out-of-centre locations which are dependant on the private car. These types of sites are likely to create more traffic on the strategic road network.
TC3 - Stockton Town Centre Primary Shopping Area	312/23: The Agency has no particular comment but considers that priority should be given to the most sustainable sites, particularly those within existing centres on previously developed land which have good access to a wide variety of services, facilities and public modes of transport. Council Response: Comments noted. This approach has been continued in the publication draft.
TC4 - New Town Centre Uses	312/24: The Agency has no particular comment but considers that priority should be given to the most sustainable sites, particularly those within existing centres on previously developed land which have good access to a wide variety of services, facilities and public modes of transport. Council Response: Comments noted. This approach has been continued in the publication draft.
TC5 - Stockton Town Centre Evening Economy	312/25: The Agency has no particular comment. Council Response: Response noted.
TC6 - Development and Change of Use within the District Centres	312/26: The Agency has no particular comment. Council Response: Response noted.
TC7- Local and Neighbourhood Centres	312/27: The Agency has no particular comment but is generally supportive of providing a range of shops, services and facilities commensurate to the scale and requirements of the local community and in highly accessible locations, as a means of reducing the need to travel, particularly by private car. Council Response: Comments noted. This approach has been continued in the publication draft.

TC8 - Development in Local and Neighbourhood Centres	<p>312/28: The Agency has no particular comment but is generally supportive of providing a range of shops, services and facilities commensurate to the scale and requirements of the local community and in highly accessible locations, as a means of reducing the need to travel, particularly by private car.</p> <p>Council Response: Comments noted. This approach has been continued in the publication draft.</p>
TC9 Small-scale retail and ancillary uses	<p>312/29: The Agency has no particular comment but is generally supportive of providing a range of shops, services and facilities commensurate to the scale and requirements of the local community and in highly accessible locations, as a means of reducing the need to travel, particularly by private car.</p> <p>Council Response: Support welcomed. This approach has been continued in the publication draft.</p>
TC10 - Proposals for Hot Food Takeaways	<p>312/30: The Agency has no particular comment.</p> <p>Council Response: Comments noted.</p>
PF1 - Open Space, Sport and Recreation Facilities	<p>312/31: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF2 - Provision of a new Cemetery and Crematorium	<p>312/32: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF3 - Bowsfield Marina	<p>312/33: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF4 - Maximise Civic Space for Community Interaction	<p>312/34: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF5 - Facilities for Ingleby Barwick	<p>312/35: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF6 - Supporting Durham University's Queens Campus	<p>312/36: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
PF7 - Supporting Health Care Developments	<p>312/37: The Agency has no particular comment.</p> <p>Council Response: Response noted.</p>
H1 - Housing Allocations	<p>312/38: As previously stated, the Agency appreciates that the deliverability of the core housing area may have become questionable due to the reduction in funding streams. However, the shift in emphasis towards the sites that are potentially in less sustainable locations than the 'Core Area' may need to be supported by additional infrastructure improvements, further mitigation measures and a greater requirement for infrastructure funding, above what has previously been considered. The Agency has undertaken high-level assessments of housing options and their implications at the SRN. It is not clear as to how this previous analysis has contributed to any specific evidence base, and given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required in line with the comments made in relation to Policy EMP1. Again, such requirements will therefore need further consideration as more detailed proposals are developed and the Agency can provide further assistance to ensure that the implications for the SRN are appropriately considered and that the housing development and the measures necessary for their delivery are credible and robust. Such provisions should be appropriately detailed in policy and supporting Infrastructure Delivery Plan. The only transport related evidence base identified is that of the Local Transport Plan and it is not clear as to how this considers, and responds to, the specific development aspirations contained in this plan, in assessing the impacts and identifying solutions. This is considered essential at this stage of allocating sites.</p> <p>Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required has been addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council. The results of this work will inform the site allocation policies in the Publication draft of the document and will be presented in detail in the accompanying Infrastructure Strategy.</p>

H2 - Housing Phasing and Implementation	<p>312/39: Careful consideration is required to ensure that housing is appropriately phased, corresponding to the delivery and phasing of any supporting infrastructure, which may be required to ensure the sustainable delivery of land allocated for housing development. The Infrastructure Delivery Plan should clearly show the linkages between housing and employment development sites, the infrastructure required to enable their delivery and the phasing of both elements. As identified in other policy responses, it is not clear as to the evidence base which has been developed in respect of assessing the impacts of developments and identifying measures.</p> <p>Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required has been addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council. The results of this work have informed the site allocation policies in the Publication draft of the document and will be presented in detail in the accompanying Infrastructure Strategy.</p>
H1a - Nifco site - Yarm Road Gateway	<p>312/40: This site could have implications at the SRN, particularly along the A66(T) corridor. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required.</p> <p>Council Response: Comments noted. This site has not been allocated in the Regeneration and Environment LDD.</p>
H1b - Urlay Nook	<p>312/41: This site could have implications at the SRN, particularly along the A66(T) corridor. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required.</p> <p>Council Response: Comments noted. A proportion of this site now has planning permission for residential development and has been included in the Publication draft of the plan as a commitment. The potential highways impact of the development were explored in full through the planning application process. The larger area of the site has not been included in the publication draft of the LDD.</p>
H1c - University Hospital of North Tees	<p>312/42: The Agency supports the development of brownfield sites however this site could have implications at the SRN, particularly along the A19(T) corridor to the north of the A66 interchange. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required.</p> <p>Council Response: Comments noted. This site has not been allocated in the Regeneration and Environment LDD.</p>
H1d - Blakeston School	<p>312/43: This site (given its scale) is unlikely to have specific implications at the SRN.</p> <p>Council Response: Comments noted. This site has been included in the Publication draft of the plan.</p>
H1e - Norton School	<p>312/44: This site (given its scale) is unlikely to have specific implications at the SRN.</p> <p>Council Response: Comments noted.</p>
H1f - Land off Leeholme Road	<p>312/45: This site (given its scale) is unlikely to have specific implications at the SRN.</p> <p>Council Response: Comments noted.</p>
H1g - Harrowgate Lane	<p>312/46: The Council are working collaboratively with the Advisory Team for Large Applications (ATLAS), landowners, developers and agents to bring forward co-ordinated housing development at Harrowgate Lane and Yarm Back Lane. Extensive highways modelling and designed improvements to key junctions (including Elton Interchange) has been undertaken to demonstrate that the sites can be delivered in highways terms. This work has been accepted by the Highways Agency and Local Highway Authority.</p> <p>Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required is being addressed by detailed analysis and modelling work and joint working between the two organisations.</p>
H1h - Land East of Yarm Back Lane	<p>312/47: The Council are working collaboratively with the Advisory Team for Large Applications (ATLAS), landowners, developers and agents to bring forward co-ordinated housing development at Harrowgate Lane and Yarm Back Lane. Extensive highways modelling and designed improvements to key junctions (including Elton Interchange) has been undertaken to demonstrate that the sites can be delivered in highways terms. This work has been accepted by the Highways Agency and Local Highway Authority.</p>



Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required is being addressed by detailed analysis and modelling work and joint working between the two organisations.

H1i - West Yarm

312/48: A planning application was submitted for this site and was subsequently approved by the planning authority through planning committee. The Agency was consulted on the application and did not object to the development proposals.

Council Response: Comments noted. This site is not included in the Publication draft as development has begun.

H1j - South West Yarm

312/49: This site could have implications at the SRN, particularly along the A19(T) corridor. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required. The Agency is currently considering a Transport Assessment supporting a planning application for this development.

Council Response: Comments noted. This site now has planning permission for residential development and has been included in the Publication draft of the plan as a commitment. The potential highways impact of the development were explored in full through the planning application process.

H1k - Wynyard Masterplan

312/50: Whilst the Agency would welcome the production of a masterplan for Wynyard a suitable approach, as detailed in response to Policy EMP3, will need to be agreed in the first instance and specific comment in relation to development in this area are provided in response to that policy.

Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required has been addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council and Hartlepool Borough Council. See the Wynyard topic paper for further detail.

