

Schedule of Responses to the Core Strategy Publication Draft Representations

Respondee	Type	Comment	Council Response
1/1/0 North Yorkshire County Council,	Comment	This document would not seem to pose any issues of significant strategic concern for North Yorkshire.	No change requested.
2/1/6 National Offender Management Service, Atkins Global	Comment	The Stockton on Tees LDF should acknowledge that HMP Holme House and HMP Kirklevington Grange are important community facilities serving local needs and which should generally be protected. In addition, a policy should be included to support the need for expansion where this can be justified. Similarly, along with other community facilities, there should be a presumption against the loss of a prison unless it is demonstrated to be surplus to requirements.	Repetition of National or Regional Policy. PPS 12, Circular 3/98
3/1/1 West Raynham Developments Ltd, Peter Wigglesworth Planning Ltd	Support	Support Policy CS1 as it directs new housing and employment development to a defined core area. In particular, support is given to the inclusion of Urray Nook within the defined core area.	No change requested. Support welcomed
3/2/2 West Raynham Developments Ltd, Peter Wigglesworth Planning Ltd	Support	Support CS2, in particular the proposed Tees Valley Metro and improved interchange facilities at Eaglescliffe, and pedestrian and cycle routes.	No change requested. Support welcomed
3/3/4 West Raynham Developments Ltd, Peter Wigglesworth Planning Ltd	Support	Support Policy CS4, in particular the main location for general employment land at Urray Nook (20 ha) is supported. As this site now has planning permission (subject to s.106 etc) it should be included in the justification text.	Support welcomed. David to check whether decision notice has been issued yet
3/4/7 West Raynham Developments Ltd, Peter Wigglesworth Planning Ltd	Support	Support Policy CS7, in particular the allocation of new housing in Yarm and Eaglescliffe in the period 2016 to 2021.	No change requested. Support welcomed
4/1/2 Teesside Environmental Trust,	Objection	The LDF contains proposals for an East Billingham Transport Corridor, the northern part of which (Routes D1/D3) crosses land owned by Teesside Environmental Trust and leased to the RSPB. Although farmed at present, it is the intention of the Trust and RSPB to incorporate this land into Saltholme as an integral part of the Nature Reserve. We also see the land becoming part of the sub regional nature park , in partnership with Stockton-on-Tees Council, Natural England and Hartlepool Council, incorporating Cowpen Bewley Woodland Park, the National Nature reserve and wildlife sites at Seaton Carew with benefits for both tourism and biodiversity. Integral to these proposals is the provision of cycle ways and footpaths allowing residents and visitors to move easily between the constituent parts of the nature park. This is in accordance with the Framework's proposals for a Tees Valley Green Infrastructure Strategy. The Trust does not object to the principle of the East Billingham Transport Corridor, but wishes to minimise the impact on the nature reserve extension area by an improved choice of alignment that does	Partial change made. Proximity to SPA acknowledged.

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		not sterilise so much of our land. It also wishes to see the inclusion of a strategic cycleway/footpath as part of the road proposals that enables easy movement between the visitor centre and land at Saltholme, Haverton Hill and Cowpen Bewley, together with appropriate landscaping that will compliment the nature reserve.	
5/1/2 Royal Mail Group Property, Sanderson Weatherall	Comment	<p>Our client is in support of the general aims and objectives of the document, however, has the following comments to make. In our last correspondence we stated that although we welcome initiatives encouraging sustainable transport an road safety scheme, we would also like the Council to consider how this will affect the accessibility of the Royal Mail depots within Stockton and also the accessibility of associated vehicles throughout the town centre and beyond. Paragraph 7.7 of the publication draft states that 'the Council's approach, in that it seeks to reduce car dependency by providing an attractive choice of sustainable alternatives, received general support.' Again, although we are in support of sustainable alternatives Royal Mail are a key stakeholder and are essential to Stockton's infrastructure and therefore due consideration must be given to their operational requirements. We must stress that the intended works which would significantly reduce the manoeuvrability of the Royal Mail vehicles should be discussed with Royal Mail as a matter of paramount importance. More specifically however Royal Mail have two key sites within Stockton, mainly 90 High Street, Stockton TS18 1AD and Orde Wingate Way, Stockton, TS19 0BJ. Twenty four hour unrestricted access to these sites is essential and therefore all future road network improvements must be considered alongside the access requirements of our client.</p>	Too detailed for the Core Strategy.
6/1/1 Church Commissioners for England, Smiths Gore	Comment	<p>It is considered that Policy CS1 should be altered to take into account changes that have and are still occurring to the Borough in terms of development. It is therefore suggested that criterion 3 of Policy CS1 should state that housing development should also be focused towards the urban fringe of Billingham, Stockton and Thornaby rather than just in the centre of these settlements. It is understood the regeneration is important.. However, larger sites may be required for future development - the centre of these settlements may not have adequate land to satisfy demand for future development whether it be for housing or employment.</p> <p>It is considered that land to the north of Wolviston provides opportunities for housing and employment development, especially now that the Health Authority have identified their preferred site for the new 'Super Hospital' for Teesside at Wynyard Business Park. Wynyard Business Park was allocated for employment use therefore it is considered that since the area is a preferred site for locating the new hospital it is suggested that further employment sites are required. Additional employment sites will also provide possible opportunities for sustainable 'mixed use' development to take place on land to the north of Wolviston adjacent to the network nodes of the A19 and the A689 (Please see attached a plan identifying sites owned by our client, the Church Commissioners for England, which are considered to provide necessary sites for sustainable future development in the area). It is considered that Policy CS1 should also state that housing development should be focused towards the A19 and the A689 junctions. With the development of the Wynyard Business Park, the potential of the new 'super hospital' and the opportunities provided by the transport nodes, it is considered that sites to the north of Wolviston surrounding the A19 and the A689 provide suitable and deliverable sites for both residential and employment development.</p>	Does not conform to the Spatial Strategy.
7/1/1 Persimmon Homes North East,	Objection	<p>We do not feel that our representations made at Preferred Options stage have been fully taken into account. The Draft Policy at that stage contained at point 7) reference to Ingleby Barwick which have now been completely removed. The justification given by the Council is that they have addressed our requirements at Policy CS6. They have not and as such we would reiterate our comments made in</p>	Too detailed for the Core Strategy.

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		<p>relation to Para. 4.2 which explain the logicity of this omission. A Point 7) needs to be reintroduced worded as follows which is a minor amendment from that previously suggested to reflect the willingness of stakeholders to work together on any masterplan variations which may facilitate a more sustainable development.</p> <p>7) Supporting the provision of services and facilities which contribute towards the sustainability and vitality of Ingleby Barwick, including the completion of villages 5 and 6 in accordance with the Approved Masterplan or variations agreed between stakeholders.</p>	
<p>7/2/0 Persimmon Homes North East,</p>	Comment	<p>The Council's acceptance that a more diverse and flexible approach towards housing distribution to facilitate greater choice in the market is welcomed. It is vital that this objective is now applied throughout DPD procedures in the identification, allocation and approval of suitable sites. In the current market it is absolutely vital to ensure the ability to deliver is maximised which will be crucial in ensuring effective monitoring procedures are put in place via the SHLAA process. The wording as it stands should simply refer to the overriding objectives of government policy, which are to see the delivery of housing.</p>	<p>Support welcomed. Paragraph 3.10 relates to the outcome of responses to consultation at Preferred Options stage. Paragraph 3.11 explains the basis for the spatial strategy at Preferred Options stage, and Paragraph 3.12 explains the minor shift in emphasis between the Preferred Options and the Publication Draft. The suggested amended wording would impose an external view on this section, which would not be appropriate.</p>
<p>7/3/0 Persimmon Homes North East,</p>	Objection	<p>This paragraph and its associated bullet points outlines the manner in which the Council's vision for the future will be achieved. In our opinion, it fails to acknowledge the important role that will be played by the future completion of the new community at Ingleby Barwick. It is acknowledged in Appendix 1 (Eastern Area) the importance placed upon the completion of development whilst in a variety of places (e. g. Policy CS2 and 6) the CS makes reference to the needs of the growing community and the settlements sustainability. Without reference in paragraph. 4.2 all of these objectives lack cohesion which can be gained with the insertion of an overarching objective which will see the new settlement completed. Add a further bullet point as follows:</p> <p>Ensuring the completion of the new settlement at Ingleby Barwick.</p>	<p>Already included. The remaining development at Ingleby Barwick is already taken into account in the Core Strategy through the extant planning permission. The completion of this development does not rely on the Core Strategy.</p>
<p>7/4/3 Persimmon Homes North East,</p>	Support	<p>We welcome the sensible approach taken within the reworded policy CS3 that seeks to bring energy efficiency and sustainable construction targets in line with Government Targets and Building Regulations. This is a practical deliverable solution to an issue that if not tackled in this way will give rise to serious deliverability issues when the market returns.</p>	<p>No change requested. Support welcomed</p>
<p>7/5/7 Persimmon Homes North East,</p>	Objection	<p>It is important to ensure there is a robust supply of deliverable land to meet housing needs over the plan period. The policy does not stress the importance of delivery and does not plan for specific developable sites for years 6 to 10 and, where possible, for years 11 to 15 in accordance with Para 55 of PPS3. It does not specify how monitoring will be undertaken and how sites may be brought into supply should the need arise. It touches on this in the supporting text but it needs to be in the Policy itself.</p> <p>In ii) it should cross-refer back to the objectives of Para 3.10 /11 which clearly shows the need for appropriate distribution of sites. In ii) it should cross-refer back to the objectives of Para 3.10 /11 which clearly shows the need for appropriate distribution of sites.</p>	<p>Partial change made. 'Deliverable' added to Policy 7 point 1 as requested.</p>

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7/6/8 Persimmon Homes North East,	Comment	<p>i) the word deliverable should be added to this criteria</p> <p>ii) (new) – A further supply of developable sites for years 6 – 10 and, where possible, years 11 to 15 will be identified.</p> <p>iii) (changed ii) – Priority should be accorded to the Core area whilst also ensuring necessary distribution is achieved and delivery targets met</p> <p>2) (should be written in the positive reflective of the delivery agenda with more precision on how plan, monitor and manage will work in conjunction with SHLAA work) – Further housing allocations will only come forward before 2016 if they are required to meet identified needs not being delivered / met by currently identified sites. The SHLAA procedures shall determine the availability and general suitability of potential sites whilst allocation DPDs will determine phased release in the context of CS objectives.</p> <p>The policy is predicated on the Tees Valley SHMA being an agreed document which it is not. The HBF and a variety of house builders have been involved and have presented a variety of shortcomings in relation to methodology and findings. The evidence to back this up has been presented formally to both GONE and NEA by way of an HBF commissioned research project undertaken by NLP. This is now being examined in the context of all regional SHMA work. Until this is finally resolved the inclusion of significant elements of this policy are premature and inappropriate. The precise situation has occurred at Newcastle with the result being that the CS has been withdrawn due to the Inspectors concerns, which reflect those made by the HBF.</p> <p>The element of para 3) referring to Ingleby Barwick is incorrect and does not reflect the Approved Masterplan. One of the stated objectives of this is to seek to achieve 30 per ha average over the development which has lead to a variety of densities across the site from low density edges (18 to 20 per ha) to higher density development adjacent to the local centre (up to 50 per ha).</p> <p>Further clarification</p> <p>As I clarified the objection is a procedural one whereby until the SHMA is published and has attained weight it is by definition not agreed. A CS Policy that therefore uses the findings of the SHMA to promote a specific policy prior to the SHMAs signoff can justifiably be considered premature. This has never been more important in the light of the monumental effects of recent months.</p> <p>I further accept that the HBF have been involved in the process as stakeholders as have NLP in relation to work done on behalf of other stakeholders. The clarification I must give however relates to the reference to the NLP research project. This piece of work is not targeted at the Tees Valley SHMA but at the SHMA guidance generally and has been undertaken with GONE / NEA and ONE. It is aimed at making more sense of the process, ensure evidence supports policy formulation etc and it is for the Regional Agencies to 'filter this down' to the sub regions and LPAs. The policy can only be changed in the context of the comments made above.</p>	Already included.
7/7/0 Persimmon Homes North East,	Comment	<p>PPS12 and the Plan Making Manual make it clear that the Core Strategy should lead allocations and can allocate sites where it is clear that there are certain sites that are key to the delivery of the overall strategy and where the location is not open to extensive debate. We feel it is as appropriate for general directions of future growth to be also identified on the Strategic Diagram. The current document contains little scope for alternative sustainable development on any scale should the priority housing sites prove undeliverable. The future direction of long-term growth (supported by appropriate policy on delivery to</p>	Does not conform to the Spatial Strategy.

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		<p>ensure priority sites are developed first – as set out in our representation to policy CS7) should also be indicated on the Strategic Diagram, both to provide guidance for long-term growth, and to provide a planned, sustainable alternative should the priority sites prove undeliverable.</p> <p>Summary of supporting document:</p> <p>Allocation of 'Land at Hartburn Grange' creating a West Urban Extension of Stockton complies with relevant national and regional planning policy, being an edge-of- town site that is sustainable located, suitable, achievable and available. The site is available now with positive benefits including, contribution to Growth Point objectives, meeting local housing market requirements, provision of affordable housing, sustainable housing, minimal visual impact, achieving aims of the Green Infrastructure Strategy and sustainable transport.</p> <p>Overall, it is clear that the allocation of the site will have a major positive impact upon delivery of many of the Council's spatial planning objectives. It provides a sustainable alternative should the Council's priority sites not be viable, and we respectfully request that the Council include it as a strategic allocation in the Core Strategy. The strategic diagram should be amended to indicate potential future expansion to the west of the Core Area. This will provide a planned alternative should the priority sites prove to be undeliverable, or undeliverable in the timescale set out in the Core Strategy, or to the extent of the housing numbers applied to them in the Core Strategy. The identification of an area of potential future growth supports the principle in PPS12 and the Plan Making Manual of the Core Strategy leading on sustainable development in the area. This would avoid the incidence of 'planning by appeal' in the event of non-delivery of priority sites. The site-specific representation relating to land at Hartburn Grange includes information to support this potential alternative for sustainable growth.</p>	
8/1/0 Yorkshire Forward,	Comment	<p>We welcome the opportunity to participate in the development of local planning policy within Yorkshire and the Humber's neighbouring authorities as part of our statutory consultee role. In this instance, however, we do not have any comments to make on the consultation. We look forward to future opportunities for involvement in the ongoing LDF preparation process.</p>	No change requested.
9/1/0 Redcar and Cleveland Borough Council,	Comment	None	No change requested.
10/1/0 North East Assembly,	Objection	<p>Stockton core strategy sets out the vision and the overarching planning strategy for Stockton. All other development plan documents will be prepared in conformity with the core strategy. The North East Assembly (NEA) made representations on the preferred options in November 2007, and provided guidance and advice on each of the issues raised in the core strategy in relation to the requirements of regional planning policy. This is the next stage in the core strategy preparation process will be submission which is expected in spring 2009.</p> <p>The NEA would support amendments which address the points of clarity raised in response to each of the policies above. The general objectives of the Stockton publication draft Core Strategy and its policies are broadly consistent with regional planning policy as set out in the RSS (2008). However, the following amendments would ensure that the core strategy is in general conformity with RSS:</p> <ol style="list-style-type: none"> 1. Ensure that policy CS2 more explicitly reflects the regional aim to reduce the need to travel; 2. Paragraph 8.1 refers to the need to 'mitigate against and adapt to' the impacts of climate change instead of just 'tackling climate change'. 3. Include in policy CS7 the amount of additional housing planned over the Core Strategy life time. 	<p>Change made. Replaced 'tackling' with 'mitigating and adapting to' in paragraph 8.1 and added sentence 'In general, new development will be located within the conurbation, to assist with reducing the need to travel to Policy 1, Point 1. Amount of additional housing land planned over the Core Strategy lifetime now included in Policy 7.</p>

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10/2/1 North East Assembly,	Support	<p>This policy concentrates the majority of development in the core area of the conurbation, which includes the River Tees corridor within the built-up area, from Bowesfield in the south to the boundary with Middlesbrough in the east. This area includes North Shore and Greater North Shore, a key regeneration area identified in RSS Policy 13, together with Stockton town centre, extending to include the Mount Pleasant area in the north and towards Lustrum Beck in the west. The conurbation includes the remainder of the built up areas Stockton, Billingham, Thornaby, Yarm and Eaglescliffe. This policy translates RSS policy 4, the sequential approach, into the context of the core strategy by explaining the focus for development, with the Core Area as the main priority. This is consistent with RSS policies 1, 2, 3, 4, 6, 7, 8 and 10.</p> <p>The focus of housing provision on previously developed land is consistent with wider RSS objectives and specifically RSS policy 28 which sets targets for the reuse of previously developed land for housing. The recognition and prioritisation of the relationships with neighbouring Middlesbrough show that the core strategy recognises the city-regional context within which it sits. This is consistent with RSS policy 10.</p>	No change requested. Support welcomed
10/3/2 North East Assembly,	Comment	<p>RSS policy 2 requires local development frameworks (LDFs) to deliver key objectives of ensuring good accessibility to all jobs, facilities, goods and services in the region particularly by public transport, walking and cycling; and reducing the need to travel by private car. RSS policies 7 and 24 also highlight these objectives, reiterating the goal of reducing the need to travel.</p> <p>Policy CS2 compliments these RSS objectives but does not fully reflect the specific regional policy objectives to reduce the need to travel. Policy CS2 should therefore incorporate this requirement to reflect climate change, social inclusion and locational objectives elsewhere in the Core Strategy and RSS. 8.</p> <p>Furthermore, the statement that all new development is adequately serviced by an attractive choice of transport modes could be strengthened by replacing the word adequately with well. 9.</p> <p>Policy CS2 states that the number of parking spaces in new developments will be in accordance with the Tees Valley Highway Design Guide, and later, a new supplementary planning document (SPD). The local authority should ensure that the new SPD is developed in conformity with RSS policy 54 and planning policy guidance 13. The policy references and supporting justification to public transport initiatives such as Tees Valley Metro and the Tees Valley Bus Network reflects RSS.</p>	Change made. Sentence 'In general, new development will be located within the conurbation, to assist with reducing the need to travel' added to Policy 1, Point 1 and 'adequately' replaced with 'well' in Policy 2, Point 1.
10/4/3 North East Assembly,	Comment	<p>Paragraph 8.1 explains that the core strategy is built around the concept of sustainable living which includes recognition of tackling climate change. Whilst this principle is consistent with RSS policies 2, 3 and 24 it should more appropriately refer to measures both to mitigate against and adapt to climate change. These are both essential components of RSS Policy 3.</p> <p>Policy CS3 sets out a number of important standards it expects to be met and various thresholds such as Code for Sustainable Homes, BREEAM, Zero Carbon and embedded renewable energy generation. These are consistent with RSS policies 2, 3, 24, 38 and 39. The encouragement of small scale renewables is consistent with RSS objectives and RSS Policy 40. Rephrase paragraph 8.1 to refer to the need to 'mitigate against and adapt to' the impacts of climate change instead of 'tackling climate change.'</p>	Change made. 'Tackling' replaced with 'adapting to and mitigating against' in paragraph 8.1.
10/5/4 North East Assembly,	Comment	The employment land allocations in this policy are consistent with those in RSS policy 18.	No change requested. Support welcomed.

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10/6/5 North East Assembly,	Support	Stockton town centre is identified as the main shopping centre for the borough, whilst Billingham, Thornaby and Yarm are defined as district centres. This is consistent with RSS policies 10 and 25 which recognise Stockton town centre as a sub- regional centre. These policies direct town centre development to other town and district centres and aim to ensure that the vitality and viability of such centres is not compromised by development elsewhere.	No change requested. Support welcomed.
10/7/6 North East Assembly,	Support	The proposals in policy CS6 are consistent with RSS policies 2 and 10. It is also consistent with RSS policy 24 as the provision of community facilities is key to the development of sustainable communities and it gives priority to the provision of facilities that contribute to the development of sustainable communities. In addition the policy is in conformity with RSS policy 16, which states that strategies should promote culture and tourism, including provision for sport and leisure.	No change requested. Support welcomed.
10/8/7 North East Assembly,	Comment	<p>The focussing of housing development in the Core Areas is consistent with RSS policies 2, 3, 4, 6, 10, 24 and 30. The provision for 75% of dwelling completions on previously developed land exceeds the Tees Valley targets established in RSS policy 29. This target is consistent with broader regional planning policy objectives such as RSS policies 2 and 24.</p> <p>The level of net additional dwelling provision set out in the core strategy is consistent with RSS policy 28. In particular the Core Strategy correctly takes the average annual 2004-21 dwelling provision from RSS policy 28 and uses this as the annual provision for the years 2021 to 2024. This is consistent with RSS policy 28.4a. However, as currently set out, the policy is not explicit in the levels of housing that are planned for overall, although it rightly indicates where additional land will need to be identified consistent with the locational approach identified earlier in the document. The policy could usefully refer to the total amount of housing proposed over the plan period and then explain that additional land will need to be identified only for a proportion of this due to pipeline development.</p>	Change made. Amount of additional housing land planned over the Core Strategy lifetime now included in Policy 7.
10/9/8 North East Assembly,	Comment	<p>This policy is consistent with RSS policy 30, making provision for a range of dwelling type, size and tenure to meet the assessed needs of all sectors of the community. Setting an affordable housing target informed by up to date housing assessments is consistent with RSS policy 30. Given recent legal decisions the Borough Council needs to be satisfied with the robustness of its evidence on need and the approach to developing a meaningful and practical target, in particular viability work.</p> <p>The policy offers flexibility in recognising the different costs associated with previously developed land and greenfield developments and allowing for a lower provision where 15-20% is not seen as viable. This will help ensure that development can still go ahead where there are other large costs associated with development, such as land remediation. A mix of both social rented and intermediate tenure is consistent with providing a mix of tenure, and the flexibility on the 80%:20% split of these offers some recognition of individual circumstances. Each of these implicitly requires circumstances of variation based on viability to be demonstrated.</p> <p>In achieving this variation of densities between 30 and 50 dwellings per hectare, and set out in the core strategy are consistent with RSS policy 29. Similarly the provision of higher densities in areas close to public transport hubs and lower densities in some areas to protect their characteristics and ensure that a range of dwelling types are provided, including larger homes with gardens where appropriate are consistent with the aims of RSS Policy 29. However, it would be helpful to set out in this policy or in a subsequent development plan document (DPD)/SPD the circumstances in which lower densities, for example larger homes, are appropriate as per RSS policy 29.3c.</p>	No change requested. Support welcomed.

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		<p>The core strategy proposes that higher densities will be restricted in places like Ingleby Barwick due to pressure on the surrounding highways networks. Although the reason for this is understood such a restriction could impact on the objective to deliver a mix of dwelling type and size, and consequently mixed communities.</p> <p>The research into rural housing needs is welcomed and the development of local needs/local connection housings can help ensure that local people and families can stay in rural areas. This is consistent with the objectives of RSS policy 30.</p> <p>Ensuring that any new student developments are meeting a proven need; compatible with wider and social economic regeneration objectives and are close to the university and public transport networks is consistent with RSS policies 10 and 24.</p> <p>The proposals for housing market restructuring are consistent with RSS policy 28 and the wider objectives of regional policy.</p>	
10/10/9 North East Assembly,	Comment	<p>This policy is consistent with RSS policy 28 giving priority to sites in or adjacent to existing settlements and the requirement of the locations to be accessible to schools, shops and services and other amenities will help deliver the objectives of RSS policy 7 and 24. The safeguarding of existing sites is supported. RSS policy 30 states that local authority should carryout an assessment o the housing needs of Gypsies, Travellers and Travelling show people and supports collaboration between authorities on these studies. In addition, it states that LDFs should provide the criteria following the plan monitor and manage and sequential approach to the provision and release of pitches. It is understood that Stockton Borough Council is working with others in Tees Valley to produce a sub-regional Gypsy & Traveller Accommodation Assessment (GTAA), which will assist in identifying local need.</p>	<p>No change requested. Support welcomed.</p>
10/11/10 North East Assembly,	Support	<p>Policy CS10 is supported and is consistent with the RSS policies 2,7,8,31,33,35 and 36. The NEA particularly welcomes the inclusion of proposals which seek to develop a green infrastructure network including the development of strategic gaps and green wedges. This is consistent with RSS policy 10.</p>	<p>No change requested. Support welcomed.</p>
10/12/11 North East Assembly,	Comment	<p>The principle of including a policy on planning obligations is consistent with RSS objectives.</p>	<p>No change requested. Support welcomed.</p>
11/1/5 WM Morrisons Supermarkets PLC, Peacock and Smith	Objection	<p>We consider that this policy, as currently worded, is unsound. Specifically, we object to Part 6) of the policy which states that:</p> <p>"The existing roles played by Teesside Park as an out-of-centre location, and Portrack Lane as out-of-centres site, are recognised. No additional retail or leisure development will be permitted in these locations."</p> <p>We consider that this policy is inconsistent with national policy guidance. PPS6 does not seek to place a blanket- ban on all retail and leisure developments in out-of-centre locations, instead it requires applicants to demonstrate that the following key tests are met when an out-of-centre development is proposed:</p> <ul style="list-style-type: none"> a) the need for development; b) that the development is of an appropriate scale; c) that there are no more central sites for the development; 	<p>Does not conform to the Spatial Strategy. Stockton- Middlesbrough Joint Retail Study indicates that it is necessary for Stockton to increase its existing market share of expenditure, particularly relative to Teesside Park. To achieve this, no further expansion of the out of centre retail and leisure developments at Teesside Park and Portrack Lane will be permitted. These local circumstances dictate that further out of centre or out of town retail is not appropriate in Stockton.</p>

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		<p>d) that there are no unacceptable impacts on existing centres; and e) that locations are accessible.</p> <p>Paragraph 3.13 of PPS6 states that a sequential approach should be applied to demonstrate retail uses in out-of-centre locations. All options in-centre should be thoroughly assessed before less central sites are considered for the development of main town centre uses. This approach, however, does not presume against edge-of-centre or out-of-centre retail development, providing that the sequential test has been met and the vitality and viability of existing centres is not compromised. It is important that the Core Strategies reflects this policy approach.</p> <p>Indeed, any further provision of retail development within an established shopping centre that people already travel to, such as Teesside Park, is a more sustainable option than provision of retail in other out-of-centre locations.</p> <p>We therefore suggest that Policy 5 is amended by the deletion of Part 6). Policy 5 is amended by the deletion of Part 6).</p>	
<p>12/1/5 Thornfield Properties Plc, England and Lyle</p>	Support	<p>Firstly, we support the strategy to focus and promote proposals for retail and other town centre uses within Thornaby town centre as a designated district centre.</p> <p>As you will be aware, Thornfield Properties were officially appointed as the Council's development partners and as the new owners of Thornaby town centre on 1st April 2008. Thornfield Properties have begun work on the first stage of a £25 million revitalisation of the town centre. Initial works have involved the construction of a new 200 space car park which opened in June 2008. This signified the start of the main development phase which is currently being undertaken by Miller Construction. The revamp will include a new retail mall, a retail and office block, a new café and a new Lidl store. It is expected that the current store will be complete by summer 2009.</p> <p>Core Strategy Policy CS5 (3) gives priority to redeveloping Thornaby town centre. We fully support this element of the policy. The justification test to the policy states that: "In supporting the district centres, upgrading of Thornaby and Billingham centres is vital. Proposals to redevelop Thornaby are progressing (due to be completed by 2009) and the revitalised retail centre with its upgraded environment will enable it to function more successfully as a district centre."</p> <p>On behalf of Thornfield Properties we request that this form of wording should be retained in the Core Strategy.</p>	<p>No change requested. Support welcomed.</p>
<p>12/2/5 Thornfield Properties Plc, England and Lyle</p>	Objection	<p>Secondly, Thornfield Properties are concerned about the lack of flexibility regarding Policy CS5(1) which states:</p> <p>"No further allocations for retail development will be made in the Borough during the life of the Core Strategy."</p> <p>Whilst it is recognised that the joint Middlesbrough/ Stockton Retail Study carried out by NLP and WYG indicates the need to maintain the vitality and viability of Stockton Town Centre, there is also a need to ensure that the vitality and viability of other district centres, including Thornaby is protected.</p>	<p>Too detailed for the Core Strategy. The issue regarding the boundary of the centre will be determined under the Regeneration DPD.</p>

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		<p>With specific regards to Thornaby town centre it is understood that the existing Asda store, located towards the south of the town centre, will soon require significant investment to bring the store up to modern standards. At present the store suffers significant difficulties in respect of access and parking. One option, which has been discussed with the Council, would be to relocate the store on the adjacent car park to the south, thereby improving access and parking, improving the quality of the store and maintaining a presence within the town centre. Such a scheme would require part of the development to be located just outside the existing town centre boundary.</p> <p>A clear policy of restraint indicating that no further retail allocations will be made within the whole Borough might therefore prevent the relocation and redevelopment of the Asda store, thereby preventing Thornaby town centre from realising its full regeneration potential. This will significantly undermine the important strategic regeneration policy set out above.</p> <p>A replacement Asda store would require a minor extension of the boundary of Thornaby town centre as shown on the existing Local Plan Proposals Map. However, it is neither necessary nor appropriate to extend the boundary to include all of the site currently occupied by Northumbrian Water in order to accommodate the scale of retail development that would be appropriate to the role and function of Thornaby town centre.</p> <p>Furthermore, we do not consider it necessary or appropriate to extend the boundary of Thornaby town centre to include the area to the east of Allensway allocated on the Local Plan Proposals Map under Policy S13 (iv) for mixed use development. In view of the major redevelopment scheme currently being carried out by Thornfield Properties, which includes a discount foodstore, the use of the S13 (iv) site for retail purposes would be contrary to the objectives of Policy CS5(3). Introduce more flexibility in Policy CS5(1) by reducing the restraint on further retail allocations to allow the relocation and redevelopment of the Asda store at Thornaby.</p>	
12/3/5 Thornfield Properties Plc, England and Lyle	Support	<p>We support the wording of Policy CS5(6) in respect of Teesside Park. It is essential and entirely appropriate for the Council to resist any additional retail development at Teesside Park (as supported in a recent appeal decision) in order to safeguard the vitality and viability of Thornaby town centre.</p>	<p>No change requested. Support welcomed.</p>
13/1/9 Friends, Families and Travellers,	Objection	<p>FFT notes that needs will be identified in a GTAA for the Tees Valley Local Authorities. We are dismayed to see that the core strategy, despite the GTAA being timetabled for completion in March 2008, it does not identify the level of need or give an indication of the level of need or characterise the sorts of need identified. As such the core strategy must be considered as unsound- emerging evidence will be available now to justify the policy even if the final version has not been decided upon. In the same way that the Housing Policy (CS8) gives an annual target for completion such targets should be given for Gypsy and Traveller pitch completions. This is an important issue and there is no reason for delay in starting to make provision.</p> <p>12.44 We are concerned that this paragraph identifies a number of privately owned sites yet the caravan count reported to CLG does not give any indication of these sites. The caravan count only identifies caravans on the council RSL site and some unauthorised camping. FFT would hope that the council will in future ensure that the caravan counts are carried out properly and as a part of the base data from which need is estimated is as accurate as possible.</p> <p>Clearly people travel through the area (para 12.44) and the policy gives no indication of the need for any</p>	<p>Too detailed for the Core Strategy. Criteria based policy is all that is required by Circular 1/06.</p>

Respondee	Type	Comment	Council Response
		<p>transit sites and is not conformable with Circular 1/2006 which has as one of its aims as 'to recognise, protect and facilitate the traditional travelling way of life of gypsies and travellers....'. This of course includes transit provision.</p> <p>The policy gives no indication how needed pitches will be delivered and do so that the policy can be effective.</p> <p>Criterion iv) is capable of being interpreted in such a way that any site could be refused planning permission. If a criterion relating to amenity is included then the term 'unreasonable' should be coupled with 'detrimental'. Any site can be held to be detrimental and many otherwise suitable sites around the country have been refused planning permission using similar criteria when impact is minimal. FFT feel that such criteria are unnecessary and purely included to pander to hostile opinion. Circular 1/2006 is clear that criteria must be 'fair, reasonable, realistic and effective'. The core strategy should give an indication of need and identify the numbers of needed residential pitches and numbers of needed transit pitches.</p> <p>In the same way that Housing Policy (CS8) gives an annual target for completion such targets should be given for Gypsy and Traveller pitch completions. This is an important issue and there is no reason for delay in starting to make provision.</p> <p>The core strategy should give details of delivery mechanisms for planned sites. The Circular 1/2006 requires such need to be addressed in the Site Specific Proposals Preferred Options DPD.</p> <p>The Core Strategy should lay out the current position of site provision- it fails to mention number of private pitches and the number of unauthorised developments and encampments. This will help put identified need into context.</p> <p>In the same way that proportions of affordable housing are identified for conventional housing the core strategy should pay due regard to the needs for sites arising in the district- whether for RSL sites or private sites, family sites or otherwise. The GTAA should contain evidence which will help with this issue.</p> <p>Criterion iv) – remove or modify as mentioned</p>	
14/1/11 British Waterways,	Support	Strongly support the Spatial Strategy at the local level for the Central Area. In particular focussing leisure and recreation pursuits and the development of a restaurant and café-bar culture on the river and riverside area between the Tees Barrage and Victoria Bridge.	No change requested. Support welcomed.
14/2/11 British Waterways,	Support	Support planning obligations policy seeking contributions for leisure and recreation facilities.	No change requested. Support welcomed.
14/3/6 British Waterways,	Support	Strongly support policy CS6 in relation to community facilities, especially point 2. The Tees Barrage is an existing focal point for sport, leisure and recreational opportunities. The offer of this facility and wider River Tees corridor needs to be further strengthened and promoted as a waterfront destination within the Green Blue Heart.	No change requested. Support welcomed.
14/4/4 British Waterways,	Support	Support policy CS4 8 iv) for growth of sustainable tourism in the River Tees as a leisure, recreation and water sports destination.	No change requested. Support welcomed.
14/5/3	Support	We would also encourage within this policy, for waterfront development, the use of waterways for cooling	Too detailed for the Core Strategy.

