

Regeneration and Environment Local Plan

Publication Draft

Consultation Statement

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1 Introduction

- 1.1 This Consultation Statement outlines the consultation activities undertaken in the preparation of the Publication draft of the Regeneration and Environment Local Plan. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that before a Local Plan is submitted to the Secretary of State for Examination in Public, the Local Planning Authority must undertake a number of consultation activities as follows:

- (1) A local planning authority must-
- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
 - (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.
- (2) The bodies or persons referred to in paragraph (1) are –
- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
 - (b) such of the general consultation bodies as the local planning authority consider appropriate; and
 - (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

- 1.2 The Regeneration and Environment Local Plan emerged from the early stages of four Development Plan Documents. The Yarm and Eaglescliffe Area Action Plan, Regeneration Development Plan Document (DPD), Environment DPD and Core Strategy Review were originally intended to be separate DPDs. 'Issues and Options' consultations relating to all four documents were undertaken but had not progressed to the 'Preferred Options' stage for various reasons. The four documents were brought together in a Local Plan style Local Development Document in the 2012 Local Development Scheme.
- 1.3 Consultation on each of the draft documents has been undertaken according to the prevailing regulations at the time of the consultation period. These were the:
- Town and Country Planning (Local Development) (England) Regulations 2004
 - Town and Country Planning (Local Development) (England) Regulations 2008
 - Town and Country Planning (Local Development) (England) Regulations 2009

- Town and Country Planning (Local Planning) (England) Regulations 2012
- 1.4 Changes to the regulations in 2008 removed the requirement to undertake both 'Issues and Options' and 'Preferred Options' consultations. However, in view of the need to combine four DPDs into one and the length of time which had passed since the first Issues and Options consultations, the Council chose to continue with a 'Preferred Options' consultation on the combined document, rather than progressing to publication of the final document prior to its submission to the Secretary of State for Examination in Public. This gave a further opportunity for the public and other stakeholders to influence policy generation and get involved in the document's development. This single document (which will be used alongside the adopted Core Strategy) is now subject to a Publication Stage consultation.
- 1.5 In accordance with regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Statement sets out:
- The bodies and persons the local planning authority invited to make representations under regulation 18 (specific consultation bodies and general consultation bodies as the local planning authority considers appropriate)
 - How those bodies were invited to make representations under regulation 18
 - The number of representations made in accordance with regulation 20 (representations made by any person)
 - A summary of the main issues raised by the representations made pursuant to regulation 20
 - How any representations made pursuant to regulations 25 and 28 have been taken into account.
- 1.6 In accordance with regulation 22(d), copies of the representations made in response to all four Issues and Options Consultations, and the Preferred Options draft of the Regeneration and Environment Local Development Document are included in the appendices to this statement. Responses received in relation to the four Issues and Options consultations are available on request.

2 Consultation Bodies and Activities

- 2.1 Part 2 of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out those bodies or persons who should be notified of, and invited to take part in consultations on Local Plan Documents. These include specific consultation, general consultation bodies and residents or other persons carrying on business in the local planning authority's area.
- 2.2 The Council maintains a database of bodies and individuals who are notified of, and invited to take part in, Local Plan consultations, either by letter or email. The details of specific and general consultation bodies are sought out and updated regularly. Local stakeholders including residents, businesses and other local groups are invited to add their details to the database and may be contacted specifically if an issue is likely to be of particular concern. The bodies and persons the Local Planning Authority invited to make representations at each stage of the plan preparation process is included at Appendix 1.
- 2.3 The Council's Statement of Involvement (adopted in 2006 and updated in 2013) sets out how the Council will meet the requirements of the regulations and ensure that the local community and other relevant stakeholders are able to engage and participate in the production of the Local Plan. Its principles and requirements have been upheld throughout the plan making process.
- 2.4 Planning is a complicated mix of national priorities, local circumstances and community views. In bringing these different strands together, there are likely to be conflicting views about the best use of land. The principle of frontloading - ensuring consultation and community engagement takes place at the earliest appropriate stage – is intended to reduce conflict by ensuring everyone has an opportunity to express their views. In addition, place shaping – where key stakeholders and the community are encouraged to have an active role in shaping the place they live in – will build capacity for understanding planning issues and conflicting points of view.
- 2.5 Despite the application of these principles, there may still be occasions when differences of opinion cannot be easily resolved. Similarly, evidence about local circumstances and national policies and guidance may mean that whilst all views are carefully considered, it is not possible to translate them into planning policy. The Council will analyse comments made in response to consultations and balance different needs and opinions, including the need to conform to national policy and guidance, and the needs of groups who have not been engaged in the consultation. Where the Council have not been able to incorporate an individual or organisation's view into the Regeneration and Environment Publication Draft, or earlier drafts of its constituent documents, an explanation has been given, either in the text of this document, or the schedules of responses included at Appendix 2 of the document.

3 Issues and Options Consultations

- 3.1 'Issues and Options' consultations for the Yarm and Eaglescliffe Area Action Plan, Environment DPD, Regeneration DPD and Core Strategy Review were undertaken between 2007 and 2011.

Yarm and Eaglescliffe Area Action Development Plan Document Issues and Options Consultation

- 3.2 The Yarm and Eaglescliffe Area Action Plan Development Plan Document (YEAAP) was intended to address development pressures and opportunities in Yarm and Eaglescliffe. It was anticipated that change in the area would be managed by suggesting sites for particular uses, showing how these would relate to each other and setting out design requirements to ensure that any change was integrated into existing development.
- 3.3 Prior to the Issues and Options consultation, a 'pre-consultation' meeting was held with key stakeholders on 22 May 2007 at Yarm Fellowship Hall. Attendees included Ward Councillors and representatives from local Parish Councils and residents' groups. The evening included a short presentation, followed by a discussion session. Comments made were reported verbally to the Council's Planning Committee and Cabinet and where necessary, changes were made to the Issues and Options Report.
- 3.4 The YEAAP Issues and Options Consultation took place between 30 July and 10 September 2007. Neighbouring local authorities, parish councils and neighbouring parish councils, key stakeholders and members of the public were contacted to inform them of the consultation period and to invite their representations. A list of consultees is attached at Appendix 1. The consultation was advertised in the public notices sections of the Evening Gazette and Herald and Post newspapers on 30 July and 1 August respectively and correspondence also sent to individuals and organisations on the Local Development Framework consultation database.
- 3.5 32 responses were received from a variety of organisations and individuals. Generally, comments sought to ensure that the environment was protected and enhanced, including parks and gardens, the historic environment, landscape and the countryside.
- 3.6 The YEAAP was included in the Local Development Scheme until 2010, when it was resolved that its policies should be incorporated into the Regeneration and Environment Development Plan Documents (DPD).
- 3.7 The preservation and enhancement of the historic environment was identified as the key issue within the Yarm and Eaglescliffe area. In response to this, the Regeneration and Environment DPD Preferred Options draft contained policies on Character Areas, the Local List and the Stockton and Darlington Railway. Whilst addressing issues within the Yarm and Eaglescliffe locality, these policies will also have a positive impact Borough wide. The Character Areas policy identified four areas within Yarm and Eaglescliffe for their distinctive character and sense of place and seeks to preserve and enhance their distinctive character, resisting development within residential gardens. The areas identified are:
- Yarm Road (North), Eaglescliffe
 - Yarm Road (South), Eaglescliffe

- The Spital/Leven Road
 - Leven Road
- 3.8 Policies were also included to protect and enhance locally listed buildings and to safeguard the line of the historic Stockton and Darlington Railway of 1825, the branch line to Yarm and its associated structures.
- 3.9 In response to comments made regarding the High Streets evening economy, retail offer and residential function, the preferred option policy for Yarm District Centre sought to maintain residential properties within the High Street, alongside a high proportion of A1 uses.
- 3.10 Transport and parking were frequently raised in relation to Yarm and Eaglescliffe. These issues have remained prominent in planning for the area. However, location specific policies were not included in the Preferred Options draft as the Borough wide policies dealt with the issues raised.
- 3.11 The Preferred Options draft contained policies to protect urban open space and green wedges. The boundaries of the green wedge within Yarm and Eaglescliffe remained unchanged; they were also removed from the limits to development, strengthening their protection from development. This approach had been supported at the Issues and Options consultation stage.

Regeneration Development Plan Document

- 3.12 Work on the Regeneration Development Plan Document began in 2006, with an Issues and Options consultation period taking place in autumn 2007. The Regeneration DPD Issues and Options consultation was undertaken simultaneously with consultation on the Core Strategy Preferred Options draft document. The Regeneration DPD was included in the Local Development Scheme until 2011, when it was resolved that it should be combined with the YEAAP and the Environment DPD to produce the Regeneration and Environment Development Plan Document.
- 3.13 During the development of the Council's Issues and Options, a series of meetings were held, or attended, to identify more detailed issues for the Regeneration DPD and inform the development Core Strategy DPD. During June and July 2007 officers from the Spatial Planning Section attended a number of Local Strategic Partnership (LSP) meetings and other group meetings with officers preparing the Sustainable Community Strategy.
- 3.14 A six-week public consultation was held between 28 September and 9 November 2007. Neighbouring local authorities, parish councils and neighbouring parish councils, key stakeholders and members of the public were contacted to inform them of the consultation period and invite representations. Correspondence was also sent to individuals and organisations on the Local Development Framework consultation database, members of Stockton Residents and Communities Groups Association and members of the Council's Residents' Panel. A list of consultees is attached at Appendix 1.
- 3.15 The Regeneration DPD Issues and Options consultation was advertised in the public notices sections of the Evening Gazette and Herald and Post newspapers on 28 September and 3 October 2007 respectively. The on-going consultation was also

highlighted in the autumn 2007 edition of Stockton News, free publication delivered to all properties within the Borough. Publicity was also given to a number of related exhibitions through press releases.

- 3.16 The Council also invited members of the public, residents groups, and stakeholders who had registered on the Council's LDF consultation database, to the 'Core Strategy and Regeneration DPD Consultation Launch'. During this event there was a short presentation of the content and implications of the documents followed by an opportunity for attendees to view related exhibitions and discuss relevant issues with Council officers. A similar invitation was extended to Council officers aimed at raising corporate awareness of these documents within other Council departments.
- 3.17 In association with other Council services, the Spatial Planning section contributed towards the hire of a large mobile television screen which was displaying in Stockton Town Centre. This was present during core retail hours for 6 days between the 13 and 19 September 2007. This screen displayed an advert identifying issues relating to the Local Development Framework, and advertised the forthcoming consultation on the Regeneration DPD Issues and Options document.
- 3.18 In order to further engage with members of the public, a number of staffed and un-staffed public exhibitions were organised. These included an exhibition touring the Borough's libraries, super markets and other community venues through mid to late October 2007. Council officers staffed these exhibitions on one afternoon / early evening for each location and in suitable locations, the display materials were available for public viewing for a number of days. When invited, other opportunities to raise the public profile of the Regeneration DPD were taken up.
- 3.19 332 organisations and individuals made representations on the Council's Regeneration DPD Issues and Options draft, equating to 1255 individual comments. Of these, 115 submitted questionnaires which guided respondents through the issues, allowing the selection of options and inviting further comments. The remainder made submissions via letter or email.