H1l - Wynyard Village

312/51: As previously stated the Agency has concerns with the scale and location of development at Wynyard both in terms of housing and employment allocations. As stated in response to Policy EMP3, a suitable approach needs to be agreed to ensure that development can be sustainably delivered without having a detrimental impact on the operation of the SRN. This site could have implications at the SRN, particularly along the A19(T) corridor, centred on the junction with the A689. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required.

Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required has been addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council and Hartlepool Borough Council. See the Wynyard topic paper for further detail.

H1m - Wynyard Park

312/52: As previously stated, Wynyard remains to be an unsustainable location in transport terms, and is likely to have a major focus on the use of the private car. Previous, broad assessments have identified that the sites at Wynyard, consisting of significant quantities of housing and prestige employment development, would likely have particular implications at the A19/A689 junction and that further evidence would need to be provided to determine the specific impact of these sites at the SRN and in particular, how the strategy's policy and infrastructure proposals would address these impacts. Therefore a continued coordinated approach with Hartlepool Borough Council and the Agency is essential to ensure that an appropriate and robust strategy for the Wynyard area is developed. This site could have significant implications at the SRN, particularly along the A19(T) corridor, centred on the junction with the A689. Refer to general comments in response to Policy H1 (Housing Allocations) which identified that given the designation of these sites as allocations, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures required.

Council Response: Comments noted. The impact of site allocations on existing infrastructure and the level and type of mitigation which may be required has been addressed by detailed analysis and modelling work and joint working between the Highways Agency and Stockton-on-Tees Borough Council and Hartlepool Borough Council. See the Wynyard topic paper for further detail.

H3 - Housing Mix and Affordable Housing provision

312/53: The Agency has no particular comment but generally considers that the provision of a mix of housing types, sizes and tenures, can help reduce the need to travel by giving everyone the opportunity to live in their desired location where they can access employment opportunities via sustainable transport modes.

Council Response: Support welcomed. This approach has been continued in the publication draft.

H4 - Care Homes and Housing for Older People	312/54: The Agency has no particular comment. Council Response: Response noted.
ENV1 - Green Infrastructure	312/55: The Council is supportive of development proposals that retain and enhance existing cycleways, footpaths and bridleways, and improve sustainable connectivity. Council Response: Support welcomed.
ENV2 - Urban Open Space And Local Green Space	312/56: The Agency has no particular comment. Council Response: Response noted.
ENV3 - Local Sites	312/57: The Agency has no particular comment. Council Response: Response noted.
ENV4 - Previously Developed Land, Development And The Creation Of New Habitat	312/58: The Agency has no particular comment but is generally supportive of focusing development on previously developed land, particularly in locations where it can be accessed by a variety of sustainable modes of transport, provided that it will not have a detrimental impact upon the operation and safety of the SRN. Council Response: Support welcomed.
ENV5 - Landscape Character	312/59: The Agency has no particular comment. Council Response: Response noted.
ENV6 - Re-Use And Replacement Of Rural Buildings	312/60: The Agency has no particular comment. Council Response: Response noted.
ENV7 - Farm Diversification	312/61: The Agency has no particular comment. Council Response: Response noted.
ENV8 - Equestrian Activity	312/62: The Agency has no particular comment. Council Response: Response noted.
ENV9 – Agricultural, Forestry and Other Rural Based Enterprise Dwellings	312/63: The Agency has no particular comment. Council Response: Response noted.
HE1 - Historic Landscape	312/64: The Agency has no particular comment. Council Response: Response noted.
HE2 - Character Areas	312/65: The Agency has no particular comment. Council Response: Response noted.
HE3 - Local List	312/66: The Agency has no particular comment. Council Response: Response noted.
HE4 - Stockton and Darlington Railway	312/67: The Agency has no particular comment. Council Response: Response noted.
RG1 - Regeneration and Gateway Sites	312/68: Refer to previous comment. It is assumed that these allocations are additional to the other housing and employment provisions. As stated in response to those policies, the Agency considers that evidence to support the linkage between the spatial aspirations, their impacts on the transport infrastructure and the supporting measures is required, given the designation of these sites as allocations. Council Response: Comments noted.

R1 - Green Blue Heart	<p>312/69: The Agency has no particular comment and would direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Response noted.</p>
R2 - North Shore	<p>312/70: As previously stated, the North Shore site is located in close proximity to the SRN with the A66 to the south and A19 to the east. Whilst a comprehensive redevelopment of the site, with mixed use provisions is proposed there is the potential for new development to impact on the operation of the SRN. Consideration of development proposals in this location in combination with other proposals in the strategy will be required to ensure that existing infrastructure can support such development. The Agency would also direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Comments noted. The Northshore site has been allocated as a mixed use development site in Policy TC3. The whole site has been granted outline planning permission for a mixed use development ; the potential highways impacts of the development were explored in full through the planning application process. A number of further application have also been granted approval and commenced.</p>
G1 - Stockton Riverside	<p>312/71: As previously stated, the Stockton Riverside site is located in close proximity to the SRN with the A66 to the south and A19 to the east. Whilst a comprehensive redevelopment of the site, with mixed use provisions is proposed there is the potential for new development to impact on the operation of the SRN. Consideration of development proposals in this location in combination with other proposals in the strategy will be required to ensure that existing infrastructure can support such development or that sufficient measures are provided to mitigate its impact. Any new or improved infrastructure should be set out in policy and the supporting IDP and linked to the corresponding development schemes. The Agency would also direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Comments noted. This site has not been included in the Regeneration and Environment LDD.</p>
G2 - Northern Gateway	<p>312/72: The Northern Gateway seeks to deliver 330 dwellings. Whilst this development will be part of a comprehensive mixed use redevelopment scheme, consideration of the development proposals in this location in combination with other proposals in the strategy will be required to ensure that existing infrastructure can support such development or that sufficient measures are provided to mitigate its impact. Any new or improved infrastructure should be set out in policy and the supporting IDP and linked to the corresponding development schemes. The Agency would also direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Comments noted. The Northern Gateway is a term used to refer to an area where there has been a number of regeneration / improvement projects. The term is not used site in the Publication Draft of the Regeneration and Environment Local Plan. However, two housing sites associated with it, at Swainby Road and Victoria Estate, have been included as a commitment and allocation respectively.</p>
G3 - Mandale Triangle	<p>312/73: Due to the level of detail currently provided, the Agency can not make any particular comment regarding the potential impact of development in this location. However, as stated above, consideration of the development proposals in this location in combination with other proposals in the strategy will be required to ensure that existing infrastructure can support such development or that sufficient measures are provided to mitigate its impact. Any new or improved infrastructure should be set out in policy and the supporting IDP and linked to the corresponding development schemes. The Agency would also direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Comments noted. This site has not been included in the Regeneration and Environment Local Plan.</p>
G4 - Boathouse Lane	<p>312/74: Due to the level of detail currently provided, the Agency can not make any particular comment regarding the potential impact of development in this location. However, as stated above, consideration of the development proposals in this location in combination with other proposals in the strategy will be required to ensure that existing infrastructure can support such development or that sufficient measures are provided to mitigate its impact. Any new or improved infrastructure should be set out in policy and the supporting IDP and linked to the corresponding development schemes. The Agency would also direct the council to the general comments made in response to Policy RG1.</p> <p>Council Response: Comments noted. The Council's Highway Engineers were consulted regarding the allocation of this site and advised that the impact of development on the local highway network can be satisfactorily mitigated.</p>

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313 Taylor Wimpey North Yorkshire (Roundhill)

313/1: These representations are put forward on behalf of Taylor Wimpey UK Ltd and follow detailed consideration of the Council's Regeneration & Environment LDD - Preferred Options and the background documents that have informed its preparation, including:-

- The National Planning Policy Framework
- Core Strategy Review – Issues & Options
- Tees Valley 2012 Strategic Housing Market Assessment
- Stockton Strategic Housing Land Availability Assessment 2011
- Housing Supply in the Borough of Stockton-on-Tees - 5 Year Deliverable Housing Supply Final Assessment: 2012 – 2017
- Stockton on Tees Green Infrastructure Delivery Plan – 2012
- Landscape Character Assessment & Capacity Study

The representations relate in particular the proposed Housing Spatial Strategy, The Council's Housing Requirements and the Proposed Housing Allocations as set out within the LDD. In particular, this response sets out the need for a higher housing requirement (and additional housing allocations) and the need for a wider mix/range of viable housing sites to create choice and competition in the market to ensure that the full, objectively assessed market and affordable housing needs of the Borough are met in full.