Respondee	Type	Comment	Council Response
British Waterways,		of the heating and cooling systems of new development. Incorporate the use of waterways for the cooling of the heating and cooling systems for new waterfront development into CS3.	
14/6/0 British Waterways,	Support	Support Objective 8 which aims to provide leisure and recreational facilities in the Green Blue Heart and River Tees and improve opportunities for water based facilities.	No change requested. Support welcomed.
14/7/0 British Waterways,	Support	We strongly support objective 6 which aims to provide quality sport, leisure and recreational facilities focusing on the creation of a Green Blue Heart on the River Tees and the continued development of Tees as a world class international venue for water sports.	No change requested. Support welcomed.
15/1/0 Ingleby Barwick Town Council,	Comment	<p>The plan appears sound in principle. However, it is noted that there is a distinct lack of reference to Ingleby Barwick which is surprising considering the current and projected population figures for Ingleby Barwick.</p> <p>Ingleby Barwick, the largest private housing estate in Europe with in the region of 8,700 dwellings anticipated on completion suffers from lack of facilities as well as lack of secondary education provision. The existing road network is also under strain as referred to on page 45, 12.29, and needs to be addressed.</p> <p>The Town Council awaits the introduction of the Core Strategy and hopes that the principles/strategy contained within the document are applied to Ingleby Barwick, particularly in respect on community facilities based locally i.e. schools, sport/recreation, youth facilities, health care (this was reduced recently with the removal of the phlebotomy clinic), shopping areas etc.</p> <p>The Town Council look forward to the implementation of Objectives 1 - 12.</p>	No change requested.
15/2/6 Ingleby Barwick Town Council,	Comment	Ingleby Barwick Town Council welcome the implementation of policy CS6 particularly point one, that priority will be given to the provision of facilities that contribute towards the sustainability of communities. In particular, the needs of the growing population of Ingleby Barwick should be catered for.	No change requested. Support welcomed.
15/3/8 Ingleby Barwick Town Council,	Support	<p>The development of two and three bedroom bungalows is welcomed to meet the needs of the older generation; we look forward to Stockton Borough Council's Planning Department influencing the developers.</p> <p>It is also noted that 'higher density development will not be appropriate in Ingleby Barwick' which is also welcomed.</p>	No change requested. Support welcomed.
16/1/5 B&Q Ltd, RPS plc	Objection	Policy CS5 together with the supporting justification fails to fully recognise the sequential approach to site selection in terms of the location of new retail development. Contrary to government guidance part (6) of the policy prohibits further retail development at Portrack Lane. Although this is an out of centre location, the policy fails to recognise that in certain circumstances further retail development at this location may be the most sequentially preferable location having regard, as PPS6 states, to the "need" identified. For example, existing retailers may require changes to their existing stores to ensure continued effectiveness of their business without which might put in jeopardy valuable local jobs etc. The policy should clearly set out a sequential approach for new retail development. Furthermore, part (6) should be drafted to recognise that some retail development at Portrack Lane might be acceptable subject to PPS6 retail policy tests or exceptional local circumstances. Without these changes, the growth of existing businesses is severely restricted, contrary to PPS6.	Does not conform to the Spatial Strategy. Stockton- Middlesbrough Joint Retail Study indicates that it is necessary for Stockton to increase its existing market share of expenditure, particularly relative to Teesside Park. To achieve this, no further expansion of the out of centre retail and leisure developments at Teesside Park and Portrack Lane will be permitted. These local circumstances dictate that further out of centre or out of

Respondee	Type	Comment	Council Response
17/1/0 Banks Developments,	Objection	<p>The Strategic Diagram shows land being Green Wedge in the area around Bowesfield which has been the subject of planning permission and partial development. Policy CS10 indicates that built development is inappropriate in Green Wedge. The designation of land at Bowesfield as Green Wedge is clearly out of date and probably the result of an innocent mistake on the part of the cartographer. It does not reflect the true picture on the ground. It is harmful to indicate allocations in this way because it may affect potential investors' decisions. We feel that the Bowesfield area should be shown as an extension to the designated Core Area (see attached sketch). This is because there are likely to be new houses in the Bowesfield site so there would be a false distinction between the Core Area and Stockton Housing Area if the site remained in the latter. Another reason to include Bowesfield in the Core Area is its riverside location which (as with the Green Blue Heart) justifies the extension of the Core Area beyond the Town Centre. The Riverside is justifiably seen as a new focus for the towns of Stockton and Middlesbrough.</p> <p>The land at Bowesfield conforms to the national definition of previously developed land so developing this would support the council's objective of focusing new development on PDL.</p>	<p>town retail is not appropriate in Stockton.</p> <p>Change made. The Key Diagram is meant to be a diagrammatic representation of proposals, and not define boundaries etc. Precise designation of green wedge will be part of Regeneration DPD but how they are shown on the Key Diagram has been reviewed.</p>
17/2/8 Banks Developments,	Objection	<p>We believe that the policy is too prescriptive. For example part 3 of the policy states that developers will be expected to achieve a minimum density of 30 dwellings per hectare in the Core Area. This might be a reasonable assumption but should it be something which the LPA has the power to require? The Core Area includes the Green Blue Heart and Bowesfield North. These are new residential areas and there is no evidence yet whether the right approach is for high density development in these areas. It may be that low density eco-housing is appropriate. It is really for the market to decide this.</p> <p>Part 2 states that "the focus will be on town and terraced houses and 2-3 bedroom apartments". Firstly we do not know of any demand for 3 bed apartments in Stockton. The policy appears to deter 1 bed apartments. To a large extent the market has turned against such developments but there may still be some situations where they are appropriate. The policy should not be used as a tool to prevent these.</p> <p>Part 8 states that affordable housing will be calculated on an area basis. We find this odd as most planning policies relate to the number of units. We would object to an area-based calculation. Generally speaking we believe that the greater the flexibility to deliver affordable housing in a range of different ways the greater likelihood of actual delivery as opposed to sites lying undeveloped or developers seeking exemption from affordable requirements altogether.</p> <p>Part 5 states that the range will be 15% to 20% depending partly on whether the site is brownfield. The supporting text elaborates on this by saying that evidence indicates that brownfield developments since 2004 would have still been viable with a 15% requirement. Whether or not this is the case land values have deteriorated significantly since the research was carried out and there will be instances where 0% is appropriate for brownfield development due to the significant clean up and remediation costs unless gap funding is secured. Part 2 of policy CS8 should allow 1 bed apartments Part 3 should allow low density development in the Core Area where it is appropriate Part 5 should acknowledge that some brownfield sites will not be able to provide any affordable housing without gap funding Part 8 should be removed altogether</p>	<p>Partial change made. Policy 8, Points 2 and 8, have been amended to reflect these concerns.</p>
17/3/5	Objection	<p>We support the thrust of the Council's retail policies and acknowledge they are broadly in line with</p>	<p>Too detailed for the Core Strategy.</p>

Respondee	Type	Comment	Council Response
Banks Developments,		national policy. However, there are instances where large scale new developments such as Bowesfield would greatly benefit from a small retail provision. This would be in the interests of sustainable development because they would cater for local needs. There needs to be some recognition of this in Policy CS5 and a concept of the ceiling on floorspace for new retail units created for this purpose. We propose a ceiling of 500 square metres. Recognise need for new local retail in major new development. Identify a ceiling on the permissible floor space in such development.	These issues are considered to be site specific which could be more appropriately dealt with by the Regeneration DPD.
17/4/3 Banks Developments,	Objection	<p>The justification (8.2) of policy CS3 Sustainable Living recognises that, "Climate Change is the most important issue worldwide in relation to the natural environment." Paragraph 8.5 correctly echo's the Government's target for 20% of electricity deriving from renewable sources by 2020 and acknowledges the sub regional targets established by the NE regional spatial strategy and the Regional Renewable Energy Strategy.</p> <p>Policy CS3 fails to recognise the targets set down in the recently approved NE RSS and consequently fails to set down any clear guidance on how Stockton Borough will make a contribution to these targets.</p> <p>It appears that policy CS3 assumes that the District can make a contribution to the RSS targets through energy efficiency measures and embedded energy in all new buildings, this is fundamentally wrong. The targets set down in the NE RSS for installed renewable energy capacity relate to grid connected capacity only. These targets cannot therefore be met by either energy efficiency measures nor on site district renewables.</p> <p>It is noted that Policy CS3 defers to the Regeneration Development Plan Document for further advice on the location of commercial scale renewable energy development in the Borough. The use of the word "may" in policy CS3 is inappropriate and reflects a lack of commitment to delivery of the regional targets at a local level. 'Sustainable Living' CS3, is a very broad topic for a policy. Too many issues have been included which has diluted the detail of the policy. CS3 should be split into 2 different policies one outlining renewable energy generation with structured targets for Stockton and the other should be for embedded energy in new buildings and on-site district renewables.</p> <p>A specific policy dealing with commercial scale wind energy development in the Borough is required. To assist with the achievement of targets, Policy 42 of the North East RSS states that broad locations of the areas of least constraint should be identified within LDFs using Policy 41 and that proposals for on shore wind coming forward outside of these areas should also be welcomed. Therefore when developing the Core Strategy for Stockton, the guidance set out in Policy 42 should be developed at a local scale to give clear advice on the approach to be taken to commercial scale wind energy developments in the Borough.</p>	Too detailed for the Core Strategy.
18/1/0 The Coal Authority,	Comment	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	No change requested.
19/1/5 Sainsbury's Supermarkets Ltd, Turley Associates	Objection	<p>Core Strategy Policy 5 (CS5): Town Centres states that:</p> <ol style="list-style-type: none"> 1. "No further allocations for retail development will be made in the Borough during the life of the Core Strategy." 2. "Stockton will continue in its role as the Borough's main shopping centre. Up to 2011, the need for additional capacity can be met through committed developments and occupation and reoccupation of vacant floorspace." 	Repetitious of National or Regional Policy. It is considered that the insertion of a point relating to the edge of Stockton Town Centre would be a repetition of PPS6. With regard to out of centre sites, the Stockton-Middlesbrough Joint Retail

Respondee	Type	Comment	Council Response
		<p>Sainsbury's support the objective of encouraging re-occupation of vacant units and recognises the benefits of this approach to the Town Centre. However, the available floorspace and configuration of existing vacant units within the Town Centre may not be appropriate to the requirements of all retail operators. Therefore, the Council must also consider the merits of edge of centre and out of centre sites where it can be proven that retail development at these locations will not have an adverse impact on the Town Centre and is in accordance with the further retail tests included within national planning guidance, PPS6 and the emerging draft PPS6.</p> <p>Limiting retail development to such a narrow choice of locations will be detrimental to the Council's aim of ensuring that Stockton "continues to perform as the principal centre of the Borough providing retail facilities, business and financial services, leisure and cultural opportunities proportionate to its role." Such restrictions will jeopardise Stockton's current position and seek to limit the Town's future growth.</p> <p>Bullet point 1 of Policy CS5 also conflicts with the Council's objective with regard to regeneration. Policy 2 of Policy CS5 states that "other initiatives will include improving the main approaches to the town via the Southern, Eastern and Northern Gateways, through creating new development opportunities and promoting environmental improvements." Retail development should not be excluded from the development opportunities at these Gateways. Paragraph 7.18 of The Stockton and Middlesbrough Joint Retail Study prepared by Nathaniel Litchfield and Partners and White Young Green states that "further consideration should be given to the potential for other sites and areas, particularly on the edge of Stockton Town Centre's Primary Shopping Area to facilitate that Centre's regeneration and meet the need for new retail and other town centre uses over the longer term." In considering applications for retail development the Council should consider the supporting retail documents and whether they justify the development proposed. Proposals should not be immediately excluded if they are not located within Stockton Town Centre. Policy CS5 provides no guidance on how the Council may consider retail development on edge of centre or out of centre sites. Sainsbury's feel that it is necessary to add an extra bullet point to CS5 to set how the Council will consider edge of centre and out of centre sites in accordance with the tests laid out in PPS6 and the emerging draft PPS6. This is an essential element which is currently missing from the Core Strategy.</p>	<p>Study recommends that no further expansion should be permitted at out of centre sites. In addition it is considered that if the Council were to identify a preferred edge of centre location this should be dealt with under the Regeneration DPD, where the Primary Shopping Area and Town Centre boundary, which will have a significant influence on the 'edge of centre', will be determined.</p>
<p>19/2/5 Sainsbury's Supermarkets Ltd, Turley Associates</p>	<p>Objection</p>	<p>The restrictive nature of bullet points 1 and 2 in Policy CS5 contradicts the Council's aspirations for growth and in particular does not accord with the Council's ambitious housing plans as set out in Core Strategy Policy (CS7): Housing Distribution and Phasing and in paragraphs 12.3 and 12.17. Therefore, it is inevitable that new retail facilities including new convenience stores will be required to support development of this scale. Sainsbury's feel that it is necessary to add an extra bullet point to CS5 to set how the Council will consider edge of centre and out of centre sites in accordance with the tests laid out in PPS6 and the emerging draft PPS6. This is an essential element which is currently missing from the Core Strategy.</p>	<p>Too detailed for the Core Strategy. The Core Strategy spatial strategy puts an emphasis on delivering housing in the Core Area which supports Stockton Town Centre. It is therefore considered that any additional retail capacity will be met within the Town Centre strengthening the vitality and viability of the centre.</p>
<p>20/1/4 Government Office North East,</p>	<p>Comment</p>	<p>Draft policies CS1, CS3 and CS4 all make reference to heritage matters but perhaps this could be strengthened particularly in CS4 (iv)-c which refers to "sites linked to the areas industrial heritage". The supporting text for strategic objective 9 describes the area's industrial heritage in relation to the development of a passenger carrying railway line and the friction match etc. The inclusion of these aspects within the policy in spatial terms would increase the local distinctiveness and help the core strategy meet this objective.</p>	<p>Change made. The Council has included references to the industrial heritage of the area by linking this element of the policy to the Council's Heritage Strategy.</p>

Respondee	Type	Comment	Council Response
20/2/7 Government Office North East,	Objection	<p>The Secretary of State objects to Policy CS7 because it conflicts with PPS12 paragraph 4.1 (3) which requires the core strategy to set out how much development is intended to happen, where and when, and by what means. The draft policy is clear on most aspects of this requirement but it would be helpful and add clarity if the total housing allocation figure to 2024, which is described in the supporting text, could be incorporated into the policy.</p> <p>The Secretary of State also objects to draft CS7 because in conflicts with PPS3: Housing paragraph 54 which states "Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years." The draft policy refers to the maintenance of a rolling 5-year supply of housing land but the Council should also ensure that these sites are deliverable in order to be consistent with PPS3.</p> <p>In addition to the above I would also like to suggest a couple of minor amendments to the key diagram. Whilst I think it is very clear and readable the symbol for the Housing sub divisions has a magenta border in the key but on the key diagram the border is green. Also the symbol of the ship for Teesport on the diagram is not included in the key. Clarity of the total housing allocation figure to 2024 is within the supporting text. However, it should be could be incorporated into the policy.</p> <p>Minor amendments to the key diagram</p>	<p>Change made. The level of housing being planned overall is stated in the introductory text to the policy (paragraph 12.1). It is acknowledged, however, that this should be stated within the policy. It is acknowledged that adding the word deliverable to criteria i) would strengthen the positive delivery emphasis of the policy. A minor change has been made to Policy 7, Point 1 to reflect this.</p>
20/3/0 Government Office North East,	Comment	<p>I would like to suggest a couple of minor amendments to the key diagram. Whilst I think it is very clear and readable the symbol for the Housing sub divisions has a magenta border on the key but on the diagram the border is green. Also the symbol of the ship for Teesport is not included in the key and the symbol for the prestige employment site is missing from the diagram.</p>	<p>Change made. Changes made to Strategic Diagram</p>
21/1/1 Mr P Baker, Ward Hadaway	Objection	<p>Objection lodged to criterion 5. The second sentence namely "this will be provided through a rural exception site policy" should be deleted. Further detail and justification for this comments is provided in relation to policy CS8; suffice to note at this stage that as drafted the policy is not effective.</p> <p>Further objection lodged that the policy should include a reference to a mix of housing types in the Borough, executive housing long having been an issue for Tees Valley as noted in policy CS8 and reasoned justification para. 12.25. Failure to deliver an appropriate mix of housing can be unsustainable in its own right causing out migration and people to commute further, for example from North Yorkshire villages. As drafted the policy is not effective or in accordance with national planning policy which calls for a mix of housing. Please see above.</p>	<p>Does not conform to the Spatial Strategy. The Spatial Strategy sets out the broad picture of where development will take place in the Borough. There is a strong link between point 5 of policy 1 and Policies 7 and 8. Any changes to the spatial strategy in relation to housing provision need to be considered in relation to Policies 7 and 8. Stockton Borough is a largely urban authority. The majority of rural settlements are commuter villages within a few miles of the conurbation and lacking many services and facilities. Further large scale development (i.e. of 10 or more dwellings) for general market housing would not be sustainable in most villages. Therefore, rural affordable housing will need to be provided through a rural exceptions policy.</p>

Respondee	Type	Comment	Council Response
21/2/8 Mr P Baker, Ward Hadaway	Objection	<p>Support reference to support for executive housing in criterion 2. Objection lodged to criterion 2 that it should recognize that the rural area and in particular settlements within it, Carlton for example, could and should make a positive contribution to the provision of executive housing in the Borough. In my opinion that is necessary for the policy to be effective – executive housing needing a commensurate location. Following on from the above the definition of executive housing should be given in the Core Strategy. In this respect in my opinion it will rarely if ever in the circumstances of Stockton include town houses.</p> <p>Objection lodged to criterion 7, where affordable housing is viable and justified having regard to a sound evidence base, the split should be 50 : 50 intermediate vs social rented housing.</p> <p>Objection lodged to criterion 9. New housing development should be allowed in the rural area. In turn this housing could deliver an affordable housing contribution. It is not appropriate just to rely on rural exception sites coming forward. Experience has shown that such sites are amongst other things at best slow to come forward if indeed they ever deliver. In the circumstances allocations should be made in sustainable locations in the rural area, Carlton for example, and development allowed to come forward perhaps subject to an affordable housing requirement different from the remainder of the Borough, lesser thresholds for provision for example. As currently proposed the policy is unlikely to be effective in the delivery of affordable housing in the rural area.</p> <p>Following on but without prejudice to the above, in specified villages including Carlton, infill development including rounding off should also be allowed.</p>	<p>Does not conform to the Spatial Strategy. Specific executive housing allocations in rural areas would be contrary to the spatial strategy. The affordable housing tenure split is supported by the SHMA and the economic viability has been tested.</p>
21/3/7 Mr P Baker, Ward Hadaway	Objection	<p>Object to 1 (i). It should be re-written to include the word 'deliverable' before '5 – year supply'. The following should also be added to the end of the sentence, 'as amplified by the DCLG advice note Demonstrating a 5 year supply of Deliverable Sites'. In the alternative this second point should be written into the reasoned justification. As currently drafted the criterion is not consistent with national policy.</p> <p>Object to 1 (ii). Criterion should be deleted. It is important that houses are delivered across the Borough in accordance with policy CS1 as amplified by representations made to that policy which amongst other things note that the rural area should make a positive contribution to housing land supply in the Borough including of open market housing, executive housing and rural housing. As currently drafted the criterion is not consistent with national policy.</p> <p>Object to 1 (iii). The target for housing development on previously developed land should not exceed that in RSS policy 29, namely 70 percent in Tees Valley. As currently drafted the criterion is not justified or consistent with regional policy which is based on national guidance.</p> <p>Object to criterion 2. Housing numbers are floors not ceilings having regard to RSS policy 28 and PPS3. In turn, the criterion does not reflect PPS3 para 70 which states where there is an up to date 5 year supply of deliverable sites, LPAs will need to consider when applications come forward whether the granting of planning permission would undermine the achievement of their policy objectives. As currently drafted the criterion is not consistent with national policy.</p> <p>Object to criterion 3, for reasons expanded in relation to criterion 7, there should be an allocation to the rural area. As currently drafted the criterion is not justified or consistent with national policy.</p>	<p>Partial change made. The word 'deliverable' has been inserted. The policy already recognises that RSS targets are not ceilings. Housing trajectory work indicates that the brownfield completions target in the RSS to 2016 can be exceeded through current commitments. No inconsistency is recognised with PPS3, paragraph 70. Specific executive housing allocations in rural areas would be contrary to the spatial strategy.</p>

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22/1/1 W T Elstob and Son, Ward Hadaway	Objection	<p>Following on from objection to criterion 3, objection to criterion 7. In this respect it is submitted that there should be allocations including of market housing in the rural area with a focus on the larger settlements within. Carlton is an example of where there should be new development amongst other things it being served by a range of services and facilities for residents to use. This would reflect the guidance in PPS7 notably paras 3, 8 and 9 and RSS policy 11 as amplified by its reasoned justification. As currently drafted the criterion is not consistent with national policy.</p> <p>In relation to reasoned justification para 12.17, this should specifically note these figures are 'minimums'. The requirement of RSS policy 28 is that LDFs and planning proposals 'shall provide ...'. In turn it is clear from RSS para 3.89 that the figures are guidelines and do not represent a ceiling. In turn having regard to policy CS8 criterion 4, housing numbers are minimums both for affordable housing and open market housing. Why is the reference only to affordable housing?</p> <p>In relation to 12.21, disagree and object. There is a need for range and choice across the Borough including in the villages. Such development may also provide for some affordable housing in the rural area which at present it is unclear how the Core Strategy will deliver. As I come onto in representations to policy CS8, there is a concern that leaving the delivery of affordable housing to rural exception sites may well not be effective in securing delivery.</p> <p>As a general comment in relation to criterion 2 a close eye will need to be kept on deliverability of housing development in the Core Area. It may well be especially in the current economic climate that this will be slow especially on difficult previously developed sites in which case positive steps will need to facilitate development to meet the Borough's housing needs by bringing forward sites elsewhere.</p> <p>Following on from the above, support specific reference to Billingham in criterion 3 as a location where the remainder of housing development will be located. An objection is however, lodged to the word "regeneration" in the policy as in our experience this can be interpreted in a number of different ways. In this respect in our opinion the role of Billingham generally should be supported. This would amongst other things, contribute to enabling a mix of housing to be delivered with a specific focus on sites closely related to services and infrastructure such as schools and not just riverside locations which could be one interpretation of the policy.</p> <p>Following on from the above in criterion iii the words "within the conurbation" should be amended to "within or adjoining the conurbation". This comment is made acknowledging my client's land is enveloped on three sides by existing development, Northfield School and Sport College to the east, Sand Lane/Thames Road to the south and the A19 to the west. Acknowledging that to be the case, this would be a particularly sustainable site to contribute towards the Borough's housing needs.</p>	Does not conform to the Spatial Strategy. Deliverability will be monitored through the SHLAA process. Increasing the housing numbers allocated to the Billingham housing sub-division would not be deliverable owing to the shortage of land assessed as suitable, available and achievable within this sub-division in the SHLAA.
22/2/7 W T Elstob and Son, Ward Hadaway	Objection	<p>Object to 1 (i). It should be re-written to include the word 'deliverable' before '5 – year supply'. The following should also be added to the end of the sentence, 'as amplified by the DCLG advice note Demonstrating a 5 year supply of Deliverable Sites'. In the alternative this second point should be written into the reasoned justification. As currently drafted the criterion is not consistent with national policy. Following on from the above monitoring will need to be effective as it may well be especially in the current economic client that difficult sites in the Core Area are slow to come forward. In such circumstances provision must be made up elsewhere with a focus of deliverable and sustainable sites.</p> <p>Object to 1 (iii). The target for housing development on previously developed land should not exceed</p>	Partial change made. The word 'deliverable' has been inserted. The housing trajectory shows that the RSS target for brownfield completions to 2016 can be achieved based on commitments. No inconsistency is recognised with PPS3 para 70. Increasing the housing numbers allocated to the

Respondee	Type	Comment	Council Response
22/3/8 W T Elstob and Son, Ward Hadaway	Objection	<p>that in RSS policy 29, namely 70 percent in Tees Valley. As currently drafted the criterion is not justified or consistent with regional policy which is based on national guidance.</p> <p>Object to criterion 2. Housing numbers are floors not ceilings having regard to RSS policy 28 and PPS3. In turn, the criterion does not reflect PPS3 para 70 which states where there is an up to date 5 year supply of deliverable sites, LPAs will need to consider when applications come forward whether the granting of planning permission would undermine the achievement of their policy objectives. As currently drafted the criterion is not consistent with national policy.</p> <p>Object to criterion 3, the housing numbers to be allocated to Billingham should be increased to be a greater proportion of the total. In this respect it is pertinent to note that reasoned justification para 12.32 specifically states that the SHMA shows that affordable housing need is greatest in the Billingham Sub Area. It is submitted that the Core Strategy should seek to address this issue positively through an increased allocation to Billingham which is a sustainable location acknowledging the presence of facilities such as Northfield School and Sports complex for example.</p> <p>In relation to reasoned justification para 12.17, this should specifically note these figures are 'minimums'. The requirement of RSS policy 28 is that LDFs and planning proposals 'shall provide ...'. In turn it is clear from RSS para 3.89 that the figures are guidelines and do not represent a ceiling.</p>	<p>Billingham housing sub-division would not be deliverable owing to the shortage of land assessed as suitable, available and achievable within this sub-division in the SHLAA.</p>
23/1/0 Friends of Tees Heritage Park,	Objection	<p>Support criterion 1, it is appropriate that there be a good mix of housing in the Borough. In turn that means that there should not be an over emphasis on riverside locations.</p> <p>Objection lodged to criterion 7, where affordable housing is viable and justified having regard to a sound evidence base, the split should be 50 : 50 intermediate vs social rented housing, that would amongst other things seem more balanced. Criterion 7 should be a 50 : 50 split between intermediate and social rented housing.</p>	<p>Not supported by evidence. The affordable housing tenure split is supported by the SHMA.</p>
23/2/0 Friends of Tees Heritage Park,	Comment	<p>Generally we welcome the sentiment and content of the Document and its widespread references to open space, leisure and green infrastructure. In particular, we were delighted to see the Tees Heritage Park included in the 'Vision' section.</p> <p>As you know, there is a great deal of work currently being undertaken in connection with the Heritage park and Tees river corridor generally, which we hope will be incorporated as part of future development plan policy. If this work had been more advanced when the Core Strategy was being formulated, it seems likely that more content would have been included in the Strategy Document. We therefore feel that it is important that the Secretary of Ste is aware of the situation and that the matter can be fully explored at the examination in public, by which time the action plan and proposals for the river and its environs will be quite advanced.</p> <p>A comprehensive policy for Tees Corridor linked to a wider Tees Valley Green Infrastructure will form an essential ingredient for the recreation and well being for residents and visitors alike, and strengthen pride in our are and heritage. In our view, it should be a priority in policy terms and included as an important element in the final Strategy Document.</p>	<p>Too detailed for the Core Strategy. This level of detail will be contained in the Environment DPD.</p>
23/2/0 Friends of Tees Heritage Park,	Comment	<p>Whilst we welcomed the Document as a whole, we were disappointed by the vision statement, which we felt was not focused enough on the Town's particular identity and aspirations - most of its content could refer to a wide number of towns in the UK. We would have preferred to see something which was</p>	<p>Support welcomed. No change as alternative wording not provided.</p>

Respondee	Type	Comment	Council Response
24/1/2 Highways Agency,	Comment	<p>punchier and more notable, identifiable to the people of Stockton and the Tees Valley.</p> <p>We are content that the document is comprehensive with regard to sustainable transport policy and in particular Policy CS2, which addresses the issue of impacts on the Strategic Road Network being fully assessed and mitigated. Further the fact that the Strategy is supported by the Infrastructure Strategy, which refers to the A19(T)/A66(T)/A174(T) Development Study, which has involved the HA as a key partner, and should provide a robust evidence base on which to support the delivery of the strategy.</p> <p>Our only concern is that ideally , the results of the Development Study and agreed funding streams would be available at this stage, however it is accepted that Policy CS2 provides the Agency with some comfort on regard to this.</p>	No change requested.
25/1/1 Wynyard Park Ltd, Barton Willmore	Objection	<p>We consider that this policy fails to meet the tests of soundness. We believe that it should be possible for the Council to make amendments to the policy which could address these issues.</p> <p>The policy's unsoundness relates to the decision, only relatively recently made public, to locate a new hospital to serve the Hartlepool and Stockton part of the sub-region. That decision is supported by Stockton Borough Council. A "state of the art" hospital is a very significant new land use that necessarily will require a review of facilities serving and surrounding it. We believe that the Council should work in conjunction with Hartlepool Borough Council and other relevant agencies in undertaking such a review.</p> <p>We fully understand that Stockton Borough Council were not in a position to take this decision into account at the time the publication draft of the Core Strategy was being prepared. However, current drafting of Core Strategy CS1 provides no 'flexibility' to consider the potential impact on the decision to locate the hospital on land in Hartlepool which is adjacent to the employment land in Stockton. We believe this policy is unsound as it fails to be 'effective' in dealing with this change in circumstance. The policy does not provide any means of providing for such contingencies.</p> <p>Paragraph 4.46 of PPS12 advises local planning authorities that they 'should not necessarily rely on a review of the plan as a means of handling uncertainty'. The circumstances at Wynyard Park require that reconsideration of the land use takes place as quickly as possible if it is properly to be re-planned in the light of those changed circumstances. We consider that it should be possible to include an additional clause in the Core Strategy Policy 1 which specifically deals with the future development at Wynyard Park. Our proposals for additional words in this policy are set out below in Section 7.</p> <p>In making the point about flexibility we believe that there should be some other minor changes to several other policies which are related to this issue. We have therefore drafted a number of other specific representations on Core Policies 2, 4, 7, and 10, and the strategic diagram.</p> <p>We propose the following addition to the Core Strategy policy 1 in order to provide the necessary flexibility to enable the policy to be 'effective'.</p> <p>7. If the decision to location the new hospital on land in Hartlepool adjacent to the Key Employment Location at Wynyard Park is confirmed, a review of the proposed land uses within the Key Employment Location will be required to be carried out in order to meet the key themes and objectives of the Core Strategy. This review will be undertaken in full consultation with the adjoining borough of Hartlepool, the Government Officer for the North East, local residents and other stakeholders, through the preparation of</p>	Too detailed for the Core Strategy. Notwithstanding the decision to locate a new hospital at Wynyard, in Hartlepool Borough, Wynyard is not regarded as a sustainable location for further housing and employment development, over and above that which already has the benefit of planning permission. To include the wording suggested has implications for the area of Wynyard which could conflict with the Spatial Strategy.