The Spatial Strategy

- 3.20 The spatial strategy section of the Regeneration Issues and Options draft set out the Council's vision of the borough to 2021. A number of responses raised issues with the delivery of key regeneration projects. In response to these concerns and the changing economic climate, the Regeneration and Environment DPD Preferred Options draft identified Regeneration and Gateway sites, but acknowledged that there would be challenges in their delivery. For this reason, a number of the sites were not integral to the delivery of the Borough's strategic requirements such as meeting housing need and demand. However, the Council remained committed to supporting and promoting regeneration and for this reason it was important to identify that those sites continued to be key regeneration priorities.
- 3.21 There was significant support for the maintenance and protection of green wedges due to the role they played in providing habitats, enabling leisure and recreation, and providing open space in urban areas. There was also support for restricting development within green wedges, however it was also stated that not all development in these locations was inappropriate. A small number of responses identified that some areas of green wedge could be developed with relatively little negative impact,

particularly if that development financed other improvements. The Regeneration and Environment DPD Preferred Options policy took these points into account, removing green wedges from the limits to development, increasing the policy protection. The policy supported development for recreation and tourism within green wedges, whilst protecting the openness and amenity of the area.

- 3.22 A significant number of responses were received regarding Limits to Development, particularly from the villages of Maltby and Thorpe Thewles. Through the issues and options consultation and consultation on the 'Planning the Future of Rural Villages in Stockton-on-Tees Borough' report in October 2008 there was an overriding preference among village residents to retain the limits to development. A review of the limits to development was necessary because the boundaries contained within the Stockton-on-Tees Borough Council's Local Plan (adopted June 1997) were produced using base map Ordnance Survey (OS) information available at the time and changes in OS base mapping, improvements in GIS technology and physical changes on the ground necessitated a review of policy boundaries to form. However, this review did not fundamentally change the location of the boundaries, except at Wynyard Village where a new limit to development has been drawn.

Transport

- 3.23 There was general support for public transport schemes including the Tees Valley Metro, the Tees Valley Major Bus Scheme Proposal and improvements to other rail facilities. Relevant policies were included in the Preferred Options draft of the LDD.
- 3.24 Respondents were also asked to consider whether traffic restrictions relating to the Barrage Bridge should be reviewed in association with regeneration proposals such as the Green Blue Heart. The majority of the comments suggested that the current vehicle restrictions over the Barrage should be maintained but footpaths and cycle routes between the Barrage and Marston Road should be improved and referred to maintaining the quiet, attractive nature of the area around the Barrage. Reference was also made to the need to have suitable access to enable new developments to come forward. Due to the importance of improving the road infrastructure to the north of the River Tees, the Council continued to support the route of the Portrack Relief Road in the Regeneration and Environment DPD Preferred Options Draft.
- 3.25 There was support for the movement of freight by rail and water, particularly where this would result in reduced traffic on the strategic road network. A policy protecting railway sidings and wharves from development which would limit their functioning was included in the Regeneration and Environment DPD Preferred Options Draft.
- 3.26 A number of sites on the north bank of the river, including Port Clarence, Haverton Hill and Billingham Reach were identified for port related activity at Issues and Options stage. There was general support for this approach, however concerns were raised regarding the potential impact on the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site. These comments were noted and have been the subject of ongoing discussions in preparing the relevant policies; at preferred options stage it was considered that the relevant allocations could be made alongside strategic mitigation.
- 3.27 In 2007, the Council was investigating the feasibility of introducing new cycle and pedestrian routes linking Ingleby Barwick with Eaglescliffe, Preston Park, Thornaby

and Yarm, although no options were put forward due to the advanced nature of the plans. Comments were supportive of the objectives of linking communities and increasing opportunities for sustainable travel, however English Heritage raised some concerns regarding funding. Natural England also made suggestions for linking to other proposed routes. Council support for these routes continued through the Green Infrastructure Strategy and its delivery plan, as well as the adopted Core Strategy. The Regeneration and Environment DPD Preferred Options policy relating to footpaths and cycle routes also supported their delivery should funding become available.

Employment Land and Employment Sites Strategy

- 3.28 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.
- 3.29 There was significant support for rationalisation of the Borough's employment land portfolio as the most sustainable option; however, it was acknowledged that a diverse range of available sites was also important. It was noted that consideration should be given to improving less attractive sites in the most sustainable locations rather than deallocation. Reference was also made to the need to take likely impacts on adjacent sites into account.
- 3.30 This issue was resolved through Core Strategy Policy CS4, which sets out the Borough's employment land portfolio and the phased release of land for general employment uses. This is expanded on in the Economy section of the Regeneration and Environment DPD Preferred Options draft.
- 3.31 There was support for maintaining a sequential approach to office development, whilst recognising that large scale offices may not be feasible on a town centre site. There also support for locating offices on industrial estates for both small and large enterprises, alongside concerns that office development could be detrimental to town centres. The Regeneration and Environment DPD Preferred Options draft maintained the sequential approach to office development, recognising that offices should be directed to town and district centre sites and take advantage of sustainable transport opportunities. However, it also proposed to allocate a Principal Office Locations where office (B1a) development will be directed to when developers can demonstrate that there are no available or suitable sites within the Town or District Centres.

Retail and Other Town Centre Uses

- 3.32 Respondents to the Issues and Options were asked whether the lay out of Stockton High Street could be improved. At the time of the Preferred Options consultation, Stockton High Street was the focus of numerous regeneration schemes set out in the Stockton Town Centre Prospectus, which underwent significant consultation in 2011. The Regeneration and Environment DPD Preferred Options draft Town Centre Improvements policy supported these improvements. There was also general dissatisfaction with the quality of town's evening economy offer was expressed, particularly to the south of the High Street; the Preferred Options draft included policies which sought to reduce clustering of the uses.

Housing

- 3.33 No specific issues or options relating to housing were discussed at Issues and Options stage. Numerous potential housing allocations which had been submitted to the Council were included in the Issues and Options consultation and a variety of comments were received, including detailed representations proposing additional sites. Where technical detail was provided, this was recorded and has been used in any subsequent analysis. Many of the issues raised have been dealt with through the adoption of Core Strategy policies, the development of the Strategic Housing Land Availability Assessments and subsequent consultations on other LDF documents.

Environment Development Plan Document

- 3.34 The Environment DPD was included in the Local Development Scheme from 2006 to 2011. It was intended that this document would contain Borough wide policies for the built and natural environment, including green wedges, nature conservation sites, open spaces and the historic environment. The Issues and Options consultation relating to the Environment DPD took place in January and February 2011, however later that year, it was decided that the Regeneration and Environment DPDs should be amalgamated into one document.
- 3.35 Public consultation took place between 31 January and 14 March 2011. The consultation exercise was advertised in the Herald and Post, a local newspaper. Letters and e-mails were sent out to those on the LDF consultation database and members of Stockton Residents and Communities Groups Association. Documents were made available on the Council's website, at Planning Services reception, and also at libraries throughout the Borough. In addition, presentations were given to groups including the Parish Council Liaison Forum and various internal and external partnership boards.
- 3.36 Issues and Options were identified in relation to four themes: the natural environment, the historic environment, the rural environment and urban open space. Respondees were asked to complete a questionnaire with their preferred response to a number of options. In total 16 responses were received.
- 3.37 The Environment DPD Issues and Options report discussed the definition of Green Infrastructure, content of the Tees Valley and Stockton-on-Tees Green Infrastructure Strategies as well as documenting the Council's approach to mitigating and adapting to climate change. Support for the overarching approach to Green Infrastructure and Climate Change was received from the Tees Valley Biodiversity Partnership and Natural England.

Natural Environment

- 3.38 There was support for detailed policies setting out how Core Strategy Policy CS10's commitment to improve various aspects of the natural environment would be delivered, as well as policies that seek to ensure that development is not detrimental to green infrastructure and where possible enhance it. There was support for policies encouraging habitat restoration and creation, as well as a policy which would protect and support the continued enhancement of RSPB Saltholme. These policies were included in the Regeneration and Environment Preferred Options Draft.

Historic Environment

- 3.39 In relation to the ‘conservation and enhancement of the historic environment and heritage assets’, respondents supported a policy which would build on the protection given to designated heritage assets through the development management policies within PPS5: Planning for the Historic Environment. This policy would identify and provide policy to protect and enhance other heritage assets and relate to Historic Landscape Characterisation to ensure that development is sympathetic to that in the local area.
- 3.40 Egglecliffe & Egglecliffe Parish Council identified Preston Park, gardens and hall as well as St John's Church, Egglecliffe. Carlton Parish Council identified lanes and their hedges which define the “character and unique sense of place”. One respondent supported the development of a heritage asset at risk register and a related local strategy. There was some support for considering the need to extend the use of Article 4 directions, however no specific areas were identified.
- 3.41 Policies within the Historic Environment section in the Regeneration and Environment DPD were informed by these comments, the Heritage Environment Record and the Stockton-on-Tees Heritage Strategy. Policy HE1 requires development to take the historic landscape into account, protecting, interpreting and where possible enhancing it. In relation to non-designated heritage assets, the distinctive character of a number of ‘Character Areas’ and locally important buildings were protected through Policy HE2 Character Areas and Policy HE3 Local List.

Rural Environment

- 3.42 Support was expressed for topic specific policies for development in the countryside, including a policy approach which ensured that only development which is conducive with the 7 individual character areas outlined within the Landscape Character Assessment and Capacity Study was allowed. Natural England advised that policy 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. 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. This was reflected in Policy ENV5 Landscape Character of the Regeneration and Environment Local Plan, which supported proposals which reflected local character and could demonstrate that they protected, and where possible, enhanced local character.
- 3.43 Support was expressed for policies which sought to ensure that development in the countryside was not detrimental to the rural nature of the area, and green infrastructure. Policies restricting the residential re-use of buildings in the countryside (other than in the most sustainable locations) were also viewed favourably. Policy ENV6 in the Preferred Options draft set out the criteria for the reuse and replacement of rural buildings.

Urban Open Space

- 3.44 Respondents were asked to consider the ways in which urban open space should be protected. There was support for the protection of all open spaces or a selection of sites. Sites might be protected by virtue of their high quality and value to the

community, their particular conservation, historical or cultural value or their contribution to the Borough's green infrastructure.

- 3.45 In relation to the enhancement of open space, there was support for focusing on enhancing higher value and lower quality spaces that are critical to avoid deficiency in a type of open space in the first instance, enhancing spaces that are of a particular conservation, historical or cultural value and enhancing spaces that form part an essential part of the boroughs green infrastructure.
- 3.46 Where new provision is required, respondents supported identifying areas with deficiencies against quantity and proximity standards and assessing the requirement for new provision associated with planned increases in population. This approach was also supported when identifying opportunities for new, enhanced or relocated provision, alongside relocated provision where this would make a better use of land, especially if it enhances the quality and accessibility to users. There was particular support for policies that protected and supported the delivery of the Tees Heritage Park and Portrack Marsh.
- 3.47 These comments influenced a number of policies in the Regeneration and Environment DPD Preferred Options draft. At a strategic level, Policy SP2 Limits to Development and SP3 Green Wedges sought to provide a high quality natural environment and preserve openness between settlements. In the Provision of Facilities section, Policy PF1 – Open Space, Sport and Recreation Facilities supported the provision and protection of urban open space through quantity and proximity standards, and criteria which must be met if spaces are to be lost. Other policies sought to maximise space for social interaction and specific developments such as a Marina at Bowesfield.