To this end, these representations identify the role of Land at Preston Farm as a sustainable urban extension to create a mixed housing development, to compliment the strategic scale housing allocations, and its scope for inclusion into the Regeneration & Environment LDD.

Council Response: To see how the authority has assessed this site and the comments about the Green Wedge see the Housing Site Selection Topic Paper

SP2 - Housing Spatial Strategy

313/2: THE HOUSING SPATIAL STRATEGY  
Range of Housing Sites

2.1 In principle, Taylor Wimpey UK Ltd generally support the proposed Housing Spatial Strategy in particular the decision of the Council to provide/allocate a range of housing sites to deliver a wide choice of high quality homes over the plan period instead of a single large site.

2.2 The Tees Valley SHMA (2012), even at the broad sub regional level, identifies a number of differing housing sub areas within the Borough with their own individual issues of supply and demand both in terms of existing stock and future requirements. The proposed provision of a range of housing sites to serve the overall needs of the Borough and the specific needs of certain sub areas accords with the advice laid down in the National Planning Policy Framework to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities'.

2.3 However, it is considered, having regard to the scale of the housing requirement (see section below), that a number of the sites proposed to be allocated have infrastructure constraints and complex land ownership arrangements, and a wider range of 'smaller' (less than 400 dwellings – around 5 years worth of building with 2 developers) housing sites should be provided for in addition to the strategic sites. This would ensure choice and competition in the market and to ensure a steady supply of new housing over the plan period.

Council Response: The range of sites that have been allocated or had planning commitments re-affirmed is wide.

H3 - Housing Mix and Affordable Housing provision

313/3: THE HOUSING REQUIREMENT

3.1 The National Planning Policy Framework, at Section 6 (Delivering a Wide Choice of High Quality Homes), makes it explicit that local planning authorities should 'boost significantly the supply of housing' through a number of means, including:-  
'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs of market and affordable housing in the housing market area, as far as consistent with the policies set out in this Framework, including key sites which are critical to the delivery of the housing strategy over the plan period' (Paragraph 47 NPPF (2012))'

3.2 Since the adoption of the Council's Core Strategy in 2010, a further Tees Valley Strategic Housing Market Assessment (2012) has been carried out that provides an up to date position in respect of housing needs and aspirations in respect of market and affordable provision.

3.3 The results of the SHMA in respect of the Borough's Affordable Housing Requirement of 560 dwellings per annum are acknowledged at Section 8.145 (Page 138) of

the Preferred Options. However, the document then goes on to explain that the Council's housing strategy being taken forward has a target of only 110 affordable dwellings per annum as this is 'realistic'. It sets out that the anticipated delivery is based on a mixture of the amount of affordable housing (15-20%) from market-led housing schemes and the delivery of affordable housing from the National Affordable Housing Programme ('assuming it is renewed').

3.4 The proposed approach to affordable housing, assuming the allocated market housing sites can viably deliver 20% affordable housing and in the face of significant uncertainty over the publically funded affordable housing schemes, would amount to less than 20% of the full, objectively assessed affordable housing needs of the Borough.

3.5 There is no reasoned justification provided for the statement 'it is clearly not realistic to set an affordable housing target at around the same level as the total housing requirement for all tenure types' (Section 8.145). There is no evidence that explains why planning for a greater number of houses overall on additional viable/deliverable sites, to deliver greater amounts of affordable housing (as a proportion of the market housing) would result in circumstances that would fundamentally conflict with the policies within the National Planning Policy Framework. The proposed approach of the Council to plan for only 100 affordable dwellings per annum in the face of a requirement of an annual affordable housing requirement of 560 is not justified in this respect.

3.6 As currently drafted, the Council's proposed Regeneration & Environment LDD/Core Strategy Review will not meet the full and objectively assessed needs of market and affordable housing in the plan area; it is therefore in conflict with national policy. It is therefore unsound.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

## H2 - Housing Phasing and Implementation

### 313/4: DELIVERING THE HOUSING REQUIREMENT Housing Allocations

4.1 Taylor Wimpey UK Ltd welcome the provision of site specific housing allocations through the emerging Regeneration & Environment DPD to deliver the required housing over the plan period. This will identify the key sites critical to the delivery of the Council's housing strategy over the plan period which is in line with the advice set out in the NPPF (Paragraph 47).

4.2 As set out above, and explained in detail below, Taylor Wimpey UK Ltd consider that the range of proposed allocated housing sites should be increased over the plan period to accommodate the full evidenced based housing requirements of the Borough and to create a more flexible and response range of sites.  
Housing Phasing and Implementation

#### Implementation Strategy & Trajectory

4.3 The provision of a housing implementation strategy and indication of the expected rate of housing delivery (or trajectory) to steer housing delivery over the plan period is compliant with the requirements of the NPPF (Paragraph 47) and is supported in principle by Taylor Wimpey UK Ltd.

#### Bring Forward Allocated Sites From Later in the Plan Period

4.4 The provision of a mechanism to 'bring forward' allocated sites in circumstances where there is a shortfall of deliverable supply (against a 5 year requirement + buffer) is supported, and is again compliant with the requirements of the NPPF.

#### 'Rolling' 5 Year Deliverable Housing Lane Supply

4.5 The suggestion that the Council will only apply the mandatory 5% buffer to the 5 year housing policy requirement instead of 20% is seriously questionable.

4.6 The NPPF is clear that in circumstances where:-

'there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land' (Paragraph 47 NPPF).

4.7 Housing delivery across the Borough over the last 9 years, save for one year (2007/08), has, as a matter of fact, been less than the planning policy requirements. This

represents persistent under delivery and has resulted in a cumulative shortfall of housing delivery against requirements and therefore a 20% buffer should be applied.

4.8 Therefore, based on Core Strategy (2010) requirement and shortfall to date, the 5 year requirement should be around 3500 units.  
Over Supply of Housing Against Requirements

4.8 The scope to allow a range of housing sites (in excess of the housing requirement) to come forward at any one time is logical, will provide for choice and competition in the market and will assist the Council in 'significantly boosting the supply of housing' across the Borough in line with the requirements of the NPPF . However, there are very serious concerns regarding proposed Policy H2 (5) which states:- 'Land allocated for housing will not be released for development if doing so would result in the housing requirement being exceeded by more than 20% at any given point in the plan period.'

4.9 This suggests that, in the event that windfall (unallocated & uncommitted) housing sites coming forward, that those sites allocated for housing development within the Regeneration & Environment LDD may not be granted an appropriate planning permission to deliver housing – the allocated sites will be 'held back'.

4.10 Paragraph 154 of the NPPF makes it explicit that:-

'Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'

4.11 As drafted, the policy will result in significant uncertainty for developers looking to deliver allocated development sites (at considerable expense). This will also have a significant negative impact on the Council's aspirations of co-working between developers to create masterplans for the development of the strategic scale housing sites. This uncertainty will result in delay in housing delivery or limited housing delivery.

4.12 Fundamentally, there is no requirement in the NPPF, or indeed any robust justification put forward by the Council, to set a ceiling for housing delivery. Moreover there is no evidence, or logic, to suggest that an overprovision of housing will result in material and unacceptable harm, especially within the context of the Governments clear directive to Local Planning Authorities to 'boost significantly the supply of housing'. The development of brownfield sites in the conurbation, as windfalls, during the plan period should be seen as a significant benefit to increasing the supply of a range of housing sites across the Borough for choice and competition in the market and the associated regeneration and environmental benefits. Seeking to place a 'cap' or 'ceiling' on the amount of housing development to come forward renders the plan not positively prepared and therefore unsound.