Respondee	Type	Comment	Council Response
25/2/2 Wynyard Park Ltd, Barton Willmore	Objection	<p>a Supplementary Planning document.</p> <p>PPS12, paragraph 4.44, states that 'Core Strategies must be effective: this means they must be: deliverable; flexible and able to be monitored.' We consider this policy to be unsound because the Council's Transport Strategy does not appear to be providing proposals to improve the accessibility of the Wynyard Key Employment Location, accessibility being something which was recognised as needing to be improved in the Council's Second Transport Plan 2006. As such the policy is not deliverable and is therefore unsound. Under the section on 'Accessibility', the document states: 'However the same analysis has shown that some of the key generators identified are not so accessible by public transport. Wynyard is the sub-region's prestige employment site as identified by RSS. Highway access to this site is excellent due to its proximity to A19 and A1 (via A689) and is the main explanation as to why the site was developed historically and has since been retained and promoted as a prime development site. The market dictates that this will continue to be the case, but as has been clearly shown, public transport accessibility is not sufficient at the present time as the site is only served by one, infrequent, bus service. The analysis now provides robust evidence for the planning authorities to ensure that improved public transport links, preferably into one or more of the strategic hubs, becomes a prerequisite of any future planning applications related to this site.'</p> <p>This is a very significant matter given that if all the extant planning permissions for commercial uses are implemented on the Wynyard Site within the Stockton Borough this could create approximately 9,000 jobs with the potential for around at least a further 15,500 jobs within the Hartlepool part of the Wynyard Park site. It would appear from the above extract from the Council's Transport Plan that the suggested 'Strategy' for improving accessibility at Wynyard is to be achieved through future planning permissions at this site. Given that there are already existing planning permissions relating to development of the entire site within the Stockton area, it is unclear what scope exists to secure improved transport links to the site from future planning permissions. We consider that point 1 of this policy, which claims that 'Accessibility will be improved and transport choice widened' is not deliverable, in respect of Wynyard Park, and is therefore not 'effective' as it does not propose any measures to address or improve the accessibility of this Key Employment Location. The policy is therefore unsound. The 'accessibility' issue has been made all the more critical with the recent decision of the Acute Health Trust to locate the new hospital at Wynyard. The opportunity to bring forward new approaches to transport solutions at Wynyard was noted in the Tees Valley Transport Monitoring Report 2008, which states that: 'One of the principal issues under discussion at the partnership is the new North Tees & Hartlepool Hospital. The hospital and supporting local facilities have recently been out to consultation under the 'Momentum: Pathways to Healthcare' banner, ending September 2008. Two sites at Wynyard were put forward as the potential locations for the new hospital and work is currently underway in developing transport solutions for the site. The hospital trust are aware that good transport links are essential and centralising certain services and localising others would hopefully be undertaken in a way to minimise trips.' The document states that work is underway to develop transport solutions, however, this would appear to be at odds with what is shown on the Core Strategy Diagram or set out in point 4 of Core Strategy Policy 2. For example, the Core Bus Routes Corridors proposed as part of the Tees Valley Bus Network Improvements Scheme, as shown on the Core Strategy Diagram, does not link up with the site at Wynyard. Therefore, it would appear that the Core Strategy is failing to improve the accessibility of the residents to this Employment site from the surrounding area. We therefore consider that this policy is unsound as it is not 'effective' in ensuring the deliverability of important infrastructure to support its vision and objectives. This failure is compounded by the lack of any identified proposed improvements to public</p>	<p>Too detailed for the Core Strategy. Notwithstanding the PCTs preferred hospital location at Wynyard, in Hartlepool Borough, Wynyard is not regarded as a sustainable location for further housing and employment development, over and above that which already has the benefit of planning permission. To include the wording suggested has implications for the area of Wynyard which could conflict with the Spatial Strategy.</p>

Respondee	Type	Comment	Council Response
		<p>transport links to this Key Employment Location. We consider that this should also be remedied by additional notation on the Diagram showing that there is an intention to improve the ‘accessibility’ of the Wynyard Park site by means other than the car.</p> <p>We consider that the policy in respect of the Wynyard Site, is also unsound in that it is not consistent with national policy in the form of PPS1 Para.27(v) which states that LPAs should seek to: Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, while recognising that this may be more difficult in rural areas. This policy is also unsound as it is not consistent with Regional Planning Policy as set out in Policy 20 of the adopted Regional Spatial Strategy that: ‘ In planning for key employment locations, LDF and planning proposals should ensure a high level of sustainability. They should:</p> <p>c). encourage high levels of public transport, walking and cycling accessibility and use;</p> <p>d). discouragement of the need to travel by car through limited parking, the use of other demand management measures, and requiring a Travel Plan for each future occupier;.’</p> <p>Policy CS2 therefore is unsound as it is not deliverable and ‘effective’, and also not consistent with national / regional policy. We propose the following additional initiative should be added to point 4 of this policy: ‘vi) Improved accessibility to the Wynyard Key Employment Location by public transport and other sustainable modes of transport.’</p> <p>We consider that such an initiative would ensure that this policy is more deliverable and therefore makes it ‘effective’ and therefore sound. Similar, improvements to the accessibility of the site will make the policy consistent with both national and regional planning policy and therefore sound.</p> <p>We also consider that there should be some additional notation on the Core Strategy diagram which shows the intention for improvements to be made to transport links serving the Wynyard Park site.</p>	
<p>25/3/4 Wynyard Park Ltd, Barton Willmore</p>	<p>Objection</p>	<p>Consider this policy to be unsound because it is not flexible in the manner in which it is written, which is identifying employment sites and advising that where these are viable and attractive to the market they will be protected. PPS12 states that, “a strategy is unlikely to be effective if it cannot deal with changing circumstances. Core Strategies should look over a long time frame – 15 years usually but more if necessary”.</p> <p>The decision to locate a new hospital to serve the Hartlepool and Stockton part of the sub-region at the Wynyard Park site has only recently been made public and is supported by the Council. We fully understand that Stockton Borough Council were not in a position to take this decision into account at the time that the publication draft of the Core Strategy was being prepared. However, the current drafting of the Policy CS4 provides no flexibility to consider the potential impact of the decision to locate the hospital on land in Hartlepool which is adjacent to the employment land in Stockton. We believe this policy is unsound as it fails to be “effective” in dealing with this change in circumstance. The policy does not provide any means of dealing with such contingencies. Paragraph 4.46 of PPS12 advises local planning authorities that they “should not necessarily rely on a review of the plan as a means of handling uncertainty”. We consider that circumstances at Wynyard Park require reconsideration of the land use that will need to take place as quickly as possible and therefore cannot wait for a full review of the Core</p>	<p>Partial change made & contrary to Spatial Strategy. Notwithstanding the PCTs preferred hospital location at Wynyard, in Hartlepool Borough, Wynyard is not regarded as a sustainable location for further housing and employment development, over and above that which already has the benefit of planning permission. To include the wording suggested has implications for the area of Wynyard which could conflict with the Spatial Strategy.</p>

Respondee	Type	Comment	Council Response
25/4/7 Wynyard Park Ltd, Barton Willmore	Objection	<p>Strategy. In order to avoid this, an additional clause should be added to policy CS4 that specifically deals with the future development of land at Wynyard Park.</p> <p>Notwithstanding the above, we consider that the policy is also not flexible in that it does not appear to allow for the re-use of allocated employment sites for appropriate alternative uses where the site can be demonstrated to be no longer viable or attractive to the market. We consider that this is especially important given the acknowledgement in paragraph 3.30 of the adopted RSS of the over supply of employment land within the region and potential for the de-allocation of employment sites. Propose the following additional words at the end of point 7:-</p> <p>Conversely with a site which is currently allocated for employment use, where it can be demonstrated that the site is no longer viable for employment uses, the Council would consider appropriate alternative uses for that site especially where a strong case can be made for sustainable development and proposed uses which are compatible with the surrounding existing employment uses.</p> <p>The Wynyard Park site is a large area of land which straddles the boundary between two districts in the Tees Valley sub-region. It has a complex planning history and the proposals now being considered for the site have implications for the sub-region as a whole.</p> <p>PPS12, paragraph 4.44, states that 'Core Strategies must be effective: this means they must be: deliverable; flexible and able to be monitored.' We consider this policy to be unsound because it is worded too inflexibly, point 2 of the policy states that 'no additional housing site allocations will come forward before 2016', and point 7 that 'there will be no site allocations in the rural parts of the Borough'. Paragraph 4.46 of PPS12 states under 'Flexibility', that 'A strategy is unlikely to be effective if it cannot deal with changing circumstances. Core Strategies should look over a long time frame – 15 years usually but more if necessary.'</p> <p>Whilst we acknowledge that in para.12.10 of the Core Strategy it states that: 'If there are not sufficient sites to be brought forward to maintain a 5 year supply of deliverable housing land then the annual update to the Strategic Housing Land Availability Assessment will seek to identify additional site allocation opportunities and a partial review of the housing allocations in the Regeneration DPD will be undertaken.', we do not consider that this provides sufficient flexibility to make the Core Strategy sound.</p> <p>In order to remedy this, we consider that point 2 of this policy should be amended and point 7 deleted. We also consider that the statement in para 12.10 is of sufficient importance that it should be incorporated into the wording of the policy itself. Given the current economic climate, we consider that the delay involved in awaiting a partial review of housing allocation through the Regeneration DPD process, as currently suggested in policy CS7, results in a policy which does not have sufficient flexibility to meet the guidance in PPS 12. As such we have set out in section 7 below how we consider that point 2 of this policy should be re-worded to ensure it is sufficiently flexible to be able to respond promptly to changes in circumstances of allocated sites not coming forward as expected so that it will still be possible to deliver a range of housing types and tenures to meet the needs of the Borough over the period of the Plan.</p> <p>We have drawn attention in our representations on Policy CS1 that, if the new hospital is to be built at Wynyard, it will require surrounding uses to be reviewed to meet the significantly changed circumstances. One of the uses that necessarily must be considered is housing. A change to this policy</p>	Does not conform to the Spatial Strategy. It is considered that the policy is flexible and that reviewing the Regeneration DPD would not impose an undue delay. It is not necessary to incorporate para 12.10 into the policy. No planning decision has been taken for a new hospital to be built at Wynyard.

Respondee	Type	Comment	Council Response
		<p>should be made as a consequence of the change to Policy CS1. We propose the following re-wording of point 2:</p> <p>‘It is expected that no additional housing will be required to be brought forward before 2016, as the RSS allocation has been met through existing planning permissions for housing. However, should there be insufficient sites to maintain a 5 year supply of deliverable housing land, then the Council would identify additional sites through the SHLAA annual update, and also where appropriate consider other sites which come forward for housing where these sites are in sustainable locations within the Borough.’</p> <p>In addition we propose that point 7 of the policy is deleted and a new point 7 is added to read:-</p> <p>‘The assessment of appropriate land uses at Wynyard Park, to be made through a supplementary planning document prepared under Policy CS1, will include housing as one of the uses to be considered notwithstanding the location of the site in the rural area.’</p> <p>We consider that these changes would provide sufficient flexibility in this policy making it ‘effective’ and therefore sound.</p>	
<p>25/5/10 Wynyard Park Ltd, Barton Willmore</p>	<p>Objection</p>	<p>We consider this Policy with respect to ‘Strategic Gaps’ to be unsound, in that we do not consider that it is deliverable, as required under guidance in paragraph 4.44 of PPS12. This states that ‘Core Strategies must be effective: this means they must be: deliverable; flexible and able to be monitored’.</p> <p>Policy CS10 point 3 states that: ‘The separation between settlements, together with the quality of the urban environment, will be maintained through the protection and enhancement of the openness and amenity value of: i) Strategic Gaps between the conurbation and the surrounding towns and villages, and between Eaglescliffe and Middleton St George’.</p> <p>This implies that all land outside the conurbation lies within a ‘strategic gap’ and it therefore follows that this is intended to apply to the Wynyard Park site.</p> <p>The Key Employment Location at Wynyard Park is also identified on the Core Strategy Diagram as a ‘Prestige Employment Site’, lying within the Strategic Gap to the west of Wolviston and the A19. This representation of the site totally overlooks the fact that the Wynyard Park Key Employment Location straddles the boundary between Stockton and Hartlepool, i.e. there are yet further urban development proposals beyond the borough boundary which therefore conflicts with the objectives of a strategic gap. We consider that given its importance to the sub-region as a whole the site cannot be considered other than as a single, indivisible site. The full extent of the site is shown on a site location plan attached to these representations. There seems to be a strong contradiction between the interpretation and application of this policy and the physical evidence on the ground. Within Stockton, around 85,000 m2 of employment buildings have been constructed with a further 235,000 m2 having been given either reserved matters approval or full planning permission. In addition within that part of Wynyard Park located within Hartlepool, there is reserved matters approval for 275,000m2 of B1 floorspace and an area of approximately 34 hectares which has the benefit of outline planning permission for employment floorspace for which reserved matters details are shortly to be submitted.</p> <p>There are two reasons why the policy is unsound. Firstly the site benefits from a significant number of extant permissions for commercial development of which a number have been implemented, as such the site, which is allocated as a Key Employment Location, clearly cannot perform the function of a strategic</p>	<p>Change made. Strategic gap now represented diagrammatically.</p>

Respondee	Type	Comment	Council Response
25/6/0 Wynyard Park Ltd, Barton Willmore	Objection	<p>gap and therefore it cannot be 'justifiable' on the basis of 'a robust and credible evidence base', as set out in paragraph 4.36 of PPS12.</p> <p>Secondly, as a result of the planning history set out above and given the time period that Core Strategy policies need to cover, this policy cannot be achieved either in the short or long term because of the permissions which have already been implemented and those unimplemented extant permissions. It is therefore not deliverable and 'effective' thereby failing the test of soundness. It is proposed that the following sentence is added to the end of point 3(i) of Policy CS10 :- ' The Wynyard Park Key Employment Location is excluded from the strategic gap.'</p> <p>This clarification that the strategic gap policy does not apply to the Wynyard Park site deals with the concerns we have raised in 6. above thereby making the policy sound.</p> <p>In addition the Core Strategy Diagram needs to be amended to omit this employment site from the 'strategic gap', so that, explicitly, this policy is not applicable to the Wynyard Employment Site. This amendment would ensure that the Policy with respect to maintaining and protecting the Strategic Gaps is both 'justifiable' and 'effective' and therefore sound. We have also made a separate representation on the Strategic Diagram.</p> <p>We consider that the Core Strategy Diagram fails to meet the tests of soundness. We believe that it should be possible for the Council to make amendments to the Diagram which could address these issues. The Core Strategy Diagram fails to properly recognise the status of the Key Employment Location at Wynyard Park. Wynyard Park straddles the boundary between Stockton and Hartlepool and, in terms of the objectives of a strategic gap, cannot be considered other than as a single, indivisible site. The full extent of the site is shown on a site location plan attached to these representations. There seems to be a strong contradiction between the interpretation of Policy CS10 on the Diagram and the evidence on the ground. Within Stockton, around 85,000 m2 of employment buildings have been constructed with a further 235,000 m2 having been given either reserved matters approval or full planning permission. In addition within that part of Wynyard Park located within Hartlepool, there is reserved matters approval for 275,000m2 of B1 floorspace and an area of approximately 34 hectares which has the benefit of outline planning permission for employment floorspace for which reserved matters details are shortly to be submitted. The diagram clearly shows the site covered by Strategic Gap notation with a very small symbol superimposed for the key employment location. The implication being that the policy for 'strategic gaps' applies across the whole of the site as set out in Core Strategy Policy 10 Environmental Enhancement. There are two reasons why the Strategy Diagram is unsound. Firstly, as already set out above, the site benefits from a significant number of extant permissions for commercial development of which a number have been implemented. This Key Employment Location site clearly cannot perform the function of a 'strategic gap' and therefore the Strategic Diagram cannot be 'justifiable' on the basis of a robust and credible evidence base, as required by paragraph 4.36 of PPS 12. Secondly, as a result of the planning history set out above and given the time period that Core Strategy policies need to cover, this 'strategic gap' cannot be achieved either in the short term or long term because</p>	Change made. Strategic gap now represented diagrammatically and symbol representing key employment location at Wynyard enlarged.

Respondee	Type	Comment	Council Response
		<p>of the permissions which have already been implemented and those unimplemented extant permissions. The Strategic Diagram is therefore not deliverable and 'effective', thereby failing the test of soundness. We consider the implemented permission and extant unimplemented permissions on this employment site mean that the Council has failed to correctly represent the facts that can be seen from the evidence base. The Diagram is totally misleading and should therefore be amended to omit the employment site from the 'strategic gap'. We therefore consider that the Diagram is neither 'justifiable' as it does not reflect the credible evidence base nor is it 'effective' as the strategic gap is not deliverable in this location. We propose that the Core Strategy Diagram should be amended to identify the full extent/area of the Key Employment Location at Wynyard as shown on our attached amended Strategy Diagram, which includes a proposed revised notation in the key to the diagram for this Key Employment Location. This should refer to Policy CS1 and Policy CS4 in the key. The Strategic Gap notation should be removed from the area of the site. This change would address the comments made above regarding the failure to show that it is properly 'justifiable' by a credible evidence base and 'effective' in that the diagram is deliverable, as amended the diagram would be sound.</p>	
26/1/1 British Polythene Industries, Prism Planning	Objection	<p>Firstly we are objecting to the spurious accuracy or otherwise of the strategic diagram. As presently set out it purports to be both a specific boundary and also seems to bear reference to key diagram concepts more usually associated with structure planning. It has the worst of both attributes and the best of neither. Either it is a key diagram and not site-specific or it is site specific and needs to be expanded in its size and scale to enable individual sites to be properly identified. As presently drafted, the conclusion we have reached is that the site excludes our client's land at the former Visqueen site. This site is located on one of the key gateways into Stockton and is surrounded by residential development and good access to road and rail infrastructure. In terms of sustainability, we feel that our site is a highly sustainable brownfield site well located to the central core area but is apparently lying outside of the defined area. Given the lack of actual deliverability of housing within the central core area on key sites because of their constraints and values, it is all the more appropriate that the Council give consideration to sites immediately adjacent to the core area which can be brought forward within the plan period and can actually deliver housing on the ground. Our client's site is one such site and it is considered that there are no good planning reasons why the site should not come forward for housing development within the plan period. We would wish to see the core strategy map made into a key diagram. Alternatively the core strategy should be provided on a plan with an Ordnance Survey base at a bigger scale. The scale should be sufficient to enable individual sites to be clearly identified. Thereafter we would wish to see the CS1 paragraph 2 amended. This paragraph should recognise the contribution which can be made by sustainable brownfield sites which need not necessarily be within the core area. We would wish to see the focus on the core area made more reliant upon sustainability criteria instead of a geographic boundary, in this way the Council could more properly consider sites which are not necessarily within the core area but still contribute to further objectives such as the Stockton/Middlesbrough initiative, and maintenance of the town centre etc. As presently drafted, the focus is overly narrow, restrictive and more importantly does not bear any relationship to apparent market conditions and housing delivery.</p>	Change made. Core Strategy diagram corrected.
26/2/7 British Polythene Industries, Prism	Objection	<p>The current collapse of the housing market has had a profound impact upon the rate of new starts and on actual completions. This appears to be a complete variance of the Core Strategy policy CS7. It is clear that the current market recession will remain in place for some considerable period of time yet and</p>	Already included. The delivery of housing commitments has been tested and will continue to be

Respondee	Type	Comment	Council Response
Planning		will have a profound impact upon actual delivery. Policy CS7 fails to reflect this situation and relies upon a historically outdated assumption of permissions being constructed. There is clearly sufficient headroom in terms of actual completions on the ground to allow for a significant increase in housing over and above the figures set out in CS7. It is likely that an under-provision of housing will result unless the policy is revised. We would wish to see paragraph 2 of CS7 deleted and the recognition that the Council will allow planning permissions to be granted in sustainable locations in order to meet the output requirements of RSS policy. Focus will be on actual delivery of housing numbers rather than on availability of planning permissions.	monitored.
26/3/4 British Polythene Industries, Prism Planning	Objection	The Borough has a number of older industrial areas which incorporate traditional industries which may have no long term future in the market place. Often such areas are surrounded by newer development, often housing which impacts upon the ability to bring forward and maintain traditional industrial uses. There needs to be a specific recognition that the Council will look sympathetically on the redevelopment of older established areas where to continue and maintain an older use would be neither compatible with surrounding land uses or the industrial market place. Add an additional paragraph to recognise that the Borough will support the redevelopment of older established uses where the existing established use is no longer necessary within the market place and/or the surrounding uses mean that it is no longer appropriate in terms of neighbour compatibility to maintain an old industrial land use classification.	Already included. This policy aims to protect viable and attractive employment sites from inappropriate development. This approach requires justification that the site is no longer viable or attractive in order for an alternative use to be considered. The text suggested in the representation would repeat this policy albeit from a perspective that encourages the loss of employment land.
26/4/3 British Polythene Industries, Prism Planning	Objection	As presently drafted CS3 seeks to set standards for provision which are either a statement of national planning policy or seek to go beyond the requirements of the building regulations. Rather reference should be made to the fact that these can only apply to new planning permissions which are granted by the Borough Council and it needs to be recognised that based upon current market conditions, the ability to meet all of these laudable aspirations can only take place if there is a significant change in the market within which the housing system operates. CS3 would impose significant costs on new development and such costs need to be considered properly in the context of all other costs that the strategy also seeks to impose. Cross reference is made to policy CS8. There is no evidence that there is joined up thinking on the part of the Borough Council relating to the consequences of all these aspirations which have financial liabilities. It is not clear how the Local Authority expect all of these aspirations to be met at the same time as they are also seeking higher targets for affordable housing and community infrastructure in an area which has seen the virtual collapse of its new build housing market. It therefore seems that there is a fundamental unsoundness with this approach and a failure to reflect market aspirations. We would urge the deletion of this policy in its present form under recognition that the Government's overall objectives of the code for sustainable homes is all that is required in this area at the present time. Furthermore, we would also wish to see the Authority undertake a thorough evaluation of the financial consequences of CS3 and CS8 before the Council proceed to impose these as requirements on the housing market.	. Policy CS3 is included to demonstrate the Council's commitment to mitigating and adapting to climate change.
27/1/1 Sven Investments, Prism Planning	Objection	CS1 seeks to direct all housing to a very tight geographic area. This area has permissions for significant amounts of apartment led development on technically challenging sites. There are grave reservations over whether these sites can be put forward realistically within the plan period. As drafted, CS1 will prevent the delivery of sustainable brownfield sites in locations which are outside the core area but nevertheless consistent with RSS policy and the national directives relating to encouraging sustainable brownfield sites to come forward. It is not clear what "the remainder of the housing will be located" means in the context of a conurbation the size of Stockton. The core area has significant question	Already included. The delivery of housing commitments has been tested and will continue to be monitored. Policy CS1, point 3 accepts that not all housing will be located within the Core Area, and that housing development will take

Respondee	Type	Comment	Council Response
		marks over its overall deliverability and will have the affect of preventing development in locations such as the rear of Norton High Street which meets key criteria for sustainable development of brownfield locations close to shops, services, local schools etc. Policy CS1 needs to be re-worded to relate to the promotion of housing in sustainable locations close to shops, services etc. The emphasis on a tightly defined core area needs to be reconsidered in the light of the need to put forward a strategy that is deliverable within the plan period.	place elsewhere in the conurbation.
27/2/2 Sven Investments, Prism Planning	Objection	Paragraph 4 of policy CS2 relates to improving interchange facilities at locations in Thornaby, Eaglescliffe and Yarm together with the introduction of Park and Ride facilities. Given the disposition of traffic flows around the Borough, it is not considered that concentrating and encouraging additional traffic movements through Eaglescliffe and Yarm is at all sustainable. Specifically, reference should be given to the main access of traffic flows along the strategic road network and in particular the A66. It should be specifically identified that a key objective of the policy is to remove traffic from the strategic corridors at suitable sustainable locations and move them onto public transport routes. Greater emphasis should be given to the integration of Park and Ride facilities with the proposed Tees Valley Metro. As presently drafted, this policy will not achieve a true synergy between public transport improvements, metro interchanges, Park and Ride facilities etc. Rather it will seek to encourage cars to travel to secondary locations in areas which are already significantly congested. It is suggested that the paragraph 6 relating to Park and Ride facilities specifically notes the need to integrate these facilities with the Tees Valley metro. As presently drafted they are two separate aspects of sustainable transport measures. Integration is key. Section 4iii needs to be revisited to move the suggestion of Park and Ride facilities being delivered in unsustainable locations.	Already included. Policy CS2 deals with this issue.
27/3/7 Sven Investments, Prism Planning	Comment	<p>The policy as presently drafted takes no account of the present economic circumstances facing the development industry. It is not enough to rely upon traditional approaches of availability of planning permissions. Given the significant cessation of housing activity, it is clearly necessary to ensure that a far greater range of sites are available with extant planning permissions so that developers can bring forward housing. Given the apparent mothballing of many large volume sites, the policy needs to reflect the capacity of small and medium builders to bring forward housing. As presently drafted, CS7 is based very much upon an out of date perception of deliverability and outcomes which is not borne out by present market conditions.</p> <p>Indeed, paragraph 2 precludes additional housing allocations before 2016. This presupposes that all sites with planning permission will be built out and yet historically this has never happened. It is therefore likely that an under-provision of housing will result unless the policy is re-worded.</p> <p>Furthermore, following the tenor of policy CS1, too great a priority is given to the 'Core Area'. The policy is too rigid and without sufficient flexibility. Indeed, there are suitable brownfield sites elsewhere within the built up area and the policy should be worded to allow for the development of such sites. As it stands, the policy is unsound. Moreover, no additional allocations before 2016? Delete paragraph 2 of CS7 and revisit section 3 of the same policy. Recognition should be given to the need to concentrate on outcomes and deliverability rather than extant permissions. In particular there should be a need for an urgent review of the actual building activity taking place on sustainable brownfield sites rather than concentration on unimplemented permissions.</p>	Already included. The delivery of housing commitments has been tested and will continue to be monitored. Policy CS1, point 3 accepts that not all housing will be located within the Core Area, and that housing development will take place elsewhere in the conurbation.
27/4/8 Sven Investments, Prism Planning	Objection	As presently drafted, CS8 makes no reference to the specific needs of the elderly and care facilities and of the imbalances in accommodation which exist across the Borough. Further consideration needs to be given to the specific needs of the elderly care sector to recognise that there are specific gaps in provision	Already included. Point 10 of the policy states "the Council will support proposals that address the

Respondee	Type	Comment	Council Response
		across the Borough. Insert a clause that specifically recognises the needs for the elderly and care sectors and recognise the need to promote care villages in sustainable locations close to areas where there is a deficiency in demand.	requirements of vulnerable and special needs groups consistent with the spatial strategy". It is considered that this address the needs of the elderly.
28/1/1 Impetus Environmental Studies, Prism Planning	Objection	As presently drafted, policy CS1 will only seek to allow development within the existing industrial estates or safe guarding land for chemical purposes at Seal Sands and Billingham. Our concerns are that there are a range of contaminated areas immediately adjacent to existing industrial areas which will require new development ideas and approaches to allow and encourage site remediation and reclamation. A narrow drafting of Section 6 will effectively preclude the clean-up of land next door to existing industrial areas and retain images of blight and dereliction which adversely affect the image of the Tees Valley. Section 6 of CS1 needs to be re-worded and re-visited to specifically recognise that a core objective is to secure the reclamation of contaminated and derelict sites around the area. The policy should specifically recognise that new development which leads to reclamation will be encouraged as a matter of principle.	Change made. Policy CS1 sets out the broad thrust of the spatial strategy. Approach to dereliction and remediation covered in policy 10. Clean-up of land on the back of development proposals needs to be considered in the light of the spatial strategy and the benefits to the community.
29/1/10 Scott Brothers, Prism Planning	Objection	As presently drafted, policy CS1 will only seek to allow development within the existing industrial estates or safe guarding land for chemical purposes at Seal Sands and Billingham. Our concerns are that there are a range of contaminated areas immediately adjacent to existing industrial areas which will require new development ideas and approaches to allow and encourage site remediation and reclamation. A narrow drafting of Section 6 will effectively preclude the clean-up of land next door to existing industrial areas and retain images of light and dereliction which adversely affect the image of the Tees Valley. Section 6 of CS1 needs to be re-worded and re-visited to specifically recognise that a core objective is to secure the reclamation of contaminated and derelict sites around the area. The policy should specifically recognise that new development which leads to reclamation will be encouraged as a matter of principle.	Change made. Policy CS1 sets out the broad thrust of the spatial strategy. Approach to dereliction and remediation covered in Policy 10. Clean-up of land on the back of development proposals needs to be considered in the light of the spatial strategy and the benefits to the community.
29/2/1 Scott Brothers, Prism Planning	Objection	As presently drafted, CS10 creates the false image that green wedges, as defined on the strategic diagram, are pleasant areas with openness and amenity value. This is not always the case. In particular significant parts of the Billingham Beck Valley are heavily contaminated from previous industrial uses associated with ICI. Reference has previously been made to the Borough Council of the need to support environmental reclamation and improvement of these areas though new development, unless such environmental reclamation works are to be paid for entirely from the public purse. Sub section 7 of the policy should be specifically amended to recognise that areas such as the Billingham Beck Valley need to be improved in terms of their environmental quality and can contribute towards the tourism offer. In particular, remediating the first section of the Billingham Beck Valley would provide an important access corridor through to the Council's own country parks and beyond.	Already included. The issue surrounding the enhancement of Billingham Beck Valley is already covered in point 3 which talks about "the protection and enhancement of the openness and amenity value". The request that Billingham Beck is recognised in relation to tourism rather than as a green wedge seems to be related to the ability to develop the area rather than its amenity value. CS1 does not create the false image that green wedges, as defined on the strategic diagram, are pleasant areas with openness and amenity value, but seeks to maintain openness between settlements and quality of the urban area by their enhancement and protection.
30/1/1	Objection	CS1 seeks to direct all housing to a very tight geographic area. This area has permissions for significant amounts of apartment led development on technically challenging sites. There are grave reservations	Already included. The delivery of housing commitments has been

Respondee	Type	Comment	Council Response
Swiftbuild Properties, Prism Planning		<p>over whether these sites can be put forward realistically within the plan period. As drafted, CS1 will prevent the delivery of sustainable brownfield sites in locations which are outside the core area but nevertheless consistent with RSS policy and the national directives relating to encouraging sustainable brownfield sites to come forward. It is not clear what “the remainder of the housing will be located” means in the context of a conurbation the size of Stockton. The core area has significant question marks over its overall deliverability and will have the affect of preventing development in locations such as the rear of Norton High Street which meets key criteria for sustainable development of brownfield locations close to shops, services, local schools etc. Policy CS1 needs to be re-worded to relate to the promotion of housing in sustainable locations close to shops, services etc. The emphasis on a tightly defined core area needs to be reconsidered in the light of the need to put forward a strategy that is deliverable within the plan period.</p>	<p>tested and will continue to be monitored. Policy CS1, point 3 accepts that not all housing will be located within the Core Area, and that housing development will take place elsewhere in the conurbation.</p>
30/2/7 Swiftbuild Properties, Prism Planning	Objection	<p>The policy as presently drafted takes no account of the present economic circumstances facing the development industry. It is not enough to rely upon traditional approaches of availability of planning permissions. Given the significant cessation of housing activity, it is clearly necessary to ensure that a far greater range of sites are available with extant planning permissions so that developers can bring forward housing. Given the apparent mothballing of many large volume sites, the policy needs to reflect the capacity of small and medium builders to bring forward housing. As presently drafted, CS7 is based very much upon an out of date perception of deliverability and outcomes which is not borne out by present market conditions.</p> <p>Indeed, paragraph 2 precludes additional housing allocations before 2016. This presupposes that all sites with planning permission will be built out and yet historically this has never happened. It is therefore likely that an under-provision of housing will result unless the policy is re-worded.</p> <p>Furthermore, following the tenor of policy CS1, too great a priority is given to the ‘Core Area’. The policy is too rigid and without sufficient flexibility. Indeed, there are suitable brownfield sites elsewhere within the built up area and the policy should be worded to allow for the development of such sites. As it stands, the policy is unsound. Moreover, no additional allocations before 2016? Delete paragraph 2 of CS7 and revisit section 3 of the same policy. Recognition should be given to the need to concentrate on outcomes and deliverability rather than extant permissions. In particular there should be a need for an urgent review of the actual building activity taking place on sustainable brownfield sites rather than concentration on unimplemented permissions.</p>	<p>Already included. The delivery of housing commitments has been tested and will continue to be monitored. Policy CS1, point 3 accepts that not all housing will be located within the Core Area, and that housing development will take place elsewhere in the conurbation. Flexibility is built into the policy.</p>
31/1/7 Mr John Duell, George F White	Objection	<p>It is considered that the statement in Policy CS7 “there will be no site allocations in rural parts of the Borough” renders the Core Strategy unsound for the following reasons:</p> <p>Justified</p> <p>The statement that “there will be no site allocations in rural parts of the borough” is not sufficiently justified. The justification merely states that the urban centres of Stockton are closely related to the rural villages however, this is not backed up by fact or research.</p> <p>Effective</p> <p>It does not provide village centres with the opportunity to develop and strengthen economically in a sustainable manner.</p> <p>Consistent with National Policy</p>	<p>Does not conform to the Spatial Strategy. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>

Respondee	Type	Comment	Council Response
		<p>The economy of rural areas is likely to stagnate which is not in accordance with the key principles of Planning Policy Statement 7 – Sustainable Development in Rural Areas. Good quality, carefully-sited accessible development within existing towns and villages should be allowed where it benefits the local economy and/or community. The annual average supply of housing as set out within the Core Strategy will not be used to justify the refusal of Greenfield Windfall Sites within rural areas of the borough where the proposal will demonstrably deliver specific social and economic regenerative benefits for communities in which it is located.</p>	
<p>32/1/1 Jomast Developments, Signet Planning</p>	<p>Objection</p>	<p>Jomast Developments Ltd. Welcome the approach by the Council in setting out its Spatial Strategy direction so that only the 'majority' of housing developments will be focused within the Core Area of the borough allowing for an element of residential development to address the needs of other localities, as appropriate. The wording in this respect is considered to be an improvement upon that set out in the Preferred Options Core Strategy although it still does not fully reflect the requirements of PPS3. Point 3 of Policy CS1 (The Spatial Strategy) is also welcomed in that where development is located outside of the core area, it is not limited only to those settlements listed within Policy CS1. However, the policy still fails to fully address and conform with the principles of PPS3: Housing. For the policy to be more effective, there should also be a clear acceptance that residential development will be considered suitable in more unsustainable locations where it will assist in the improvement of the sustainability of the respective settlement as a result of any proposed residential development.</p> <p>Such an approach would accord with the requirements of PPS3: Housing (November 2006) which states, at paragraph 38, that:</p> <p>"At the local level, local development documents should set out a strategy for the planned locations of new housing which contributes to the achievement of sustainable development. Local planning authorities should, working with stakeholders, set out the criteria to be used for identifying broad locations and specific sites taking into account:</p> <ul style="list-style-type: none"> - the need to provide housing in rural areas, not only in market towns and local service centres, but also in villages in order to enhance or maintain their sustainability. This should include, particularly in small rural settlements, considering the relationship between the settlements so as to ensure that growth is distributed in a way that supports informal social support networks, assist people to live near their work and benefit key services, minimise environmental impact and, where possible, encourage environmental benefits." <p>In this respect it is important to bear in mind the locational benefits of Wynyard Village in relation to the nearby Wynyard Business Park which is to be constructed in a phased manner over the period to 2021 and will result in a total of some 19,000 jobs within the immediate locality of Wynyard Village.</p> <p>The release of land at Wynyard Village for additional residential development will therefore provide housing opportunities for employers of Wynyard Business Park. It is also anticipated that an increased level of residential development within the village will attract and sustain additional services and facilities, including local bus services which will contribute to the sustainability credentials of the village as is considered appropriate by paragraph 38 of PPS 3. It was always the intention from the initial grant of planning permission for Wynyard that it would evolve as a high-quality self-sustaining settlement. This process has yet to be completed and an additional element of residential development at Wynyard Village would enable this to be achieved. Such an approach in the Core Strategy would result in a policy which is 'effective' and 'consistent' with national policies.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance.</p>

Respondee	Type	Comment	Council Response
		<p>Further, Jomast Development Ltd.'s intention is to provide a residential development at the very highest end of the property market with housing of the quality found nowhere else not only in Stockton Borough, but also across the region. The North East RSS seeks a step change in the economy of the region and it acknowledges, as does the Housing Aspirations Study, that a further element of high quality executive housing is required to help stimulate this by helping to attract and retain senior management personnel and entrepreneurs to the region. Given the existing nature of Wynyard Village and the close links it has with Wynyard Business Park and the wider strategic transport network, it is clear that this is the obvious location for housing of this type.</p>	
<p>32/2/3 Jomast Developments, Signet Planning</p>	<p>Objection</p>	<p>Policy CS3 (Sustainable Living) of the Publication Draft Core Strategy identifies the Council's ambitions for ensuring development is built to specific levels of the Code for Sustainable Homes and equivalent measures for other development types as well as other various carbon reducing and sustainability initiatives. It is considered that in this respect Policy CS3 of the emerging Core Strategy is a repetition of policy set out within the national and regional planning policy context and with reference to paragraph 4.30 of PPS12: Local Spatial Planning which states that:</p> <p>"The Core Strategy should not repeat or reformulate national or regional policy."</p> <p>It is clear that Policy CS3 is unnecessary for inclusion within the Core Strategy.</p> <p>PPS1: Delivering Sustainable Development and the PPS1 supplement (Planning and Climate Change Supplement) identify clear guidance for the inclusion of renewable energies within development schemes. In addition it should be noted that the house building industry has a committed code for sustainable homes targets. Finally various policies within the adopted North East RSS (July 2008) provide a clear framework for the inclusion of renewable energies within developments. These policies include Policy 2: Sustainable Developments, Policy 3: Climate Change, Policy 38: Sustainable Construction and Policy 39: Renewable Energy Generation. It is clear that Policy CS3 is unnecessary for inclusion within the Core Strategy.</p>	<p>. To be reviewed</p>
<p>32/3/7 Jomast Developments, Signet Planning</p>	<p>Objection</p>	<p>Policy CS7 (Housing Distribution and Phasing) identifies those areas of the Borough where housing numbers set out in the adopted RSS will be focused over the LDF period. It is apparent that Policy CS7 also fails to recognise paragraph 38 of PPS3 in relation to the prospects of increasing levels of sustainability in small rural settlements as considered under policy CS1. In this respect it is clear that Policy CS7 is not in conformity with paragraph of PPS3. Having particular regard to this issue it is noted at Point 7 of Policy CS7 that:</p> <p>'There will be no site allocations in the rural parts of the Borough'.</p> <p>In this respect the policy is in direct conflict with paragraph 38 of PPS3.</p> <p>A blanket approach to the non-provision of residential development within the rural areas if the Borough is a clear contradiction to the aims and objectives of PPS3 which recognises throughout the importance of securing residential development within rural areas to maintain fluidity within the market and prevent existing dwellings becoming unaffordable to local residents.</p> <p>Policy CS8 of the Publication Draft Core Strategy relates to housing mix and affordable housing</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>