Core Strategy Review

- 3.48 The Core Strategy Review addressed the need to review the housing elements of the adopted Core Strategy to ensure that sufficient housing sites could be delivered to meet housing need and demand in the Borough to 2029. The Core Strategy Review Issues and Options Consultation (Planning for Housing) took place between July and September 2011. As well as questions relating to the spatial strategy, respondents were asked to comment on 16 sites which the Council had identified as having some potential to meet the requirement for new housing. Respondents were also asked to comment on the limits to development around villages, new development within villages and all types of development at Wynyard.
- 3.49 Prior to and during the consultation period an Issues and Options document and Sustainability Appraisal were produced and deposited in Planning reception and all libraries for public inspection and published on the Council's website. An explanatory leaflet and questionnaire including brief details of sites, a map showing locations and an opportunity to comment on the sites, as well as some strategic issues has been produced and was also distributed.
- 3.50 Regular Local Development Framework consultees were informed of the consultation by letter or email and specific contact was made with Parish Councils. Community and Residents' Groups were informed of the consultation by letter through the Stockton

Community and Residents Groups Association. Participants in the original Core Strategy Examination were informed of the review consultation by letter or email

- 3.51 The Council's corporate Facebook and Twitter accounts were used to publicise the consultation period and staffed information sessions were held in libraries at scheduled times to answer questions from members of the public. A press release targeted at local newspapers was released and an article was published in Stockton News magazine signposting the consultation. A series of drop in events at libraries and community venues around the Borough were also completed.
- 3.52 During the consultation period 791 questionnaire responses were received, whilst 77 representations were received by letter and email, including a number of residents of the Borough, statutory consultees, developers and land owners. Viewpoint 30, the Council's residents panel (which included the Planning for Housing questionnaire) received 603 responses.
- 3.53 Work on developing a Preferred Option began with a thorough analysis of the information received during the consultation period to identify both public opinion on the sites, and technical information which would impact on their delivery. This involved the collation and synthesis of a wide range of information from a variety of sources. Overall, whilst the community engagement exercise undertaken in summer 2011 gathered useful information and opinions about strategic issues and the 16 sites, the results did not give a clear indication of which sites' allocation would best meet public opinion. This was partly a result of the questionnaire design, which asked people to consider each site's merits as a location for housing in isolation, rather than comparing to or ranking against other sites.
- 3.54 Many of the responses provided further detail or suggested further considerations to take into account, both in terms of the sites' characteristics at the present time, and the potential impact of further housing development. In each case, these have been investigated and the data gathered recorded to inform decision making. In some cases, because of the scale of development being proposed, it was necessary to request information in addition to that provided at the Issues and Options Stage or in response to previous consultations, particularly from infrastructure and utility providers.

Spatial Strategy and Housing Requirement

- 3.55 Respondents were asked to consider whether housing development should be focused on a single large site or a number of smaller sites. There was support for both options; however the majority of respondents supported the allocation of a number of smaller sites. Points raised by consultation respondents included:
- The potential for the housing market to be dominated by one area of the Borough if large sites were selected
 - Facilitation of choice of both housing type and location
 - Need to ensure flexibility and deliverability, which could be limited on larger sites
 - Provision of adequate infrastructure for both large and small sites
 - Potential to subdivide larger sites into medium and small sites to make these more acceptable
 - Integration with the existing community and the delivery of sustainable communities.

- 3.56 Several respondents questioned whether there was a real need and demand for new houses in the light of current economic circumstances, with particular reference to the housing market in Stockton, the difficulty in gaining funding for developments and securing mortgages. The number of exiting empty homes was also cited as an issue. Conversely some respondents contended that the housing requirement should be higher citing the 20% allowance referred to in the draft National Planning Policy Framework and the need to provide sufficient houses nationwide.
- 3.57 Following the Issues and Options consultation began in July 2011, became apparent that the outstanding housing requirement had risen to 4,200 dwellings, 1,400 more than the outstanding requirement identified previously. This had 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 had moved forwards to January 2014, meaning a further 555 dwellings were required as the Council must plan for 15 years from the date of adoption.
- 3.58 This reality made the choice of housing sites for allocation more restricted, as more sites needed to be allocated to meet housing need and demand within the Borough. In addition, some sites had to be removed from consideration as site allocations as issues surrounding their delivery had emerged.
- 3.59 Delivering housing on only the smallest sites would not enable the delivery of the outstanding housing requirement, meaning that a number of larger sites had to be included as Preferred Options. However, the Preferred Options housing policies did seek to allocate a wide range of smaller sites in the Core Area and conurbation. In addition, the largest site put forward at Issues and Options stage has not been allocated, and where logical, the boundaries of larger sites have been reduced in size.

Billingham Bottoms

- 3.60 A response was received on behalf of the owner of this site, promoting its development
- 3.61 Respondents to the consultation raised various concerns regarding the potential development of the site, particularly with regard to flood risk. Other concerns included impact upon wildlife and biodiversity, proximity to the A19 and industry, impact on the traffic network, ability to achieve satisfactory access, impact on the green wedge, impact on allotments, costs associated with remedial work in relation to contamination, services and facilities being a long walking distance away from the site.
- 3.62 Comments identifying the site as a suitable location were also received, including a response on behalf of the owner of this site, promoting its development. Responses identified that the site provides good access onto arterial roads and is close to the bus network. It was also suggested that the scale of development would not cause severe impacts and would enable the site to integrate with existing development. It was also felt that the site could contribute positively to the Borough's mix of housing types and tenures.
- 3.63 Following the consultation period, it became apparent that the Billingham Bottoms site had numerous issues which meant it is was not considered appropriate to allocate it for residential development. The Environment Agency identified that the site could become a 'dry island' during a flood event due to the presence of watercourses on

both sides. It was also anticipated that the area of the site within flood zone one (and therefore acceptable for residential development) may have decreased as a result of climate change. In addition, it was likely that extensive remediation of the site would be required to enable residential development. It is also understood that the site would require a new access onto New Road over Thorpe Beck. Combined, these factors would limit the site's viability and deliverability.

Harrowgate Lane

- 3.64 Numerous representations were received from land owners and their representatives for the parcels of land which make up this site, in support of the allocation. However, other comments also referred to the site's greenfield status, rural character and location on the periphery of the conurbation. Access and impact on the highway network was raised as an issue by some respondents; others considered that good access was achievable and current road infrastructure could support further development with appropriate upgrades.
- 3.65 The sustainability of the site in terms of good access to services and facilities was raised by numerous respondents, including that the site was within walking distance of existing schools and facilities, had supermarket provision nearby, good bus services and linked well with the adjacent residential area. However, other responses suggested that the development would require new facilities.
- 3.66 Some comments identified that the site's boundaries should be revised or that only a smaller element of the site should be developed. Specific comments identify that a buffer should be left between any development and the electricity substation and that the western boundary of the site need not extend to the pylon lines.
- 3.67 The Regeneration and Environment DPD Preferred Options draft included a policy allocating 126 hectares of land for approximately 2500 dwellings. In response to concerns raised during the consultation period, the policy stated that a comprehensive master plan for the area would be developed, taking into account the opportunity to extend the green infrastructure network and the need to create a buffer between the development and the countryside. To ensure residential amenity, the policy also stated that a landscape buffer must be maintained between the development and the existing electricity sub station.
- 3.68 It was also acknowledged that additional community facilities will be required to support a development of this size. The Regeneration and Environment DPD Preferred Options draft policy stated that the master plan for the site will include education provision, neighbourhood centres (including health, leisure and other community facilities) and open space, sport and recreation facilities.

Land at Ingleby Barwick

- 3.69 Responses were received from representatives of two landowners on this site, both promoting its development. Responses were also received from numerous members of the public.
- 3.70 Many comments concerned the size of the existing settlement at Ingleby Barwick and potential scale of further development, with a number of respondents stating that there were 'too many' houses in this area. In contrast, some respondents felt that the existing and ongoing development in Ingleby Barwick meant the site would be more

appropriate than other more static areas. Respondents referred to the site's current 'green wedge' status in planning policy and its contribution to the landscape in the area. However reference was also made to the potential to 'fill in the gap', suggesting that this would be a logical extension to the settlement.

- 3.71 A large number of responses related to the provision of community facilities in Ingleby Barwick, both in the existing settlement and for the proposed dwellings. Reference was made to education, leisure and youth facilities, shops and the need to create sustainable communities. Some respondents felt that new development would put increasing pressure on already stretched resources, whilst others felt that the new development would support existing and/or bring new community facilities. A number of respondents also noted that this site was also associated with the development of a Free School.
- 3.72 Significant concerns were raised regarding Ingleby Barwick's road network and the impact additional dwellings would have on congestion both within and around the estate. Concerns were also raised about how the new development would be accessed. Conversely, other respondents considered that Ingleby Barwick's relatively modern road system would be better equipped to deal with additional vehicles than other sites.
- 3.73 Following the consultation period, Little Maltby Farm, Ingleby Barwick was not included as a preferred options policy. Whilst it was acknowledged that the site had potential for residential development, it was also recognised that allocating the site would have a significant impact on the green wedge which currently prevents the coalescence of Ingleby Barwick and Teesside Industrial Estate and maintains the open aspect of the surrounding area. In reaching this decision, comments regarding the scale and intensity of development at Ingleby Barwick have been taken into account, as has the current distribution of community facilities.

Land at Urlay Nook 1 and 2

- 3.74 The representatives for the main landowners of these sites have submitted a master plan for development with options for developing either Urlay Nook 1 or Urlay Nook 2. Due to the overlap between Urlay Nook 1 and Urlay Nook 2 many respondents made comment in relation to the Urlay Nook site in general and this approach has been continued in this summary.
- 3.75 Many respondents considered the Urlay Nook sites in association with the other Eaglescliffe sites (Land at Durham Lane Industrial Estate and Land to the South of Preston Farm) and expressed concerns over any expansion of Eaglescliffe and the impact this will have on the highway network and levels of road congestion in the Yarm and Eaglescliffe area and also the extra pressure development would place upon existing schools in the area. Specific comments relating to the highways around Urlay Nook were also made, with some residents expressing concerns over inadequate highways and public transport systems with others making reference to the good access and arterial road links at Urlay Nook.
- 3.76 A common concern was the proximity of the Urlay Nook sites to site of Elementis Chromium, especially in terms of the impact this would have on the amenity of any new residents. However, this industrial site has ceased operation and a large area of the site has been cleared.

- 3.77 There was concern that the Urray Nook sites were too far from the true urban area and their development would result in urban sprawl with limited access to local infrastructure and facilities for the new residents. However, an alternative view was also expressed by a number of respondents, who considered that the sites provided good access to local facilities and could be supported by local infrastructure. Concerns were also expressed over the loss of agricultural land and the potential impact on Durham Tees Valley Airport.
- 3.78 The Regeneration and Environment Preferred Options draft allocated 25 hectares of land at Urray Nook for approximately 570 dwellings. This is the site referred to as Urray Nook 1 at the Issues and Options stage. Whilst a Health and Safety Executive Consultation Zone currently limits the development potential of the site, it was anticipated that this would be removed in the near future. At that time, the area was currently undeveloped, however it was within the limits to development and the Council's Planning Committee was minded to approve development of the site when proposed in 2009 (although the relevant Section 106 Agreement has not been signed) meaning that the principle of development in this area has been established.
- 3.79 Concerns regarding the cumulative impact of development in the Eaglescliffe area on transport and community facilities were taken into account, however it was anticipated that these can be overcome, particularly because a number of sites proposed in the Eaglescliffe area at Issues and Options stage were not carried forward. The Preferred Options policy required any developer to prepare a master plan for the development, setting out details of access, arrangements, design and development phasing. It was anticipated that any facilities necessary to promote a sustainable community would be delivered through that process.