4.13 The rate and amount of delivery of new housing and the capacity of the housing market areas is, and will continue to remain, entirely dictated by the market and a commercial decision for the respective housing developers.

Council Response: Comments noted and addressed in the Housing Need and Demand Topic Paper

New Policy

SP3 - Limits to Development

SP4 - Green Wedge

H1 - Housing Allocations

313/5:

HOUSING & GREEN WEDGE ALLOCATIONS – THE ROLE OFF ROUNDHILL AVENUE, INGLEBY BARWICK

5.1 Taylor Wimpey (North Yorkshire) Ltd is concerned that the proposed Regeneration & Environment LDD does not include the Land off Roundhill Avenue, Ingleby Barwick as a housing allocation, and instead seeks to maintain it as 'Green Wedge and remove it from the existing development limits.

5.2 The surprise at the site not being identified as a housing site for delivery over the plan period relates to a number of factors:-

- Its very limited contribution to the function and purpose of the 'Green Wedge'
- The development that has taken place/been approved immediately to the north and south of the site within the existing 'Green Wedge' since the adoption of the Stockton Local Plan.
- The opportunities that the development of this site offers itself in respect of a sustainable location for housing within a strong market area, the scope for a significant landscape, biodiversity, recreation and amenity enhancements.
- The scope this site offers as part of the wider on-going developments to the west of Ingleby Barwick (in particular to the immediate south) for the creation of an extensive Country Park/Local Nature Reserve.

5.3 Therefore Taylor Wimpey propose a further a revision of the 'Development Limits' as currently drafted in the LDD (see Figure 1) to exclude the land from its current position within the adopted Development Limits (Stockton Local Plan Proposals Map) and part of the site (the developable area) from the proposed Green Wedge allocation.

5.4 The site (Figure 2& 3) shown below extends to approximately 9 ha gross. However the developable area put forward by Taylor Wimpey amounts to approximately 4.2 ha (Red) with an estimated yield of 130 dwellings. The rest of the identified landholding (approx. 4.8ha – Green) would be put forward as a Country Park/Local Nature Reserve to link to the approved Country Park immediately to the south.  
Existing Planning Policy Status

5.5 At present, in planning policy terms the site itself is allocated in Stockton on Tees LP Proposals Map as 'landscape and visual amenity value of this site itself, has significantly undermined any value that the land immediately along the western boundary of this part of Ingleby Barwick had as a 'Green Wedge'.  
Recent Development/Planning Permissions

5.6 As shown on the extract from the Council's SHLAA 2011 Map, the land to the north and south of the site benefits from extant planning permissions.

5.7 Site 192 (Land in the Vicinity of Betty's Close Farm) benefits from planning permission for 17 dwellings with associated creation of a Country Park & Nature Reserve – Application 06/1064/OUT.

5.8 Site 383 (Sandhill, Ingleby Barwick) benefits from planning permission for the erection of 150 dwellings under planning permission 09/3025/OUT this also falls within the Green Wedge as identified on the Stockton Local Plan Proposals Map 1997.  
Land to Immediate South of Site – Site 192

Land to the North of Pennal Grove – Site 383 5.9 In addition, it must be noted that the land to the immediate North of the site (to the south of Pennal Grove) put forward by Taylor Wimpey, is located within the adopted Green Wedge.

Extract of Stockton Local Plan 1997 Proposals Map overlaid on up to date base. Note the development to the immediate North of the site within the Green Wedge and the land further to the North (upon which further permissions have been granted).  
Proposed Planning Policy Status – Regeneration & Environment LDD

5.10 As indicated on the Proposals Map accompanying the Regeneration & Environment LDD Preferred Options, the site is to be located within the 'Green Wedge' and located outside of the 'Development Limits'.

5.11 It is clear from LDD that the decision taken to exclude the 'Green Wedge' from the 'Development Limits' is to afford the Green Wedge Areas a greater level of protection from development that may erode its character.

5.12 Fundamentally however, it is essential that a Green Wedge allocations, in particular within sustainable locations within the established urban area, are fully justified and actually serve a purpose otherwise they should form development opportunities. The following section comments on the whether the Green Wedge allocation continues to be justified in this location having regard to its proposed purpose, the development that has taken place/been approved to the immediate north and south, and opportunities that the development of this site, along with its associated landholding offers to the landscape, biodiversity and amenity value of the surroundings.

Purpose of the Green Wedge

5.13 Both adopted Policy CS10 of the Core Strategy and the emerging Strategic Policy SP4 (Green Wedge) in the Preferred Options states that the function of the Green Wedge is to prevent the coalescence of communities within the built up area by maintaining its appearance and openness.

5.14 In reality, the only characteristic of the 'gap' that the existing land provides between the western boundary of Ingleby Barwick in this location and Eaglescliffe to west, a significant distance away. In all other respects it is of little inherent landscape, ecological or amenity value.

5.15 For the most part the 'gap' is only experienced on the ground by those properties to the west and the east overlooking it or along the River Tees Corridor. In visual amenity/landscape character terms it offers no assimilation of the built development into the landscape, instead the western boundary of the existing development at Round Hill is stark and harsh within the landscape.

5.16 Green Wedges are a common and long established policy designation throughout the Tees Valley and come in a variety of shapes, sizes and widths – many are much narrower than the gap between the west of Ingleby Barwick and the east of Eaglescliffe. In any event the approved and existing development to the South and North of the site already project further to the west than the development of this site would. The development of this site for housing would not reduce the existing 'gap' between the respective urban areas.

#### Development Potential of the Land

5.17 Notwithstanding the proposed designations set out in the Preferred Options, Taylor Wimpey (North Yorkshire) Ltd consider that there is scope to create a high quality, sustainable housing development upon part of this land (amounting to approximately 130 dwellings) and retain a 'gap/wedge' between the residential and the River Tees and the built development to the West of it and provide a publically accessible Country Park and Local Nature Reserve between the site and the River Tees resulting in significant biodiversity and landscape enhancements to the Tees Heritage Park.

5.18 A housing development that provides high quality affordable and market housing, commensurate with the character and appearance of the locality. Integral to the development will be significant landscaping, tree planting and public open / amenity space that will help to emphasise the character differences and physical / visual separation between the River Tees corridor and the built development of Ingleby Barwick. It will significantly soften the existing harsh transition between the urban development and the Tees Corridor. A high quality sustainable environment can be delivered.

#### Linkages to the South – Extension Country Park/Public Open Space within Tees Heritage Park

5.19 In addition, the proposed site provides a tremendous opportunity, coupled with the existing approved developments to the north and south and associated environmental enhancements and areas of open space to the West to create an extensive, high quality, multi-functional Country Park for formal and informal recreation and relaxation in addition to significant biodiversity gains. The adjacent plan shows the approved Country Park to the south.

5.19 The development option demonstrates how a 'Green Wedge' can be maintained between the settlements of Eaglescliffe and Ingleby Barwick to avoid 'coalescence'. The development of the site, subject to appropriate structure planting would not harm the local or wider landscape character or the visual amenity of the Tees Heritage Park. Indeed, it will lead to significant benefits.

5.20 In all other respects the development of housing in this broad location would be a sustainable development option – as demonstrated by the Council's own Sustainability Appraisal of land at Ingleby Barwick given, in particular, the education, retail and public transport offer. In addition, the quantum of development proposed on this non- strategic size site would not lead to an unacceptable impact upon the capacity of the Highway Network.

5.21 Other initial investigations, and acknowledgment that the site is not subject to any ecological, landscape or heritage constraints, have established that development of the site for housing (in accordance with the identified needs set out in the Tees Valley SHMA) would be compliant with the adopted Development Plan, the National Planning Policy Framework and the emerging planning policies set out in the Regeneration & Environment LDD as far as relevant.

## 6 SUMMARY

6.1 It is considered that the Council require a wider range of housing sites to meet the full and objectively assessed housing needs (market & affordable) and to provide choice and competition in the market. The land off Roundhill Avenue, Ingleby Barwick provides an opportunity to deliver a modest scale of housing development in a deliverable and sustainable location in a strong housing market area.