Respondee	Type	Comment	Council Response
		<p>provision. As with Policy CS1, it is considered that the Publication Draft version of Policy CS8 is a significant improvement upon that of the policy set out within the Preferred Options version of the Core Strategy. The policy now provides an allowance for the development of executive housing schemes within the Borough over the development plan period.</p> <p>In conclusion, Jomast Developments Ltd consider the Publication Draft Core Strategy to be an improvement upon that of the Preferred Options Core Strategy although still raise concerns against the tests of PPS12 on the above issues. We would be grateful, therefore, if these issues could be taken into consideration in the preparation of the Submission Core Strategy.</p>	
<p>33/1/7 Mr Ian Snowdon, George F White</p>	<p>Objection</p>	<p>It is considered that the statement in Policy CS7 there will be no site allocations in rural parts of the Borough renders the Core Strategy unsound for the following reasons:</p> <p>Justified The statement that there will be no site allocations in rural parts of the borough is not sufficiently justified. The justification merely states that the urban centres of Stockton are closely related to the rural villages however, this is not backed up by fact or research.</p> <p>Effective It does not provide village centres with the opportunity to develop and strengthen economically in a sustainable manner.</p> <p>Consistent with National Policy The economy of rural areas is likely to stagnate which is not in accordance with the key principles of Planning Policy Statement 7 Sustainable Development in Rural Areas. Good quality, carefully-sited accessible development within existing towns and villages should be allowed where it benefits the local economy and/or community. The annual average supply of housing as set out within the Core Strategy will not be used to justify the refusal of Greenfield Windfall Sites within rural areas of the borough where the proposal will demonstrably deliver specific social and economic regenerative benefits for communities in which it is located.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>
<p>33/2/0 Mr Ian Snowdon, George F White</p>	<p>Objection</p>	<p>In our view, the Green Wedge illustrated within the Core Strategy diagram that separates Ingleby Barwick to the east and Teesside Industrial Park to the west is not justified and renders the Core Strategy unsound.</p> <p>It is stated within the Core Strategy that there are a sufficient number of planning permissions to meet the Regional Spatial Strategy housing requirement to 2016. There is currently a pool of 1600 planning permission that have not yet been implemented within the area of Ingleby Barwick.</p> <p>Due to the current economic climate, it is possible that many existing planning permission will not be implemented and will therefore lapse in the future.</p> <p>It will therefore be necessary to grant new planning consents for residential purposes in order to satisfy the Regional Spatial Strategy housing requirement.</p> <p>The Employment Policy within the Core Strategy states that there will be a need to expand Teesside Industrial Park by 30 ha. To meet employment requirements.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Green wedges serve the purpose of maintaining the openness between settlements and the quality of the urban area.</p>

Respondee	Type	Comment	Council Response
		<p>It is questionable whether there are, in fact, 30 ha. Of undeveloped currently available within the demises of Teesside industrial Park. As such, ;land adjacent to Thornaby Road, currently allocated as a Green Wedge, may be required to meet this need especially when considering the need to add landscaping initiatives, as conditions of planning consents, to the 30 ha. Required for employment use. The Green Wedge between Ingleby Barwick and Teesside Industrial Park is a natural in-fill site for either residential or employment use.</p> <p>Accordingly, the benefit of the area being retained as Green Wedge should be reviewed when considering the comments made above and the fact that it may be unlikely that the following objectives, set out in the Core Strategy, may be met:</p> <ul style="list-style-type: none"> - To implement 1600 existing residential commitments within the Ingleby Barwick area - to expand Teesside Industrial Park by 30 ha. For employment use. 	
34/1/0 Tees Valley Wildlife Trust,	Support	We support Objective 8 - To protect and enhance the Borough's natural environment	No change requested. Support welcomed
34/2/10 Tees Valley Wildlife Trust,	Objection	<p>We support all aspects of policy 10 with the exception of paragraph 8 "the delivery of the Tees Forest Plan will be supported". We believe this plan may be inconsistent with other government and policy guidance regarding the protection of flood plains and it may also encourage tree planting in conflict with other biodiversity species and habitats. Finally, the North East Community Forest organisation is no longer available to lead or support the plan delivery.</p> <p>We believe the biodiversity aspects of forest planting are best delivered through the Tees Valley Biodiversity Action Plan's strategies for broadleaved woodland and the recreational aspects of the Tees Forest Plan are best delivered through the Tees Valley Green Infrastructure Strategy. Para 8 of Policy 10 should be replaced with the words "The delivery of the Tees Valley Green Infrastructure Strategy will be supported". This change should similarly be applied to other references to the Tees Forest Plan in the Core Strategy.</p>	Change made. Change made was not inline with that requested as Tees Valley Green Infrastructure Strategy is mentioned elsewhere but the change still deals with the issue raised.
34/3/0 Tees Valley Wildlife Trust,	Comment	The reference to 'Sites of Nature Conservation Importance' should be changed to 'Local Wildlife Sites' as this is the term recommended in Defra Guidance and PPS9. The term has been adopted by the Tees Valley Local Sites Partnership. Change the term 'Sites of Nature Conservation Importance' to 'Local Wildlife Sites'.	Change made. SNCI replaced with Local Wildlife Sites
34/4/3 Tees Valley Wildlife Trust,	Objection	<p>The policy does not comply with guidance for public authorities contained in the Natural Environment and Rural Communities Act regarding adaptation to climate change, particularly relating to the resilience of the natural environment. This relates to ensuring connectivity and robustness in natural habitats as well as their creation and enhancement.</p> <p>Of particular relevance to Stockton is the potential impacts of climate changes on the internationally important habitats of the Tees Estuary (Teessmouth and Cleveland Coast SPA/ Ramsar site). Adaptation might include the provision of wetland habitats higher up the Tees which will support the populations of birds for which the SPA is designated. Include reference to the need to ensure resilience of natural habitats to climate change by encouraging appropriate management and ensuring connectivity through the creation of new habitats and the protection of wildlife corridors.</p>	Change made. Additional paragraph added after paragraph 13.4 to address these points.

Respondee	Type	Comment	Council Response
35/1/7 Carlton Parish Council,	Support	We support the statement that there will be no housing site allocations in rural parts of the Borough. This accords with the views of parish residents expressed through surveys, that further development of the village would be unsustainable.	No change requested. Support welcomed
36/1/0 Northumbrian Water Ltd, England and Lyle	Support	<p>Chapter 4, Vision and Chapter 5, Objectives.</p> <p>In relation to its water and sewerage operations, NWL supports the overall vision and the strategic objectives of the Core Strategy, particularly the following underlined elements contained in Objective 11:</p> <p>"Reduction in pollution will improve air and water quality in the Borough. Development will be steered towards areas which are at low risk of flooding, or to sites where acceptable mitigation measures can be put in place without making other areas more liable to flooding. Sustainable drainage systems will be integral to development, reducing the risk of flooding and ground water pollution and helping to provide an attractive, diverse environment."</p>	No change requested. Support welcomed
36/2/7 Northumbrian Water Ltd, England and Lyle	Support	<p>As stated to the Council in relation to previous versions of the Core Strategy, the Company would request close liaison with the Council and potential development partners at the earliest stage to identify the precise details of future development, such as specific use, scale and density of development. This will allow the Company to carry out a more detailed assessment on capacity issues relating to individual sites and therefore the implications for strategic water and sewer investment in the Borough over the Plan period. Failure to do so would potentially result in the Company objecting to the potential site specific proposals and policies in other Development Plan Documents.</p> <p>NWL has commented separately on the Infrastructure Strategy, which relates to the principles contained in policy CS7.</p> <p>As stated in previous representations to the Regeneration Development Plan Documents, the Company has identified potential water supply capacity issue in relation to proposed development at Wynyard on sites MU1 (land at junction of A19/A689 Wolviston) & MU2 (land at Wolviston & on Wynyard site). Also, when considering the de-allocation of employment and mixed sites for alternative uses, the capacity of the water and sewerage infrastructure should be taken into account.</p>	No change requested. Support welcomed
36/3/11 Northumbrian Water Ltd, England and Lyle	Support	<p>NWL acknowledges that previous requests to include specific reference to water and sewerage infrastructure necessitated by development have not been included in the publication draft. 'Water and sewerage infrastructure' could have effectively been included in the example list of infrastructure requiring contributions. Nevertheless, NWL does not object to policy CS11.</p> <p>However, NWL would welcome the Council's agreement to the following statement of common ground to allow general water and sewerage infrastructure issues to be addressed at the earliest possible stage in the production of the Local Development Framework.</p> <p>Proposals for new development must be capable of being accommodated by existing or planned water and sewerage infrastructure services (whether supplied by utilities providers or the development itself), and must not have a seriously harmful impact on existing systems, thereby worsening the services enjoyed by the existing community. Where necessitated by new development, the provision of additional water and sewerage infrastructure capacity will be essential to the timely implementation and functioning of developments. In some circumstances, it may be appropriate to use a planning obligation to facilitate</p>	Too detailed for the Core Strategy. Policy CS11 only identifies the Council's key priorities for seeking contributions, it is not an exhaustive list. It is expected that developers would fund any infrastructure requirements to service their site as a matter of course; a planning obligation would not normally be necessary. The LDF process in association with the Infrastructure Strategy is designed to deal with this matter

Respondee	Type	Comment	Council Response
		<p>the delivery of water and sewerage infrastructure required for new development and necessary for its effective and efficient phasing.</p> <p>This Statement of Common Ground would give NWL the confidence, as a key delivery partner in the District's future growth, to sign up to policy CS11 to ensure effective infrastructure delivery planning.</p>	
36/4/0 Northumbrian Water Ltd, England and Lyle	Support	<p>Paragraph 13.6 of the publication draft Core Strategy makes reference to the Strategic Flood Risk Assessment (SFRA) and levels of flood risk.</p> <p>NWL would support the principles contained in paragraph 13.6. However, the Company would request:</p> <ul style="list-style-type: none"> -To be involved closely through direct and meaningful liaison with other partnering agencies in the production, up-dating and monitoring of the Strategic Flood Risk Assessment; and, -For the SFRA to address the risk of flooding from all sources in compliance with Planning Policy Statement 25, particularly 'other sources', such as flooding from sewers. 	No change requested. Support welcomed
36/5/0 Northumbrian Water Ltd, England and Lyle	Support	<p>Water and Sewerage 6.0 UTILITIES</p> <p>NWL acknowledge and verify the statements in paragraphs 6.3 – 6.5 regarding liaison with the Council in relation to 'water and sewerage'. In particular, NWL would request that the Council relates the Company's representations on policies CS7 and CS11 to the following statement in paragraph 6.4 of the Utilities Strategy:</p> <p>"...Northumbrian Water operates within a five-year investment programme called the Asset Management Plan (AMP). The next AMP, which will commence in 2010, is currently being finalised with Northumbrian Water and other providers preparing bids to the regulator at Ofwat. This process will determine the price levels that can be charged to fund investment programmes and also the content of those programmes. Given the above it is difficult for Northumbrian Water to provide commitments to provide capacity to service potential developments beyond the current AMP period. This is further complicated by competing demands on the investment programme from other potential growth strategies within the region.</p> <p>As stated above in the main document, NWL supports the Core Strategy in its present form but is unable to guarantee its support to the spatial strategy in the longer-term due to uncertainties in its investment plan. In addition, site-specific issues may arise as part of the Regeneration Development Plan Document. This is summarised in paragraph 6.5, below:</p> <p>However, NWL have reservations to the text in paragraphs 6.5 and 6.6 as these paragraphs tend to reflect their comments in an overly negative light: Paragraph 6.5 states: "Northumbrian Water have therefore identified that they have no objection in</p>	Change made. Additional text added to paragraph 6.5 of the Infrastructure Strategy for clarification.

Respondee	Type	Comment	Council Response
		<p>principle to the Core Strategy but have identified that unforeseen problems could still arise.”</p> <p>NWL would request that paragraph 6.5 is amended to: “Northumbrian Water have therefore identified that they have no objection in principle to the Core Strategy and consider adequate infrastructure capacity should be available subject to early and full consultations on the detail of location, size and phasing of proposed developments”</p> <p>NWL acknowledges the following text in paragraph 6.6: “Although Northumbrian Waters comments do not rule out potential issues and a number of companies have not provided adequate responses, it should be noted that within Stockton on Tees Borough there is an existing supply of dwellings, with planning permission, to meet requirements to 2016. In addition a large proportion of the employment land supply is identified on existing industrial estates which are generally well serviced.”</p> <p>NWL has strong reservations about the above wording and would object to the implications that it has not provided an adequate response on the infrastructure requirements of the Core Strategy. As is clearly explained in paragraph 6.4 the regulation of the pricing and investment of the Company means that certainty and guarantees cannot be given, as is the case with any utility company. This general point could be usefully made in the introduction to Section 6. In any case the Company would request that the text in paragraph 6.6 is amended as follows: “Although Northumbrian Water’s comments do not rule out potential issues it should be noted that within Stockton on Tees Borough there is an existing supply of dwellings, with planning permission, to meet requirements to 2016. In addition a large proportion of the employment land supply is identified on existing industrial estates which are generally well serviced.”</p>	
37/1/0 Mrs Wilson, England and Lyle	Support	<p>Mrs Wilson would support the following section of wording in the future vision that: "Residents have access to the very best in housing".</p> <p>However, as explained in the following and previous representation (see Appendix 1) Mrs Wilson considers that it would be difficult to ensure access to the 'very best' housing when the remainder of the Core Strategy does not provide adequate opportunities to provide a mix of private and affordable housing provision in service villages, particularly Long Newton.</p>	No change requested. Support welcomed
37/2/0 Mrs Wilson, England and Lyle	Objection	<p>Mrs Wilson previously expressed concern about Strategic Objective 12 at the preferred options stage of the Core Strategy. (see Appendix 1). This concern does not appear to have been acknowledged or reflected in the publication draft Core Strategy, which states that "A steady rate of house building will be maintained, focused in the Core Area. This will ensure that homes are available in a range of sizes, types and tenures, providing a balance and mix to meet different requirements of the increasing population of the Borough, informed by up-to-date research".</p>	Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and

Respondee	Type	Comment	Council Response
		<p>Whilst clearly the Core Area is an appropriate location for some new housing development, Mrs Wilson regards this paragraph as self-contradictory in that it would not be flexible enough to deliver a range of housing sizes, types and tenures in service villages. Concentrating housing development in the core area is only likely to meet the housing needs and aspirations of a small proportion of existing and future residents. Not every one will want to live in the Core Area and in order for the Vision to be delivered the housing land supply therefore needs to comprise a mix of sites, including sites in service villages located outside the urban core, such as Long Newton. The Vision should therefore be amended to reflect these issues.</p> <p>The Spatial Vision and Spatial Objectives, as currently worked, therefore fail to provide a 'sound' core strategy which is justified, effective and consistent with national policy (PPS12 paragraph 4.52) - notably PPS1, PPS3 and PPS7 - in terms of providing housing within or adjacent to sustainable service village locations, such as Long Newton, to meet local housing needs and to ensure the future vitality and viability of such villages.</p>	<p>2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>
<p>37/37 Mrs Wilson, England and Lyle</p>	<p>Objection</p>	<p>Mrs Wilson acknowledges the statement that:</p> <p>“No additional housing allocations will come forward before 2016 as the Regional Spatial Strategy allocation has been met through existing housing permissions.”</p> <p>In response, she considers that it would be more beneficial to allocate additional housing sites so that there is an additional reserve of deliverable sites to address a potential scenario where current housing commitments are not delivered (and inevitably lapse) between now and 2016. For instance, planning consents have been in place at North Shore and Boathouse Lane (both in the central area) for several years but construction on them is yet to commence.</p> <p>Mrs Wilson would object to the proposed distribution of the remaining, non-committed housing requirement as detailed in policy CS7. She considers that the over concentration of development in the Core Area and amount of any additional development proposed in the rest of the Stockton area to be unsustainable and un-sound. For the reasons outlined in relation to representations on the Vision and Spatial Strategy she considers that that a more appropriate and equitable distribution of housing is needed which supports the long term sustainability of the Borough’s service villages, particularly Long Newton - at least before 2016.</p> <p>Mrs Wilson previously commented on the ‘small-scale, low-key growth’ proposed within village limits. Moreover, she commented that the proposed allocation of only 14 dwellings across all villages would fail to adequately reflect the necessity to maintain the vitality and viability of sustainable settlements and neighbourhoods.</p> <p>Policy CS7 in the draft Core Strategy no longer provides an answer to how the aim of delivering sites for future housing development in service villages. will be achieved. Whilst stating: “Proposals for small sites will be assessed against the Plan’s spatial strategy.”, it is also stated that: “There will be no site allocations in the rural parts of the Borough”.</p> <p>The sites North Of White House Farm and at Mount Pleasant, Long Newton, (Site HA16 on Map 22 of the Regeneration DPD) would represent the best location for a housing allocation, incorporating at least a 50 per cent element of affordable housing, to sustain the long term vitality and viability of Long Newton.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Although the focus is on the Core Area, provision is made for housing elsewhere in the conurbation. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8. The policy contains a flexibility element with regards to housing deliverability (para 12.10).</p>

Respondee	Type	Comment	Council Response
		<p>These sites are relatively small and well related to the existing settlement pattern of the village and are readily accessible by public transport and car being located on the main A66 Corridor and have good access to the Core Area and other employment growth points such as Durham Tees Valley. The sites benefit from their proximity to Durham-Tees Valley airport and the new A66-Airport interchange, scheduled for completion in 2008. The sites would provide opportunities to deliver an increased provision of housing resulting from the 'flexibility element' afforded to the Council by virtue of the Tees Valley to recently becoming a Growth Point.</p> <p>On this basis, Mrs Wilson considers core strategy policy CS8 to be unsound. By ruling out site allocations in rural parts of the Borough, in its current format policy, CS7 could potentially jeopardise such sites coming forward. This would be at the expense of the future vitality and viability of Long Newton and similar service villages in the Borough. Consequently, the Core Strategy would fail: "to meet the different requirements of the increasing population of the Borough" - as promised in its own Vision and in Objective 12.</p>	
37/4/8 Mrs Wilson, England and Lyle	Objection	<p>Mrs Wilson acknowledges the following statement in point 9 of Core Strategy Policy CS8:</p> <p>"The requirement for affordable housing in the rural parts of the borough will be identified through detailed assessments of rural housing need. The requirement will be met through the delivery of a "rural exception" site or sites for people in identified housing need with a local connection. These homes will be affordable in perpetuity."</p> <p>Whilst understanding that the Council will be requiring a strong element of affordable housing on sites in service villages, such as Long Newton, Mrs Wilson considers that the above requirement for 'a local connection' and perpetual affordability is over-restrictive on the type and mix of housing to be delivered. On this basis, Mrs Wilson considers core strategy policy CS8 to be unsound as it fails to reflect that an element of private open market housing will be crucial to delivering affordable housing in service villages, such as Long Newton.</p> <p>Allocating sites for housing development in or adjacent to service villages such as Long Newton would promote a greater mix of housing in the Borough. Development on the sites North of White House Farm and at Mount Pleasant, Long Newton, could deliver a range of house types including higher value/ lower density housing, as well as significant element (at least 50%) of rural affordable housing in accordance with PPS7: Sustainable Development in Rural Areas. Development would also compliment the proposed commercial expansion of Durham Tees Valley Airport. In its current format core strategy policy CS8 would not be justified, effective and consistent with national policy.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>
37/5/1 Mrs Wilson, England and Lyle	Objection	<p>Mrs Wilson would object to Draft Policy CS1. She considers that the spatial strategy, in terms of housing land issues, is too narrow, 'fragile' and unlikely to deliver the wider aspirations for the Borough detailed in the Spatial Vision and the Community Plan. The Core Area, as defined on the Core Strategy Diagram, comprises only a relatively small area of the Borough and lacks diversity in terms of its environment and therefore limits the type of housing market that any new development will serve. She considers it unrealistic therefore to expect this area to deliver the level, range and choice of house building that is anticipated in the Policy.</p>	<p>Does not conform to the Spatial Strategy. It is considered that the focus on sustainable urban locations is consistent with national guidance. Although the focus is on the Core Area, provision is made for housing elsewhere in the conurbation. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and</p>

Respondee	Type	Comment	Council Response
		<p>The statement that rural housing needs will be met through a 'rural exception site policy' which prioritises the provision of only affordable housing in sustainable locations does not provide a flexible or robust approach to meeting future housing needs in the Borough. As such Mrs Wilson considers that policy CS1 fails to provide a 'sound' core strategy which is justified, effective and consistent with national policy (PPS12 paragraph 4.52) - notably PPS1, PPS3 and PPS7 - in terms of providing housing within or adjacent to sustainable service village locations, such as Long Newton, to meet local housing needs and to ensure the future vitality and viability of such villages.</p> <p>The Core Area, because of its high levels of accessibility/sustainability, is a much more suitable location for employment and commercial uses and should be the important to this type of development during the plan period.</p> <p>In housing terms a more robust approach, and one that is inherently more likely to deliver RSS requirements and housing aspirations, would be to balance development in the Core Area with development in other parts of Stockton Borough, particularly service villages. This approach should include the identification of Long Newton as a sustainable service village and the allocation of land in the land north of White House Farm, Long Newton and the land at Mount Pleasant as housing allocations (sites shown as HA16 on Map 22 of the Regeneration DPD).</p>	2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8. The policy contains a flexibility element with regards to housing deliverability (para 12.10).
38/1/0 North Tees PCT,	Comment	Paragraph 11.4 bullet point 1 refers to the location of the new hospital. The preferred site has now been agreed and this will be reflected in the document.	Change made. The Core Strategy has been updated to reflect these points.
39/1/5 The Theatres Trust,	Comment	Policy 5 announces the 'socially inclusive cultural sector' around Green Dragon Yard to boost the evening economy but we are unsure if this refers to the proposed Cultural Quarter. Clarification of whether the "socially inclusive cultural sector" around Green Dragon Yard is referring to the Cultural Quarter.	Already included.
39/2/6 The Theatres Trust,	Comment	Policy 6 provides for existing facilities to be enhanced and opportunities to widen the Borough's leisure and cultural offer and the explanatory text at 11.2 includes performing arts facilities.	No change requested. Support welcomed.
39/3/0 The Theatres Trust,	Support	We are pleased to see at 2.5 on page 6 that it will be necessary to "Improve the leisure, sport, recreation and cultural offer of the area."	No change requested. Support welcomed
39/4/0 The Theatres Trust,	Support	We are also pleased to see at 4.1 on page 11 that part of Stockton's Vision will be to provide residents with the very best cultural facilities including the creation of a cultural quarter to help regenerate the town centre.	No change requested. Support welcomed
39/5/0 The Theatres Trust,	Support	We support Objective 4 on page 13 to encourage leisure and cultural facilities in the maintenance of a vibrant evening economy.	No change requested. Support welcomed
40/1/6 Ramblers' Association,	Objection	PPG17 attaches importance to the rights of way network. PPG17 states that 'Rights of way are an important recreational facility, which local authorities should protect and enhance. Local authorities should seek opportunities to provide better facilities for walkers, cyclists and horse-riders, for example by adding links to the existing rights of way network.' Despite the advice from the government in PPG17 and the wealth of evidence of the beneficial effect of walking in improving health, physical and mental,	Change made. Additional bullet point added to paragraph 11.2 to reflect changes requested.

Respondee	Type	Comment	Council Response
		<p>the rights of way network is not mentioned in the list, nor elsewhere in the CS DPD Publication Draft. This omission should be corrected. Add to the list in 11.2 after the seventh bullet point 'Parks, play areas and other green spaces' an additional bullet point to include 'the rights of way network' so as to better comply with government policy.</p>	
<p>41/1/0 Yarm Residents Group,</p>	<p>Objection</p>	<p>The phrase 'in addition to Yarm' is ambiguous and could have the effect of indicating that Yarm is precluded from any upgrading or regeneration as is intended to apply to Stockton, Billingham and Thornaby. If this is intended it should be made explicit for consultation purposes and may give rise to further objection. It would be entirely appropriate to pursue a sensitive programme of regeneration and upgrading of the conservation area in furtherance of the proposals for Yarm Town centre.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this form of words fails the Effectiveness test in that it fails to allow flexibility to deal with changing circumstances. It is further submitted that there is no justification for excluding Yarm from the opportunity to benefit from upgrading or regeneration.</p>	<p>Disagree. The Council believe the statement is clear and unambiguous. The objective of the vision is to upgrade centres so that they are vital and viable and complement Yarm as the 'Best High Street in Britain'.</p>
<p>41/2/1 Yarm Residents Group,</p>	<p>Objection</p>	<p>Sub-paragraph 3 indicates that 'the role of Yarm as a historic town and a destination for more specialist shopping needs, will be protected' (your grammar). The policy should be expanded to indicate how it will be protected by the planning system.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this form fails the Effectiveness test in that the policy is not deliverable because it fails to indicate the nature of planning decision to which it relates.</p>	<p>Too detailed for the Core Strategy. This will be expanded in the Yarm and Eaglescliffe Area Action Plan and Environment DPD.</p>
<p>41/3/2 Yarm Residents Group,</p>	<p>Objection</p>	<p>COMMENT RELATING TO CS2 - TRANSPORT Sub-paragraph 4 relates only to the publication of proposals regarding initiatives to improve public transport. The thrust of the justification is to indicate that the strategy depends on the delivery of such improvements. The policy should be reworked to indicate proposals that are intended to be delivered during the plan period.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this part of the policy fails the test of effectiveness in that it fails to promise the delivery of tangible public transport improvement necessary to the achievement of the core strategy overall.</p>	<p>Already included. Policy supports improvements to public transport provision, specifically through the Core Route Corridors, as shown on the Core Strategy Diagram. The LDF system is heavily focused towards delivery, and therefore, proposals included will be implemented within the plan period. More detail will be included in the Regeneration DPD, where appropriate.</p>
<p>41/4/2 Yarm Residents Group,</p>	<p>Objection</p>	<p>Sub-paragraph 5 indicates where improvements to the road network will be required and includes at iv) a reference to Ingleby Barwick. In this light it is submitted that reference should also be made to Yarm in that it is equally or more congested than Ingleby Barwick, it suffers from considerable volumes of heavy traffic, there is conflict in the town centre between the use of the A67 as a major route and its role as the spine of town centre parking and that the plan contains significant proposals for employment, retail and residential development that will impact further on the town's traffic problems. It is further submitted that the priority for addressing the improvements be established on the basis of explicit evidence taking account of the factors outlined</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this part of the policy fails the test of justification in that it is not founded on robust and credible evidence and it is not the most appropriate strategy when considered against reasonable</p>	<p>Too detailed for the Core Strategy. The number of HGVs passing through Yarm are recognised as a problem. Highway solutions are being explored (such as weight restrictions). No other proposals are being considered. More detail may be included with the Yarm and Eaglescliffe Area Action Plan.</p>

Respondee	Type	Comment	Council Response
		alternatives.	
41/5/5 Yarm Residents Group,	Objection	<p>Sub-paragraph 3 allows proposals which support Yarm's specialist niche role etc provided that the residential mix in the town centre is not compromised. This is not sufficiently precise in that the justification refers specifically to the retention of residential frontages on the High Street. The policy should be reworded properly to give effect to the intention expressed in the justification.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this part of the policy fails the test of justification in that as worded it is not the most appropriate strategy when considered against reasonable alternatives.</p>	Already included. Policy and justification refer to Yarm Centre (not just the High Street). This allows protection of the Wynds which retains residential properties.
41/6/7 Yarm Residents Group,	Objection	<p>Sub-paragraph 3 includes a new allocation of 50-100 houses for Yarm and Eaglescliffe in the period 2016 – 2021. This is not justified, its need is questionable and it runs counter to the strategy relating to the development of the core area. It would be likely to exacerbate existing traffic problems and should be deleted.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this policy is not justified in the absence of robust and credible evidence of need and is not the most appropriate strategy when considered against reasonable alternatives, principally relating to the need to promote the development of the core area.</p>	Reflects other Council plans.. The housing allocation at Yarm between 2016 and 2021 reflects the Building Schools for the Future programme. Any major development proposal will require a Traffic Impact Assessment and a Green Travel Plan.
41/7/7 Yarm Residents Group,	Objection	<p>Sub-paragraph 6 relates to proposals for small sites. There is no definition of small sites. Further it appears that the broad policy content of CS1 is inadequate as a basis for the assessment of small scale proposals which require sensitive design not least when introduced to established residential areas. 'Small scale' should be defined in the policy and detailed assessment criteria should be introduced and applied to this policy.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this policy is not the most appropriate strategy when considered against reasonable alternatives which would include detailed assessment criteria and hence is not justified. It is not deliverable in the absence of an appropriate definition.</p>	Already included & too detailed for Core Strategy. The justification (paragraph 12.20) defines small sites. The Core Strategy is not intended to be a development control manual.
41/8/8 Yarm Residents Group,	Objection	<p>Sub-paragraph 2 refers to the appropriateness of executive housing in Eaglescliffe. Generally, reference in the Strategy is to 'Eaglescliffe and Yarm' and the new allocation, which we oppose in earlier comments in relation to CS7. The justification is equally unclear referring to parts of Yarm, Eaglescliffe and Norton as potentially suitable for lower density development. While continuing to oppose the allocation, it is submitted that this policy lacks justification and clarity and should be revised accordingly.</p> <p>RELEVANT TEST OF SOUNDNESS It is submitted that this policy is not the most appropriate strategy when considered against reasonable alternatives which would include detailed assessment criteria, nor is it founded on robust and credible evidence hence it is not justified.</p>	Change made. The justification has been amended to clarify that the reference to executive housing in Eaglescliffe is intended to convey the desirability of protecting the existing executive housing. The housing allocation between 2016 and 2021 reflects the Building Schools for the Future programme.
41/9/10 Yarm Residents Group,	Objection	<p>This set of policies fails to take cognisance of the contribution made by small open spaces, groups of trees, hedgerows and gardens together with the inclusion of new such features in proposals for development to the achievement of greater biodiversity in the Borough. It is submitted that a new policy should be included in this section which seeks to protect existing features and to require the inclusion of new habitats in development proposals wherever the potential exists</p>	Too detailed for the Core Strategy. The protection of existing habitats and provision of open space in new developments is highlighted at point 3iii) of policy 10 in the reference to urban open space and play space. It

Respondee	Type	Comment	Council Response
		<p>RELEVANT TEST OF SOUNDNESS</p> <p>It is submitted that the current set of policies fails the Effectiveness test in that it omits reference to small scale habitats and their contribution to biodiversity, weakening the overall thrust of policy in this regard. Hence it is not the most appropriate strategy when considered against alternatives.</p>	is also referenced at point 3 in policy 6 in regard to open space standards. These issues will be covered in detail by the Environment DPD and expanded upon by the Open Space, Recreation and Landscaping SPD. The reference to green infrastructure contained in policy 10 is also relevant.
42/1/1 Middlesbrough Council,	Support	The reference to the importance of the Stockton-Middlesbrough Initiative, in particular its role in the delivery of wider regeneration in the Tees Valley area is welcomed and supported. This approach is consistent with the spatial strategy contained within the adopted Middlesbrough LDF Core Strategy.	No change requested. Support welcomed
42/2/5 Middlesbrough Council,	Support	The recognition that no further retail or leisure development will be allowed at Portrack Lane or Teesside Park is welcomed and supported. This approach is in accordance with the findings of the recent joint Stockton and Middlesbrough retail study, and is consistent with the spatial strategy of the Middlesbrough LDF core strategy. Such an approach should ensure the continued vitality and viability of Stockton and Middlesbrough town centres.	No change requested. Support welcomed
42/3/7 Middlesbrough Council,	Objection	The recognition that no additional housing allocations will come forward before 2016 is welcomed. The overall level of housing proposed is also supported. The concern is with the phasing of the proposed housing allocations. The phasing of housing allocations between 2016-21 and 2021-24 are too heavily front loaded resulting in a potential oversupply of 1,000 dwellings up to 2021. Windfalls (assuming 50 per annum) could further increase the oversupply to nearly 1,700 dwellings. In comparison there is a potential undersupply in the period 2021-24 of approximately 1,000 dwellings. This is illustrated in the table below. The phasing of the allocations should be re-profiled to better reflect the RSS requirements. If monitoring indicates for some reason that there is a shortfall in delivery for the 2016-21 period the plan, monitor and manage process via the AMR can be used to bring allocations in the later phases forward into earlier ones.	Comment withdrawn.
43/1/1 Mr David Hand,	Support	I support the idea that the remainder of the housing requirements in the future should be prioritised on the urban areas as development of the villages and in particular Wynyard is not sustainable.	No change requested. Support welcomed
43/2/7 Mr David Hand,	Support	I support the general distribution and phasing of housing development and in particular that no allocations will be made in rural areas.	No change requested. Support welcomed
43/3/10 Mr David Hand,	Comment	Whilst I am in general support of the policy and the protection of open spaces and important wildlife sites, I feel there needs to be a commitment to review these areas to assess whether they are still relevant now. Many of these areas were designated in a desk-top exercise many years ago without any detailed assessment of their importance. I mainly refer to green wedges, which basically include any land not built on between settlements. Since this was done circumstances have changed such as the realignment of the A19 between Billingham and Norton. This arbitrary designation may prevent development on land which contributes little to biodiversity but could contribute to sustainable development and therefore preventing less sustainable development elsewhere.	Partial change made. Support welcomed, paragraph 13.8 amended to indicate upcoming review of green wedges.
44/1/0 English Heritage,	Objection	At the outset the Core Strategy Publication Draft document deals well with matters pertaining to the historic environment. The overarching components of it, namely the Spatial Vision and the Strategic Objectives, are extremely positive, and I take no issue with them. Unfortunately, however, the document lets itself down in respect of one fundamental aspect, namely the absence of a policy concerning the	Partial change made. Incorporated into Policy CS3.