Land at Durham Lane Industrial Estate

- 3.80 No representation was received from the owners of this site, or their representatives. Many respondents considered the Land at Durham Lane Industrial Estate in association with the other Eaglescliffe sites (Urray Nook 1 and 2 and Land to the South of Preston Farm) and expressed concerns over any expansion of Eaglescliffe and the impact this will have on the highway network and levels of road congestion in the Yarm and Eaglescliffe area and also the extra pressure development would place upon existing schools in the area.
- 3.81 When considered as an individual site, Land at Durham Lane Industrial Estate received both support and objections. Some respondents considered that the site was served by inadequate highways infrastructure and had poor access to public transport and local facilities and services. However, comments were also received that referred to the site having good road and infrastructure links, good access to existing facilities and services and being in close proximity to a train station.
- 3.82 The site was considered to be in need of improvement, to be a smaller site that could be absorbed into the existing community and to be a good site because it was within the established boundaries of Stockton. One comment also referred to a need for housing in the area. Negative comments expressed concerns over the site being adjacent to an industrial estate and having potential to support wildlife. It was stated that the site is both too small and that it proposes too many houses for the area.

- 3.83 Following the Issues and Options consultation, it became apparent that Land at Durham Lane Industrial Estate would not be an appropriate site for new housing development due to its value as a viable employment site which continues to be attractive to new and expanding businesses. In addition, it was considered that links with existing residential areas would be relatively poor, with the neighbouring industrial estate likely to be incompatible with new residential uses.

Wynyard Hall Estate, Wynyard Park and Land to the East of Wynyard Village

- 3.84 Representations were received from the landowners or their representatives for all three Wynyard sites. The majority of the responses to the consultation discussed Wynyard generally – this has been reflected in this summary.
- 3.85 A number of comments related to the ability of the road network in the village to accommodate the additional traffic generated from any new dwellings. In addition concerns were expressed regarding current congestion on the A19 and the A689, in particular at the junction of these major roads. Furthermore residents also expressed concerns that the road capacity in the area will already be affected by the potential hospital development in the Wynyard area. However, several comments suggest that the sites must have good transportation links, because they are immediately adjacent to two major roads. Issues were also raised over how additional housing sites would conflict with the access to employment land at Wynyard Park
- 3.86 A number of responses stressed the unique status of Wynyard as an executive housing location. Concerns were raised that additional housing would water-down the original Wynyard vision and the area would be less popular in this market. Some responses suggest that there is no demand for executive housing within the Borough. A number of views suggested that all large/quality housing has been concentrated in Wynyard at the expense of other areas, which may decline. Some responses in favour of development at Wynyard were supportive of an executive style development.
- 3.87 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.
- 3.88 A significant number of respondents had concerns about the size of the sites in the Wynyard area and the affect that this growth would have on the village lifestyle, as well as the character and exclusivity of the area. One of these responses also referred to 300-dwellings which are identified in Hartlepool's Core Strategy. Some responses suggested that the settlement is growing too quickly already and as an 'exclusive' area it is at the point of over-development. Many residents suggested that further growth of the settlement could lead to future comparisons with more 'normal' residential estates.
- 3.89 Several respondents suggested that the loss of exclusivity could have Tees Valley wide ramifications. This is because the area is one of the few executive housing locations in the North-East and one of the main incentives to attract executives in to the Tees Valley sub-region. The responses envisage that the loss of the areas status would lead to a decline in the number of these people that are attracted to the area.

- 3.90 Given the village location, many responses identified concerns regarding sustainability issues relating to the level of amenities available to residents. However, an alternative view suggests that the Wynyard sites provided scope to improve existing infrastructure in the Wynyard area. Several comments identify the area as a whole as 'green belt' or outside of development limits and that this designation should be retained, as well as the gap between Wynyard and Wolviston.
- 3.91 A number of concerns related to the ecological value of the sites and the loss of agricultural land. A number of site specific environmental impacts were identified relating to the proposals link to Wynyard Hall Estate. These included the loss of the open aspect at the cricket pitch; that part of the site falls on an example of the ancient agricultural technique of ridge and furrow; and that birds of prey, owls, bats and foxes have been spotted in the area.
- 3.92 Concerns were raised that the initial concept behind the employment land at Wynyard Park was to provide jobs rather than housing. Some responses considered that the Wynyard Park and land east of Wynyard village sites would conflict with this growth.
- 3.93 Respondents were also asked if more homes were to be built at Wynyard, what types of house should there be. Whilst executive housing was a popular selection, mid-range family housing, affordable housing and housing for older people were also supported.
- 3.94 The Regeneration and Environment DPD included a policy allocating land at Wynyard Hall Estate (up to 300 dwellings on 30 hectares) and Wynyard Park (up to 1000 dwellings on 45 hectares) for residential development. It was acknowledged that there were significant issues regarding the provision of community facilities and services at Wynyard which limit its role as a sustainable settlement. It was intended that this would be rectified through the production of a Supplementary Planning Document which would master plan the area, taking into account the Council's sustainability objectives. The Regeneration and Environment DPD Preferred Options draft policy set out that development of the site should include improved rights of way, including pedestrian and cycle routes across the A869 and community facilities such as education provision, open space, and a neighbourhood centre to the north of the A689. It was also anticipated that this scale of development will deliver any necessary highways mitigation measures.
- 3.95 At Wynyard Park, the principle of development had been accepted through the identification of 70 hectares of land as a Key Employment Location in this area. However, additional planning permissions granted for employment uses beyond the Key Employment Location meant that there was scope to allocate both uses in the Wynyard Park area. This meant that whilst housing would make up a significant proportion of the land allocations in the area, employment allocations would continue to play an important role. The Wynyard Master Plan Supplementary Planning Document would also include requirements for infrastructure provision related to employment land, including improvements to the road network and public transport.
- 3.96 The Preferred Options policy relating to Wynyard Hall Estate allocated land at very low density. It was anticipated that this land would be developed for executive housing in keeping with the character of the existing village. This area is well related to the existing village, enabling access to existing community facilities. In contrast, residential

development at Wynyard Park will be required to provide a full range of housing to support a sustainable community, including affordable housing, mid-range family housing and housing suitable for older people.

- 3.97 Land to the East of Wynyard Village was not been included in the Regeneration and Environment DPD Preferred Options draft. Due to its location beyond the intended site for Red House School, it was not considered that residential development in this location would be well related to existing residential development, or any community facilities provided through the Wynyard Master Plan Supplementary Planning Document.

Land to the South of Preston Farm Industrial Estate

- 3.98 Representations were received from both the land owner and a housing developer with an interest in this site. Comments were also received from numerous members of the public.
- 3.99 A number of respondents noted that Land to the South of Preston Farm Industrial Estate is currently designated as a green wedge and overlaps with plans for the Tees Heritage Park. The importance of the green wedge in providing a gap between the Stockton conurbation and Eaglescliffe was cited, particularly with regard to maintaining the separate identity of both settlements, preventing urban sprawl and the amenity of residents already living in the area. Responses also referred to the area being aesthetically valuable because of its open, undeveloped nature and its proximity to the Cleveland Way and Preston Park. It was perceived that there was a lack of this type of space in Yarm and Eaglescliffe. The site's value as agricultural land was noted, as was its value as a wildlife area with deer, badgers and foxes having been seen.
- 3.100 However, there were also positive responses to the site. Some respondents questioned the site's value as open space, noting that the site was within the urban area and suggesting that the impact on the Borough would be less than more at more peripheral sites. It was also stated that developing the site would have a limited impact on existing residents, either because the area is already urbanised or its remoteness from other properties. Some respondents suggested that the site would be more acceptable if the scale of development was smaller, allowing some of the green wedge to be maintained.
- 3.101 Highways and traffic were significant concerns, both across the Yarm and Eaglescliffe area and the site itself. It was felt that the development of the site would add to existing congestion in Yarm and Eaglescliffe, and that Yarm Road and Yarm High Street would be unable to support the additional traffic generated. In contrast, a number of respondents suggested that the site was well positioned to deal with additional traffic, being close to the A66 and the South Stockton Link Road and having good access to public transport links.
- 3.102 Concerns were raised regarding the remains of Preston medieval village, and the presence of gas, water and sewerage infrastructure on the site which it was felt would constrain development. Concerns were also raised regarding community facilities and infrastructure to serve new and existing residents, particularly pressure on school places and health services. In contrast, the close proximity to the employment opportunities offered by the industrial estate was seen as positive. A view that any

development at Preston Farm should be for employment uses to compliment the industrial estate was also expressed.

- 3.103 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 was not therefore, allocated for residential development in the Regeneration and Environment DPD. It was acknowledged that the site made 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.

North West Billingham

- 3.104 Detailed comments were provided on the behalf of the landowner. Comments were also provided by members of the public. The majority of comments received were opposed to this site. The expansion of Billingham towards Wolviston was a significant concern, as many people considered that the reduction in the gap between the two settlements would lead to the two areas being joined together. Several comments expressed the concern that a smaller site would then grow taking up more land and further reduce the gap between the settlements.
- 3.105 The impact of the development on the road network and highway safety was a significant concern, with many people citing poor public transport and existing high levels of congestion in the area, which would be increased. Many also noted that traffic levels are exacerbated by the level of traffic associated with nearby schools. Many residents also made reference to the noise created by the concrete surface of the adjacent section of the A19 and the impact this has on existing residents. Additional impacts from the road included the level of pollution generated from traffic and the detrimental impact of these factors on the quality of life and health of new residents.
- 3.106 Other concerns raised included the level of amenities in the area, the potential for anti-social behaviour and that there are insufficient school places within the area to accommodate the additional children from the development. A small number of positive comments were received regarding the site, including the views that the development 'wouldn't affect anyone', that the site is suitable as it is near to main roads; that the site was suitable subject to a 'link in' to the A19, and that sites in the Billingham housing market area would be more affordable for future residents.
- 3.107 This site was not been included in the Regeneration and Environment DPD Issues and Options draft. North West Billingham was the smallest site considered at Issues and Options stage. Taking into account the need to leave a buffer between the A19 and any new houses, the remaining area would form a long thin site which would be difficult to link to existing residential development and community facilities. There would also be limited potential to provide facilities for new residents within the remaining small area. The erosion of the Strategic Gap and the potential for coalescence with Wolviston village were also taken into account.