6.2 The site can deliver a development that will retain an open 'Green Wedge' but more importantly enhance it for significant, and material, landscape character, biodiversity and public recreation gains.



Council Response: To see how the authority has assessed this site and the comments about the Green Wedge see the Housing Site Selection Topic Paper

### 313/6: 7 Recommendations

7.1 It is recommended that the Stockton Regeneration & Environment LDD is revised to:-

- Increase the amount of housing planned for to meet the full, objectively assessed needs for market and affordable housing in the Borough consistent with the requirements of the National Planning Policy framework.
- Remove Point 5 of Draft Policy H2 to provide confidence/certainty for developers to invest in and acquire allocated housing sites at an early stage to ensure constant deliver of new housing over the plan period to meet the housing needs of the Borough.
- Retain the land set out within this submission within the Development Limits of the Conurbation and de-allocate it as 'Green Wedge'.
- Allocate the land as a housing site to deliver of a mix of housing with scope for delivery on site within the short term along with the provision of Public Open Space with high quality landscaping.

Council Response: To see how the authority has assessed this site and the comments about the Green Wedge see the Housing Site Selection Topic Paper

### 314 England and Lyle on behalf of Mr D Holmes

#### SP3 - Limits to Development

314/1: Proposal to extend the existing dwelling into land to the side of the existing dwelling and include the land within the limits to development. In support of this proposal the planning statement for permission 12/1938/FUL has been submitted as a representation to the LDD preferred options.

Council Response: Permission has been granted for an extension to The Stables and change of use of land to residential curtilage. Land subject to this proposal has been incorporated within the limits to development.

314/2: As you may be aware, I have attempted to find an equitable solution for the sensible use of land at my property at Redmarshall (i.e. The Stables; land to the side and the paddock to its rear). As a consequence, as you rightly refer to, I have submitted a number of proposals and I'm grateful for the opportunity to clarify my intentions/desires.

Firstly, I would like to address the use of land to the side of the dwelling, between the dwelling and the substantial hedgerow which forms the natural boundary to the site, which is separated from the rear land by a post and rail fence.

I have made a number of proposals to have this land included within the limits to development, and reiterate that proposal here. The rationale for that proposal is addressed within the attached document. The document relates specifically to a current planning application for an extension to the side of the dwelling on land which is currently designated as agricultural, so the arguments put forward in favour of the extension mirrors the very obvious logic of the proposal to include the land within the limits to development. Although you do not mention it in your e-mail, I did recently submit the attached document to the council as part of the public consultation exercise. Please accept the document as formal representation.

Secondly, with regard to the land to the rear of The Stables, I will continue to seek a use for this area of land in the future, but past proposals have included its use for affordable housing, and for commercial use.

Regarding affordable housing, the initial proposal failed due to a lack of identifiable need. Since then a rural housing survey has identified a very specific need for the immediate area and I am advised that such an application could now find support at appeal – because of the results of the rural housing survey, and because of the more positive and pro-development planning regime we find ourselves in. As part of this representation, I formally propose that the land be allocated for affordable housing.

Also, the land has potential for uses which would create much needed employment for the area. For example, I approached planners via my local councillor to propose that the land be used for a commercial art gallery, along the lines of the very successful Biscuit Factory in Newcastle. I proposed that I would construct an oak framed and glass walled building to display the work of local artists, supported by a craft gift shop and a restaurant. The business plan indicated that 22 jobs would be created. It is my

firm view, as the investor, that such a venture would need to sit in an attractive rural location within a building which itself would become a local landmark. Planners advised that such a scheme would be more appropriate in a brown field site within Stockton and rejected the scheme! It is my view that such a proposal to use the land to the rear of The Stables for commercial purposes (whether that be for something like a nursing home, or my preference, an rural art gallery, where significant employment gains could be achieved) should be considered as part of this representation.

Alternatively, If the land to the rear were to be included within the limits to development, I would work with the LPA to develop it in a way which enhances the immediate area, rather than see it crammed with houses. I would suggest the 1.5 acre field could accommodate 2 or 3 high quality dwellings without impacting the area negatively. I have no desire to see the site over developed in the usual way of village developments.

I appreciate this isn't a simple response to your enquiry, but the history – and the potential uses of the land – makes it difficult to respond otherwise

Council Response: The response refers to a number of proposals. The first proposal is to extend the existing dwelling into land to the side of the existing dwelling and include the land within the limits to development. In support of this proposal the planning statement for permission 12/1938/FUL has been submitted as a representation to the preferred options. A response to this proposal has been made separately.

The remaining proposals are in relation to the larger area of land to the rear of The Stables. Specific proposals include an affordable housing scheme, commercial use (nursing home/art gallery) or 2-3 high quality houses (if included within the limits to development).

It is not intended to include the land to the rear of The Stables within the Limits to Development as there is no justification for doing so. The land is currently within agricultural use with the limits to development defining the break between the urban and rural area. Indeed, the inspector to the appeal for application 12/1938/FUL noted that it is entirely logical for the paddock to remain as land beyond the limits to development for Redmarshall as it is part of the countryside around the village.

The Regeneration and Environment Local Plan identifies that affordable housing in the rural parts of the Borough will be met in locations that are within or adjacent to sustainable villages. It would not be appropriate to identify any sites for allocation for affordable housing within the Regeneration and Environment Local Plan. A number of commercial proposals or a small number of high quality homes are also suggested; as the site is to remain located outside the limits to development any proposal would be considered against relevant policies; namely SP3 'locating development'.

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### 315 Bennet

TC2 – Sites for major new retail and town centre use development

315/1: We write in relation to the above document, which was recently published by Stockton on Tees Borough Council. In particular, we wish to confirm our support for Policies TC2 and TC4.

Policy TC2 relates in particular to the proposed allocation of land to the rear of 90-101a High Street, Stockton and land at the Southern Gateway, for the purposes of major new retail and town centre use development. We consider this Policy greatly supports the potential regeneration of the southern end of the High Street which has struggled in recent years. In addition the Policy supports the Core Strategy which states that allocations for retail development will only be located in or on the edge of Stockton Town Centre.

Council Response: Comments noted, support welcome.

TC4 - New Town Centre Uses

315/2: We also support Policy TC4 - New Town Centre Uses, which indicates that the sequential test for Town Centre Development will be applied to proposals including retail (A1 use-class) which will be directed to the Primary Shopping Area; and that the Council will expect planning applications for town centre uses of more than 1,000 square metres gross floor space located outside or on the edge of Stockton Town Centre, to be accompanied by an impact assessment demonstrating that the Centre will not be adversely affected by the development.

Such an approach would fully accord with the recently adopted National Planning Policy Framework. This states at paragraph 23 that local planning authorities should inter alia "allocate appropriate edge of centre sites for main town centre uses that are 'well connected to the town centre' [our emphasis] where town centre sites are not available".

We believe Policy TC4 will help protect the possibility of a major food-store linked to Stockton Town Centre being developed, and will further assist the improvement of

Town Centre Gateways and the wider regeneration of the Core Area.

Council Response: Comments noted, support welcomed.

### 316 Egglecliffe & Egglecliffe Parish Council

#### Consultation

316/1: E&EC are disappointed with SBC's promotion of the consultation on this important document to the general public. In contrast to the Council Tax Benefit leaflet which was delivered to every home in the borough SBC seem to have relied on people reading the Stockton News to find out that they can have their say on where and whether to build; they have depended on parish councils and community groups which is viewed as inadequate consultation.

Council Response: Comments are noted.

#### H1b - Urlay Nook

316/2: Preferred Options, Policy H1b – Urlay Nook

There are sustainability issues with the two fields closest to Hunters Green. It is not credible to assume that people will cycle to and from Yarm and the contours of the land make it less likely that people will walk back from Yarm direction. In addition there is only a very limited bus service which does not run at peak times. Both of these arguments become stronger to the further west of the site. There are safety concerns regarding development of the cycleway towards Yarm which would take cyclists over the narrow Yarm Bridge and through busy traffic in Yarm High Street.