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		<p>historic environment which might be said to correspond with Policy CS10, which focuses exclusively on the 'natural' environment. Given that the cultural heritage of the Borough is accorded such prominence in both the Spatial Vision and Strategic Objectives, I would expect that in line with PPS1: Delivering Sustainable Development (Sections 20, 27(ix), and 40), the historic environment should be given at least equal weight to that of the natural environment.</p> <p>In this regard I consider the Strategy to fail test of soundness 6 and 4B. Inclusion of a policy on the historic environment in the Core Strategy.</p>	
44/2/0 English Heritage,	Objection	<p>Although in a general sense it undoubtedly is one, heritage protection is not identified as a driver for change in paragraph 2.4.</p> <p>In as much as this represents an internal inconsistency [with paragraph 2.5] I consider the Strategy to fail test of soundness 6. Identify the historic environment as a driver for change in paragraph 2.4.</p>	No change requested. Following a meeting held between the Council and English Heritage it was agreed that this was not required.
44/3/0 English Heritage,	Support	I welcome acknowledgement of the Borough's historic environment in paragraph 2.5 as a means to strengthen economic performance, maintain population growth, encourage inward investment and improve the image of the area.	No change requested. Support welcomed.
44/4/0 English Heritage,	Objection	<p>The Vision statement helpfully recognises the historic origins of the Borough, and looks forward to a time when its 'unique historic assets are valued, protected, enhanced and optimised for the benefit of everyone'. In the checklist in paragraph 4.2 setting out how this will be achieved, the historic environment is rendered invisible by reference only to the 'built' environment. The action would be improved by reference to '..the Borough's built and historic environment...', and in so doing would better align with the Spatial Vision and Strategic Objective 9.</p> <p>In as much as this represents an internal inconsistency I consider the Strategy to fail test of soundness 6. Change paragraph 4.2 to "..the Borough's built and historic environment."</p>	Change made. Paragraph 4.2 has been rephrased.
44/5/0 English Heritage,	Support	<p>English Heritage welcomes the inclusion of Strategic Objective 9 which refers to the protection and enhancement of the built environment, but which also unequivocally supplements this with specific reference to 'the area's archaeological, industrial and cultural heritage'.</p> <p>The commentary accompanying this Strategic Objective is holistic in its approach, whilst at the same time drawing specific attention to those aspects of the area's cultural heritage that epitomise its locally distinctive character and possess it of its unique sense of place. I support this approach.</p>	No change requested. Support welcomed
44/6/0 English Heritage,	Objection	Hereafter, the document fails to deliver on the Vision and Strategic Objective 9. Paragraph 4.4 of PPS12 regards the delivery strategy as 'central', but the policy content of the Core Strategy provides little clarification as to how the Vision and Strategic Objective (in respect of the historic environment) will be achieved. Include a separate policy on the historic environment or emphasise it in other policy areas.	Change made. Following a meeting held between the Council and English Heritage it was agreed that a separate policy was not required. Emphasis made within other policy areas.
44/7/0 English Heritage,	Objection	<p>Furthermore, the monitoring framework and implementation plan contains no targets or indicators which could measure the performance of the Core Strategy in delivering this aspect of the Spatial Vision or the Strategic Objectives.</p> <p>This issue was raised at the Preferred Options stage. The Council's Consultation Statement response (39/193) is to include details in an Environment DPD. English Heritage contends that if the historic</p>	Change made. Following a meeting held between the Council and English Heritage it was agreed that a separate policy was not required. Details regarding monitoring of historic environment have been

Respondee	Type	Comment	Council Response
		<p>environment is considered strategic enough to warrant specific reference in the Vision Statement and in a dedicated Strategic Objective, it is deserving of a policy which explains how it will be protected and positively utilised. In my view it is not acceptable to leave something thought so fundamental to the spatial planning of the area to a daughter document.</p> <p>I note that similar concerns expressed by the Government Office (55/282) and Natural England (9/60) with regard to targets and indicators elicited a different, and more constructive, response.</p> <p>In this regard I consider the Strategy to fail tests of soundness 4B and 8. Include a separate policy on the historic environment. Include details about monitoring of the historic environment.</p>	included.
44/8/1 English Heritage,	Comment	<p>Policy CS1 refers to Yarm, which we are advised will be protected as an historic town and retail offer. The policy does not explain why only Yarm will be treated in this way, and not, for example, Stockton or Norton which are equally historic, and Stockton which is arguably more important in retail terms. Highlight Stockton and Norton as historic towns alongside Yarm in CS1.</p>	Partial change made. As agreed in meeting between the Council and English Heritage.
44/9/3 English Heritage,	Objection	<p>Policy CS3 refers to designing new development and the need to protect and enhance important environmental assets, and to respond positively to existing features of natural, historic, archaeological or local character, but no further explanation of how this will be achieved is given. If there is to be no dedicated policy to cover the historic environment of the Borough I would strongly urge the strengthening of this section of Policy CS3 in support of the Spatial Vision and the Strategic Objectives to ensure conformity with test of soundness 6.</p> <p>In order to better align this policy with the RSS and meet test of soundness 4C, English Heritage maintains that reference should be made to the prudent use of existing built fabric as a means of reducing construction waste, and reducing energy consumed in materials manufacture, transportation and construction. This is advocated in mitigation of environmental effects in the accompanying sustainability appraisal report. Strengthen CS3(8) to outline how new development will respond positively to the existing features of natural, historic, archaeological or local character. Outline how the prudent use of the existing built fabric as a means of reducing construction waste and reducing energy consumed in materials manufacture, transportation and construction.</p>	Partial change made. As agreed in meeting between the Council and English Heritage.
44/10/6 English Heritage,	Comment	<p>Policy CS3 makes reference to the provision of high quality public open space. Floorscape treatment is so fundamentally important to the Borough's town centres that there should be specific inclusion of it in Policy CS6. Stockton town centre has failed over many years in attempts to deal successfully with the scale of the High Street. English Heritage welcomes the intention to drive forward the creation/ augmentation of its cultural quarter from the Green Dragon Yard to Dovecot Street. Include reference to the floorscape treatment of Stockton Town Centre in CS6.</p>	Too detailed for the Core Strategy. This may be incorporated into other policy documents.
44/11/0 English Heritage,	Comment	<p>Paragraph 12.18 refers, I assume erroneously, to Figure 2. Change paragraph 12.18 to refer to figure 3.</p>	Change made. Editorial change made.
44/12/8 English Heritage,	Comment	<p>Policy CS8(4) requires housing developers to have regard to area character in Yarm, Eaglescliffe, and Norton when formulating densities. English Heritage welcomes, as a criterion of acceptability, consideration of local character but would argue that all housing interventions, especially those relating to conservation areas, should be responsive to context. Specify explicitly in CS8 that all housing developments, especially those relating to conservation areas, should be responsive to context.</p>	Too detailed for the Core Strategy. This may be incorporated into other policy documents.
44/13/8 English Heritage,	Support	<p>English Heritage also welcomes the wording of Policy CS8(12) and CS8(13) which in combination presuppose that before housing demolition is decided upon the stock will first be assessed to ascertain</p>	No change requested. Support welcomed

Respondee	Type	Comment	Council Response
44/14/10 English Heritage,	Objection	<p>whether it is obsolete, and unsustainable and non-viable to repair, adapt or convert.</p> <p>Policy CS10 concerns environmental enhancement. Paragraph 13.1 advises that improving the built and natural environment is regarded by many as a key issue. The policy, however, remains silent with regard to the built (historic?) component of the environment.</p> <p>In as much as this represents an internal inconsistency I consider the Strategy to fail test of soundness 6. Refer to the historic and built environment in CS10.</p>	Partial change made. Incorporated into Policy CS3 as agreed in meeting between the Council and English Heritage.
44/15/3 English Heritage,	Objection	<p>Policy CS3 is the only policy that makes any reference to the historic environment. That being the case it is disappointing to note that it is perceived to have no linkage with SA Objective 9 which seeks to protect and enhance the full range of heritage assets. Even more disappointing is the fact that no indicators or targets have been identified which would measure the success or otherwise of Policy CS3 in safeguarding the historic environment.</p> <p>In as much as this represents an internal inconsistency and omission as regards targets and indicators I consider the Strategy to fail tests of soundness 6 and 8. Link Policy CS3 with SA Objective 9 and develop a monitoring framework accordingly.</p>	Change made.
44/16/10 English Heritage,	Objection	<p>SA Objective 9 is recorded as having no relationship to any Core Strategy policy other than CS10, but looking at the content of CS10 it is difficult to observe how even this relationship is substantiated.</p> <p>In as much as this represents an internal inconsistency and omission as regards targets and indicators I consider the Strategy to fail tests of soundness 6 and 8. Clarify how SA Objective 9 relates to the policies. Justify how it is linked to CS10.</p>	Change made.
44/17/0 English Heritage,	Objection	<p>Infrastructure Strategy</p> <p>This document identifies five key areas of infrastructure provision, one of which is green infrastructure. The historic environment is generally accepted as an integral component of green infrastructure, but there is no reference to it in this section of the strategy, nor is it mentioned elsewhere. Preston Park and Preston Hall are effectively badged as 'other community facilities'. Their heritage value and significance is overlooked entirely. The invisibility of the historic fabric (infrastructure) of the Borough is at odds with the important contribution it is thought to make to achieving the Spatial Vision for its future, and at odds with the compatibility it is thought to have with delivering sustainable living, economic regeneration, and community facilities as expressed in Figure 4 in paragraph 14.1 of the Sustainability Appraisal. Embed the historic environment more explicitly in the Infrastructure Strategy, specifically the green infrastructure strategy. Refer to Preston Park and Hall as historic assets as well as community facilities.</p>	Partial change made. As agreed in meeting between the Council and English Heritage.
44/18/0 English Heritage,	Objection	<p>Core Strategy Sustainability Appraisal</p> <p>Section 6, at Figure 2, looks at the compatibility of the Sustainability Appraisal (SA) Objectives. SA9 and SA10, in particular, pick up the sustainability issues in relation to the historic environment. I note that there is considered to be no relationship between SA9 and SA10, and SA7, SA13, or SA15. I would take issue with this.</p> <p>In relation to SA7, conservation of the historic environment brings with it a number of employment opportunities and the need for craftsmen skilled in a variety of trades. Sadly, there is a significant shortage of these skills and crafts in the north east. Furthermore, in relation to SA13 and SA15, I would argue that the prudent use of existing built fabric, including historic fabric, is a meaningful way of reducing waste and energy consumption, and thereby helps to reduce the causes and impacts of climate</p>	Change made.

Respondee	Type	Comment	Council Response
44/19/0 English Heritage,	Objection	change. Reassess how SA9 and SA10 relate to each other and SA7, SA13, and SA15.	Already included. Appendix 4 considers the relationship between SA9 and CS3.
44/20/3 English Heritage,	Objection	Section 13 concerns mitigation. Mitigation, we are advised, should include developments adopting sustainable construction techniques and using recycled construction materials wherever possible. I welcome this and also welcome the suggestion that existing built fabric should be used wherever possible in order to further minimise waste and energy consumption. This does not, however, appear to have found its way into Policy CS3(9) or any other policy dealing with, for example, housing or education. Include more details about how the existing built fabric should be used wherever possible in order to further minimise waste and energy consumption in CS3(9).	Already included. This is an underlying theme of the document.
44/21/0 English Heritage,	Comment	Mitigation in the form of landscape and visual assessment for all new developments is helpful, but I would urge the use of building in context and historic characterisation techniques and methodologies to inform design solutions. Add another requirement to paragraph 13.5 to undertake building in context and historic characterisation techniques and methodologies to inform design solutions.	Change made. Additional bullet point added to Sustainability Appraisal paragraph 13.5.
44/22/0 English Heritage,	Comment	Appendix 3 contains baseline information. Ref. Nos. 9.1-9.14 appear to form the basis of a helpful set of indicators and targets, but it is acknowledged in the document that much more work needs to be done to flesh this out. Undertake more work to flesh out Appendix 3; 9.1- 9.14.	Already included. There is already sufficient information held within the Sustainability Appraisal (14 indicators specifically relating to the historic environment).
45/1/10 Groundwork South Tees,	Objection	<p>There is a great deal of work currently being undertaken in connection with the Heritage Park and the Tees river corridor, which should be incorporated as part of future Development Plan Policy. It is important the Secretary of State is aware of the situation and that the matter can be fully explored at the examination in public, by which time an action plan and proposals for the river and its environs will be quite advanced.</p> <p>A comprehensive policy for Tees Corridor linked to a wider Tees Valley Green Infrastructure will form an essential ingredient for the recreation and well-being for residents and visitors alike, and strengthen pride in our area and heritage. In our view, it should be a priority in policy terms and included as an important element in the final Strategy Document.</p> <p>The Vision Statement should focus on the town's particular identity and aspirations, identifiable to the people of Stockton and the Tees Valley Details of the proposed boundary should be updated in the schematic drawing to include the area up to Victoria Bridge to ensure the interface between the urban and rural area - the gateway into the park, is better integrated.</p> <p>Objective 8: Wording amended to read 'The potential of the River Tees corridor will be utilised as a key feature through the creation of the Tees Heritage Park'.</p> <p>Policy 10. Include in bullet points Tees Heritage Park; providing greater connectivity and access to this stretch of the River Tees.</p> <p>In terms of the vision statement, to include: 'Aim to see a vibrant and dynamic community, proud of its history and industrial heritage, set in an area of outstanding natural beauty with the River Tees as its</p>	Partial change made. Partially changed Strategic Diagram to include 'Core Heritage Park' but not the full extent of draft proposals. Objective 8 and Vision statement not changed as too detailed for Core Strategy. The inclusion of the Tees Heritage Park as a point under point 3 of the policy is also suggested however this has not been changed as the area covered by the Tees Heritage Park is already included in other green wedges.

Respondee	Type	Comment	Council Response
46/1/0 Friends of Tees Heritage Park,	Comment	backbone.' The statement should emphasise the unique features of Stockton within the wider City Region.	Partial change made. Partially changed Strategic Diagram to include 'Core Heritage Park' but not the full extent of draft proposals. Objective 8 and Vision statement not changed as too detailed for Core Strategy. The inclusion of the Tees Heritage Park as a point under point 3 of the policy is also suggested however this has not been changed as the area covered by the Tees Heritage Park is already included in other green wedges.
47/1/0 Tees Valley Biodiversity Partnership,	Objection	<p>In relation to paragraph 13.4 "Sites of Nature Conservation Importance. There are a number of these in the Borough, but their designation is currently under review in a study being undertaken by the Tees Valley Wildlife Trust, to inform the Environment Development Plan Document"</p> <p>Note that Sites of Nature Conservation Importance are now called Local Sites. The current review is being undertaken by the Tees Valley Biodiversity Partnership who is acting as the Local Sites partnership in the Tees Valley. The Tees Valley Wildlife Trust has been carrying out the field surveys as evidence for this review. Note that Sites of Nature Conservation Importance are now called Local Sites. The current review is being undertaken by the Tees Valley Biodiversity Partnership who is acting as the Local Sites partnership in the Tees Valley. The Tees Valley Wildlife Trust has been carrying out the field surveys as evidence for this review.</p>	Change made. 'Sites of Nature Conservation Importance' changed to ' Local Wildlife Sites.'
47/2/0	Objection	In table 7 the description on the Tees Valley Biodiversity Action Plan is inaccurate and we suggest	Change made. Text relating to Tees

Respondee	Type	Comment	Council Response
Tees Valley Biodiversity Partnership,		<p>replacing your text</p> <p>"To support the UK Biodiversity Action Plan Objectives, in maintaining and enhancing international , national and local overall populations and natural ranges of species, habitats and ecosystems."</p> <p>With a longer and more accurate statement- "A plan of action for threatened of characteristic habitats and species in the Tees Valley, carried out by the Tees Valley Biodiversity Partnership. The Plan - Identifies local priorities for biodiversity conservation and works to deliver agreed actions and targets for specific habitats and species. Translates national targets for species and habitats into effective action at the local level. Works to raise awareness of the need for biodiversity conservation and enhancement in the local context. Ensures opportunities for conservation and enhancement of biodiversity are promoted, understood, reflected in policies , programmes, strategies and decisions at the local level. Provides a basis for monitoring and evaluating local action for biodiversity priorities, at both national and local levels." We suggest replacing your text:</p> <p>"To support the UK Biodiversity Action Plan Objectives, in maintaining and enhancing international , national and local overall populations and natural ranges of species, habitats and ecosystems."</p> <p>With a longer and more accurate statement- "A plan of action for threatened of characteristic habitats and species in the Tees Valley, carried out by the Tees Valley Biodiversity Partnership. The Plan - Identifies local priorities for biodiversity conservation and works to deliver agreed actions and targets for specific habitats and species. Translates national targets for species and habitats into effective action at the local level. Works to raise awareness of the need for biodiversity conservation and enhancement in the local context. Ensures opportunities for conservation and enhancement of biodiversity are promoted, understood, reflected in policies , programmes, strategies and decisions at the local level. Provides a basis for monitoring and evaluating local action for biodiversity priorities, at both national and local levels."</p>	Valley Biodiversity Action Plan updated.
47/3/0 Tees Valley Biodiversity Partnership,	Objection	Regarding paragraph 13.5. The targets of the Tees Forest Plan need revisiting as in some cases the tree planning targets are too ambitious. The Tees Forest ceased to exist in November 2008. It is currently unclear how the delivery of the Tees Forest Plan will now be co-ordinated. The DPD should not rely too heavily on this plan. The Tees Forest ceased to exist in November 2008. It is currently unclear how the delivery of the Tees Forest Plan will now be co-ordinated. The DPD should not rely too heavily on this plan.	Change made. Policy CS10 the reference to the Tees Forest Plan has been replaced with the aim of 'enhancement of forestry and increase in tree cover'.
47/4/3 Tees Valley Biodiversity Partnership,	Objection	Section 8 on sustainable living concentrates on carbon reduction targets whereas the guidance for Local Authorities on the NERC Act states, in the section on Local Policies, that: "A key area for more urgent action is the need to develop and integrate adaptation policies through the Local Authority services to help increase the resilience of the natural environment to climate change." While the statement in section 8.2 Climate change is the most important issues worldwide in relation to the natural environment is arguably correct nevertheless climate change is going to happen and the crucial thing will be how well we adapt to it. This section needs to reflect the need for adaptation to climate change in relation to both the natural and built environment, and perhaps acknowledge the role of green infrastructure in climate	Partial change made.

Respondee	Type	Comment	Council Response
47/5/10 Tees Valley Biodiversity Partnership,	Support	change adaptation and helping wildlife to cope with such change. The Tees Valley Biodiversity Partnership express support for paragraphs 4 and 5 of policy 10 and are pleased with the references to the Tees Valley Biodiversity Action Plan and the strong support for the protection and enhancement of biodiversity.	No change requested. Support welcomed
48/1/0 Durham County Council,	Comment	Thank you for notifying Durham County Council of the consultation on your LDF Core Strategy. I do not consider the strategic interests of County Durham would be adversely affected by the development proposals contained in the Publication Draft Core Strategy. Therefore the County Council does not propose to submit any further comments.	No change requested.
49/1/0 Turley Associates,	Objection	<p>It is considered that the Publication version of the Core Strategy does not properly reflect the importance of the Airport to the future of the Borough. Growth of the Airport is provided for in the RSSs Vision (see paragraph 1.17 of the North East RSS July 2008). Improving the competitiveness of local business is a key theme – see for example paragraph 3.6 of RSS where growth of key regional economic drivers (which include the Airport) is supported in pursuit of an improved competitive position for the regional economy.</p> <p>The Airport is acknowledged in the RSS as a key economic driver and gateway for business and tourism at regional level. The Airport’s role in maintaining and attracting new development and investment is also acknowledged (see for example paragraph 3.47). The presence of the Airport enhances the competitiveness of local businesses by providing ready access to key UK destinations including international Heathrow Airport and international markets and destinations. The role of the airport is also supported Regional Economic Strategy for the North East. This position is part of the evidence base for the Core Strategy.</p> <p>A significant part of the Airport is within Stockton Borough Including large areas of land to the south of the runway which are identified in RSS and have planning permission for development for airport related and general employment development (known as Skyline International Business Park). Bearing in mind the importance of competitiveness, connectivity and economic regeneration to the achievement of the RSS and Core Strategy visions it is considered that the importance of the Airport should be more explicitly acknowledged.</p> <p>It is considered that the omission of appropriate acknowledgement in the Core Strategy renders it unsound in that it is not properly reflective of the acknowledgement of and support for the expansion of the Airport which is contained in RSS.</p> <p>Furthermore, Core Strategy does not properly reflect one of the key themes of RSS namely, ‘improving connectivity and accessibility within and beyond the region’. While there are various references to connectivity within the Borough there is little reference to measures to support connectivity beyond the Borough boundaries. This is considered to be a serious omission which renders the Core Strategy not legally compliant as it does not adequately reflect the provisions of one of the four key overarching themes of RSS.</p> <p>The Airport straddles the boundary between Stockton and Darlington Boroughs. As such it is vital that the LDFs of the two Boroughs adopt a consistent approach to the Airport. At present they do not achieve this. The emerging Darlington Core Strategy reflects the importance afforded to the Airport in RSS by</p>	Repetition of National or Regional Policy.

Respondee	Type	Comment	Council Response
		<p>including acknowledgement of and support for the expansion of the Airport (e.g. paragraph 3.1.8 and Policy CS1 appended to this objection). It is considered that the Stockton Core Strategy should contain similar references in order to present a coherent approach across the Airport. The following changes are requested in order to render the Core Strategy legally compliant and sound:</p> <p>The Vision set out in paragraph 4.1 be amended by the addition of the following additional sentence to the end of the paragraph:</p> <p>‘The competitiveness of local business has been enhanced through improved air travel for passengers and freight to other UK and European markets and destinations’</p> <p>Bullet point 11 of paragraph 4.2 be amended to read:</p> <p>‘Supporting improved regional and sub-regional interconnectivity by road, rail and air including providing for an extended range of services from DTVA.</p> <p>The bold text of Objective 3 be amended to read:</p> <p>‘To increase employment opportunities, with emphasis on improving the competitiveness of local businesses and maintaining, enhancing and retaining a high quality skilled work force’.</p> <p>The supporting text of Objective 3 be amended by adding the following sentence to the end of the paragraph:</p> <p>‘Expansion of routes from DTVA to other UK and European markets will enhance the competitiveness of local businesses’.</p> <p>The bold text of Objective 5 be amended to read:</p> <p>‘To ensure good accessibility for all jobs, facilities, goods and services within the Borough, and to improve links to other areas of the Tees Valley, the rest of the UK and Europe’.</p>	
<p>49/2/2 Turley Associates,</p>	<p>Objection</p>	<p>The airport straddles the Borough boundary between Stockton and Darlington. The airport is subject to the following aerodrome safeguarding consultation zones:</p> <ul style="list-style-type: none"> · A 15km circle safeguarding area relating to buildings, structures, erections and works, roads and railways and other aviation development, with a 13km bird strike within it; and · A 30km circle safeguarding area relating to Wind Farm development. <p>Copies of plans showing these zones have been lodged with both Stockton and Darlington Councils for development control purposes. A review of the plans demonstrates that Stockton is located entirely within the 13km and 30km safeguarding zones. Parts of Darlington Borough are similarly affected.</p> <p>Maintenance of these safeguarding areas is of critical importance to the ongoing safe operation of Durham Tees Valley Airport. It is vital that the safeguarding zones are clearly reflected in the Core Strategy. In order that proposers of development that may affect safeguarding can take proper account of the safety of the Airport. Because the Airport straddles a Borough boundary it is vital that the approach</p>	<p>. TO BE REVIEWED</p>

taken to the Airport is consistent in both LDFs. The emerging Core Strategy for Darlington includes appropriate references to safeguarding - see policy CS4 and paragraph 3.4.5 (extract appended to this objection).

The aerodrome safeguarding requirements in respect of Development Plans area set out in Annex 2 of the Joint Office of the Deputy Prime Minister / department for Transport Circular 1/2003 (27 January 2003)/ This is supplemented by the CAAs guidance to airport operators (CAP 738 - Safeguarding of Aerodromes) DTVA is a safeguarded airport and as such the Core Strategy should have full regard to the advice within the Circular.

Paragraph 3 in Annex 2 of the Circular identifies the specific arrangements for safeguarding aerodromes:

“Certain civil airports, selected on the basis of their importance to the national air transport system, are therefore officially safeguarded, in order to ensure that their operation and development are not inhibited by buildings, structures, erections or works which infringe protected surfaces, obscure runway approaches lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems; by lighting which has the potential to distract pilots, or by developments which have the potential to increase the number of birds of the bird hazard risk.”

As stated above safeguarded areas for bird hazard extend for a 13km radius of an airport. DTVA's safeguarding map (reference paragraphs 5 - 6 of the circular) predominantly comprises the administrative area of Stockton on Tees and therefore Stockton falls within the 13km consultation radius for bird strike hazard (reference paragraphs 7 - 9 of the circular).

Types of development that can attract birds are identified as including those for facilities intended for the handling, compaction, treatment or disposal of household or commercial waste, the creation or modification of areas of water (such as reservoirs, lakes, ponds, wetlands and marshes), nature reserves and bird sanctuaries, sewage disposal and treatment plant and outfalls, the planting of trees and bushes close to aerodromes and after uses resulting from mineral extraction and quarrying.

The Circular identifies the requirement for the local planning authority to consult and airport operator for development that may affect aerodrome safeguarding. It states at paragraph 28 that DPDs should:

“... include a policy stating that official safeguarding areas have been established for a particular airport ... that certain planning applications will be the subject of consultation with the operator of that aerodrome ... and that there may be restrictions on the height or detailed design of buildings or on development which might create a bird hazard”.

Further criteria for wind farm development is set out in paragraph 15 of the Circular, and information can also be found in the document ‘Wind Energy and Aviation interests - Interim Guidelines’ (DTI) referred to within it, and section 8 (Wind) of the Technical Annex of the Companion Guide to PPS22 ‘Planning for Renewable Energy’.

Plans for the expansion of DTVA were recently approved by Stockton on Tees and Darlington Borough Councils and these impending developments make the safeguarding of DTVA all the more important and necessary. Despite this, the publication draft Core Strategy does not include reference to safeguarding

or consultation zones for development which may affect DTVA.

The omission of appropriate references to the Airport's safeguarding zones in the Core Strategy renders this document unsound as it is not compliant with National policy. It also means that there is not a consistent approach to safeguarding in the LDFs of Stockton and Darlington Councils. As such it is considered that the Stockton LDF fails the test of soundness relating to effectiveness because it is not coherent with the Darlington LDF.

Furthermore, the Core Strategy contains no policy on renewable energy (including wind farms). If such a policy is requested by others or considered by the Council any such policy should include reference to the 30km safeguarding zone around the Airport. Failure to do so would render the Core Strategy unsound due to non-compliance with national policy and inconsistency with the approach of neighbouring DPDs - in particular the Darlington Core Strategy Preferred Options which contains a policy (CS4 and paragraph 3.4.5) which relates to safeguarding of Durham Tees Valley Airport. The airport straddles the Borough boundary between Stockton and Darlington. The airport is subject to the following aerodrome safeguarding consultation zones:

- A 15km circle safeguarding area relating to buildings, structures, erections and works, roads and railways and other aviation development, with a 13km bird strike within it; and
- A 30km circle safeguarding area relating to Wind Farm development.

Copies of plans showing these zones have been lodged with both Stockton and Darlington Councils for development control purposes. A review of the plans demonstrates that Stockton is located entirely within the 13km and 30km safeguarding zones. Parts of Darlington Borough are similarly affected.

Maintenance of these safeguarding areas is of critical importance to the ongoing safe operation of Durham Tees Valley Airport. It is vital that the safeguarding zones are clearly reflected in the Core Strategy. In order that proposers of development that may affect safeguarding can take proper account of the safety of the Airport. Because the Airport straddles a Borough boundary it is vital that the approach taken to the Airport is consistent in both LDFs. The emerging Core Strategy for Darlington includes appropriate references to safeguarding - see policy CS4 and paragraph 3.4.5 (extract appended to this objection).

The aerodrome safeguarding requirements in respect of Development Plans area set out in Annex 2 of the Joint Office of the Deputy Prime Minister / department for Transport Circular 1/2003 (27 January 2003)/ This is supplemented by the CAAs guidance to airport operators (CAP 738 - Safeguarding of Aerodromes) DTVA is a safeguarded airport and as such the Core Strategy should have full regard to the advice within the Circular.