South West Yarm

- 3.108 One response was received on behalf of the two landowners of this site which supported its development. Numerous comments were also received from members of the public.
- 3.109 One of main concerns was the capacity of the road infrastructure to accommodate the extra traffic, both from this site, and in conjunction with other sites in the vicinity. Parking in Yarm is limited and causes access problems through the town, and it considered that more homes will add to those problems and extra parking provision would be required. There was also concern that local infrastructure and facilities would be incapable of serving an expanded population. There were references to the lack of, and the need to provide for schools, leisure facilities, public transport and in one case it was mentioned that there would be a need to improve the capacity of the local water supply. There was also concern regarding employment opportunities for new residents and the development of agricultural land.
- 3.110 Many responses made reference to local and strategic wildlife corridors, Special Landscape Areas and areas of biological interest. It was suggested that development on this site would have an adverse impact on the unique character of Yarm as well as the rural character of Kirklevington and would result in the coalescence of settlements.
- 3.111 In developing the site, respondents noted that the proximity to pylons and railway lines should be avoided. The point was made that this is an area of high cost housing area and to meet local needs, the site should provide for a mix of house types and tenures, including affordable housing. Furthermore, the site should include play area/park to attract young families and people.
- 3.112 Of the three sites on Yarm's existing southern development limit, South West Yarm was considered to be one of the most sustainable, with good access to public transport and community facilities, including shops. 49 hectares of land were therefore allocated for up to 735 homes in this location in the Regeneration and Environment DPD Preferred Options draft. The policy also stated that the site should provide a wide range of housing, including both affordable and executive dwellings.
- 3.113 As well as providing good links to Yarm Railway Station, any developer developing the site would be expected to mitigate the impact of the dwellings on the local and strategic road network. The policy also made reference to improving community facilities, including education provision and open space, particularly if playing pitches are lost through the development.
- 3.114 Whilst the wildlife corridor referred to in a number of responses is no longer protected specifically through planning policy, the site was amended to creating a buffer between the site and the watercourse to the south. It was considered that a development of this scale will not prevent the functioning of the established strategic gap between Yarm and Kirklevington.

South East Yarm

- 3.115 A representation was received from the landowner for this site, promoting its development. However numerous concerns were also raised. One of main concerns was the capacity of the road infrastructure to accommodate the extra traffic, both from this site, and in conjunction with other sites in the vicinity. Parking in Yarm is limited

and causes access problems through the town, and it was considered that more homes will add to those problems and extra parking provision would be required.

- 3.116 A number of respondents have expressed concerns about the ability of local services and infrastructure to cope with new housing development, particularly community facilities, leisure facilities, schools, shopping (the nearest being in Yarm), social amenities and road infrastructure. A need for school playing fields was noted as well as the existing planning permission for a golf course.
- 3.117 One resident commented that the site is in a sustainable location as it is near the railway station. However, some respondents suggested that many residents do not use public transport and there were also comments that the service available is not a good one. Little local employment would lead to commuter traffic and whilst there is a good bus service to Stockton, it is affected by the congestion and is extremely slow at peak times.
- 3.118 Residents commented that the site is coincident with both the local strategic wildlife corridors and areas of biological interest that are of increasing importance as the Teesside conurbation expand. Furthermore, these areas connect the Leven and the Tees but also are part of the greater corridor between North York Moors and the Pennines. Comment is also made that development will damage farming and wildlife along the only continuous wildlife corridor in Stockton which is unique. Many respondents made reference to now superseded Adopted Stockton on Tees Local Plan Tees Valley Structure Plan Policies, in particular there was great concern that development at this site will have an adverse impact on the Special Landscape Area along the River Leven and Tees Valley and an established wildlife corridor.
- 3.119 It was considered that development on this site would have an adverse impact on the unique qualities of Yarm and that the Town could lose its quaintness and uniqueness if lots more houses are built. Development of this site would erode the divide between Yarm and Kirklevington and would make the gap between the two settlements virtually disappear.
- 3.120 Of the three sites on Yarm's southern development limit, the increased distance from public transport and other community facilities made South East Yarm the least sustainable site, meaning it would be more difficult to deliver. It was not, therefore, allocated for residential development in the Regeneration and Environment DPD Preferred Options draft. It was anticipated that not allocating this site would reduce the potential impact on the local and strategic road networks, improving the deliverability of other sites in the vicinity. The extant planning permission for a golf course and associated facilities meant that residential development of this site may result in a reduction rather than an increase in community facilities in this location.

West Preston

- 3.121 A representation was received on behalf of the major land owner for this site, supporting its development. Members of the public raised concerns about the impact the development of this site would have on the local road network. Increased traffic on Durham Lane, the effect on Elton village and the difficulty of accessing Yarm Road via the tunnel under the railway line were cited as particular issues. Conversely, it was stated that the road infrastructure close to the site was good and could be improved if a larger development went ahead. In addition, bus routes could be improved and the

site is close to Eaglescliffe Station which was seen as advantageous, especially if the Tees Metro proceeded.

- 3.122 The size and location of the site was seen to be positive by a number of respondents. It was noted that a large site would bring an opportunity to create a new 'village' and a new community. It was also felt that the site's distance from other settlements meant that the impact of new housing on existing residents would be reduced. However, it was also considered that the site would not relate well to existing residential properties and this would make it difficult for new residents to access existing facilities.
- 3.123 Other comments related to the impact developing the site would have on the countryside, the loss of agricultural land and the loss of a natural corridor for wildlife. The availability of the necessary sewerage and drainage infrastructure to support the number of houses proposed was also questioned.
- 3.124 West Preston was not included in the Regeneration and Environment DPD Preferred Options draft. This was, in part, a response to the view expressed through the consultation that a larger number of smaller sites would be preferable to one large site. It was also acknowledged that the site is not well related to existing settlements and community facilities. Physical barriers, including a road and railway line, would make this difficult to rectify. Access to the site is also constrained by the railway line and it seems likely that the site's development and associated traffic would have a negative impact on the small village of Elton.

West Yarm

- 3.125 A representation promoting development of the site was received on behalf of the landowner. Numerous comments were received from members of the public. Like other Yarm sites, one of the main concerns was that the 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 consider 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. It was also considered that new access roads to this area would be needed should development take place.
- 3.126 Some respondents took the view that Yarm could not accommodate any more houses with its current infrastructure, particularly that there are no leisure facilities, not enough schools, and a lack of shopping facilities. Additional infrastructure should be provided, such as and community centres, schools, roads and shops. The point was made that there was little work or services so most people travel elsewhere to work, and as Yarm could not provide employment opportunities, any new developments would be for commuters.
- 3.127 Comment was made that the site was coincident with both the local and strategic wildlife corridors and areas of biological interest, and that these connect the Leven and Tees, part of the greater corridor between North York Moors and Pennines. Concern is expressed at the impact of development on the integrity and quality of strategic and local wildlife corridors and nature conservation interests. Furthermore, development on

the site would have an adverse impact on areas of biological interest and the connection between the River Leven and Tees

- 3.128 The Town was seen to be at risk of losing its quaintness and unique qualities, and its small town charm. It was considered that Worsall Road [which is the eastern boundary of the site] provides a natural boundary to Yarm and a clear identity for the end of development.
- 3.129 Like South West Yarm, West Yarm was considered to be one of the most sustainable sites adjacent to Yarm's existing southern development limit. 15 hectares were therefore allocated for up to 300 dwellings in the Regeneration and Environment DPD Preferred Options draft. The policy also made reference to the provision of community facilities, including education, public transport and, footpaths and cycle routes. Any developer developing the site would be expected to mitigate the impact of the dwellings on the local and strategic road network.
- 3.130 Whilst the wildlife corridor referred to in a number of responses is no longer protected specifically through planning policy, the development of the site would need to take the character of the landscape and its location on the urban fringe into account. The site boundary was drawn to take pylons and pipelines around and within the site into account. It is considered that a development of this scale will not prevent the functioning of the established strategic gap between Yarm and other settlements.

Yarm Back Lane

- 3.131 Representations were received from the representatives of the two landowners associated with this site, both supporting its development. Comments were also received from members of the public. Some respondents raised the issue of highways, particularly traffic congestion at peak periods in the vicinity of the site. It was suggested that the present highway design was inadequate and making any significant changes would be costly. Conversely, some respondents reported that the site had better road links than other sites in the consultation and new development would facilitate necessary improvements. Public transport links were also considered to be relatively good, including access to Allens West train station.
- 3.132 The majority of comments relating to this site referred to the aesthetic impact development would have on existing residents and the strategic gap between Stockton and other settlements. The potential impact on wildlife was also raised as an issue. However, some respondents considered that this site would be a logical extension to the urban area which could easily be developed.
- 3.133 Some respondents considered that there were insufficient schools, both primary and secondary, in the locality to accommodate development. However others suggested that the site was close to centres of employment, schools, medical facilities and shopping and was also big enough to support some facilities in its own right. Flood risk was also noted as an issue, with particular reference made to Lustrum Beck. It was considered that further development would make existing issues worse.
- 3.134 The Regeneration and Environment DPD Preferred Options draft contained a policy allocating a 42 hectare site to the east of Yarm Back Lane for approximately 945 dwellings. This was a significant reduction in both size and number of dwellings from the site consulted on at Issues and Options stage, restricting development to the area

between Yarm Back Lane and the existing residential development. This change had been made in part due to the preference for distributing the housing required amongst a larger number of smaller sites.

3.135 It was concluded that a master plan for the whole site would be required to ensure a comprehensive, sustainable development. The master plan would set out how concerns regarding the aesthetic impact on the strategic gap, wildlife, and ecology in the area, as well as the open space, sport and recreation facilities which will be required within the site itself. The policy also took into account flood risk associated with the site, including the incorporation of any water courses into the site's design and layout, and any impacts on flood risk in relation to Lustrum Beck. The site is in close proximity to existing residential areas and therefore has access to a range of community facilities, however the regeneration and Environment DPD Preferred Options policy also set out that any development must include land for educational provision, neighbourhood centres (to meet health, leisure and any other community needs) and allotment provision.

3.136 The potential impacts on the local and strategic road network were been noted. The policy included in the Regeneration and Environment DPD Preferred Options draft sets out alterations that both Yarm Back Lane, its junction with Darlington Back Lane and Elton Interchange will need to be undertaken to enable development to go ahead.

New Sites

3.137 A number of respondents suggested additional potential housing sites. These included land within the urban core, the wider conurbation, rural locations and new towns and villages. Some representations proposed easily identifiable sites, and whilst others gave general areas or parts of the Borough.

3.138 The new sites suggested were:

- Stockton, North Shore
- Old Westland School Site, Mill Lane, Norton
- Site of Tilery Sports Centre
- Swainby Road/Tilery Housing Regeneration
- Queens Park North (Old Hills Doors Site)
- Site North of Thorpe Thewles between the A177 and the village road
- Grove Stables, Kirklevington
- Land behind Tesco/Horse and Jockey
- ICI Offices at Billingham (Billingham House)
- Old Doctors Surgery, Messines Lane, Stillington
- Land between Thornaby and Teesside Park shopping complex (Golf Club)
- Triangle of land between southern edge of Hartburn and A66 (Six Fields)
- 18A Braeside, Kirklevington
- North Tees Hospital
- Ragworth (general location)
- Port Clarence (general location)
- Banks of the River Tees between Stockton and Middlesbrough (general location)
- Buchanan Street (general location)
- New town or eco-village on land between Stockton and Darlington

3.139 Where new sites were put forward, these have been considered in accordance with the housing spatial strategy set out in the Regeneration and Environment DPD Preferred Options draft and the policies in the adopted Core Strategy. As a result, the North Tees Hospital site was included as a preferred option. A number of the new sites were not known to be available or have constraints which limit their deliverability for residential development. In some cases, they are sited in locations which would be less sustainable than those sites selected as preferred options, or would be allocated for other uses (such as employment or open space) in the Regeneration and Environment DPD Preferred Options draft. Many of the sites suggested benefit from extant planning permissions for residential development and have therefore already been included in the Council's calculations of the development required to meet the Borough's housing requirement.