The site is within easy reach of two primary schools, however both of these schools are at full capacity and their ability to cope is questionable considering the approval for 840 homes at the Allens' West site.

There are concerns over the ability of health care services in the area to cope.

Long Newton Lane is not designed for heavy traffic and there are concerns that drivers wanting to access the A66 from Urlay Nook Road will use Long Newton Lane to avoid congestion at the A67 roundabout.

Council Response: Comments noted. Planning approval has been granted for 145 dwellings on part of the Urlay Nook site. The potential impacts of these dwellings have been considered within the planning application process. The remainder of the potential Urlay Nook allocation has not been included within the Publication Draft.

#### H1j - South West Yarm

316/3: Preferred Options, Policy H1j – West Yarm

The road network would be unable to cope with increased pressure from housing in this area and would result in congestion backing up into Egglecliffe.

Building in this area goes against the principal of SBC's Strategic Policy SP4 which refers to recreational use of the River Tees; the proposals for Yarm School playing field would restrict access to one school and a limited number of people for less than 40 weeks a year. The greenspace in this area should be protected for all the people of the borough and not reserved for a limited few.

Green wedge development should have reference to the policies in the Core Strategy for areas which are within the Tees Heritage Park; areas of Egglecliffe and nearby Yarm are denoted as a tranquil zone of the park.

Council Response: Comments are noted and are addressed within the Yarm and Kirklevington Topic Paper . However, the proposal for sports development to the north of the River Tees have been submitted as a separate planning application and are not proposed through the Regeneration and Environment Local Plan.

### 317 Appletons Chartered Surveyors

317/1: Please find attached updated plan showing in particular the land availability at West of Yarm Back Land (Sites 3,4,5,6, and 8). Also update on East of Yarm Back Lane (Site 9); and slight alteration to site 2 (north of Darlington Back Lane).

All of these areas are available for development and should be considered for inclusion in the LDF as potential housing land.

All of these with the exception of site 9 have been drawn to the council's attention on previous occasions.

Please let me know if you require further information

Council Response: Comment noted

### 318 Individual

#### H1i - West Yarm

318/1: Housing developments should not be built on Green Belt land when there are brownfield sites within the Borough. Yarm does not have the infrastructure to support another 1900+ houses. Can the doctors and schools accommodate all these extra people living in the area? Traffic levels at the present time are high and another 1900+

H1j - South West Yarm

cars will only make the situation worse. Also there are no amenities in the area for children.

SP2 - Housing Spatial Strategy

Council Response: Comments are noted. Green Belt is a national designation and there are no areas of Green Belt within Stockton Borough or the wider Tees Valley area. However, comments relating to the development of greenfield land, pressure on health and education provision and traffic have been addressed within the Yarm Topic

### 319 Individual

H1j - South West Yarm

319/1: Land South of Green Lane, Kirklevington (12/1990/EIS) - Pressure on existing facilities i.e. Health Centre, Schools waiting time to see a doctor now is lengthy. Further housing would be longer.

Congestion of traffic from A19 to Ingleby Barwick, Yarm and Kirklevington and pressure on parking in Yarm, which is practically impossible now, especially for people working in Yarm and travelling through Yarm.

Flooding and drainage is a problem in Kirklevington because of over building in the village. The applications appears to be developer led.

Council Response: Comments relating to flood management, health and education provision and, traffic and parking are addressed in the Yarm and Kirklevington Topic Paper . The Council does not have any control over whether developers submit planning applications now or wait for the plan process to be complete.

### 320 Individual

H1j - South West Yarm

320/1: I wish to object to this planning application to South West Yarm. The roads cannot cope with any more traffic. Already there are regular traffic delays; and cars are queueing up to get through Yarm, Fridays are particularly bad. There is no way any more traffic can get through Yarm High Street, afterall there is only one bridge across the river.

Council Response: Comments addressed in the traffic section of the Yarm and Kirklevington Topic Paper .

### 321 Individual

H1j - South West Yarm

321/1: 12/1595/EIS - I object - Development will destroy historic character of historic Yarm and its riverbank. Necessary access will destroy uniqueness of Egglecliffe village and its footpaths. This is a Tees Heritage site for which we have fought long and hard.

12/1990/EIS - I object - Outside limits of development. Will more than double size of the Parish. Preferred Options had not been completed before application was accepted by SBC. Traffic congestion in and around Yarm - already at saturation point. Erosion of farmland and Strategic Gap. Effect on Wildlife Corridor. Will destroy nature of our village. Pressure on the Infrastructure of an historic town - Health Centre, Schools etc. Pressure on parking in Yarm and at Health Centre, Station etc. Are houses really needed - Where is work? Lack of leisure facilities in this area.

Council Response: Comments regarding historic character of Yarm, limits to development and strategic gap, wildlife corridor, agricultural land, traffic and parking, health and education provision, employment and planning applications are addressed in the Yarm and Kirklevington Topic Paper . Comments regarding need for houses addressed in the Housing Need and Demand topic paper.

### 322 Individual

322/1: 12/1990/EIS - Land South of Green Lane Kirklevington - 1) Pressure on existing infrastructure ie. Medical facilities, schools, limited parking at Health Centre. 2) Congestions of routes to A19 and Yarm. 3) Flooding and drainage issues are now a national problem due to large acreages of land being paved/covered with buildings causing flooding in areas normally free from them. 4) The applications appears to be developer led. 5) Pressure on parking in Yarm. 6) Access to and travelling through Yarm.

Council Response: Comments regarding planning application, flood risk, health and education provision, traffic and parking are addressed in the Yarm and Kirklevington Topic Paper . The Council does not have any control over whether developers submit planning applications now or wait for the plan process to be complete.

### 323 Individual

H1i - West Yarm

323/1: Morley Carr Farm (12/0980/OUT) Yarm Playing Fields (12/1636/SCO) Leven Bank (12/1664/SCO)

H1j - South West Yarm

I object to the above proposed developments on the following basis - Increased traffic congestion. Road network not capable of handling safety, especially at peak times. Lack of investment/ Planning by SBC has caused this. Insufficient capacity at schools to accept additional housing also at doctors/dentists where patient care will suffer. ... Waiting for appointments. Brownfield sites within planning such as Hills Stockton should be developed first. Bellway are involved at Stockton/Yarm but not developing Stockton.

Council Response: Comments regarding planning applications, health and education provision, traffic and parking and brownfield sites are addressed in the Yarm and Kirklevington Topic Paper .

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### 324 Individual

H1i - West Yarm

324/1: I am incensed at the proposed developments in the Yarm area. The traffic situation has never been addressed in Yarm and until it has and the grid lock through the High Street has been resolved, these developments should not take place. With the proposal on Green Lane being of significant worry due to the sheer size of the number of houses (ie. 700+ on the playing field!!).

H1j - South West Yarm

I am not a nimby and can see a need for some new homes in the area (affordable homes for first time buyers) but the traffic congestion in Yarm must be addressed first. I feel that the wishes of the local community have not been given sufficient attention and the attitude of the Council is that the proposals will go ahead regardless of what the local community has to say.

Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper . All comments received through the consultation process are taken into consideration.

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### 325 Individual

H1i - West Yarm

325/1: Morley Carr Farm 12/0980/OUT, Yarm Playing Fields 12/1636/SCO, Leven Bank Dev 12/1664/SCO.

H1j - South West Yarm

I object to all the above developments on the following basis- Increased traffic congestion. Road network not capable of dealing with any extra traffic. Insufficient capacity to cope with extra demand for schools, doctors and dentists. Brownfield sites should always be developed before greenfield.

Council Response: Comments regarding planning applications, traffic, health and education provision and brownfield sites are addressed in the Yarm and Kirklevington Topic Paper .