Paragraph 3 in Annex 2 of the Circular identifies the specific arrangements for safeguarding aerodromes:

“Certain civil airports, selected on the basis of their importance to the national air transport system, are therefore officially safeguarded, in order to ensure that their operation and development are not inhibited by buildings, structures, erections or works which infringe protected surfaces, obscure runway approaches lights or have the potential to impair the performance of aerodrome navigation aids, radio aids or telecommunication systems; by lighting which has the potential to distract pilots, or by

Respondee	Type	Comment	Council Response
49/3/2 Turley Associates,	Objection	<p>developments which have the potential to increase the number of birds of the bird hazard risk.”</p> <p>As stated above safeguarded areas for bird hazard extend for a 13km radius of an airport. DTVA's safeguarding map (reference paragraphs 5 - 6 of the circular) predominantly comprises the administrative area of Stockton on Tees and therefore Stockton falls within the 13km consultation radius for bird strike hazard (reference paragraphs 7 - 9 of the circular).</p> <p>Types of development that can attract birds are identified as including those for facilities intended for the handling, compaction, treatment or disposal of household or commercial waste, the creation or modification of areas of water (such as reservoirs, lakes, ponds, wetlands and marshes), nature reserves and bird sanctuaries, sewage disposal and treatment plan and outfalls, the planting of trees and bushes close to aerodromes and after uses resulting from mineral extraction and quarrying.</p> <p>The Circular identifies the requirement for the local planning authority to consult and airport operator for development that may affect aerodrome safeguarding. It states at paragraph 28 that DPDs should:</p> <p>“... include a policy stating that official safeguarding areas have been established for a particular airport ... that certain planning applications will be the subject of consultation with the operator of that aerodrome ... and that there may be restrictions on the height or detailed design of buildings or on development which might create a bird hazard”.</p> <p>Further criteria for wind farm development is set out in paragraph 15 of the Circular, and information can also be found in the document ‘Wind Energy and Aviation interests - Interim Guidelines’ (DTI) referred to within it, and section 8 (Wind) of the Technical Annex of the Companion Guide to PPS22 ‘Planning for Renewable Energy’.</p> <p>Plans for the expansion of DTVA were recently approved by Stockton on Tees and Darlington Borough Councils and these impending developments make the safeguarding of DTBA all the more important and necessary. Despite this, the publication draft Core Strategy does not include reference to safeguarding or consultation zones for development which may affect DTVA.</p> <p>The omission of appropriate references to the Airport’s safeguarding zones in the Core Strategy renders this document unsound as it is not compliant with National policy. It also means that there is not a consistent approach to safeguarding in the LDFs of Stockton and Darlington Councils. As such it is considered that the Stockton LDF fails the test of soundness relating to effectiveness because it is not coherent with the Darlington LDF.</p> <p>Furthermore, the Core Strategy contains no policy on renewable energy (including wind farms). If such a policy is requested by others or considered by the Council any such policy should include reference to the 30lm safeguarding zone around the Airport. Failure to do so would render the Core Strategy unsound due to non-compliance with national policy and inconsistency with the approach of neighbouring DPDs - in particular the Darlington Core Strategy Preferred Options which contains a policy (CS4 and paragraph 3.4.5) which relates to safeguarding of Durham Tees Valley Airport.</p>	<p>Repetition of National or Regional Policy. Status of DTVA included in RSS. Planning permission already</p>

Respondee	Type	Comment	Council Response
49/4/1 Turley Associates,	Objection	<p>'Strategies, plans and programmes and planning proposals should support the development of both North East air ports by (inter alia):</p> <ul style="list-style-type: none"> a. supporting the sustainable expansion of facilities at the Region's airports to accommodate 3 million passengers per annum at Durham Tees Valley Airport by 2016 c. Allowing for the expansion of operational facilities and airport related development d. Maintaining frequent services to London Heathrow Airport e. Increasing the range of direct European and international destinations f. Ensuring that the needs and preferences of tourists, including both leisure and business visitors are taken into account'. <p>This is also reflected in the emerging Darlington LDF (see for example paragraph 3.1.8 and Policy CS1 of the Core Strategy Preferred Options October 2008 which affords priority to new development and regeneration at a number of locations including Durham Tees Valley Airport and paragraph 9.0.1). (The Airport has made representations seeking additional references in the Spatial Vision and Strategic Objectives of the Darlington Core Strategy which would ensure full compliance with Policy 21 of RSS and ensure consistency with these representations on the Stockton Core Strategy.)</p> <p>The explicit provision in RSS that Core Strategies should support the development of the Airport forms a key part of the evidence base upon which the LDF has been prepared but is not properly reflected in the Core Strategy as drafted.</p> <p>To ensure that the Core Strategy is consistent with National and Regional Policy on DTVA,, with the approach taken in the LDFs of adjacent boroughs (in particular Darlington) and Stockton Council's strategic objectives, the Core Strategy should include specific support for the growth of the DTVA in recognition of the contribution it has made and will continue to make to the regeneration of the Borough and improved accessibility across the Tees Valley and beyond.</p> <p>The failure to make appropriate reference renders the Core Strategy not legally compliant because it does not conform fully to the provisions of RSS and unsound because it is not reflective of a key part of the evidence base for the plan and is not effective because it is not coherent with the Darlington LDF. DTVA requests and additional clause in Policy CS2 (after the current clause 5) as follows (the reason for the second part of the suggested addition to Policy CS2 is set out on a separate objection to the policy):</p> <p>'Connectivity to other national and international markets will be improved by an expanded range of passenger and freight services from DTVA. The ongoing and safe operation of the Airport and its potential for future expansion will be safeguarded by resisting development which would compromise the safe operation of the Airport's safeguarding consultation zones. (The current zones are shown on plan xx).</p> <p>It is considered that this change would render the Core Strategy legally compliant and sound.</p>	<p>exists for both airport related uses and general employment uses at the airport, in accordance with RSS requirements. There are no new proposals for the airport during the life of the plan.</p> <p>Repetition of National or Regional Policy. The Council has agreed with Darlington Borough Council that there are no inconsistencies with their LDF.</p>

Respondee	Type	Comment	Council Response
		<p>One of the key themes of RSS is improving connectivity of the region. It is considered that the Core Strategy does not adequately reflect this. This renders the Core Strategy not legally compliant as it does not fully conform to RSS and unsound because it is not coherent with Darlington Core Strategy Preferred options which acknowledged the importance of the Airport as an economic driver and regional gateway. In the light of this the following change is requested.</p> <p>Core Strategy Policy 1 (CS1) - The Spatial Strategy - addition of the following clause at the end of the policy</p> <p>'7. The connectivity of the Borough to national and international markets and destinations will be enhanced through expansion of the range of services and routes available from Durham Tees Valley Airport.</p>	
<p>49/5/4 Turley Associates,</p>	<p>Objection</p>	<p>Policy 4 (CS4) makes reference to 60ha of land at Durham Tees Valley Airport for employment development. In clause 1 of the policy this is separate from the General Employment Land requirement. It is assumed that this relates to that part of the 80 ha of "airport related" allocations to the south of the airport (referred to in Policy 21 of RSS) which lies within Stockton Borough. This land has the benefit of planning permission and is known as Skylink Business Park.</p> <p>However, RSS makes clear (policy 18) and the planning permission provides that 20ha of this land is for general employment purposes (see the penultimate bullet point in paragraph 18.3 of policy 18 of RSS). This is an important part of the evidence base of the Core Strategy and should be reflected in Policy CS4. We note that the Core Strategy states, at paragraph 9.5, that "planning permission already exists in the key employment location at Wynyard Park, and at Durham Tees valley Airport to meet RSS requirements. No further allocations are necessary. Policy CS4, which deals with economic regeneration, does not however accurately reflect the employment land allocations at DTVA. It is considered that the following should be added to Policy CS4 clause 2;</p> <p>"South of Durham Tees Valley Airport (known as Skylink International Business Park) - 20 ha.</p> <p>This addition would render this part of the Core Strategy sound.</p>	<p>Partial change made. Reference made to Skylink Business Park.</p>
<p>50/1/5 Block Holdings Ltd & UK Land Estates, Montagu Evans LLP</p>	<p>Objection</p>	<p>Our clients welcome the Council's recognition of the role of Portrack Lane in the Borough but consider that it would be appropriate for the policy to acknowledge that additional retail development (food and non- food floorspace) or changes of use outside Stockton Town Centre and beyond the boundaries of the District and Local Centres will be subject to Planning Policy Statement (PPS6): Planning for Town Centres considerations.</p> <p>Consequently, it is submitted that Policy CS5 should be amended to reflect PPS6 considerations (particularly applying the sequential approach to site selection). It is also submitted that the policy should be amended to allow for retail developments (food and non- food floorspace) or changes of use outside Stockton Town Centre where it can meet wider sustainability, economic and social objectives, including meeting local needs and promoting Stockton's competitiveness. It is submitted that Policy CS5 should be amended to reflect PPS6 considerations (particularly applying the sequential approach to site selection). It is also submitted that the policy should be amended to allow for retail developments (food and non- food floorspace) or changes of use outside Stockton Town Centre where it can meet wider sustainability,</p>	<p>Does not conform to the Spatial Strategy. Stockton- Middlesbrough Joint Retail Study indicates that it is necessary for Stockton to increase its existing market share of expenditure. To achieve this, no further expansion of the out of centre retail and leisure developments at Teesside Park and Portrack Lane will be permitted. These local circumstances dictate that out of centre or out of town retail development is not suitable in Stockton.</p>

Respondee	Type	Comment	Council Response
		economic and social objectives, including meeting local needs and promoting Stockton's competitiveness.	
51/1/0 One North East,	Comment	The agency would welcome the broadening of this objective to include not only the consideration of accommodating housing need but also recognition of housing as an enabler of economic growth to support both need and aspiration/opportunity.	Repetition of National or Regional Policy. Draft PPS4 identifies that Housing should be considered as economic development. It is considered that including a similar phrase within this policy would be repetition and would be contrary to advice given in PPS12.
51/2/1 One North East,	Support	<p>The Agency endorses this policy which supports the Council's objectives to support regeneration of the urban core. The Agency also agrees with the spatial distribution of development defined as the Core Area in the Core Strategy Key Diagram.</p> <p>The reference to the regeneration of North Shore in the commentary to this policy is noted and welcomed. North Shore is one of eight Regional Brownfield Mixed-use Development Schemes identified in the Regional spatial Strategy and as such is recognised by Tees Valley Regeneration as a key regeneration project in the sub region.</p>	No change requested. Support welcomed
51/3/2 One North East,	Support	The Agency endorses this policy which supports the Council's Preferred Option to improve accessibility and widen transport choice.	No change requested. Support welcomed
51/4/3 One North East,	Support	<p>The Agency endorses this policy which seeks to address the impacts of climate change by putting sustainability at the heart of the spatial planning process.</p> <p>As you are aware the RES promotes the need for quality of place within existing and proposed development. Agency initiatives include delivering developments/regeneration schemes to comply with a set of Quality Design Standards. The aim is to deliver buildings which are over and above Building Regulation Standards and demonstrate best practice in areas of accessibility, sustainability, whole life costing and general design standards.</p> <p>The Agency welcomes the emphasis that Policy CS3 places on the achievement of high quality development, particularly in respect of BREEAM and Code for Sustainable Homes targets, with the requirement for energy efficiency measures to be embedded in all new buildings.</p> <p>One North East agrees that all new development should contribute towards renewable energy targets. Whether this is on-site or off-site should depend on the scale, nature and size of the development.</p> <p>The Agency fully endorses the use of renewable energy sources where applicable and this policy will support the Council's efforts to encourage the development of renewable energy sources.</p> <p>The Agency welcomes the policy's reference to encouraging measures aimed at achieving Government targets on waste reduction.</p>	No change requested. Support welcomed
51/5/4 One North East,	Support	<p>One North east welcomes the protection afforded to existing employment sites by this policy.</p> <p>One North east welcomes the inclusion of the knowledge based employment uses associated with</p>	No change requested. Support welcomed

Respondee	Type	Comment	Council Response
		<p>Durham Universities Queens Campus.</p> <p>Rural economy; One North east welcomes the support relating to the rural economy and rural diversification which accords with the aims of the RES.</p> <p>The RES recognises the valuable contribution of the region's more rural areas to both the regional economy and the quality of life, identity and cultural distinctiveness of the North East.</p> <p>The RES' Business and People priorities and the programmes which flow from them will be tailored to delivery in rural areas in order to maximise the positive contribution that rural areas can make to regional development in term of tourism, recreation and farm diversification.</p> <p>As a consequence, the aim is to ensure that the rural economy will be diverse and entrepreneurial, with rural areas embracing the knowledge economy with more opportunities to live and work in these areas without the need to commute huge distances.</p> <p>Employment and training opportunities</p>	
51/6/5 One North East,	Support	<p>The Agency endorses this policy which prioritises development of the town centres within the Borough, focusing and promoting proposals for main services within those centres.</p> <p>The recent master planning exercise, which covers the southern riverside/town centre area of Stockton including part of the current retail offer, has already identified that one of the biggest obstacles to the regeneration of the town centre is the loss of retailers to out of town locations. The Agency welcomes the restrictions imposed by this policy option to resist out-of-centre retail development since further losses could hamper future efforts to revitalise the town centre.</p>	No change requested. Support welcomed
51/7/6 One North East,	Support	<p>The agency endorses policy CS6 which seeks to ensure that additional facilities meet the needs of the Borough. The agency also welcomes the reference to the Green Blue Heart which recognises the importance of the community benefits that this long term plan can provide.</p>	No change requested. Support welcomed
51/8/7 One North East,	Support	<p>One North East acknowledges the Core Strategy's requirement to prioritise development within the its defined 'Core Area' which will provide the main growth area and focus for regeneration followed by the urban areas. This sequential approach to the location of new housing, which will prioritise the development of brownfield land over greenfield sites, aligns with current Government policy advice and is welcomed by the Agency.</p> <p>This approach, which the Agency adopts in its delivery of projects, will also enable the Council to prioritise areas for development and ensure that services and community facilities can be planned and delivered where required rather than by a piecemeal approach to development. It will also enable the Council to prioritise areas for development, which will contribute to the SMI initiative and the Housing Market Renewal areas.</p>	No change requested. Support welcomed
51/9/8 One North East,	Comment	<p>The Agency welcomes the inclusion of this policy which refers to the provision of a mix and balance of good quality housing of all types and tenure. Work on regional housing aspirations by the Agency ('Regional Housing Aspirations Study' (NLP, 2005) www.nerip.com) demonstrates the importance of providing a different range of housing types in the future in order to achieve sustainable communities and support the regional economy.</p>	Already included. Cross-boundary impact of the Council's housing policy - although not specifically referenced within the policy, cross-boundary issues have been taken into account (justification, para

Respondee	Type	Comment	Council Response
		<p>As stated in our response at the earlier consultation stages of this Core Strategy document, the Agency would have welcomed, within this policy, acknowledgement of the importance of the 'cross boundary' impact of the Council's housing policy. It is considered that cross-boundary issues relating to housing provision and employment will be satisfactorily addressed only by the continuing interaction between the appropriate local authorities, regional and other partnerships.</p> <p>We welcome the policy's intention, in providing a more balanced mix of housing types, to positively plan for executive housing.</p>	12.33)
51/10/9 One North East,	Comment	The Agency has no comment to make regarding this policy.	No change requested.
51/11/10 One North East,	Support	The agency endorses policy CS10 which seeks to improve and safeguard the Borough's environmental capital.	No change requested. Support welcomed
51/12/11 One North East,	Support	Endorse this policy. ONE agrees that all new developments should contribute toward meeting the costs to the community that arise from them. We agree that the type and amount of developer contributions should be tailored to the nature of individual sites.	No change requested. Support welcomed
51/13/0 One North East,	Comment	The contents of this report accompanying the Core Strategy DPD are noted and I confirm that the Agency has no specific comments to make regarding these reports.	No change requested.
52/1/0 Sport England,	Support	Sport England welcomes the inclusion of access to the very best in sport and recreation facilities as being part of the inspirational vision for the Borough.	No change requested. Support welcomed
52/2/0 Sport England,	Support	Sport England welcomes the aspiration of providing high quality facilities to meet the needs of the Borough's growing and ageing population in terms of sport, leisure, recreation and cultural pursuits.	No change requested. Support welcomed
52/3/6 Sport England,	Support	Sport England welcomes this policy's recognition that sport and recreational facilities are an element in the creation of sustainable communities. Sport England also recognises and supports the potential of the Tees Barrage, and the Green Blue Heart as potential locations to widen the Borough's sport, recreation and leisure offer. We wish to support point 3's commitment to protect the quantity and quality of sport and recreation facilities. Finally we support the recognition in point 5 of the potential offered by the Extended Schools Programme to provide a range of facilities and services at one accessible location.	No change requested. Support welcomed
52/4/11 Sport England,	Objection	While Sport England welcomes the general thrust and justification for this policy as set out in para14.1 we are disappointed by the omission of sports facilities from the list of priorities for the use of planning obligations. The Council would be justified in using planning obligations to address quantitative, qualitative & accessibility issues relating to sports facility provision within the Borough. Neither the (sports) facility strategy work that the Council has undertaken nor the Playing Pitch Strategy suggests that sports facility provision in the Borough would not benefit from investment from the planning obligation mechanism. As such Sport England considers the exclusion of sports facilities from this policy to be both arbitrary and unjustified. Our objection could be very simply addressed through amending bullet point 3 of CS11.2 to read; "open space, leisure, recreation and sports facilities"	Change made. Additional bullet point added to Policy 11, Point 2.
53/1/0 Mr Clive Narrainen,	Support	None	No change requested. Support welcomed
54/1/0 RSPB Northern England,	Objection	<p>On the whole the Objectives are sound. However, there are elements where the wording could be strengthened.</p> <p>We welcome the reference to Sustainable Urban Drainage systems in Objective 11. SUDS can reduce</p>	Change made. Objective 8 amended.

Respondee	Type	Comment	Council Response
		<p>the impacts of new developments on flood risk through a range of measures., including water collection and recycling, the use of surface materials that mimic natural drainage systems, and the creation of 'balancing' ponds that can be designed to have a high biodiversity value. However, we do not feel that this commitment is reflected in the Core Strategy policies and believe that positive references relating to SUDS should be included within CS3 and CS10. Objective 8: replace "these will continue to make a valuable contribution.." to "these will be improved and managed to strengthen their value.."</p> <p>Objective 10: replace "More renewable energy will be produced and used.." with" More renewable energy will be generated whilst energy consumption.."</p> <p>CS3 and CS10 should be altered to better reflect Objective 11. These should state that the Council will require developments to incorporate SUDS wherever it is technically achievable to do so.</p>	
<p>54/2/1 RSPB Northern England,</p>	<p>Objection</p>	<p>As identified in the Screening Analysis for the Appropriate Assessment, the broad spatial strategy of safeguarding land at Seal Sands and Billingham for the expansion of chemical processing industries has the potential to impact upon the Teesmouth & Cleveland Coast Special Protection Area (SPA) and Ramsar site. Our particular concern is the loss of habitat with functional importance for SPA species outside the designated site, such as high tide roosts. It may not be possible to deliver the scale of development envisaged by the Core Strategy without causing an adverse effect on the SPA's integrity, either through a lone development or more likely through a combination of developments. Given the strong legal protection provided by national policy through the Habitats Regulations, the Council risks adopting a contradictory and undeliverable policy in CS1. Furthermore, this policy and its supporting text fails to identify a major constraint to the viability of this spatial strategy, and does not attempt to set out an approach to development in this area that would address the potential for impacts on the SPA and Ramsar site. Neither does it examine the implications of climate change and sea level rise for developments on coastal or riverside locations, such as coastal squeeze or increased flooding elsewhere, or identify potential mitigation and adaptation measures to improve the natural environment's resilience to climate change impacts. This conflicts with the RSS's policies on climate change (Policy 3, Policy 34c)There is a more specific issue about the level of information provided within the Core Strategy regarding allocations in the Seal Sands and Billingham areas. We address this issue in our comments on CS4 – see below. The RSPB proposes the following additional wording for CS1 re the designated sites:"</p> <p>"In taking forward development along the river corridor and at Seal Sands, it will be necessary to ensure that there is no adverse effect on the integrity of the SPA and Ramsar site, either alone or in combination with other plans and programmes. Developments will be directed to sustainable locations where adverse effects on site integrity will be avoided."</p> <p>"The implications of climate change for the Core Strategy's development agenda and the need to protect and strengthen the natural environment should be addressed by appropriate policy changes both within CS1 and indeed subsequent policies: there may be a need to assess all the Core Strategy's policies to determine whether they are climate change 'proofed'.</p>	<p>. To be reviewed.</p>
<p>54/3/2 RSPB Northern England,</p>	<p>Objection</p>	<p>Whilst the emphasis of CS2 on sustainable transport networks and, in particular, the development of new public transport is very welcome, the RSPB has significant concerns regarding the possible routes of the East Billingham Transport Corridor (CS2.5) as shown in Appendix 3 of the Infrastructure Strategy. These are as follows:</p>	<p>Contrary to adopted Council Policy. To be reviewed</p>

Respondee	Type	Comment	Council Response
		<p>i) Potential impacts on SPA species using land within the SPA, and also on land outside the SPA that has functional importance for SPA species i.e. feeding or roosting sites. New roads or road improvement could result in loss or damage to habitats used by SPA species, including hydrological changes, or cause disturbance or displacement to SPA species during the construction phase or due to large volumes of heavy goods vehicles.</p> <p>ii) Both possible routes shown within Appendix 3 of the Infrastructure Strategy runs through part of the RSPB Saltholme Nature Reserve, land that the RSPB holds on a 99-year lease from the Teesside Environment Trust. Road construction through this area is likely to reduce the potential for wetland habitat creation across this area, conflicting with the RSPB's objective of creating a greater extent of wetland habitat to benefit, among other species, SPA and Ramsar site birds. We are surprised that the Council is contemplating road construction across our land holding and note that we have had no prior consultation regarding this proposal. This approach contrasts markedly with the constructive and supportive steps that the Council has taken when helping the RSPB establish the Saltholme reserve. The RSPB would strongly resist any proposals that compromised our ability to create new habitats on our land holding.</p> <p>CS2 fails to establish these environmental constraints and their implications for the deliverability of the Core Strategy. Once again, it would be appropriate for the Council to identify these potentially significant constraints to the viability of CS2, and set out an approach to development in this area that would address the potential for impacts on the SPA and Ramsar site and the development of a regionally significant Nature Reserve attraction. The RSPB proposes the following additional wording for CS2:</p> <p>ii) To the east of Billingham (the East Billingham Transport Corridor) to remove heavy goods vehicles from residential areas, without adversely affecting the SPA and Ramsar site or RSPB Saltholme Nature Reserve"</p> <p>We also propose additional wording for the supporting text of this policy: The East Billingham Transport Corridor runs through an environmentally-sensitive location where road development could result in impacts on the Teesmouth & Cleveland Coast SPA and Ramsar site, and on the RSPB Saltholme Nature Reserve. It will be necessary to ensure that the EBTC has no adverse effect on the integrity of the SPA and Ramsar site, either alone or in combination with other plans and programmes, and that habitat creation proposals within the Nature Reserve are not compromised. The Council will ensure that the EBTC is routed in a sustainable manner that minimises adverse effects on biodiversity and natural resources.</p>	
<p>54/4/3 RSPB Northern England,</p>	<p>Objection</p>	<p>Paragraph 7 of CS3 does not give sufficient guidance or a spatial approach to renewable energy development within Stockton. The policy draws heavily on Policy 40 of the RSS rather than setting out a locally specific policy. However, Policy 40 of the RSS states that strategies, plans and programmes should 'identify renewable resource areas': whereas CS3.7 merely states, "Broad locations for renewable energy generation may [my emphasis] be identified in the Regeneration Development Plan Document."</p> <p>The RSPB supports the development of renewable energy sources, provided significant impacts on wildlife are avoided by appropriate siting and design. The RSS identifies a general location within Stockton as an 'urban/urban rural fringe resource area' of least constraint for small-scale wind energy development: this general location appears to fall within the Teesmouth and Cleveland Coast SPA. However, although the Appropriate Assessment of the Stockton Core Strategy correctly identifies a number of potential impacts on the SPA because of renewable energy development (p4, p12, p33); it fails to identify the potential for any impacts on the SPA arising from CS3.7. This is a significant failing of</p>	<p>Repetition of National or Regional Policy. A dedicated policy for renewable energy would be too detailed for the Core Strategy. Reference to SUDS is made in PPS25 and would be repetition of national policy.</p>

Respondee	Type	Comment	Council Response
		<p>the Appropriate Assessment.</p> <p>Given the fragmented nature of the SPA and the high levels of interchange between its component parts by SPA species, we seriously question whether the part of Stockton-on-Tees identified in the RSS as an area of least constraint can accommodate wind energy development. By failing to i) address the potential implications of this RSS policy at the local scale, and ii) set out a broad spatial policy for renewables that ensures they are directed to sustainable locations where adverse affects on the SPA are avoided, we question whether the Council can rule out an adverse effect on the SPA's integrity from CS3.</p> <p>See also our comments on Objective 11 as regards SUDS. As stated in our response to the Core Strategy Preferred Options, the RSPB believes that the Core Strategy should contain a dedicated policy relating to renewable energy generation so that an appropriate spatial approach can be developed. This policy should develop a spatial strategy for wind energy development to guide developers away from environmentally sensitive areas, and describe the significant constraints facing renewable energy development in the vicinity of the SPA. This policy should include the following text: "Renewable energy developments in the Billingham/ Seal Sands area have the potential to adversely affect the integrity of the SPA and Ramsar site, either alone or in combination. Proposals will be directed to sustainable locations where adverse effects on site integrity will be avoided." Furthermore, it should indicate that a subsequent DPD will identify broad locations for renewable energy developments, and that these will be subject to careful assessment through the Appropriate Assessment process to ensure there will be that no adverse effects on SPA integrity.</p> <p>CS3 should include an extra point relating to the use of SUDS as part of developments. This should state that the Council will require developments to incorporate SUDS wherever it is technically achievable to do so.</p>	
54/5/4 RSPB Northern England,	Objection	<p>CS4.1 proposes that 'up to 445ha' of land within Stockton will be provided as 'Land for chemical and steel industries'. Later on in this policy, CS4.5 identifies 340ha of land for chemical production and processing. We presume that the remaining 105ha will be provided for the steel industry – however, no broad location is identified for this 105ha. Without a broad location identified for such a large allocation, the deliverability of this policy let alone its potential for environmental impacts cannot be assessed. This matter should be clarified within CS4. Footnote to be added.</p>	. To be reviewed.
54/6/4 RSPB Northern England,	Objection	<p>The Council's safeguarding of 100ha at North Tees Pools and 175ha at Seal Sands for chemical production and processing has the potential to cause an adverse effect on the integrity of the SPA and Ramsar site. We note that a number of allocations in the Stockton Local Plan within these two areas are located where significant effects on the SPA are likely, including allocations within the Seal Sands SSSI. In particular, the extant allocations immediately to the south of the main inter-tidal area at Seal Sands are known to be used by significant numbers of curlew, a species forming part of the SPA's internationally-important waterfowl assemblage.</p> <p>The Appropriate Assessment correctly identifies the potential for a number of impacts on the SPA from this policy. The Seal Sands and North Tees Pools are areas in close proximity to the designated site and include areas where there is significant usage of undesignated land by SPA species. In adopting a high level policy that does not identify specific locations for development but nevertheless includes a precise hectareage for allocations in particular areas, we do not believe that the Council is able to rule out</p>	. To be reviewed

an adverse effect on the SPA arising from the successful delivery of this amount of development without a more detailed assessment of potential impacts.

Furthermore, there is a clear risk that the Council could adopt the Core Strategy only to find during the more detailed Appropriate Assessment of the Regeneration DPD (which we assume will include specific allocations in these areas) indicates that this scale of development cannot be delivered without an adverse effect on the integrity of the SPA. Equally, there is a risk that the Appropriate Assessments of individual planning applications reveals a similar barrier to delivery. The Appropriate Assessment of the Core Strategy must therefore examine the likely implications of the envisaged scale of development (275ha) in these areas for the integrity of the SPA and Ramsar site rather than just development per se. As the Appropriate Assessment does not currently do so, the Council is unable to ascertain no adverse effect on site integrity.

In addition, the supporting text for this policy provides no indication that the locations specified in point 5, and indeed in points 6 and 8iv), are environmentally sensitive because they lie in close proximity to the SPA and Ramsar site. The implications of climate change for developments on coastal land, including the potential for 'coastal squeeze' to affect the designated sites are not identified or addressed. This is key contextual information. Additional text would also allow this policy to be more consistent with the welcome commitment within CS10.2 to protect and enhance biodiversity in the Billingham and Seal Sands area. To justify CS4.5, the Council needs to bring forward evidence to demonstrate that the scale of development proposed for the Seal Sands and North Tees Pools areas can be delivered without causing adverse effects on the integrity of the SPA and Ramsar site, and carry out a more detailed Appropriate Assessment of the implications of CS4. 5 for the integrity of the SPA and Ramsar site. To achieve this, the Council will need to draw on a robust evidence base regarding bird usage of this area. This will allow the Council to assess the importance of their preferred safeguarding areas for SPA species, the implications for industrial development in these locations, potential alternative solutions and to identify measures to prevent adverse effects (e.g. an integrated programme of habitat enhancement and creation to mitigate for any impacts.) Without such an exercise, we question whether the Council will be able to reach a conclusion of no adverse effect on the SPA arising from the Core Strategy.

The outcome of this Appropriate Assessment should be a policy that includes sufficient measures to ensure that CS4.5 has no adverse effect on the SPA.

The supporting text to this policy needs to establish the SPA and Ramsar as a key potential constraint to industrial development in certain areas. We suggest the following additions:

i) Additional text: "Developments within the Seal Sands and North Tees Pools areas have the potential to significantly affect the Teesmouth & Cleveland Coast SPA and Ramsar site, a complex of wetlands and intertidal habitat protected by the Habitats Regulations. The Council will ensure that both the Regeneration DPD and individual proposals do not adversely effect the integrity of the SPA and Ramsar site, either alone or in combination with other plans and programmes. Opportunities within development proposals to retain, enhance and create habitats for the benefit of SPA species and to improve resilience to climate change impacts are identified and taken.

"ii) Addition to paragraph 9.6.: "To minimise the risk to the public, and to the internationally important SPA and Ramsar site..."

Respondee	Type	Comment	Council Response
54/7/4 RSPB Northern England,	Objection	<p>Port-related and industrial development adjacent to the River Tees in the Haverton Hill and Port Clarence areas have the potential to significantly affect the SPA and Ramsar site through loss of functionally related habitat, disturbance, hydrological alterations, pollution and changes to water quality. However, CS4 currently fails to identify the need to protect the SPA against adverse effects: as previously noted in our response to CS4.5, we therefore question whether an adverse effect on site integrity can be ruled out.</p> <p>Neither does the supporting text identify the SPA and Ramsar site as a significant constraint, or identify the River Tees as a significant part of the Borough's network of natural habitats (see paragraph 12 of PPS9) and green infrastructure, or the need to incorporate mitigation and adaptation measures to protect the natural environment against climate change impacts. CS4 should contain policy that rules out an adverse effect on the integrity of the SPA and Ramsar site. See our comments on CS4 point 5. We suggest the following additional wording for paragraph 9.7:</p> <p>"...to complement and support the expected growth of Teesport. However, developments in the river corridor have the potential to significantly affect the Teesmouth & Cleveland Coast SPA and Ramsar site. Proposals will need to demonstrate no adverse effect on the integrity of these designated sites, and identify opportunities to protect, enhance or create priority habitats in order to improve the connectivity of the River Tees for biodiversity, enhance its contribution to Stockton's green infrastructure and to strengthen its resilience to climate change."</p>	. To be reviewed
54/8/0 RSPB Northern England,	Support	<p>Welcome the reference to increasing tourism to the area in order to diversify the economic base. However, this paragraph would be strengthened by referring to the role of the natural environment in attracting visitors to the Tees Valley I.e. 'green tourism'. Paragraph 9.10 should contain a brief reference to the potential role of green tourism in diversifying the Stockton economy, referring to destinations such as the Teesmouth National Nature reserve and RSPB Saltholme</p>	Change made. Reference included linking policy CS4 and policy CS10, which already identifies these sites, within paragraph 9.10.
54/9/6 RSPB Northern England,	Objection	<p>We welcome the reference to improving health through exercise in the natural landscape. However, this activity should be encouraged within a strategic approach to multi-functional green infrastructure. CS6 would be strengthened if it referred to this 'natural health' agenda as part of such a strategy.</p> <p>Potential impacts on the SPA and Ramsar site arising from CS6 are identified in the Appropriate Assessment, however, no reference is made to this potential constraint. We propose the following amendments:</p> <ol style="list-style-type: none"> 2. Opportunities to widen the Borough's cultural, sport, recreation and leisure offer, particularly with the river corridor, at Tees Barrage and within the Green Blue Heart, whilst preventing any adverse effects on the SPA and Ramsar site downstream. 3. The quantity and quality of open space, sport and recreational facilities and opportunities for natural exercise throughout the Borough will be protected, enhanced and managed as part of a strategic approach to multi-functional green infrastructure. 	Already included. Reference to Green Infrastructure already included under CS10. The importance of not allowing adverse effects to the SPA and Ramsar site is already highlighted in the Appropriate Assessment.
54/10/10 RSPB Northern England,	Objection	<p>We welcome the principles set out in CS10, but believe the following elements need to be strengthened:</p> <p>Point 1- This policy does not adequately address the potential for developments to contribute towards cumulative impacts on the SPA and Ramsar site: a particular issue considering the scope of development in sensitive areas proposed by CS4, and the aspirations of neighbouring authorities. We are also concerned that the Council is currently relying on CS10 policy to prevent impacts on the Teesmouth & Cleveland Coast SPA and Ramsar site rather than looking to address the impacts of</p>	Partial change made. Cumulative effects of development on Ramsar and SPA sites are to be dealt with through the Appropriate Assessment. The need for criteria based policies has been highlighted, changes have been made to include

Respondee	Type	Comment	Council Response
		<p>particular policies by altering the content of those policies. In doing so, the Council has failed to take the opportunity to identify policy-specific solutions, and risks adopting a Core Strategy where the only way to successfully deliver its aspirations is to adversely affect the integrity of the SPA and Ramsar site. See comments within CS4 and our comments on the Appropriate Assessment.</p>	<p>the management as well as creation of habitats and clarification of the wording has been amended around improvements for Haverton Hill and Seal Sands corridor to include wildlife as well as the tourism offer. However, networks of natural habitats is already included with the reference to Green Infrastructure, recognition of biodiversity on previously developed land is already covered in national policy and development control policies are not suitable for the Core Strategy. The creation of new priority habitats is more suitable to be included in the Environment DPD.</p>
		<p>Point 2- We support the general principle of this policy. Paragraph 5(ii) of PPS9 states that LDFs should 'identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets' [my emphasis] - given the proximity of a designated site and the need to buffer and augment such sites against the impacts of climate change, it would be appropriate to identify the Billingham and Seal Sands areas as such sites. We also note paragraph 14 of PPS9.</p>	
		<p>Point 3 - This policy should better reflect Paragraph 12 of PPS9, 'Networks of natural habitats'.</p>	
		<p>Point 4 - We support the principle of this policy. However, we note paragraph 9 of PPS9, which states that LDDs should contain 'criteria-based policies' against which proposals affecting locally designated sites will be judged.</p>	
		<p>Point 5 - To ensure successful delivery, habitat management is as important as habitat creation in the long-term.</p>	
		<p>Point 7 - Environmental improvements should be carried out for their intrinsic worth and for allowing the natural environment to adapt to climate change, as well as to contribute towards 'the tourism offer'. However, any environmental improvements in the named sites should fully respect and strengthen the integrity of the SPA and Ramsar site, and provide complementary habitats for the interest features of those sites and strengthen Stockton's habitat networks, rather than just making the area more attractive to tourists. If these issues can be clarified, we would strongly support policy that aims to deliver high-quality habitats in the Haverton Hill and Seal Sands corridor indicated on the Strategic Diagram.</p>	
		<p>Point 10 - We are pleased that the potential biodiversity value of previously developed land is acknowledged, however paragraph 13 of PPS9 states that local authorities should 'aim to retain this interest or incorporate it into any development'.</p>	
		<p>The policy should also address the impacts on the natural environment arising from climate change, and incorporate a policy that ensures that mitigation and adaptation measures will be incorporated into development control decisions and the Council's wider activities. Reference should be made to the use of SUDS to deliver flood risk management and biodiversity - see our representations on Objective 11 and CS3. Point 1: amend to read: and other European sites. "This will include ensuring that there will be no adverse impact in combination with the effects of other developments or plans."</p>	
		<p>Point 2: Add an additional sentence: "Opportunities to retain, restore and create priority habitats in these areas should be identified and taken."</p>	
		<p>Point 3: amend to read "the protection and enhancement of the openness, amenity and biodiversity value" and add an additional point: "iv) Other parts of the green infrastructure network"</p>	
		<p>Point 4: either the Core Strategy should contain such a criteria-based policy, or the supporting text of</p>	

Respondee	Type	Comment	Council Response
		<p>CS10 should identify which subsequent LDD will include such a policy.</p> <p>Point 5: amend to read: "Habitats will be created and managed"</p> <p>Point 7: amend to read: "may contribute towards strengthening habitat networks, the robustness of designated wildlife sites, and the tourism offer"</p> <p>Point 10: amend to read "the biodiversity and geological conservation value, and develop measures to ensure this value is maintained or enhanced"</p> <p>An additional point should be added referring to the need to protect and enhance the natural environment against the impacts of climate change, through mitigation and adaptation measures both within developments and more generally. This should state that the Council will require developments to incorporate SUDS wherever it is technically achievable to do so.</p>	
54/11/0 RSPB Northern England,	Objection	<p>As stated in our response to the Core Strategy Preferred Options, the RSPB strongly believe that the Core Strategy Diagram should show the outline of the SPA in full, and also the SSSI boundaries. This will identify key potential areas of conflict between the protection of designated wildlife sites and the Core Strategy's policies, most notably CS1, CS2 and CS4.</p> <p>We note that two sites are identified as the 'International Nature Reserve'. This is confusing, as the northernmost sites is the Teesmouth National Nature Reserve and the one to the southwest will be the RSPB's Saltholme Reserve. These symbols do not adequately map the extent of designated wildlife sites - the protection and enhancement of which must be a key purpose of the Core Strategy. For the purposes of the Diagram, the boundaries of the SPA and Ramsar site and SSSI boundaries are more relevant than the location of these nature reserves.</p> <p>The role of the 'Haverton Hill/Seal Sands corridor', marked with black hatching that runs along the River Tees and running up to Borough boundary, should be clarified. The Key indicates it relates to CS10: the corridor is referred to in CS10.7.i), relating to environmental improvements (which we broadly welcome, though see our comments on CS10). Nevertheless, we are concerned that this hatched area also relates to industrial and port-related development, which would be of major concern given that this corridor includes sections of the SPA and Ramsar site, not to mention land that has functional importance for SPA species. The Strategic Diagram should accurately map the boundaries of the Teesmouth & Cleveland Coast SPA and Ramsar site, including those parts that lie adjacent to Stockton Borough, as well as all SSSIs within Stockton.</p> <p>The relationship of the 'Haverton Hill/Seal Sands corridor' to all of the Core Strategy's policies must be clarified, and if it corresponds to the Council's preferred areas for development, be subject to a full assessment through the Appropriate Assessment process.</p>	<p>Partial change made. Locations of designated sites clarified through addition of symbols. Agreed at meeting with RSPB that mapping actual boundaries of designated sites would be inappropriate on the Strategic Diagram.</p>
54/12/0 RSPB Northern England,	Objection	<p>Additional indicators required to adequately monitor the implementation of CS10. In order to adequately monitor the implementation of CS10, we suggest the following additional Indicators: i) Tees Valley BAP habitats restored or created through development (ha) ii) Priority habitats restored or created through development (ha) iii) Local sites damaged or destroyed by development (ha)</p>	<p>Change made. Minor change to include additional indicators in Monitoring Plan.</p>
54/13/0 RSPB Northern	Objection	<p>We welcome the protection and enhancement of 'the International Nature Reserve at Seal Sands' but this reference is confusing. Referring to the designated sites instead would resolve this.</p>	<p>. To be reviewed</p>

Respondee	Type	Comment	Council Response
England,		<p>We welcome the reference to ‘environmental improvements’ to the Haverton Hill and Seal Sands corridor, but believe this should be strengthened in line with our representations on CS10.</p> <p>Low-lying coastal areas are likely to be subject to additional pressures because of climate change e.g. increased flooding, sea level rise. The need to address these should be identified here. We suggest the following amendments</p> <p>"Protection and enhancement of the Teesmouth & Cleveland Coast SPA and Ramsar site and areas used by SPA species"</p> <p>"Environmental improvements to the Haverton Hill and Seal Sands corridor through the creation and management of priority habitats."</p> <p>And the following addition:</p> <p>"Ensuring that developments improve the resilience of the natural and built environment in the face of climate change through sustainable mitigation and adaptation measures"</p>	
54/14/0 RSPB Northern England,	Objection	<p>Please note these comments relate solely to the assessment of impacts on the Teesmouth & Cleveland Coast SPA and Ramsar site, and the North York Moors SPA</p> <p>2.2 Parts of the Tees & Hartlepool Foreshore & Wetlands SSSI also fall within Stockton-on-Tees. This is a component SSSI of the Teesmouth & Cleveland Coast SPA.</p> <p>2.3 The ‘approximately 10km’ criteria is unhelpful: it would be better to consider Natural 2000 sites in the region on the basis of their interest features. In any event, an SPA and Ramsar site approximately 10km have been omitted from the screening stage of the Appropriate Assessment.</p> <p>Table 1: T&CC SPA There are additional primary reasons for the SPA’s designation: internationally important populations of wintering knot and wintering redshank. In addition, the JNCC’s 2001 SPA review identified an additional internationally important population, that of ringed plover in spring.</p> <p>Table 1 and 2 Ramsar site rather than RAMSAR</p> <p>Table 1:Northumbria Coast SPA The Northumbria Coast SPA and Ramsar site lie just over 10km from Stockton-on-Tees, and are adjacent to the Teesmouth & Cleveland Coast SPA and Ramsar site. These sites should be included in the screening analysis.</p> <p>Table 2: T&CC SPA Should briefly refer to internationally important wintering water bird assemblage.</p> <p>Table 3: T&CC SPA and Ramsar Requirements - we recommend adding ‘Safe high tide roost sites’</p> <p>Initial assessment - we suggest the following changes: i) coastal squeeze, caused by a combination of sea level rise and fixed coastal defences protecting developments ii) worth clarifying that water quality and hydrological changes could affect food availability iii) separating road upgrades and wind energy development iv) adding ‘water-based recreation’ to the section about disturbance.</p> <p>Section 3 Clarification should be provided re whether Section 3 is an analysis of the Core Strategy Preferred Options, the publication draft, or both. Given that the publication draft takes forward Option 1 with elements of Options 2 & 3, it is unclear why a detailed analysis of the all the Preferred Options is provided. Equally, there are several references to the Preferred Options in Table 10. Has an</p>	. To be reviewed

Appropriate Assessment of the publication draft, as opposed to the Preferred Options been carried out in full?