Village Development

3.140 The Core Strategy Review Issues and Options consultation document asked respondents to consider whether the Council's policies on residential development in villages continued to be appropriate. The only village sites put forward for public consultation were those at Wynyard (discussed above), however the Council received a number of representations from land owners with sites in or adjacent to villages as part of this consultation period.

3.141 Members of the public made a wide range of comments regarding villages. Coalescence between villages and the erosion of strategic gaps between villages and the conurbation were raised by numerous respondents. The need to retain village identity and community was also discussed, with some respondents stating there should be no development in villages at all. The availability of community facilities such as schools and shops was cited as a limit to new development, however the point was also made that new development would support these amenities.

3.142 Some respondents were positive about small scale development in villages. A number of reasons for this were given, including the need to ensure prosperity was spread to all areas of the Borough, the opportunities villages provided for good quality, small scale developments and the need to build sustainable mixed communities. Particular reference was made to the need to provide affordable and family homes alongside more 'executive' house types for those with family or employment connections to the rural area.

3.143 In preparing the Regeneration and Environment DPD Preferred Options policies, a review of the limits to development was undertaken to take into account changes to Ordnance Survey (OS) base maps and mapping, improvements in GIS technology and physical changes on the ground necessitated a review of policy boundaries to form. This review did not fundamentally change the location of the boundaries, except at Wynyard Village where a new limit to development was drawn. The Spatial Strategy section of the Regeneration and Environment DPD Preferred Options draft sets out the Council's preferred approach to limits to development in rural areas.

3.144 The Regeneration and Environment DPD Preferred Options draft includes a number of policies which will be applied Borough wide but will also support sustainable communities within villages. This includes a policy protecting village shops unless it can be demonstrated that they are not viable businesses and cannot be run as

community enterprises. Policies in the adopted Core Strategy will continue to support the provision of affordable housing in rural areas where it is supported by a detailed assessment of rural housing need.

4 Regeneration and Environment Local Development Document Preferred Options Consultation

- 4.1 Following the Issues and Options consultations, the Council drew together the four documents into the Regeneration and Environment Local Development Document Preferred Options Draft. This presented the Council's draft site allocations and other policies to deliver the Council's Core Strategy, adopted in 2010.
- 4.2 The Regeneration and Environment LDD Preferred Options draft drew together the four Issues and Options consultations undertaken previously and therefore included policies on a wide range of topics. The Document's primary purpose was to set out the site allocations which would deliver the vision and objectives within the Core Strategy. The document included draft site allocations for housing, limits to development and green wedges, employment, retail, renewable energy development and transport. Policies were also included to deliver sustainable development and reduce and mitigate against climate change, as well as maintaining and enhancing the Borough's natural and historic environment.
- 4.3 A public consultation on the Preferred Options draft took place between 30 July and 24 September 2012. Neighbouring local authorities, parish councils and neighbouring parish councils, key stakeholders and members of the public were contacted to inform them of the consultation period and invite representations. Correspondence was also sent to individuals and organisations on the Local Development Framework consultation database, members of Stockton Residents and Communities Groups Association and members of the Council's Residents' Panel. A list of consultees is attached at Appendix 1.
- 4.4 During the six week period, the following activities were undertaken:
- Letters and emails were sent to all consultees on the Council's Local Plan Consultation Database, informing them about the consultation, the availability of documents and the opportunity to make representations.
 - A letter was sent to Parish Councils inviting comments, including recognition of need for longer timescales in some cases.
 - Community and Residents' Groups were informed of the consultation by through the Catalyst Newsletter – Catalyst are an intermediary organization who bring together a social, voluntary and community groups.
 - An article was published in the July edition of Stockton News magazine signposting the consultation
 - A formal notice was placed in the Herald and Post prior to the consultation beginning
 - A press release targeted at local newspapers was released at the beginning of the consultation period.
 - Corporate Facebook and Twitter accounts were used to publicise the consultation period and drop in events

- Presentations were given to the Northern, Central Western and Eastern Area Partnership Boards, the Environment Partnership Board and the Council's Urban and Environmental Task Group.
 - A consultation web page holding copies of all consultation documents for download and information on how to make comments was made available. This included an interactive and downloadable copy of the policies map.
 - Copies of all consultation documents were made available for public inspection in all libraries, including the mobile library.
 - An short explanatory leaflet detailing the document's purpose, content and how to comment was made available.
- 4.5 Drop in sessions were held throughout the consultation period at a number community venues throughout the Borough. These included a display of relevant information and were staffed by members of the Spatial Planning Team. These sessions provided an opportunity for members of the public and other stakeholders to view the documents, discuss matters of concern and submit representations regarding the documents.
- 4.6 The Council received a total of 334 separate representations. Of these 68 were from a variety of organisations and 271 were from individuals.

5 Main Issues Raised During the Regeneration and Environment Local Plan Preferred Options Consultation

- 5.1 A summary of the main issues raised during the consultation period, and how these have influenced policies in the Regeneration and Environment Local Plan Publication draft is given in the following pages. A schedule of the all responses received in response to the latest draft of the document, the Regeneration and Environment Local Plan is included at Appendix 2, along with the Council's response to each point made. In a small number of cases, it has been necessary to summarise responses and maps, figures and illustrations have not been included. The full responses to all consultations in their original form can be viewed by arrangement with the Spatial Planning Team.

Topic Papers

- 5.2 During the consultation period, a significant number of responses were received in relation to:

- The need and demand for further housing development within the Borough
- The process of selecting housing sites and the site selections made
- Housing Development in the Yarm area
- Development in the Wynyard area

- 5.3 Appendix 3 contains four topic papers which relate to these issues. They address the points raised in relation to these topic areas and seek to explain how national policies and guidance and local evidence have been balanced against the views expressed through the consultation period in order to produce the Publication draft of the document. In addition, a topic paper has been produced in response to comments from the Health and Safety Executive. This is also included at Appendix 3.

Limits to Development and Green Wedges

- 5.4 Representations relating to the limits to development and green wedges were largely polarised. Whilst some individuals and organisations sought to maintain restrictive policies and tight boundaries to protect the countryside and green wedges, other sought relaxation and the allocation of land for development. In preparing the Publication draft, reviews of the Borough's limits to development and green wedges have been undertaken, taking into account the criteria for each designation and the views expressed through the various consultations which have taken place through the plan period. The detailed results of these are set out in the reports relating to each review.

Harrowgate Lane and Yarm Back Lane

- 5.5 Responses received to the proposed housing allocations at Yarm Back Lane and Harrowgate Lane were from local residents (including Letch Lane Residents Association), landowners/developers, and other stakeholders including National Grid and Highways Agency.
- 5.6 Concerns raised by local residents included highways congestion, amenity (including loss of views), flood risk, lack of social infrastructure, water supply and sewerage system capacity, and loss of greenfield and agricultural land. Representations from

landowners and developers with an interest in the site were supportive of the allocation but sought clarification over the phasing and how a master plan would be progressed for the site.

- 5.7 Since the Preferred Options draft was consulted on in 2012, the Council has been working in collaboration with the Advisory Team for Large Applications (ATLAS), landowners, developers and agents to bring forward coordinated housing development and associated infrastructure on Harrowgate Lane and Yarm Back Lane. A Development Framework Document (DFD) which draws together this collaborative work is under preparation. The DFD will guide the development of the site, identifying the phasing of development and delivery of infrastructure.
- 5.8 As part of the collaborative approach, extensive highways modelling has established a maximum quantum of housing that can be delivered to the satisfaction of the Highways Agency and Local Highway Authority, alongside improvements to key junctions at the following locations:
- Elton Interchange
 - Darlington Back Lane and Yarm Back Lane
 - Durham Road, Junction Road and Harrowgate Lane
- 5.9 Emerging policy also identifies the need to provide social infrastructure in the form of land for a primary school and neighbourhood centre. The Council have also engaged with numerous agencies, including Northumbrian Water, to ensure that housing can be successfully delivered.
- 5.10 The DFD will include a Strategic Framework Plan which will provide a development structure within which more detailed masterplanning can take place at planning application stage. This masterplanning work will seek to overcome issues raised by local residents and stakeholders. Policy within the publication draft outlines what development should seek to achieve. At this stage the phasing of the site is unknown the DFD will detail delivery approaches to the site including a phasing programme and details regarding the delivery of infrastructure.

Transport Infrastructure

- 5.11 A significant number of representations raised concerns about the Borough's transport infrastructure and its capacity to cope with the location and scale of development proposed.
- 5.12 The Highways Agency supported policies relating to sustainable transport and the locational strategy that directs development to the most sustainable sites. The sustainable pattern of development supported by the Highways Agency has been continued in the Publication Draft. However, the Agency also expressed concern that evidence to support linkages between the spatial aspirations, their impacts on transport infrastructure and the supporting measures required should be provided, particularly with reference to housing and employment allocations. The Council's neighbouring authorities, Middlesbrough, Redcar and Cleveland, Darlington, Hartlepool and Durham also raised concerns about the impact of Stockton's plans on the Tees Valley's strategic and local road networks, often in relation to soecific sites in close proximity to the Borough boundary.

- 5.13 At the Preferred Options stage, it was acknowledged that the implications of the preferred sites on the strategic and local road network had not been fully explored. This has been addressed in the Publication draft through Borough wide and site-specific work.
- 5.14 Committed development and proposed allocations have been fed into the Development Database that informs the Tees Valley Infrastructure Plan, a constantly evolving response to the Tees Valley's development aspirations. This has been developed by the five Tees Valley authorities, Tees Valley Unlimited and the Highways Agency and has been used to identify the impact of site allocations on existing infrastructure and the level and type of infrastructure that may be required. This has led to the safeguarding of land highways improvements, and the identification of others which are expected to take place during the plan period.
- 5.15 In addition, an assessment has been made of each of the site allocations' transport requirements. A number of the sites have been granted planning permission since the Preferred Options draft, meaning that the highways implications of the sites have been fully explored through the application process. Where necessary, particularly in relation to large housing sites at Yarm, Wynyard and West Stockton, specific modelling has been undertaken to understand the implications of each site and develop suitable mitigation where the strategic or local road network is likely to be impacted by development. The results of this work have been included in the Publication draft policies.

Town Centres

- 5.16 Support for the draft policies relating to Town Centres was received from three respondents, including Bennett, AG Lathe and Asda Stores Limited. As well as supporting the general thrust of the policies and the 'town centre first approach', the respondents supported particular boundaries and sites being included, usually related to their land holdings and development aspirations. The potential for a food store within Stockton Town Centre received particular support. The Council's approach to Town Centres has continued in the Publication Draft, with allocations for large scale Town Centre uses being included at 99 – 101a High Street, the Southern Gateway and Northshore.
- 5.17 Other respondents raised concerns about Town Centre policies, highlighting development aspirations they considered would be adversely effected by them. GMI Holdings made a number of comments in relation to a site at Thornaby and the potential for a sit in and drive thru restaurant on a site on the edge of Thornaby Town Centre. The site referred to has now been developed for this use, however the general points made have been taken into account when developing policies related to food and drink uses. The Garden Centre Group made comments in relation to their site at Preston Farm, suggesting that it should be considered for retail or office development. However, this aspiration has not been included in the Preferred Options draft as it would not contribute to the Council's objectives in relation to Town Centre development.

Infrastructure Delivery

- 5.18 As well as the comments raised about the infrastructure required to support particular developments which have been dealt with elsewhere, comments were also received

from the Mobile Operators Association and National Grid. Comments from the Mobile Operators Association have contributed to the addition of a policy regarding communications infrastructure in the Sustainable Living Section of the Preferred Options draft. This sets out how the Council will deal with planning applications which are for, include or require communications infrastructure.