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### 326 Individual

H1i - West Yarm

326/1: Whilst I recognise the need for the Council to identify where additional housing may be provided, and the challenges faced in doing so, I feel compelled to object most strongly to the proposal to extend the current development boundary to include green field sites to the south of Green Lane (B1264) and to the west of Allerton Balk in Yarm. Fundamentally, it is quite evident, as a local resident, that the existing single carriage roads in and around Yarm, not to mention the single file/one way railway bridge at Yarm Station, cannot support the substantial number of additional cars (I expect in excess of 1000 vehicles) that development of these areas will bring to two minor roads resulting in traffic being brought to a virtual standstill in and around Yarm. It was explained to me that the Council seek to preserve the trade of Yarm High Street and yet, as a resident, I have have to tell you that I (and everyone I spoke with at the Council's consultation process at Kirklevington Village Hall) already avoids Yarm High Street whenever possible due to congestion of traffic that already exists. Any further development will compound this problem immeasurably. You ask that comments are supported by factual supporting evidence. Without the resources available to major developers (road surveys etc.), I'm not sure what you expect from individuals such as myself. All I can offer is 23 years of life experience of living in Yarm. A development of this nature would make me seriously consider moving out of the area.

H1j - South West Yarm

Council Response: Comments regarding traffic are addressed in the Yarm and Kirklevington Topic Paper

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### 327 Individual

H1i - West Yarm 327/1: The proposed developments in Yarm left me speechless in their size and disregard for the wishes of the local community. I object with a passion to any development that has the potential to escalate the traffic congestion in Yarm to a situation of chaos!! Yarm must be the only small town in a 20 mile radius where it is impossible to drive through the High Street without delay (at times up to 20 minutes). The High Streets of Stokesly and Northallerton do not have the same problem. Building so many houses on green field sites should not be allowed when brownfield sites are available. The house building frenzy around Yarm is unforgiveable. The Environmental cost of increased traffic plus the waste of greenfield sites is tragic for those in the local community who should be allowed to have a quality of life.

H1j - South West Yarm

Council Response: Comments are noted and addressed in the Yarm and Kirklevington Topic Paper

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### 328 Individual

H1i - West Yarm 328/1: 12/1595/EIS - The area for the proposed playing field development is a greenfield site. It is included in the Tees Valley Heritage Plan as a site to be preserved as an open space, wildlife corridor and public amenity area. This proposed development will destroy that and the infrastrucure needed to service it will destroy the riverbank, Yarm and Eaglescliffe as viable communities.

H1j - South West Yarm

12/1990/EIS - The area designated is part of a wildlife corridor. It is currently a greenfield site. It should not be considered for housing in view of current traffic, drainage and amenity issues.

Council Response: Comments regarding planning applications, the wildlife corridor and Tees Valley Heritage Park, traffic and brownfield sites are addressed in the Yarm and Kirklevington Topic Paper

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### 329 Individual

H1i - West Yarm 329/1: Ref:12/1636/SCO 22 /08/12

H1j - South West Yarm

My Husband and I strongly protest against Stockton Borough Councils plans to build on these sites- there is very little green space left in Yarm and the parking and congestion problems are getting worse nd worse but the Taxpyers the residents appear to have no say whatsoever.

We have lived here for 27 years so are well qualified to speak. As ever Stockton uses Yarm as prolific cash cow for Stockton on tees yet stockton never looks any better, vast sums are wasted on redoing the High Street --what an eyesore and the ludicrously named 'Splash' etc. but Yarm is fortunate to get grass cut and a few tubs of plants.

As I write now the helicopter has been hovering for hours around these sites- we live opposite Morley Carr aand have no wish whatsoever to be'part of an urban sprawl with the additional problems that would bring. Not only are there plans for Morley Carr but also the Tall Trees has plans passed and now plans are afoot for Yarm School Playing Fields . There are plenty of brown sites where building could be- why spoil the only fairly peaceful surrounds of Yarm- the roads aare narrow there are queues of traffic all around at peak times- Fridays sepecially are a nightmare- we do get a bit of respite during school holidays- perhaps why this time was chosen for the big planning meeting??? there is precious little place for wildlife as it is but it will disappear completely when and if the awful spread is allowed to ruin the are.

Do the resident taxpayers a good service for once and take your plans elsewhere where no one can be upset or their lives so wantonly disturbed.

Council Response: Comments regarding brownfield sites, traffic, wildlife and planning applications are addressed in the Yarm and Kirklevington Topic Paper . The other issues raised by the representation are not planning issues.

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### 330 Individual

SP2 - Housing Spatial Strategy 330/1: Before us embarking on housebuilding - full consideration should be rigorously applied to the use of brownfield sites. Brownfield does not necessarily mean contaminated. In a changing and more unstable world, the UK needs to feed itself. This cannot be achieved if builders continue touse arable land. There are lots of spaces in the town where housebuilding should be undertaken. Look at Newcastle and Glasgow. Very aestheric development on an eyesore riverside - also inner city/town development would revitalise Stockton's facilities.

Council Response: The Core Strategy, adopted in March 2010, focused housing development on the brownfield sites in the Core Area. Since 2010, issues with the deliverability of these brownfield sites have become apparent. Many of these sites have significant issues, such as flooding and land contamination that are costly to rectify.

There is very limited public funding available to contribute to this and developers are unwilling or unable to deliver these sites.

As a result, the Strategic Housing Land Availability Assessment shows that we do not have sufficient brownfield land that is or will be suitable, available or achievable in the period up to 2030 to meet our housing requirement, and we have been required to identify greenfield sites to meet the housing requirement.

### 331 AG Lathe

331/1: I write on behalf of my client AG Lathe Castlegate Shopping Centre LLP, which is the asset manager / owner of the Castlegate Shopping Centre in Stockton-on-Tees town centre.

My client is keen to work with the Council in relation to emerging planning policies and development proposals relating to Stockton Town Centre, the Borough's retail function and the Castlegate Centre including its neighbouring land. To this end, I have recently contacted your department by email to ask to be added to your consultation mailing list.

The owners/managers of the Castlegate Centre have been active in a range of town centre matters and initiatives over many years now and work closely with your colleague Nigel Laws. However, they have not submitted representations to the recent consultations on the emerging Regeneration and Environment LDD (Preferred Options).

The purpose of this letter is to reconfirm my client's commitment to participation in the Local Plan preparation process and matters relating to town centre development. Through previous engagement with the Council, it is apparent that the goals and success of the Town Centre and of the Castlegate Centre are intrinsically linked and therefore the interests of my client and the Council are considered to be mutual in this regard.

In our forthcoming engagement in the Local Plan preparation process we will look to protect the interests of the Castlegate Centre and its tenant retailers, which will in turn protect and enhance the retail and social function of the town centre. We will support and help to steer development proposals that are compatible with, and complimentary to, the Castlegate Centre and wider town centre.

Council Response: Comments noted.

331/2: We have briefly reviewed the Regeneration and Environment LDD (Preferred Options) document and generally support the policies on Stockton Town Centre. In particular we support the policy provision that maintains the potential for retail development (including foodstore) at the Southern Gateway site.

Council Response: Support welcomed.

331/3: You will be aware that land in my client's ownership south of the Castlegate Centre has previously benefitted from planning permission for a foodstore. We are pleased therefore that the 'Southern Gateway' is identified as a 'site for major new retail and town centre use development'. We agree with the content of paragraph 6.15 regarding this site's attractiveness as a location for retail development, its beneficial road infrastructure links, prominent location and the potential wider benefits of its development to the town centre.

Council Response: Support welcomed.

331/4: We note the requirement of any proposed edge-of-centre or out-of-centre retail development to consider its impact on a major foodstore linked to Stockton Town Centre Primary Shopping Area. We note also the aspiration for new foodstore development set out in the Stockton Town Centre Prospectus and consider that our client's land at the Southern Gateway remains the primary site for such development.

Council Response: Support welcomed. The impact policy included in the publication Regeneration and Environment LDD no longer includes a specific reference to delivering a supermarket in the town centre. It is considered that this aspiration can be considered under the phrase 'impact on existing, committed and planned public and planned investment in a centre'.

331/5: We look forward to engaging in the consultation process in the normal manner in 2013 when we understand that the publication version of the document will be issued. In the meantime, I would be pleased to discuss any planning issues relating to the Castlegate Centre with you or your colleagues. Similarly, if it would be of assistance, my client would be pleased to meet with you and perhaps with other senior officers responsible for regeneration and the town centre etc.