Table 10: CS3 We disagree with this analysis. CS3.7 includes policy relating to medium to small-scale renewable energy developments but does not set out a spatial policy for their location, referring instead to the RSS. The RSS indicates that a broad location in Stockton-on-Tees is suitable for renewable energy development, lying partly within the SPA and Ramsar site. It is important that the Core Strategy looks at this area of least constraint in more detail and, given the sensitivity of the location, i) identifies the key issue of impacts on the SPA and Ramsar site and ii) takes a spatial approach to ensure developments are directed to locations where there is minimal impact on designated sites. The absence of a spatial approach within CS3 means that a more precautionary assessment of its potential impacts is required. The Further Assessment Required column should read 'Yes'.

Table 10: CS4 Potential Impacts - is this an assessment of the Preferred Options or the publication draft? The potential locations in the publication draft of the Core Strategy are that could cause adverse effects on the SPA as follows:- CS.4.1 – general employment land and land for chemical and steel industries- CS.4.2 – the Core Area- CS.4.5 – North Tees Pools and Seal Sands are locations of considerable concern. Developments at the Billingham Chemical Complex could potentially have impacts.- CS.4.6 – land on the River Tees at Haverton Hill and Port Clarence- CS.4.8.iv.a - the potential for river-based recreation to disturb SPA species should be noted here.

Table 10: CS10 A key issue in Stockton and in neighbouring authorities for the integrity of the Teesmouth & Cleveland Coast SPA and Ramsar site is the potential cumulative impacts of multiple developments. This is particularly relevant bearing in mind the scale of the Council's ambitions for the Seal Sands and North Tees Pools areas. CS.10.1 lacks a specific reference for the need for proposals to show no adverse effect on site integrity in combination with other plans and programmes. As such, we believe it should be subject to further assessment to see if a more appropriate and locally relevant level of protection can be provided. Currently, we question whether CS.10.1 provides more than a restatement of national policy. The Council is currently relying on a standalone 'environment protection' policy to prevent impacts on the Teesmouth & Cleveland Coast SPA and Ramsar site rather than looking to address the impacts of particular policies within those policies themselves. In doing so, the Council has failed to take the opportunity to identify policy-specific solutions, and risks adopting a Core Strategy where the only way to successfully deliver its aspirations is to adversely affect the integrity of the designated sites. See later comments.

Table 11 The comments above regarding CS3, CS4 and CS10 are also relevant to Table 11.

Table 12 The Appropriate Assessment of the draft RSS identifies the potential for air quality impacts on this site as a result of increased economic growth, housing development, improved connectivity and maximising potential of ports, airports and transport infrastructure. It also indicates the potential for improved transport infrastructure to lead to increased disturbance because of additional visitors. Consequently, the Council should take a precautionary approach and identify CS1, CS2 and CS4 as requiring further assessment.

Table 17 CS3 and CS10 should be assessed in more detail here

Respondee	Type	Comment	Council Response
		<p>Table 17: CS1 The following impacts of this policy have not been identified:- Loss of undesignated areas with functional importance for SPA species e.g. foraging and roosting sites- Impacts on water quality and hydrology, including release of contaminants into watercourses- Potential for 'coastal squeeze' and other impacts related to climate change</p>	
		<p>Table 17:CS2 4th bullet – EBTC will also involve long-term habitat loss, not just those lost or damaged during the construction phase.</p>	
		<p>Table 17: CS4 The following impacts of this policy have not been identified:- Potential for 'coastal squeeze' and other impacts related to climate change</p>	
		<p>Table 17: CS6 The following impacts of this policy have not been identified: - Potential for disturbance from water-based recreation</p>	
		<p>Table 17: CS7 The following impacts of this policy have not been identified:- Impacts on water quality and hydrology, including release of contaminants into watercourses</p>	
		<p>Table 18 The comments on Table 17 above are also relevant to Table 18.</p>	
		<p>Table 19 This table should also include an analysis of other spatial plans that could affect Natura 2000 sites. With regard to the Teesmouth & Cleveland Coast SPA and Ramsar site, the Environment Agency's Tidal Tees Flood Risk Management Strategy and Tees Catchments Flood Management Plan are highly relevant, as is the North East Shoreline Management Plan 2.</p>	
		<p>Paragraph 5.1. The key in-combination issue that the Core Strategy needs to address is the potential for multiple developments to have impacts on the SPA and Ramsar site that, whilst not in themselves significant, have residual impacts that when added to the residual impacts of other developments could adversely affect the integrity of the designated sites. These developments could be either within or outside Stockton-on-Tees. To address this, the Core Strategy needs to: i) identify all the potential policy areas where impacts on the SPA and Ramsar site could arise ii) address these potential impacts through developing policy-specific solutions to those impacts iii) making specific references to the designated sites in these policies, to identify them as important constraints iv) include text in CS10 that identifies the significant potential for cumulative impacts and contains a specific commitment to ensuring that in-combination effects are avoided. See Redcar & Cleveland and Middlesbrough Core Strategies.</p>	
		<p>Paragraph 6.1 The reference to paragraph 30 is confusing – this should be clarified. However, we disagree with the view that it is not necessary to amend policies within the Core Strategy that the Appropriate Assessment identifies as potentially affecting the SPA and Ramsar site. This approach risks a significant contradiction in the Core Strategy, where a number of policies that are likely to affect the SPA and Ramsar sites conflict with a standalone policy that protects them. This could lead to the Core Strategy becoming undeliverable, because the only way of doing so would involve adversely affecting the integrity of these sites. Individual policies that could affect the SPA and Ramsar sites must be written in a way that rules out adverse effects arising from them. Furthermore, as CS10.1 is essentially a restatement of national policy, this clearly reveals that several of the Core Strategy's policies are inconsistent with national policy.</p>	

Respondee	Type	Comment	Council Response
55/1/5 Stockton Retail Park Ltd, Blue Sky Planning	Objection	<p>Teesside Park Teesside Park (excluding Morrisons, Toys R Us and McDonalds- outwith our client's ownership) compromises circa 38,150 sqm (410,000 sqft) of ground floor retail and related floorspace. It is a well established destination in the shopping hierarchy of the Sub- Region and a very significant employer (estimated to directly provide circa 1,500- 2,000 jobs).</p> <p>Our client's have made significant investments at Teesside Park in the last 5 or so years improving the physical and natural environment, accessibility and the overall shopping offer for the benefit of the customers and employees.</p> <p>Core Strategy Policy 5: Town Centres We consider that proposed Policy 5: Town Centres is unsound. Specifically, we object to Part 6) of the policy which states that: "The existing roles played by Teesside Park as an out-of-centre location, and Portrack Lane as out-of-centre site, as recognised, No additional retail or leisure development will be permitted in these locations."</p> <p>We consider that this policy is inconsistent with national policy guidance.</p> <p>We acknowledge the Core Strategy's focus on Stockton's role as the main town centre in the Borough for retail, cultural, leisure and civic administrative activities. We welcome recognition of the role of Teesside Retail Park in the retail hierarchy. However, we consider that the proposed "blanket ban" on further development at Teesside Park is inconsistent with national policy guidance.</p> <p>PPS6 does not seek to place a blanket- ban on all retail and leisure development in out-of-centre locations, instead it requires applicants to demonstrate that the following key tests are met when an out-of-centre development is proposed: a. The need for development;</p>	Does not conform to the Spatial Strategy. This would be a repetition of national policy and the Stockton-Middlesbrough Joint Retail Study indicates that it is necessary for Stockton to increase its existing market share of expenditure, particularly relative to Teesside Park. To achieve this, no further expansion of the out of centre retail and leisure developments at Teesside Park and Portrack Lane will be permitted. These local circumstances dictate that out of centre or out of town retail development is not suitable in Stockton.

Respondee	Type	Comment	Council Response
		<p>bathmat the development is of an appropriate scale; cathead there are no more central sites for the development; d. That there are no unacceptable impacts on existing centres; e. That locations are accessible.</p> <p>PPS6 goes on to state that the sequential approach should be applied to demonstrate retail uses in out-of-centre locations. All options in-centre should be assessed before other sites are considered for the development of main town centre uses. This approach does not presume against non town centre locations for retail developments, providing that the sequential test has been met and subject to other criteria. It is important that the Core Strategy reflects this policy approach.</p> <p>Therefore, we consider that the more appropriate approach would be to acknowledge that applications for additional retail development will be subject to PPS6 considerations. A criteria- based policy reflecting PPS6 is therefore recommended against which any large scale non town centre retail proposals can be considered. If such proposals are shown to meet the criteria in this policy it would be preferable from the point of view of sustainability, to first locate new development at existing out-of-centre retail locations before considering new free standing sites. This should improve opportunities for single trips to retail destinations and help reduce increases in the number of journeys. Teesside Park provides a concentration of retail warehousing and other facilities which offer real opportunities to make multi purpose trips in a single journey reducing the overall journey lengths etc. Therefore, we consider that Teesside Park should be the preferred location for out of centre development should other criteria is satisfied. We propose the modification of CS5 Para 6 as follows:</p> <p>"The main existing out of centre retail provision in Stockton is located at Teesside Retail Park and Portrack Lane. These locations form an established part of the overall network of retail provision in the Borough. The role played by Teesside Retail Park will continue to be recognised. Where all of the following criteria can be satisfactorily addressed, Teesside Retail Park will be preferred location for further out of centre retail development.</p> <p>a. There is a proven need for the proposed development; and b. There are no available, suitable or viable sites for the proposed development in or on the edge of Stockton Town Centre or other defined centres; c. The development would not result in an unacceptable loss to the vitality and viability of any nearby town centres; d. The development would not result in an unacceptable increase in congestion on the surrounding highway network; and e. The development would be accessible by public transport from a wide area and would not significantly extend journey patterns."</p>	
56/1/1 Mr Chris Thompson, George F White	Objection	<p>The strategic diagram identifies housing sub-divisions (1 - 5) and a 'conurbation' in which all housing need will be accommodated.</p> <p>This approach, prior to site allocation is neither flexible or justified. Furthermore it is inconsistent with national policy in that it will not guarantee the most suitable or sustainable sites are developed within the plan period when assessed against reasonable alternatives.</p> <p>Comments are made specifically in respect of Policy 1 of the Core Strategy and its wording to the effect that all housing development will be provided within the identified conurbation. It is suggested that CS1 is</p>	Does not conform to the Spatial Strategy. The policy has sufficient flexibility to meet all housing need, including that outside the conurbation.

Respondee	Type	Comment	Council Response
56/2/1 Mr Chris Thompson, George F White	Objection	<p>reworded such that the 'majority' of housing development will be located within the conurbation, reflecting the fact that some flexibility may be required in relation to this boundary to allow for proper consideration of the sustainability of individual sites at site allocation stage.</p> <p>The policy states (paragraph 2) that priority for development will be given to previously developed land in the Core Area to meet the Borough's housing needs and that thereafter (paragraph 4) the remainder of housing development will be located elsewhere in the conurbation.</p> <p>The conurbation is identified in grey on the strategic diagram and delineated by a pink boundary line.</p> <p>To be 'justified' it must be demonstrated that the stated policy is the most appropriate strategy considered against reasonable alternatives. It is not clear that the identified needs for the Borough for housing, economic growth and to meet the objectives identified in the draft core strategy can be reasonably accommodated within the clearly identified and delineated conurbation. It is also not clear whether the alternatives which are not yet identified are adequately deliverable or available, or that the most sustainable options and locations are situated within the delineated conurbation. To be 'effective' the policy must be flexible. In the light of the above, Policy 1 does not allow the flexibility to develop beyond the defined conurbation. The policy should, for reasons set out above, be changed to introduce flexibility when producing site specific allocations for housing, employment land and leisure needs of the Borough. It is suggested that the policy is amended as follows:</p> <p>Paragraph 3:</p> <p>"The majority of housing development will be located elsewhere within the conurbation, with priority given to sites that support the regeneration of Stockton, Billingham and Thornaby, and those close to public transport nodes. The role of Yarm as a historic town and as a destination for more specialist shopping needs, will be protected."</p>	Does not conform to the Spatial Strategy. The policy has sufficient flexibility to meet all housing need, including that outside the conurbation.
56/3/2 Mr Chris Thompson, George F White	Objection	<p>The policy identifies the need to strengthen the role of public transport in the Borough, and to develop the capacity of rail and associated infrastructure.</p> <p>Paragraph 4 (iii) identifies a desire to develop interchanges and park and ride facilities on sites adjoining the existing stations.</p> <p>This approach is entirely consistent with advice contained within Planning Policy Statement 3: Housing, Planning Policy Guidance Note 13: Transport, and RSS. It is justified and consistent with national policy.</p> <p>This policy is fully supported for the above reasons.</p>	No change requested. Support welcomed
56/4/7 Mr Chris Thompson, George F White	Objection	<p>Land is to be allocated, under Policy 7, to the effect of 50-100 units in Yarm up to 2021. Thereafter no allocations are proposed for the period beyond to 2024.</p> <p>There are significant services at Yarm, including an identified key public transport interchange. Restricting growth beyond the period 2021, and before 2016 will have an impact upon the viability of those services and facilities crucial to maintaining sustainability within the Borough.</p> <p>Submissions are given in respect of Policy 1, and the restrictive nature of the delineation of the conurbation. In addition, the provision of only 50-100 dwellings within the Yarm and Eaglescliffe area is</p>	Does not conform to the Spatial Strategy. The scale of the proposed housing distribution for the Yarm and Eaglescliffe housing sub-division takes into account the planning application that has been submitted to develop the Allen's West site in Eaglescliffe for a mix of uses including 500 dwellings.

Respondee	Type	Comment	Council Response
		<p>insufficient to support the viability of the town and its many services. Nor is it sufficient to justify the proposed strategy outlined at draft Core Strategy Policy 2 in respect of the development of interchanges / park and ride services of services.</p> <p>Such a vast majority of new development as proposed within the core area, does not reflect the general desire to ease congestion and in this respect it is critical to support the continued viability of services and particularly public transport.</p> <p>For the above reasons it is suggested that Policy 7 is unsound, for reasons of it being unjustified. There is insufficient evidence base for the limitation on numbers in each sub-division. Allocations should reflect the need to support the continued contribution of the remainder of the conurbation (notwithstanding comments raised in respect of Policy 1 and the restrictive nature of the delineation of that conurbation), being dispersed more equally between the Core Area, Stockton, Billingham and Yarm / Eaglescliffe.</p>	
56/5/8 Mr Chris Thompson, George F White	Support	<p>Priority should be given, in permitting rural exception sites for affordable housing, to those sites with good access to public transport and services.</p> <p>In all other respects, this policy is supported and is sound when assessed against the necessary criteria.</p>	<p>Already included. The justification (paragraph 12.41) already states this.</p>
57/1/3 Barratt Newcastle, Nathaniel Lichfield and Partners	Objection	<p>The North East RSS's Policy 38 encourages strategies, plans and proposals to achieve high energy efficiency levels and to minimise resource consumption. The Core Strategy's policy CS3 reflects this and sets it own local targets.</p> <p>Criterion 1 of Policy CS3 states that all new residential developments will achieve a minimum of level 3 of the Code for Sustainable Homes up to 2013 and thereafter a minimum of level 4. Our client's view is that level 4 is operative from 2014. On that basis, if the Core Strategy was seeking to introduce level 4 from the beginning of 2013 then our client would object as there is no clear justification for doing so provided by the Council.</p> <p>Our client also considers that it should be borne in mind that the industry is still uncertain as to if and how these higher targets can be met in practice and therefore whether they are deliverable.</p> <p>It is considered that this policy is overly prescriptive and allows no flexibility for the viability or feasibility of achieving this higher level for every new development. Our client considers that the policy should instead highlight the following three areas of preference for providing renewable energy:</p> <ul style="list-style-type: none"> a. Embedding in building b. Local renewables c. Grid supplied renewable energy <p>Criterion 5 reflects the North East RSS, in that it sets a target for 10% on site renewable energy provision. However, the RSS acknowledges that this may not always be feasible or viable, depending on the type of development and its design. Furthermore, it is our client's view that this requirement is dealt with adequately through the Code for Sustainable Homes and therefore there is no need to repeat the policy here.</p> <p>Criterion 8 sets a requirement for all new homes to be built to lifetimes standards by 2013. It is our</p>	<p>. To be reviewed (along with Jomast Developments)</p>

Respondee	Type	Comment	Council Response
57/2/7 Barratt Newcastle, Nathaniel Lichfield and Partners		<p>client's views that this reflects a government objective but should not be set as a specific policy requirement. In light of the comments made above, criterion 1) should be changed to read: "All new development will achieve a minimum of level 3 of the code for sustainable homes up to the end of 2013, and thereafter a minimum Code Level 4."</p> <p>Criterion 2) should be changed to read: "All new non-residential developments will be completed to a Building Research Establishment Environmental Assessment Method (BREEAM) of 'very good' up to the end of 2013 and thereafter a minimum rating of 'excellent.'"</p> <p>Criterion 5 should be changed to read: "For all major developments, including residential developments comprising 10 or more units and non-residential developments exceeding 1000 square metres gross floor space, 10% of total predicted energy requirements will be provided, on site, from renewable energy sources, unless having regard to the type of development involved and its design, this is not feasible or viable."</p> <p>Criterion 8 should be amended to read: "By 2013 the Council will seek that all new homes will be built to Lifetime Homes Standards."</p>	<p>Already included. The policy already recognises that RSS targets are not ceilings. Housing trajectory work indicates that the brownfield completions target in the RSS to 2016 can be exceeded through current commitments. The SHLAA report 2008 details the testing of deliverability of planning permissions.</p>
	Objection	<p>There appears to be a drafting error in the text accompanying policy CS7 in paragraph 12.1. It should refer to the period 2004-2024, rather than 2004-2021.</p> <p>Criterion 1 iii) sets a target of 75% of new housing completions on previously developed land. However, the RSS proposes a target of 70% of completions on previously developed land in 2008, rising to 75% in the second phase of the plan. We would highlight that this blanket target of 75% is inconsistent with the phased RSS target. We acknowledge that this is a target rather than a minimum requirement and in our view should therefore not be used as a basis for refusing applications for housing on sustainable Greenfield sites, if appropriate.</p> <p>Criterion 2 states that no additional housing allocations will be made before 2016, as in the Council's view the RSS housing provision targets over that period have already been met through existing planning permissions. This should not, however prevent applications coming forward during this period, especially those that would deliver affordable housing to meet the needs that cannot be met by committed supply.</p> <p>However, it is not clear from the Core Strategy whether the 9,200 units of committed supply have yet been subject to a delivery assessment against the relevant criteria of PPS3 and via the SHLAA process. In this regard, we would draw the Council's attention to PPS3's paragraph 58 which states that:</p> <p>'In determining how much land is required, LPAs should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged'.</p> <p>In view of the above there is no clear demonstration within the Core Strategy or its accompanying evidence base that sites with planning permission have been considered against the above criterion. In our view such a demonstration should be provided alongside developers and other key stakeholders.</p>	

Respondee	Type	Comment	Council Response
57/3/8 Barratt Newcastle, Nathaniel Lichfield and Partners	Objection	<p>Some of these permissions may not be implemented in the first phase, if at all. Indeed, sites that were granted planning permission relatively recently may no longer be viable in the current economic climate. Additional sites may need to be allocated to meet the requirement in the first phase of the plan. Indeed, we would highlight that the RSS indicates that its housing requirements should be treated as minimum requirements, not as ceilings not to be exceeded. Its paragraph 3.89 states:</p> <p>‘It is emphasised that the gross and net dwelling provisions set out in Policy 28 are guideline figures and do not represent a ceiling; LDFs may make the case for higher figures as appropriate’.</p> <p>In view of this, new sites may well need to be allocated in the first phase of the plan.</p> <p>In respect of Criteria 3 and 4, we note that these target ranges may need to be reviewed following the update of the SHLAA housing trajectory in March.</p> <p>Furthermore, it has recently been announced by the Government Office for the North East that Tees Valley has now secured growth point funding. Cognisant of the 20% uplift on RSS targets required by growth point status, further housing land is likely to be needed to be identified in order to support an increased housing requirement. While we recognise and support the need for flexibility in this policy, we would suggest that there is scope to make this policy slightly clearer in terms of how the RSS requirement is going to be met in the three plan periods.</p> <p>Given that growth point funding has now been secured, it is considered that the policy should be updated to clarify how housing delivery will be accelerated. The council now needs to be clear within the Core Strategy about how much and when housing growth will be accelerated.</p>	No change requested.
58/1/0 Environment Agency,	Objection	<p>The term International Nature Reserve’ is incorrect these symbols roughly approximate to the Teesmouth National Nature Reserve and the new RSPB Saltholme reserve. The designated areas should be defined more accurately on the Core Strategy Diagram. These areas involve significant issues (see comments on CS10 and elsewhere) and must be clearly indicated and referenced.</p> <p>The Sub-regional (Tees Valley) SHMA is under preparation but we understand that it will be made publicly available imminently. We understand from officers of the council that the findings of the SHMA will inform the 2008 review of the 2006 Local Housing Assessment, which is now out-of-date. We reserve the right to comment further on this policy following the publication of the Sub-regional SHMA and the Local Housing Assessment 2008 Update.</p>	Change made. Changes made to Strategic Diagram as appropriate.
58/2/0 Environment Agency,	Objection	<p>We consider that these representative symbols are inadequate to represent the spatial context of internationally and nationally significant nature conservation areas which must be given appropriate protection and enhancement through the LDF. The designated areas should be defined more accurately on the Core Strategy Diagram. These areas involve significant issues (see comments on CS10 and elsewhere) and must be clearly indicated and referenced.</p>	Change made. Changes made to Strategic Diagram as appropriate.
58/3/10 Environment Agency,	Objection	<p>It is also unclear how the shaded area identified as ‘Haverton Hills/ Seal Sands Corridor - CS10’ relates to Policy CS10, the area is not referred to in the policy, and overlaps in part with the designated nature conservation sites and with developed areas. To be effective the intention needs greater clarification in</p>	Change made. Changes made to Strategic Diagram as appropriate.

Respondee	Type	Comment	Council Response
59/1/1 Dalton Warner Davies LLP,	Objection	<p>Policy.</p> <p>Point 1 of policy CS1 should be aligned better with the RSS.</p> <p>Point 1 of policy CS1 states that “The regeneration of Stockton will support the development of the Tees Valley City Region, as set out in Policy 6 of the Regional Spatial Strategy, acting as a focus for jobs, services and facilities consistent with its role as part of the Teesside conurbation”.</p> <p>Policy 6 of the RSS supports “the polycentric development and redevelopment of the...Tees Valley City-Region by concentrating the majority of new development in the two Conurbations and the Main Settlements”. Paragraph 2.9 explains that “the Tees Valley Conurbation comprises the contiguous built up areas of Stockton, Middlesbrough and Redcar”.</p> <p>Reference should also be made in Point 1 of policy CS1 to Policy 10 of the RSS which states “Strategies, plans and programmes, and planning proposals, should support the polycentric development and redevelopment of the Tees Valley City-Region by: ...</p> <p>10.2 Economic Prosperity</p> <p>c. ...supporting the development of business and financial services and new city scale leisure, cultural and retail development in Stockton and Middlesbrough”.</p> <p>The above could be better achieved by referring to both Policies 6 and 10 in policy CS1.</p>	Change made. Change made as requested
59/2/1 Dalton Warner Davies LLP,	Objection	<p>Point 2 of policy CS1 states that “Priority will be given to previously developed land in the Core Area to meet the Borough’s housing requirement. Particular emphasis will be given to projects that will help to deliver the Stockton-Middlesbrough Initiative and support Stockton town centre”.</p> <p>The supporting text to policy CS1 at paragraph 6.4 justifies this spatial strategy approach by explaining that it supports the concept of the Stockton-Middlesbrough Initiative (SMI) and development of a Green Blue Heart and the regeneration of Stockton town centre. It needs to be made absolutely clear in policy CS1 that the priority of the Core Strategy is to attract investment to Stockton town centre in accordance with PPS6 and that support will only be given to SMI projects where they also support the regeneration of Stockton town centre. For example The Stockton-Middlesbrough Initiative report “Green Blue Heart Plan” (August 2007) “notes the potential for “sympathetic but stunning development” in Portrack and for leisure, hotel and retail development alongside a new transport hub at Maze Park” (page 15). Policy CS1 should be amended so that it is clear that the strategy will not support SMI projects which include retail development that could compete with the town centre as this would not provide support to the regeneration of the town centre. The policy should also include a stand-alone statement that proposals for development and/or changes of use in Stockton town centre will be supported where they contribute to the regeneration of the town centre. Policy CS1 should be amended so that it is clear that the strategy will not support SMI projects which include retail development that could compete with the town centre as this would not provide support to the regeneration of the town centre. The policy should also include a stand-alone statement that proposals for development and/or changes of use in Stockton town centre will be supported where they contribute to the regeneration of the town centre.</p>	Already included. The issue of retail development is covered in Policy CS5 Town Centres. This makes it clear that no new retail allocation are required and that Stockton will continue as the Borough's main shopping centre. Further retail development will not be permitted at Portrack Lane.
59/3/5 Dalton Warner Davies LLP,	Comment	<p>CS5.1</p> <p>Stockton town centre has suffered from increased retail competition from out of town retail development at Teesside Park and Portrack Lane.</p>	Too detailed for the Core Strategy. This issue will be dealt with in other policy documents.

Respondee	Type	Comment	Council Response
59/4/5 Dalton Warner Davies LLP,	Objection	<p>We support point 1 of draft policy CS5, with the proviso that additional retail floor space and other uses appropriate to the town centre such as Classes A2, A3, A4, A5 uses may be permitted where there is a need to bolster the centre. We support point 1 of draft policy CS5, with the proviso that additional retail floor space and other uses appropriate to the town centre such as Classes A2, A3, A4, A5 uses may be permitted where there is a need to bolster the centre.</p> <p>CS5.2 It is important that the Core Strategy demonstrates support for existing investors and businesses in Stockton town centre and in the case of Wellington Square, to support investment in new floor space and flexibility to enable an appropriate tenant mix.</p> <p>For the reasons above policy CS5 should enable other town centre uses, such as Use Classes A2, A3, A4, A5 to be accommodated within the current primary shopping frontage where this will contribute to the level of activity within the town centre.</p> <p>Paragraph 10.1 of the supporting text to Policy CS5 correctly identifies that "Concentrating retail opportunities and other town centre uses in the town and district centres will provide and maintain attractive and accessible shopping facilities to meet the needs of the local population as a whole, and will protect and enhance the vitality and viability of the roles that the hierarchy of centres play towards the provision of retailing." Point 2(iii) of policy CS5 also states that "Other initiatives will include...providing additional leisure opportunities, and other town centre uses, in accordance with PPS6." The conclusion to the above is that Point 2(iii) seemingly recognises the case for allowing "other town centre uses" such as Classes A2, A3, A4, A5 and if that is not the case then 2(iii) should be widened to make it clear that such uses in the town centre are acceptable.</p> <p>As a reminder, PPS6 states that "Where existing centres are in decline, local planning authorities should assess the scope for consolidating and strengthening these centres by seeking to focus a range of services there, promote the diversification of uses and improve the environment."</p> <p>With regard to the role of Stockton as a market town, care must be exercised to ensure that these market activities do not detract from the shopping environment. Point 2(iii) of policy CS5 also states that "Other initiatives will include...providing additional leisure opportunities, and other town centre uses, in accordance with PPS6." The conclusion to the above is that Point 2(iii) seemingly recognises the case for allowing "other town centre uses" such as Classes A2, A3, A4, A5 and if that is not the case then 2(iii) should be widened to make it clear that such uses in the town centre are acceptable.</p>	Already included.
59/5/5 Dalton Warner Davies LLP,	Comment	<p>We strongly support the requirement of policy CS5 in referring to Teesside Park and Portrack Lane, that "No additional retail or leisure development will be permitted in these locations" but we recommend that the policy is amended to read only "At Teesside Park and Portrack Lane no additional retail or leisure development will be permitted in these locations, including the addition of retail mezzanine floors." Amend CS5 to state "At Teesside Park and Portrack Lane no additional retail or leisure development will be permitted in these locations, including the addition of retail mezzanine floors."</p>	Already included.
60/1/5 ASDA Stores, Drivers Jonas LLP	Objection	<p>We are concerned that as drafted policy CS5 does not provide enough flexibility to respond to changing circumstances and is contrary to National and Regional Policy we therefore object to this policy as drafted.</p> <p>We recognise that Stockton Town Centre is to remain the principle service centre and that there is a</p>	Does not conform to the Spatial Strategy. Stockton- Middlesbrough Joint Retail Study indicates that it is necessary for Stockton to increase its existing market share of

Respondee	Type	Comment	Council Response
61/1/1 Tesco Stores Ltd, GVA Grimley	Objection	<p>need for possible diversification to help to attract new business and that there is development in the pipeline. However, through placing what is essentially a ban on any future development opportunities coming forward the economy of the area as a whole could suffer. Indeed Policy 25 of the North East Regional Spatial Strategy (RSS) states that Stockton will continue to have an important role in servicing the hinterland.</p> <p>Part 6 of the policy as it stands also restricts development beyond the restrictions advocated in PPS6 and does not provide appropriate flexibility.</p> <p>National Policy in relation to retail and other town centre uses is set out in PPS6 which instructs a town centres first policy, not a town centres only policy. Further to this within the justification for Policy 25 of the RSS it states that 'scale of new development within town or other district centres should be based on the sequential approach and locational strategy to reflect their role in the region.'</p> <p>It is considered that as drafted the policy is not consistent with national and regional policy in that it seeks prevent development and does not allow development to come forward if appropriate need is established. We would therefore request that Part 6 of the policy is re-drafted to incorporate greater flexibility or removed.</p>	<p>expenditure, particularly relative to Teesside Park. To achieve this, no further expansion of the out of centre retail and leisure developments at Teesside Park and Portrack Lane will be permitted. These local circumstances dictate that both out of centre and out of town retail development is not suitable in Stockton.</p>
		<p>The spatial strategy promoted through Policy CS1 poses a risk to the continued development, vitality and viability of the retail hierarchy within the Borough. Chapter 4 of PPS12 and paragraph 1.6 of PPS6 dictate that through the Core Strategy Local Planning Authorities should set out a clear spatial vision and strategy for the network and hierarchy of centres within their area. Policy CS1 fails to adequately represent the function of centres within the Borough and does not accurately reflect the borough wide hierarchy to give spatial representation in accordance with PPS6: Planning for Town Centres. The Policy is therefore considered unsound on the grounds of both effectiveness and compliance with nation planning guidance.</p> <p>The Core Strategy acknowledges that Ingleby Barwick has been the focus for housing development for the past 20 years, and with housing commitments totalling 1600 units (Policy CS7), Ingleby Barwick has the second highest number of commitments for housing in the Borough after the Core Area. With an existing population of over 20,000 people, the spatial strategy must adequately meet the needs of its large and expanding local population, and policies throughout the Core Strategy should recognise the capacity for increased housing provision and the demand this creates for shops, services and community facilities. Vibrant and successful centres make a vital contribution to sustainable communities, reducing the need to travel to other centres to access essential services. As set out in the Climate Change Annex of PPS1 (2007), addressing climate change is the Government's principal concern for sustainable development and climate change considerations should be integrated into all spatial planning concerns, including the ability to build and sustain socially cohesive communities with appropriate community infrastructure. Policies which promote housing development in Ingleby Barwick without allowing development of shops, services and community facilities of an appropriate scale undermine the sustainability of this centre as people are forced to travel further to meet their needs, increasing dependence on the private car and associated emissions. This is in direct conflict with the aims of PPS1 and Climate Change Annex and Policy CS2 (Sustainable Travel) and is therefore considered unsound.</p>	<p>Does not conform to the Spatial Strategy. Does not accord with definition in PPS6 for District Centre.</p>
		<p>Extending Ingleby Barwick to acknowledge its function as a District Centre in line with other similar</p>	

settlements, including the provision of additional retail floorspace, services and facilities and public realm would provide a centre of a more adequate scale with an effective community centre to support its growing population. This would also support the Government's sustainability objectives of focusing development in existing centres and improving local access to shops, leisure and community facilities whilst increasing inclusivity, sustaining more socially cohesive communities and reducing dependence on the private car as set out in Policy CS2 (Sustainable Transport).