- 5.19 National Grid made comments setting out the infrastructure for electricity and gas transmission and gas distribution within the Stockton-on-Tees area and how this could be affected by proposed developments. The potential impact at Harrowgate Lane, South West Yarm, Blakeston School and Norton School was highlighted in particular and these constraints have been considered when producing policies relating to them. Any planning application for the site would need to take these issues into account.

Environment

- 5.20 Protection of the natural environment was raised as an issue by a number of respondents. Where these comments related to housing allocations, they have been dealt with in the relevant topic papers.
- 5.21 Natural England recommended that Phase 1 Habitat Surveys be carried out for all allocations and that further clarity be provided as to how the landscape and amenity value had been considered for each site and considers the plan to be unsound on these two points. In response to these comments, the Council commissioned Tees Valley Wildlife Trust (TVWT) to review 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. Tees valley Wildlife Trust 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 not had access to land at Durham Tees Valley Airport historically; however data from the Industry Nature Conservation Association (INCA) has confirmed that it is highly unlikely that European Protected Species would render the DTVA site as undeliverable in the life of the LDF
- 5.22 In response to Natural England's comments, the Council has also revised policies within the LDD have been revised to ensure consistency with the NPPF which requires Local Planning Authorities to set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. The plan also makes clear distinctions 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. This change was also requested by Tees Valley Wildlife Trust.
- 5.23 Natural England's comments in relation to public rights of way, tranquillity, light pollution and high quality design have been taken into account as appropriate in the Publication draft unless they have been previously addressed in other documents. A number of comments made in relation to the Habitats Regulations Assessment have also been addressed.

- 5.24 The Environment Agency provided flood risk information for a number of sites and raised a number of points which should be taken into account when planning development around water courses. 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 and to protect and enhance the wildlife corridor value of the river or watercourse.
- 5.25 Friends of Tees Heritage Park requested that greater attention be given to the Tees Heritage Park. It is considered that 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. A specific policy regarding the Tees Heritage Park has been included within the publication draft of the plan.
- 5.26 Both Natural England and the RSPB made detailed comments in relation to potential land allocations at Seal Sands and North Tees, and strategic mitigation which would be required to mitigate their impact on the integrity of Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site. These comments reflected ongoing concerns which the Council had sought to address over a number of years in partnership with Natural England, the RSPB and land owners and businesses operating in the area, in order to secure the long term protection of the sites.
- 5.27 In 2011, the Use of Land at Seal Sands and North Tees by Birds of the SPA study (undertaken in partnership with Natural England and RSPB, with INCA reviewing existing evidence and undertaking site surveys where necessary) identified a number of sites which should be de-allocated as they were of 'functional importance' to birds using the SPA and Ramsar site. A further recommendation required the identification of strategic mitigation which would off-set the cumulative impact of the loss of land to development in the Seal Sands and North Tees areas. Following this recommendation the Council, Tees Valley Unlimited and INCA sought to identify appropriate strategic mitigation in the area. However, site availability is limited due to, the distance that birds can physically travel; the land being unsuitable because of proximity to business; or because sites already support an assemblage of birds and do not have the capacity to support further populations. As a result, it has not been possible to secure a suitable area of land for use as strategic mitigation for the cumulative impacts of the allocation of employment land within the Seal Sands and North Tees areas.
- 5.28 This has led to a revision in employment land policies from the Preferred Options draft of the RELP. Policy EMP2 of the Publication Draft states that 'no land is allocated for development in the Seal Sands area as all available land is cumulatively important for bird species associated with the Teesmouth and Cleveland Coast SPA and Ramsar Site'. Furthermore, measures are included to require any schemes coming forward for process industry uses to demonstrate that either strategic mitigation can be secured or that the proposed development, in-combination with other proposals, will not adversely impact the Teesmouth and Cleveland Coast SPA and Ramsar site.
- 5.29 Policy EMP2 does still include allocations for developments requiring a riverside location at Billingham Reach, Casebourne and Haverton Hill. These sites are largely brownfield, former industrial sites which include existing slipways and port infrastructure. It is considered that the sites can be allocated without resulting in an

impact on the integrity of the designated sites and any future developments will be subject to individual Habitat Regulations Assessments, as necessary.

- 5.30 Policy EMP3 relates specifically to the SPA and Ramsar site and the industrial areas of Seals Sands and North Tees and encourages development in the areas only on land not identified as being of functional importance. The policy also specifically protects areas that were identified within the 2011 study as being of functional importance and provides further protection for the SPA and Ramsar site by requiring the consideration of any combined or cumulative impacts and the provision of appropriate mitigation.

Historic Environment

- 5.31 English Heritage's response to the Preferred Options draft concluded that taken together with other LDD documents, the policies would not create a positive strategy for the historic environment as required by paragraph 126 of the NPPF and were therefore unsound. However, opportunities to address these issues were also identified and to champion a project-related pro-active approach to heritage protection. Specific comments were also made regarding a number of policies and queries were raised regarding how the historic environment had been taken into account when producing these policies.
- 5.32 The Council has produced policies which it considers provide a positive strategy as required in the NPPF. Work on the Historic Environment section of the publication draft has been undertaken with English Heritage. A Historic Environment Assessment of all allocations has been undertaken with Tees Archaeology and this forms part of the Sustainability Appraisal for the publication draft. Where considered appropriate, policies have been amended in line with English Heritage's comments.

Appendix 1 Bodies and Organisations Informed of Consultations by letter and email

This list shows the specific consultation bodies consulted on each of the consultation documents.

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Countryside Agency	■	■			
Coal Authority			■	■	
Environment Agency	■	■	■	■	■
Historic Buildings and Monuments Commission for England	■	■	■	■	■
English Nature	■	■			
Natural England			■	■	■
Government Office North East	■	■	■		
Strategic Rail Authority	■	■			■
Highways Agency	■	■			■
One North East (Regional Development Agency)	■	■	■	■	
The Homes and Communities			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Agency					
Cleveland Police			■	■	■
Aislaby & Newsham Parish Council	■	■	■	■	■
Billingham Town Council	■	■	■	■	■
Bishopton Parish Council	■	■	■	■	■
Carlton Parish Council	■	■	■	■	■
Crathorne Parish Council	■	■	■	■	■
Darlington Borough Council	■	■	■	■	■
Durham County Council	■	■	■	■	■
East and West Newbiggin Parish Meeting	■	■	■	■	■
Egglescliffe & Eaglescliffe Parish Council	■	■	■	■	■
Elton Parish Council	■	■			
Elwick Parish	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Council					
Girsby Parish Council	■	■	■	■	■
Great Stainton Parish Meeting	■	■	■	■	■
Greatham Parish Council	■	■	■	■	■
Grindon Parish Council	■	■	■	■	■
Hambleton District Council	■	■	■	■	■
Hartlepool Borough Council	■	■	■	■	■
Hilton Parish Council	■	■	■	■	■
Ingleby Barwick Town Council	■	■	■	■	■
Kirklevington & Castle Levington Parish Council	■	■	■	■	■
Long Newton Parish Council	■	■	■	■	■
Maltby Parish Council	■	■	■	■	■
Middlesbrough Borough	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Council					
Middleton St George Parish Council	■	■	■	■	■
Mordon Parish Meeting	■	■	■	■	■
Newby Parish Council	■	■	■	■	■
North Yorkshire County Council	■	■	■	■	■
Picton Parish Meeting	■	■	■	■	■
Preston on Tees Parish Council	■	■	■	■	■
Redcar and Cleveland Borough Council	■	■	■	■	■
Redmarshall Parish Council	■	■	■	■	■
Rudby Parish Council	■	■	■	■	■
Sadberge Parish Council	■	■	■	■	■
Seamer Parish Council	■	■	■	■	■
Sedgefield Borough	■	■			

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Council					
Sedgefield Parish Council	■	■	■	■	■
Stainton and Thornton Parish Council	■	■	■	■	■
Stillington & Whitton Parish Council	■	■	■	■	■
Thornaby on Tees Town Council	■	■	■	■	■
Wolviston Parish Council	■	■	■	■	■
Worsall Parish Council	■	■	■	■	■
Yarm Town Council	■	■	■	■	■
North Tees NHS Trust	■	■	■	■	■

The following list shows *general consultation bodies* and individuals who were sent details of the four Issues and Options consultations in accordance with Regulation 25, having requested that their details were stored in the Local Development Framework consultation database for this purpose at the time of the consultation. The number of individuals who were contacted is shown, rather than personal details.

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Individuals	30	36	253	253	236
Accent North East			■	■	■
Age Concern - Teesside	■	■	■	■	■
Airport Operators Association			■	■	■
Appletons Chartered Surveyors		■	■	■	■
Avecia	■	■	■	■	■
BT Group plc	■	■	■	■	■
Baines Goldston	■	■	■	■	■
Banks Developments	■	■	■	■	■
Barclays Bank	■	■	■	■	■
Barratt Homes	■	■	■	■	■
Barton Willmore	■	■	■	■	■
Bede Sixth Form College			■	■	■
Bellway Homes	■	■	■	■	■
Big Tree Planning Ltd			■	■	■
Blackett Hart and Pratt	■	■	■	■	■
Blue Sky Planning Ltd	■	■	■	■	■
BOC Gases	■	■	■	■	■
bpi. Industrial	■	■	■	■	
British Gas	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
(Northern)					
British Geological Survey	■	■	■	■	■
British Land	■	■	■	■	
British Telecom	■	■	■	■	■
British Toilet Association			■	■	■
British Waterways	■	■	■	■	
Bryant Homes/Taylor Woodrow	■	■			
BTCV	■	■	■	■	■
Building Design Consultant	■	■	■	■	■
Business & Resident Action Group - Norton High Street			■	■	■
CABE	■	■	■	■	
Campaign for Real Ale					■
Canals and Rivers Trust					■
Castlegate Shopping Centre	■	■	■	■	■
Catalyst			■	■	■
Caterpillar Stockton	■	■	■	■	■
CB Richard Ellis Ltd			■	■	■
CE Electric UK	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Centre for Ecology and Hydrology	■	■	■	■	■
Charles Church	■	■	■	■	■
Chemical Business Association			■	■	■
Childrens Society	■	■	■	■	■
Chris Thomas Ltd	■	■	■	■	■
Church Commissioners	■	■	■	■	■
Civil Aviation Authority	■	■	■	■	
Cleveland Fire Brigade			■	■	■
Cleveland Police			■	■	■
Colliers International				■	■
Commission for Racial Equality	■	■	■	■	■
Conaco Phillips Petroleum Co. UK Ltd	■	■	■	■	■
Concept Town Planning Ltd			■	■	■
Corporate Real Estate	■	■	■	■	■
Council for British Archaeology	■	■	■	■	■
Country Land and Business Association (NE)	■	■	■	■	
Cowpen Bewley Village Residents			■	■	