### 332 Northern Power Grid

332/1: I can advise that at this time there are no known constraints on the provision of connections to Northern Powergrids network in respect of the developments identified in your development document.

Connections will be provided in line with our standard connections policy and charging methodology by the extension of the existing EHV, HV and LV networks where appropriate dependent upon the connection requirements.

Council Response: Comments noted

### 333 Health and Safety Executive

333/1: Thank you for your request to provide a representation on the Stockton-On-Tees Regeneration and Environment Local Development consultation document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved. The HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with the HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents.
2. Regulation 10(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC (Seveso II). Regulation 10(c)(i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas.

At this early stage the HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to modify, relinquish or revoke hazardous substances consents<sup>2</sup>. Local planning authorities are advised to use HSE's Planning Advice for Developments near Hazardous Installations Information Package (PADHI+) to verify any advice given. Further information on PADHI+ is available on the HSE website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>

Council Response: Issues related to this response are covered in the Health and Safety Constraints Paper.

- 333/2: We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocations that could be effected are:
- i) Employment allocation EMP1/1a (Belasis Business Park) could encroach upon the inner, middle and outer consultation zones of multiple establishments. Allocation EMP1/1a could also encroach upon the inner, middle and outer consultation zones associated with the 6 Feeder Little Burdon/Billingham MAHP operated by National Grid Gas PLC (HSE Ref. No: 7858/Transco Ref. No: 2115).
  - ii) Employment allocation EMP1/1b (Billingham House) could encroach upon the inner, middle and outer consultation zones of multiple establishments.
  - iii) Employment allocation EMP1/1c (Cowpen Lane) could encroach upon the inner, middle and outer consultation zones of multiple establishments. Allocation EMP1/1c could also encroach upon the middle and outer consultation zones associated with the 6 Feeder Little Burdon/Billingham MAHP operated by National Grid Gas PLC (HSE Ref. No: 7858/Transco Ref. No: 2115).
  - iv) Employment allocation EMP1/1d (Durham Lane) could encroach upon the inner, middle and outer consultation zones of Elementis PLC, Eaglescliffe (HSE Ref. No:3267). Allocation EMP1-1d could also encroach upon the inner, middle and outer consultation zones associated with a MAHP operated by Northern Gas Networks.
  - v) Employment allocation EMP1/1f (Oxbridge Industrial Estate) could encroach upon the outer consultation zone of Chemoxy International Limited, Billingham (HSE Ref. No:H3721)
  - vi) Employment allocation EMP1/1h - EMP7 (Skylink Business Park/Airport) could encroach upon the middle and outer consultation zones associated with the 13 Feeder Bishop Auckland/Yafforth MAHP operated by National Grid Gas PLC (HSE Ref. No:7856/Transco Ref. No: 2113).
  - vii) Employment allocation EMP1/1j (Teesside Industrial Estate) could encroach upon the inner, middle and outer consultation zones associated with a MAHP operated by Northern Gas Networks.



- viii) Employment allocation EMP1/1k (Malleable Industrial Estate) could encroach upon the outer consultation zone of Chemoxy International Limited, Billingham (HSE Ref. No:H3721).
- ix) Employment allocation EMP3 (Wynyard Park) could encroach upon the inner, middle and outer consultation zones associated with the 6 Feeder Little Burdon/Billingham MAHP operated by National Grid Gas PLC (HSE Ref. No: 7858/Transco Ref. No: 2115). Allocation EMP3 could also encroach upon the inner, middle and outer consultation zones associated with a MAHP operated by BP Chemicals Limited.
- x) Employment allocation EMP4/1a (Billingham Chemical Complex) could encroach upon the inner, middle and outer consultation zones of multiple establishments. Allocation EMP4/1a could also encroach upon the outer consultation zone associated with the 6 Feeder Little Burdon/Billingham MAHP operated by National Grid Gas PLC (HSE Ref. No: 7858/Transco Ref. No: 2115).
- xi) Employment allocation EMP4/1b-1c (North Tees Pools/Seal Sands) could encroach upon the inner, middle and outer consultation zones of multiple establishments. An allocation to the east of the site encroaches upon a development proximity zone (DPZ). Allocation EMP4/1b-1c could also encroach upon the inner, middle and outer consultation zones associated with a MAHP operated by Northern Gas Networks.
- xii) Employment allocation EMP6/1a (Billingham Reach Industrial Estate) could encroach upon the inner, middle and outer consultation zones of multiple establishments.
- xiii) Employment allocation EMP6/1b (Casebourne Site) could encroach upon the middle and outer consultation zones of multiple establishments.
- xiv) Employment allocation EMP6/1c (Haverton Hill Industrial Estate) could encroach upon the middle and outer consultation zones of multiple establishments.
- xv) Employment allocation EMP6/1d (Port Clarence) could encroach upon the inner, middle and outer consultation zones of multiple establishments.
- xvi) Housing allocation H1/b (Urlay Nook) could encroach upon the inner, middle and outer consultation zones of Elementis Chromium, Eaglescliffe (HSE Ref. No:H1269)
- xvii) Housing allocation H1/f (Land at Leeholme Road) could encroach upon the middle consultation zone of PD Logistics, Cowpen Lane (HSE Ref. No: H2019)
- xviii) Housing allocation H1/g (Harrowgate Lane) could encroach upon the outer consultation zone associated with a MAHP operated by BP Chemicals Limited.
- xix) Housing allocations H1/i and H1/j (West/South West Yarm) could encroach upon the inner, middle and outer consultation zones associated with a MAHP operated by National Grid Gas PLC (NTS Extra). The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.

Council Response: Issues related to this response are covered in the Health and Safety Constraints Paper.

### 333/3: Housing Allocations

Inner Zone – Housing is not compatible with development in the inner zone. PADHI+ would normally give an Advise Against decision for such development. The only exception is infill and backland developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.

Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare.

Outer Zone – Housing is compatible with development in the outer zone including larger developments of for more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.

### Workplace Allocations

Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m<sup>2</sup> total floor space are compatible with the inner zone.

Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself.

Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height. Retail developments where the total floor space is from 250m<sup>2</sup> up to 5000m<sup>2</sup> are compatible with the middle zone.

Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically of people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m<sup>2</sup> total floor space are compatible with the outer zone.

This is a general description of development compatibility. Detail of development types and their compatibility with consultations zones can be found in the section on Development Type Tables (pg.9) of PADHI - HSE's Land Use Planning Methodology, which is available at: <http://www.hse.gov.uk/landuseplanning/padhi.pdf>

### Mixed-Use Allocations

Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to PADHI+ to determine HSE's advice regarding mixed-use developments.

Council Response: Issues related to this response are covered in the Health and Safety Constraints Paper.

#### 333/4: Verification of Advice using PADHI+

The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments.

The use of PADHI+ will assist you in making informed planning decisions.

Information on major hazard installation and MAHP locations and general planning advice can be found on the HSE extranet system, to which all planning authorities have access. This contains lists of all major hazard installations and MAHPs, along with consultation zone maps where available. This information, in conjunction with the guidance in PADHI - HSE's Land Use Planning Methodology will allow you to identify compatible development within each consultation zone.

The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. The proposal maps in Site Allocation Development Planning Documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence. Details of pipeline operators and their contact details are also found on the HSE extranet pages. We also recommend that you include in your plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on Development Type Tables and the Decision Matrix (pg.17) are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

There are a number of factors that can alter a PADHI+ decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of PADHI+. Development Proximity Zone (DPZ) Following the Buncefield incident in 2005, HSE reviewed the consultation distances of all sites which met the criteria for large-scale petrol storage sites, and an additional zone (DPZ) was introduced 150 metres from the boundary of the relevant storage tank bunds. PADHI cannot be used to determine HSE's advice on developments within the DPZ, and LPAs must refer any planning applications or preplanning enquires on developments within the DPZ to HSE.

#### Provision of Information to Interested Parties – Pipeline Operators

The pipeline operators referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter.

Council Response: Issues related to this response are covered in the Health and Safety Constraints Paper.