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Association					
CPRE	■	■	■	■	■
Crown Estate Office			■	■	■
Dalton Warner Davis	■	■	■	■	■
Dalton Warner Davis Chartered Surveyors	■	■	■	■	■
David Kitchen Associates	■	■	■	■	■
Davis Planning Partnership		■	■	■	■
DEFRA	■	■	■	■	■
Department for Business Innovation and Skills				■	■
Department for Education and Employment	■	■	■	■	■
Department for Transport	■	■	■	■	■
Design Council/CABE					■
Development Planning Partnership	■	■	■	■	■
Devplan UK	■	■			
Dickinson Dees LLP	■	■	■	■	■
Disability Rights Commission	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Disabled Persons Transport Advisory Commission		■			
DKS Architects			■	■	
DPDS Consulting Group	■	■	■	■	■
Dr Malcolm Bell Ltd			■	■	■
Drivers Jonas Chartered Surveyors	■	■	■	■	■
Drivers Jonas LLP			■	■	■
DTZ		■	■	■	■
DTZ Debenham	■	■	■	■	■
DTZ on behalf of Royal Mail Property					■
Durham Diocese	■	■	■	■	■
Durham University			■	■	■
Eaglescliffe Preservation Action Group	■	■	■	■	■
Eastern Area Partnership Board	■	■	■	■	■
Egglescliffe Youth Group	■	■	■	■	■
Emolior	■	■	■	■	
Endeavour Housing Association	■	■	■	■	■
Endeavour Partnership	■	■	■	■	■
England and Lyle	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
English Heritage	■	■	■	■	■
English Partnerships	■	■	■	■	
Entec UK Ltd on behalf of National Grid	■	■	■	■	■
Environment Agency	■	■	■	■	■
Equality and Human Rights Commission			■	■	■
Esh Developments	■	■	■	■	■
Farming and Wildlife Group	■	■	■	■	
FFT Planning			■	■	■
Fields in Trust			■	■	■
Firstplan	■	■	■	■	■
Forest Enterprise	■	■	■	■	■
Forestry Commission (County Durham)	■	■	■	■	■
Forestry Commission (Morpeth)	■	■	■	■	■
Freight Transport Association			■	■	■
Friends of Tees Heritage Park	■	■	■	■	■
Friends of the Earth - Middlesbrough & Redcar	■	■	■	■	■
Fusion on Line Ltd	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
G and I Developments			■	■	
George F White (Estate Agent)	■	■	■	■	■
George Wimpy - Strategic Land	■	■	■	■	■
GL Hearn Property Consultants			■	■	■
Gladman Developments					■
GO Northern	■	■	■	■	■
Groundwork Trust		■	■	■	■
GVA Grimley			■	■	■
GVA Lamb & Edge Planning Development and Regeneration Unit			■	■	■
H J Banks & Co. Ltd.	■	■	■	■	■
Habinteg Housing Association	■	■	■	■	■
Halcrow			■	■	■
Halcrow Group Limited	■	■	■	■	■
Hanover Housing Association	■	■	■	■	■
Hart Properties		■	■	■	■
Hartburn Residents Association	■	■	■	■	■
Hartlepool Water	■	■	■	■	■
Health and Safety			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Executive					
Health and Safety Executive, North East Area	■	■	■	■	■
Help the Aged			■	■	■
Highways Agency - Northumberland & Durham			■	■	■
Highways Agency Tees Valley	■	■	■	■	■
Highways Agency Tyne & Wear			■	■	■
Hilton and Seamer Action Group			■	■	
Historic Towns Forum	■	■	■	■	■
HJ Banks & Co Limited			■	■	■
HM Prison Service Estates	■	■	■	■	
Hobson 7 Smith, Builders	■	■	■	■	
Home Builders Federation	■	■	■	■	■
Home Housing Association	■	■	■	■	■
Home Office		■	■	■	■
Homes and Communities Agency	■	■	■	■	■
Housing Corporation (London)	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
How Planning			■	■	■
Ian Derby Partnership	■	■	■	■	■
Industry Nature Conservation Association	■	■	■	■	■
Jackson Plan	■	■	■	■	■
Jayline Travel	■	■	■	■	■
Jeffrey Tarren & Associates	■	■	■	■	■
JG Eaglescliffe (Holdings) Ltd	■	■	■	■	■
John Potts Limited	■	■	■	■	
John Potts Ltd			■	■	
Jomast Developments			■	■	■
Jon Tweddell Planning	■	■	■	■	■
JWPC Limited			■	■	■
Lafarge Aggregates Ltd			■	■	■
Lambton Smith Hampton	■	■	■	■	■
LaSalle Investment Management			■	■	■
Learning and Skills Council	■	■	■	■	
Limes Developments					■
Lovell	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Lovell Johns	■	■	■	■	■
Maltby Northern Edge Resident's Group			■	■	■
Matthew Trotter & Miller Architects	■	■	■	■	■
McInerney	■	■	■	■	
Metropolis PD	■	■	■	■	■
Miller Homes	■	■	■	■	■
Ministry of Defence	■	■	■	■	■
Mobile Operators Association C/o Mono Consultants Limited	■	■	■	■	■
Montague Evans	■	■	■	■	■
Nathaniel Lichfield and Partners	■	■	■	■	■
National Farmers Union	■	■	■	■	■
Natural England	■	■	■	■	■
Network Rail	■	■	■	■	■
Network Rail Property	■	■	■	■	■
NG Bailey			■	■	■
North British Housing	■	■	■	■	
North East Chamber of Commerce	■	■	■	■	■
North East Civic Trust	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
North East Community Forests			■	■	■
North Star Housing Group	■	■	■	■	■
North Tees NHS Trust	■	■	■	■	■
Northern Consortium of Housing	■	■	■	■	■
Northern Gas Networks	■	■	■	■	■
Northumbrian Water Ltd	■	■	■	■	■
Npower Renewables	■	■	■	■	■
ONE North East	■	■	■	■	
Openreach (BT)			■	■	■
Peacock and Smith	■	■	■	■	■
Persimmon Homes	■	■	■	■	
Persimmon Homes Teesside	■	■	■	■	■
Peter Wigglesworth Planning Ltd	■	■	■	■	■
Philips Petroleum	■	■	■	■	■
Planning Prospects	■	■	■	■	■
Preston Farm Developments	■	■	■	■	■
Primeland Consultants Limited	■	■	■	■	■
Prism Planning			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Property Search Group	■	■	■	■	■
Property Services Agency (Crown Property)	■	■	■	■	
Rae Watson Development Surveyors					■
Railtrack Plc	■	■	■	■	■
Railway Housing Association	■	■	■	■	■
Ramblers Association, Stockton	■	■	■	■	■
Regional Tourism Team	■	■	■	■	
RenewableUK	■	■	■	■	■
RGB Ltd			■	■	■
Richard Burt Design	■	■	■	■	■
Road Haulage Association - Northern Office			■	■	■
RPS Group Plc	■	■	■	■	■
RSPB	■	■	■	■	■
Sabic UK Petrochemicals					■
Sanderson Weatherall			■	■	■
Sanderson Weatherall for Inbond and Royal Mail Property			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Holdings					
Sanderson Weatherall on behalf of Lidl UK	■	■	■	■	■
Satnam Group			■	■	■
SAVE	■	■	■	■	■
Savills (Leeds)	■	■	■	■	■
Newcastle University	■	■	■	■	■
Scott Wilson	■	■	■	■	
Shuttleworth Picknett & Associates LLP		■	■	■	■
Second Site Property Holdings	■	■			
Signet Planning	■	■	■	■	■
Sita UK			■	■	■
Smiths Gore			■	■	■
Society for the Promotion and Advancement of Romany Culture	■	■	■	■	■
Society for the Protection of Ancient Buildings (SPAB)	■	■	■	■	■
Solutions Northern	■	■	■	■	■
sp&architects		■	■	■	■
Spawforths			■	■	■
Sport England	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Stagecoach Transit	■	■	■	■	■
Sted Construction Design	■	■	■	■	■
Stewart Ross Association	■	■	■	■	■
Stockton Business Forum	■	■	■	■	■
Stockton Renaissance	■	■	■	■	■
Stockton Residents' Association	■	■	■	■	■
Stockton Retail Park	■	■	■	■	■
Stockton Riverside College	■	■	■	■	■
Stockton Sixth Form College			■	■	■
Stockton Western Area Partnership Board	■	■	■	■	■
Stockton-on-Tees Teaching PCT	■	■	■	■	
Stockton Volunteering Support Project	■	■			
Storeys:ssp			■	■	■
Strutt and Parker			■	■	■
Sustrans	■	■			■
Taylor Wimpey UK Ltd			■	■	■
Tees and Hartlepool Port	■	■	■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Authority Ltd.					
Tees Archaeology	■	■	■	■	■
Tees Barrage	■	■	■	■	■
Tees East and North Yorkshire Ambulance NHS Trust	■	■	■	■	■
Tees Valley Biodiversity	■	■	■	■	■
Tees Valley Housing Association	■	■	■	■	■
Tees Valley Living	■	■	■	■	
Tees Valley Partnership	■	■	■	■	
Tees Valley Regeneration	■	■	■	■	
Tees Valley Rural Community Council	■	■	■	■	■
Tees Valley Unlimited			■	■	■
Tees Valley Joint Strategy Unit	■	■			
Tees Valley Wildlife Trust	■	■	■	■	■
The Ancient Monuments Society	■	■	■	■	■
The Billingham Partnership	■	■	■	■	
The Coal Authority			■	■	
The Co-operative Group			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
The Council for British Archaeology	■	■	■	■	■
The Garden History Society	■	■	■	■	■
The Georgian Group	■	■	■	■	■
The Gypsy Council UK Office	■	■	■	■	■
The National Federation of Gypsy Liaison Groups				■	■
The Tees Forest	■	■	■	■	■
The Theatres Trust	■	■	■	■	■
The Twentieth Century Society	■	■	■	■	■
The Victorian Society	■	■	■	■	■
The Woodland Trust	■	■	■	■	■
Thornfield Properties Ltd	■	■			
Thoroughbred Homes Ltd			■	■	■
Thorpe Thewles Residents Association	■	■	■	■	■
Transco	■	■	■	■	■
Traveller Law Reform Coalition	■	■	■	■	■
Tribal MJP	■	■			
Tristar Homes	■	■	■	■	

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Turley Associates	■	■	■	■	■
Turley Associates on behalf of Tees Valley Airport	■	■	■	■	■
U.K Land Estates			■	■	■
UK Association of Gypsy Women	■	■	■	■	■
University of Durham	■	■	■	■	■
URS					■
Vernon and Co			■	■	■
Viewpoint	■	■	■	■	■
Ward Hadaway	■	■	■	■	■
Warner Ashtenne			■	■	■
Wellington 2004 Estate Company	■	■	■	■	■
Wellington Square	■	■	■	■	■
Wimpey Homes	■	■	■	■	
Women's National Commission			■	■	■
Woodford Consulting Group (North)	■	■			
Woodsyde, Thorntree farm	■	■	■	■	
Wright Construction (Durham) Ltd.	■	■	■	■	■
Wynyard Estates	■	■	■	■	■
Wynyard Park	■	■	■	■	■
Yarm and Willie			■	■	■

Organisation	Yarm and Eaglescliffe Area Action Plan	Regeneration DPD	Environment DPD	Core Strategy Review	Regeneration and Environment LDD Preferred Options
Flats Residents Group					
Yarm Chamber of Trade	■	■	■	■	■
Yarm Civic Society	■	■	■	■	■
Yarm Residents Group	■	■	■	■	■
York Diocesan Society	■	■	■	■	■
Yorkshire Forward	■	■	■	■	
Yuill Homes	■	■	■	■	■
Zero Waste Ltd	■	■	■	■	■

Appendix 2 Consultation Responses

Appendix 3 Topic Papers