Development of Ingleby Barwick in line with its function as a district centre will in no way prejudice the vitality or viability of other centres within the Borough when regeneration proposals at these centres are considered. Both Billingham and Thornaby are subject to significant regeneration schemes which will comprehensively redevelop the town centres, including the remodelling and expansion of the existing retail provision. Yarm is the subject of an Area Action Plan currently being prepared as part of the emerging LDF which seeks to protect and enhance its retail offer. Consequently, proposals to extend Ingleby Barwick to acknowledge its function as a District Centre in line with other similar settlements will have negligible impact on the performance or development of other centres in the retail hierarchy.

It is not considered that these redevelopment proposals have been given sufficient consideration in the context of facilitating appropriate development of Ingleby Barwick, or the resultant impact on the retail hierarchy. The need for policies which support the regeneration of nearby centres such as Thornaby and Billingham is recognised but this should not be at the expense of other centres within the retail hierarchy which should facilitate fair competition. Ingleby Barwick should be allowed to function appropriately within the hierarchy in a complementary role; the vitality and viability of Ingleby Barwick should not be threatened at the expense of regeneration of other nearby centres and a more sustainable approach to local services needs to be provided.

Examining the key diagram, it is also worthy of note that out of the 5 Housing Sub-Division areas, Ingleby Barwick is the only sub-area without a town or district centre. This balance must be addressed and Ingleby Barwick recognised more strongly within the spatial strategy and retail hierarchy with designation as a district centre in accordance with the guidance established in PPS6 to create a more sustainable environment. Currently, residents of Ingleby Barwick must travel out of the settlement to meet their needs.

Policy CS1 claims that the conurbation includes the built up areas of Stockton, Billingham, Thornaby, Yarm and Eaglescliffe without reference to Ingleby Barwick and it is unclear whether Ingleby Barwick is included in the conurbation as indicated in grey on the Core Strategy Diagram. Spatially Ingleby Barwick lies between Thornaby, Eaglescliffe and Yarm and is therefore implicitly contained within the built up area of the Borough. As a large settlement and a focus for housing growth within the Borough, Ingleby Barwick contributes to the conurbation of the Borough. As such failure to include Ingleby Barwick within the conurbation is considered unsound by inadequately representing the spatial function of the region. ADDITION OF NO. 4 The needs of the growing population of Ingleby Barwick will be catered for through its designation as a District Centre. The provision of shops, services and community facilities which adequately meet the needs of its large and expanding population and contribute towards the vitality and sustainability of Ingleby Barwick will be supported.

(In line with PPS1: Delivering Sustainable Development, PPS! Annex on Climate Change, PPS6: Planning for Town Centres and PPS12: Local Development Frameworks.)

Respondee	Type	Comment	Council Response
61/2/5 Tesco Stores Ltd, GVA Grimley	Objection	<p>Retention of the existing retail hierarchy as promoted through Policy CS5 of the Core Strategy is constraining retail development necessary to ensure vital, viable and sustainable centres within the retail hierarchy. This is contrary to national planning policy guidance as set out in PPS6: Planning for Town Centres and the sustainability principles outlined in PPS1: Delivering Sustainable Development (2005) as well as Core Strategy Objective 4 which aims to deliver healthy and vibrant centres and the policy is therefore considered unsound.</p> <p>PPS6 defines town centres as follows: Town centres will usually be the second level of centres and, in many cases, they will be the principal centre or centres in a local authority area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing facilities and services for extensive rural catchment areas.</p> <p>Whilst it is agreed that Stockton provides the principal town centre function in the Borough, acting as an important retail and service centre for an extensive catchment area and population, Billingham, Thornaby and Yarm also perform town centre functions within the local authority area. This is demonstrated by the range of services within the respective centres and the extensive retail floorspace.</p> <p>Thornaby is home to a large superstore of 100,000 sqft of retail floorspace. Alongside its retail offer, the centre provides a leisure centre (The Pavilion), a dental centre, hotel, library, a community centre and existing office floorspace. This scale of retail development and its function is that of a town centre, serving a wide catchment and large population. Billingham has a wide retail provision, including a selection of multiples with a significant comparison offer and anchor Asda store. The town centre is also home to the Forum centre, including a swimming pool, bowling hall, and squash courts as well as offices and conference facilities. It also houses a police station, council offices and a library. Yarm is an attractive, traditional linear market town with a wide selection of shops and services. The retail offer is beyond simple convenience provision and includes some household name stores, as well as high quality niche independents.</p> <p>Billingham, Thornaby and Yarm are all acknowledged as important town centres in Objective 4 within the Core Strategy, yet they remain allocated as District Centres. This approach is inconsistent, both with activity on the ground and the recommendations of PPS6, questioning the effectiveness and deliverability of the policy as well as compliance with national planning guidance.</p> <p>Myton Way at Ingleby Barwick is currently designated as a local centre in the retail hierarchy retained within Policy CS5. However its role is greater than a local centre, with the facilities normally found in a district centre. PPS6 defines a district centre as follows:</p> <p>"District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library."</p> <p>Providing a large supermarket and a library, medical centre, health club, funeral director, dental centre, chiropodist, and a veterinary surgery, as well as a selection of other shops and services, Ingleby Barwick provides a retail offer over and above that of a local centre in PPS6 terms, and is clearly performing a district centre role for its large and expanding local population.</p>	Does not conform to the Spatial Strategy. Does not accord with definition in PPS6 for District Centre.

PPS6 states that LPAs should define a network and hierarchy of centres each performing their appropriate role to meet the needs of their catchments. LPAs must also recognise that networks and hierarchies are dynamic and will change over time and should take a positive and pro-active approach to planning for the future of all types of centre within their area through the development plan process. Ingleby Barwick is identified as having a growing population and is a focus for housing growth (as recognised in Policy CS6 and CS7). With housing commitments totalling 1,600 units (Policy CS7), Ingleby Barwick has the second highest number of commitments for housing in the Borough after the Core Area. With an existing population of over 20,000 people before growth from these commitments is taken into account, the scale and growth of the centre and its catchment has not been adequately reflected within the hierarchy within the Borough. Stockton must therefore prepare a Core Strategy which corrects the clear discrepancies between the allocation of centres and the functions they play within the retail hierarchy and for the growing local population. It is therefore recommended that Billingham, Thornaby and Yarm are promoted to town centres, commensurate with their function and acknowledged role as Town Centres in Core Strategy Objective 4, and that Ingleby Barwick is designated as a District Centre, with associated extension to the centre boundary, to more adequately serve the needs of its large and expanding population, promoting and enhancing the vitality and viability of the retail hierarchy as a key objective of PPS6. This is in line with Core Strategy Objective 4 which aims to deliver healthy and vibrant centres and the guidance contained within PPS6, and is reaffirmed by Policy 25 of the RSS (Urban and Rural Centres) which directs additional retail, leisure and service provision to existing centres proportionate to their scale and function.

Significantly, development of Ingleby Barwick in line with its function as a district centre will in no way prejudice the vitality or viability other centres within the Borough when regeneration proposals at these centres are considered. Both Billingham and Thornaby are subject to significant regeneration schemes which will comprehensively redevelop the town centres, including the remodelling and expansion of the existing retail provision. Yarm is the subject of an Area Action Plan currently being prepared as part of the emerging LDF which seeks to protect and enhance its retail offer. Consequently proposals to extend Ingleby Barwick to acknowledge its function as a District Centre in line with PPS6 will have negligible impact on the performance or development of nearby centres, facilitating appropriate development of Ingleby Barwick, or the resultant impact on the retail hierarchy. Policy CS5 currently results in an over-concentration of growth in the higher level centres. As recognised within PPS6:

"[larger centres have in the past been the focus for much development and investment, but local planning authorities should consider whether a more balanced network of centres should be developed within their area (PPS6 Paragraph 2.57)."

Proposals to regenerate nearby centres must be countered with appropriate development and improvement in centres lower down the retail hierarchy if their vitality and viability is to be maintained. Ingleby Barwick must therefore be allowed to develop in line with the regeneration of higher order centres to safeguard its viability and sustainability as people are forced to travel further to access improved retail services elsewhere. Without appreciation, and mitigation, of the long-term impact on the health and sustainability of Ingleby Barwick in relation to ongoing regeneration in neighbouring centres, the effectiveness of policy CS5 is considered unsound with regard to its effectiveness and guidance contained within PPS6 and PPS1 and Core Strategy Policy CS4.

Respondee	Type	Comment	Council Response
61/3/6 Tesco Stores Ltd, GVA Grimley	Objection	<p>The Core Strategy states that a re-evaluation has been carried out within the Borough to reassess the retail hierarchy, and that no changes are proposed as a result. This is part of a wider document not yet available for public consultation. Without publication of the assessment and associated scrutiny of the methodology and its recommendations, a reasonable judgement to maintain the current hierarchy cannot be made. As such the soundness of the evidence base for Policy CS5 is seriously questioned.</p> <p>2. Stockton will continue in its role as the Borough's main shopping centre, defined as the Principal Town Centre in the retail hierarchy.</p> <p>3. Billingham, Thornaby and Yarm will function as town centres. Priority to regeneration initiatives will be given to: AS EXISTING.</p> <p>4. Ingleby Barwick will be promoted to a District Centre within the retail hierarchy in accordance with Planning Policy Statement 6: Planning for Town Centres. Development will be promoted and supported provided that it complements the District Centre and is in accordance with Planning Policy Statement 6: Planning for Town Centres.</p> <p>5 (Previously 4). Elsewhere, within the local shopping centres of Billingham Green in Billingham, Norton High Street and Newham Court in Stockton, and the neighbourhood centres, AS EXISTING.</p> <p>6 (Previously 5). AS EXISTING.</p> <p>7 (Previously 6). AS EXISTING.</p> <p>(In line with PPS1: Delivering Sustainable Development, PPS1 Annex on Climate Change, and PPS6: Planning for Town Centres).</p>	Does not conform to the Spatial Strategy. Retail is dealt with within Policy CS5
		<p>As acknowledged in CS Policy 7, with housing commitments totalling 1,600 units, Ingleby Barwick has the second highest number of commitments for housing in the Borough after the Core Area. With an existing population of over 20,000, policies throughout the core strategy should recognise the capacity for increased housing provision within the centre and the demand this will create for shopping, essential services and community facilities.</p> <p>Policies which promote housing development in Ingleby Barwick without allowing development of local retail, service and community facilities undermines the sustainability of this centre and increases the potential for residents to travel further for essential shops, services and community facilities, increasing reliance on the private car and associated emissions. This is contrary to the guidance as set out in PPS1: Delivering Sustainable Communities (2005) and the Annex on Climate Change (2007) and PPS6: Planning for Town Centres (2005) and is therefore considered unsound.</p> <p>Retail and service provision in line with community facilities will promote the health and sustainability of Ingleby Barwick, reducing the need for people to travel for retail and community facilities and services. ADDITION TO PARAGRAPH 1: Retail and service provision which caters for the growing population of Ingleby Barwick in line with this will be supported.</p> <p>(In line with PPS1: Delivering Sustainable Development, PPS1 Annex on Climate Change, and PPS6: Planning for Town Centres).</p>	

Respondee	Type	Comment	Council Response
61/4/11 Tesco Stores Ltd, GVA Grimley	Objection	<p>Appropriate planning obligations are essential to mitigate the undesirable consequences of development (social, economic, environmental). However, to be effective and in keeping with national planning guidance provided in Circular 05/05 governing their use, planning obligations must be appropriate, reasonable and fit for purpose, and justified by the anticipated consequence of development (mediation of which is essential to make the development acceptable in planning terms). Planning obligations should be negotiated on a site by site basis to enable a fair and flexible approach to proposed development and its anticipated impact. The level of developer contribution must be proportionate to the nature and scale of the development proposed and based on a reasonable and transparent assessment of the predicted impact. The current wording of Policy CS11 (specifically ALL new development) provides no clarification on the circumstances which developer contributions will be applied and gives the impression that all proposed development will be subject to planning obligations, regardless of the likely impact. This runs contrary to national planning guidance as set out in circular 05/05. As such the effectiveness and deliverability of the policy is questioned and its content considered unsound.</p> <p>Whilst the policy recommends priorities for which the Borough will seek contributions, these must be directly linked to the impact of the development proposed, mediation of which is essential to make the development acceptable in planning terms (as per guidance contained within Circular 05/05). The nature and extent of developer contributions necessary to improve transport infrastructure should be made clear and calculated on a site by site basis in a transparent manner with respect to the likely impact on the strategic highway network of the development proposed. Again the wording in the second part of the policy makes no reference to how and when planning conditions will be imposed and, without modification as suggested below, is unsound with regards to its effectiveness, deliverability and compliance with national planning guidance.</p> <p>1. Where development results in an unacceptable impact on infrastructure provision, developers will be required to contribute towards the cost of providing additional infrastructure and meeting social and environmental requirements. Contributions will be appropriate, reasonable and directly linked to the anticipated consequence of development.</p> <p>2. Where required, when seeking contributions the priorities for the Borough are the provision of:</p> <p>Highways and transport infrastructure Affordable Housing Open space, leisure and recreation facilities, with particular emphasis on the needs of young people.</p> <p>The level of contribution will be proportionate to the nature and scale of the development proposed and directly linked to the predicted impact.</p> <p>(in line with circular 05/05).</p>	<p>Already included. The supporting justification of this policy identifies that will regard will have to be had to the Council's SPD and Circular 05/05, which provides policy guidance on planning obligations. The changes proposed would result in a repetition of planning policy established in circular 05/05. Inclusion of this text would therefore be contrary to Planning Policy Statement 12 (Local Spatial Planning), paragraph 4.32.</p>
61/5/0 Tesco Stores Ltd, GVA Grimley	Objection	<p>According to the Core Strategy Diagram, out of the 5 Housing Sub-Division areas Ingleby Barwick is the only sub-area without a town or district centre. This balance must be addressed and Ingleby Barwick recognised more strongly within the spatial strategy and retail hierarchy with designation as a district centre in accordance with the national planning guidance established in PPS6.</p> <p>The development of Ingleby Barwick has dominated the housing supply for the past 20 years, creating a new settlement. Policy CS7 indicates that the centre has the second highest number of housing commitments in the Borough after the Core Area. However, this dominance is not reflected in the spatial strategy for the borough. Policy CS1 claims that the conurbation includes the built up areas of Stockton,</p>	<p>Partial change made. Minor change to strategic diagram for clarification. To be consistent with Policy CS5 the Strategic Diagram should show local centre in Ingleby Barwick.</p>

Respondee	Type	Comment	Council Response
		<p>Billingham, Thornaby, Yarm and Eaglescliffe without reference to Ingleby Barwick and it is unclear whether Ingleby Barwick is included in the conurbation as indicated in grey on the Core Strategy Diagram. Spatially Ingleby Barwick lies between Thornaby, Eaglescliffe and Yarm and is therefore implicitly contained within the built up area of the Borough. As a large settlement and a focus for housing growth within the Borough, Ingleby Barwick contributes to the conurbation of the Borough. As such failure to include Ingleby Barwick within the conurbation is considered unsound by inadequately representing the spatial function of the region. Ingleby Barwick to be indicated as a District Centre on the Core Strategy Diagram and included within the conurbation (shaded grey).</p> <p>(In line with PPS6: Planning for Town Centres and PPS12: Local Developments Frameworks)</p>	
62/1/0 Tithebarn Land,	Objection	<p>It is less than clear from Paragraph 3.10, paragraph 3.11 and particularly 3.12 what is the basis of the Core Strategy.</p> <p>In relation to housing, Paragraph 3.12 is especially vague. It is difficult to understand: what is the basis for housing policy in the strategy; which aspects of the Preferred Options have been adopted; and what is the nature of the impact of education and health service providers on the scale and distribution of future housing. Without greater clarity, and an ability to question the basis upon which the Core Strategy is founded, substantive elements must be suspect. The Core Strategy should state clearly and justify the hybrid option it adopts, and, in relation to housing, explain why the Core Area/previously-developed land model has been preferred to other potential means of providing sustainable development.</p>	Change made. Acknowledged that the wording needed to be clearer.
62/2/8 Tithebarn Land,	Objection	<p>In relation to 'modern executive housing in order to promote Stockton as an attractive location for new businesses', it is unclear as to why there is mention that 'Eaglescliffe is a particularly attractive location for this type of offer.....' while no reference is made to any of the other locations in the Borough that are equally attractive.</p> <p>If the suggestion is that the subdivision of large gardens in Eaglescliffe to allow for new executive housing is either a sufficient or a sustainable means of providing the range, number and quality of executive houses required in the Borough to underpin investment in new businesses, then the statement clearly points to a flaw in the Policy and raises questions as to the soundness of this element of the Strategy. Eaglescliffe has been the subject of many 'infill' planning permissions in recent years the cumulative effect of which has been to dilute the character of the area, dominated as it once was by substantial dwellings in generous grounds, but now characterised by large dwellings slotted awkwardly onto limited sites, sitting uncomfortably with neighbouring dwellings and detracting from the original character of the area.</p> <p>If it is suggested that Eaglescliffe is a suitable site for Greenfield development on the periphery, this also must be questioned because the quality of the landscape surrounding Eaglescliffe is generally high, such that any new housing development beyond existing limits would be seriously harmful to amenity, more so than would a similar development in other locations on the edge of Stockton. The Policy must do more to explain why Eaglescliffe is seemingly the preferred location for modern executive housing and why other named locations are not similarly considered acceptable.</p>	Change made. Change made to provide clarification
62/3/1 Tithebarn Land,	Objection	<p>The Spatial Strategy is fundamentally unsound due to an over-reliance on the Core Area for new housing. The Spatial Strategy implicitly acknowledges that the majority of new employment development will continue to be provided away from the Core Area at locations at Seal Sands, Wynyard, Eaglescliffe and Durham Tees Valley Airport. The concentration of new housing in the central part of Stockton at a</p>	Does not conform to the Spatial Strategy. The priority given to sustainable brownfield locations within the urban area is consistent

Respondee	Type	Comment	Council Response
		<p>considerable distance from such sources of existing and particularly future employment will do little to guarantee the sustainability sought by the Core Strategy as a whole, the location of the new housing proposed giving rise to a considerable volume of car-based movements, regardless of the distant, hoped-for improvements to the Tees Valley public transport infrastructure, which will never be sufficient to provide the necessary linkage between employment and residential locations.</p> <p>There is not a sufficient range in the type of sites in a quality setting that will promote housing to satisfy the increasingly varied customer base to be served. Ignoring the potential of urban extensions on greenfield sites will prove fatal to attracting wealth creating in-migrants, who will continue to choose to make their home in North Yorkshire and South Durham, as they do at present, to the detriment of the local economy and the environment generally, such locations occasioning a considerable commute, which would be obviated by providing an attractive setting for housing through a selective urban extension to the north-west of Stockton. It is not apparent that any detailed consideration has been given to the value of an urban extension to the north-west of Stockton. The Spatial Strategy should be extended to recognise the value of the more varied and diversified offer that would be available with such an additional element in the framework of sites for housing, particularly in relation to higher quality, sustainable homes.</p>	with national guidance.
62/4/5 Tithebarn Land,	Objection	<p>In order to provide for the role- change for Stockton Town Centre aspired to within the Core Strategy, the Strategy needs to provide more positive action to strengthen the catchment of the Centre. The type of priority locations proposed for new housing in the Strategy will not provide the volume of quality accommodation that will be required to generate the spending power required to bring about and sustain the desired diverse and up- market retail offer. While the aspiration to improve the nature of the Town Centre's offer may be welcome, there is nothing in the content of Policy CS5 that suggests that this will be achieved. To that extent the Policy is unsound. Rather than merely focusing on the Core Area as the "driver" for new development, the strategy should recognise the valuable role that other locations may perform in attracting the high income households that may be motivated to spend in the Town Centre. An urban extension of high quality housing of a type lacking in the Town would make a robust contribution towards the strengthening of the retail catchment.</p>	Does not conform to the Spatial Strategy. The priority given to sustainable brownfield locations within the urban area is consistent with national guidance.
62/5/1 Tithebarn Land,	Objection	<p>The Spatial Strategy is unsound in the over-concentration of new housing in poor quality environments and in the limited distribution of such housing in the context of the wider urban area. The locations intended for new housing involve very costly redevelopment; rely on costly and very extensive changes in the quality and amenity of substantial parts of the urban area as a precursor to any new housing of a suitable form and character with any hope of proving attractive and successful; will never possess the character or special quality that will attract the wealth-creating in-migrants so badly needed in the Borough; and in the case of such locations as those in the Green Blue Heart should not even be considered for development, given the important role such open locations play in keeping apart distinct settlements with their own particular character.</p> <p>There is a considerable leap of faith and little sound reasoning in the narrow conception of what the Borough needs for a sustainable future, giving due consideration to the dynamics of the urban areas as a whole. Considerable swathes of the urban area and its hinterland are neglected in the Spatial Strategy, relegated from proper attention as an alternative means of generating and accommodating future growth. An urban extension will have as positive an impact on growth as will the majority of sites in the Core Area. All the Borough's future housing needs will not be adequately or qualitatively met by reliance on the types of location reflected in the Spatial Strategy. This fact should be recognised by</p>	Does not conform to the Spatial Strategy. The priority given to sustainable brownfield locations within the urban area is consistent with national guidance.

Respondee	Type	Comment	Council Response
62/6/3 Tithebarn Land,	Objection	<p>appropriate reference to the potential for selective greenfield development on the urban fringe to contribute equally positively to a sustainable future for the Borough.</p> <p>This is important in the context that the Council is seeking to concentrate new housing particularly in parts of the Borough in which the immediate environs are not conducive to the construction of the quality of housing that will be attractive to wealth creating in-migrants, who will choose to make their home away from the Borough, thereby occasioning considerable commuter journeys with all the attendant adverse impact on the environment and climate.</p> <p>The selective and judicious location of new modern executive housing within a carefully crafted setting in an urban extension will help attract the in- migrants the Borough needs to invest and stimulate the local economy, their ultimate position on the urban fringe allowing far fewer and shorter journeys to and from employment centres and services, thereby reducing the emission of green house gases but, conversely, helping to support local services and facilities. The Core Strategy should include the facility to include an urban extension as a means to diversifying the housing offer and reducing the overall impact of the Strategy on the environment.</p>	<p>Already included. The priority given to sustainable brownfield locations within the urban area is consistent with national guidance. Policy CS2 deals with Sustainable Transport.</p>
62/7/7 Tithebarn Land,	Objection	<p>The policy is unsound, relying as it does on previously developed land in the Core Area. In terms of choice and variety, the distribution of sites in the Core Area and with planning permission elsewhere, presents a very narrow potential for the delivery of a sustainable pattern of development, restricting the range of housing available and not accommodating the aspirations of a significant element of the housing market. Ignoring the possibilities offered by selective urban extensions, limits the palette of opportunity.</p> <p>Certain locations favoured within the Core Area are no more sustainable than would be realised by the release of land at the edge of the urban area. Although housing in the Green Blue Heart is supported by the Core Strategy as a key location for new housing development, it occupies an isolated position distant from both Middlesbrough and Stockton. Development in such a location would give rise to as many car-based movements as would a site to the north-west of Stockton, and there would be little inclination for residents in housing there to support Stockton Town Centre, the location serving more to bolster the retail catchment of Teesside Retail Park and Middlesbrough Town Centre. There are no schools or other services nearby that could be accessed principally by public transport.</p> <p>There will be a greater likelihood of new residents in an urban extension at the north-west part of the town shopping in Stockton Town Centre, since it is more accessible than Middlesbrough or Darlington, and the location is better served by schools. The policy seems to be based too simply on an expectation that planning permissions will build out at the pace required to satisfy housing needs over consecutive five year periods and that expensive-to-develop previously-developed land will be readily available when needed.</p> <p>This is a high-risk approach to housing supply, ignoring the practicality of bringing land forward, particularly previously-developed land constrained by contamination from earlier uses, and especially in view of economic circumstances that are likely to persist for the foreseeable future, where the funds, both public and private, to invest in remediation and site improvement are likely to be severely limited.</p>	<p>Does not conform to the Spatial Strategy. The priority given to sustainable brownfield locations within the urban area is consistent with national guidance.</p>

Respondee	Type	Comment	Council Response
63/1/0 CPRE Stockton,	Objection	<p>The Council should be exploring ways of levering-in capital from more-readily developed sites in order to support highly-constrained locations, and should be setting up its Spatial Strategy to enable both identification and early release of such sites.</p> <p>References are made throughout the Core Strategy to 'previously developed land within urban areas' and 'brownfield land'. See CS8 12.31 page 45, when it is quite obvious that the intended definition refers to derelict buildings or land formerly and principally related to lost manufacturing industries. However, you will be aware that the legal 'planning' definition of previously developed land covers all buildings, including residential housing and their curtilages.</p> <p>Developers and proprietors have used this legal definition to their advantage in the past often paying over the market value to buy traditional, period, quality executive houses for demolition and higher density development. See 9.8 page 30. It is critical that a clear differentiation is made in this document; whenever the term is used (it even appears in the Draft Vision Statement 4.1 page 11). It must be precise as to which definition is being referred to i.e. the legal definition or the derelict buildings and land definition. See 3.9, bullet point 1 page9, CS1. Bullet point 2 and para 6.1 page 19. Para 6.5 page 20. CS7 1 iii). Where the term previously developed land is used it should suggest if this is the legal definition or the derelict buildings and land definition</p>	Contrary to National or Regional Policy. Definition of PDL is provided within PPS3.
63/2/0 CPRE Stockton,	Objection	<p>The map provided is inadequate in that in black and white, it is not easy to differentiate the border between Stockton and Middlesbrough. Assuming that people realise that the River is the border is not satisfactory. The border should be in bold for its entire length. Stockton-on Tees border should be in bold for its entire length on the map.</p>	Already included. The Core Strategy Diagram was produced in colour in the publication draft.
63/3/0 CPRE Stockton,	Objection	<p>This draft statement is unacceptable from 'residents have access to' to 'a better life for all'. The comments herein are accepted as aspirations for every Council in England and their inclusion is therefore pointless. Surely any unique features that apply to Stockton should be emphasised and developed. Reference should therefore be made to its excellent communications via its upgraded airport, new direct rail link to London and close proximity to the East Coast Rail Mainline. Reference should also be made to the City Region's two universities. Continuing first sentence leading the way in economic regeneration, developing a new knowledge based economy building on the expertise of the City Region's two universities'.</p> <p>Replace section between 'Residents have access to' and 'better life for all' with 'Stockton has excellent communications via its upgraded airport, new direct rail link to London and close proximity to the East Coast Main Line'.</p>	Too detailed for the Core Strategy. Comments appear to relate to the current position, rather than future aspirations.
63/4/4 CPRE Stockton,	Objection	<p>Welcome the reference to "the River Tees as a leisure, recreation and watersports destination", but feel that it is critical that reference is also made to the protection of tranquil areas of the river Tees particularly between Stockton and Yarm. Points iv) a should read,</p> <p>"The River Tees as a leisure, recreation and watersports destination, whilst also maintaining the areas of tranquillity, particularly those between Stockton and Yarm".</p>	Change made. Policy 4 Point 8 amended to include 'regard given to the protection and enhancement of the character of tranquil areas along the river corridor between the towns of Stockton and Yarm.
63/5/8 CPRE Stockton,	Objection	<p>Additional wording should be added after 'housing types', 'including the preservation of traditional, period, executive homes' 'particularly in Eaglescliffe'. This is inferred in the penultimate sentence in CS8, point 3, page 43 and CS8, point 12, page 44 but should be clarified by the above amendment. (There is significant demand throughout the U.K. for traditional, period executive houses with large gardens which</p>	Disagree. Executive Housing is not necessarily 'traditional period'. It can also be modern.

Respondee	Type	Comment	Council Response
		<p>appeal to families).</p> <p>The importance of this amendment is highlighted in CS8 12.25 last sentence of page 44 and first sentence of page 44 and first sentence of page 45 should have the words 'and traditional period' inserted between 'modern' and 'executive housing'.</p> <p>We have extreme concerns over CS8 12.43 page 47 'demolition and the provision of replacement housing that meets the needs and aspirations of the area may be the most positive option where housing is obsolete', in that it will be used in conjunction with the mis-use of the phrase 'previously developed land' by developers to justify their paying over the market value, buying traditional, period quality, executive houses with large gardens for demolition and higher density development. We therefore applaud the references to respecting existing character and the necessity for lower density development in CS8, 12.27, page 45 and the inappropriateness of high density referred to in CS8, 12.28 page 45. Additional wording should be added after 'housing types' 'including the preservation of traditional period, executive homes' 'particularly in Eaglescliffe'.</p> <p>In CS8 12.25 the first sentence on page 45 should have the words 'and traditional, period' inserted between 'modern' and 'executive housing'.</p>	
63/6/10 CPRE Stockton,	Support	We applaud the maintenance of strategic gaps and the green wedges detailed in policy CS10 points 3i) and 3ii).	No change requested. Support welcomed
63/7/0 CPRE Stockton,	Support	We applaud the references to the development of the "River Tees Park" which has been promoted by the CPRE Stockton Group for the last eight years. We also applaud all of the bullet points detailed in the Western Area section.	No change requested. Support welcomed
63/8/0 CPRE Stockton,	Objection	The proposed expansion of All Saints School in Ingleby Barwick is not sufficient to solve the problem of very large numbers of pupils being bussed out to surrounding school every day. A new secondary school will be constructed which will eliminate the current requirement of bussing large numbers of pupils out of Ingleby Barwick every day.	Too detailed for the Core Strategy. The precise details of proposals and changes to the education provision in the Borough belong to the Building Schools for the Future programme and the Primary Capital Programme. It is not the role of the Core Strategy to dictate these details. Any proposals which have land use implications will be incorporated into the Regeneration DPD.
64/1/0 Natural England,	Objection	The term „International Nature Reserve“ is incorrect. These symbols roughly approximate to the Teesmouth National Nature Reserve and the new RSPB Saltholme Wildlife Reserve and Discovery Park – the term „International Nature Reserve“ is no longer valid. As indicated in our Preferred Options response these are two separate entities. We also consider that these representative symbols are inadequate to represent the spatial context of internationally and nationally significant nature conservation areas which must be given appropriate protection and enhancement through the LDF. The shaded area identified as „Haverton Hills/ Seal Sands Corridor – CS10“ overlaps in part with the designated nature conservation sites and with developed areas, it is not clear what this policy is to deliver in these areas. To be effective the proposal needs greater clarification within Policy and the	Change made.

Respondee	Type	Comment	Council Response
		designated areas should be defined more accurately on the Core Strategy Diagram. These areas involve significant issues (see comments on CS10 and elsewhere) and must be clearly indicated and referenced.	
64/2/0 Natural England,	Objection	<p>Although Climate Change is discussed briefly in the SEA, the Core Strategy does not address Climate Change impacts, adaptation, and mitigation beyond mention in the first point of 2.4.</p> <p>Due the Stockton's location on the Tees Estuary the impacts of climate change must be considered in the strategic planning. Issues to be addressed should include sea level rise, flooding, enabling adaptation of the natural environment to the impacts of climate change, potential for managed realignment. Changes are necessary in order to be compliant with the RSS:</p> <p>RSS: 1.47 Tackling the Impacts of and Adapting to Climate Change- it is now a national policy priority that preventative action is needed to reduce greenhouse gas emissions and adapt to the likely impacts of climate change. Preventative measures require increased efficiency of energy and resource use and a shift to more renewable energy production. Adaptation measures will need to recognise the increased risk of extreme weather events such as flooding, drought and sea level rise.</p> <p>RSS Policy 3, CLIMATE CHANGE, sets out how: All strategies, plans and programmes in the Region shall contribute to mitigating climate change and assisting adaptation to the impacts of a changing climate.</p> <p>RSS Policy 34 THE AQUATIC & MARINE ENVIRONMENT at c sets out issues relating to climate change in coastal areas and river corridors. The Core Strategy should include reference as to how climate change will be addressed within Stockton within its vision, objectives and policy, including consideration of mitigation and adaptation measures, and should ensure that all objectives and policies can be delivered sustainably in the context of climate change.</p>	
64/3/0 Natural England,	Objection	<p>1st point, whilst we welcome the recognition given to the River Tees as a key asset of the Borough it is not clear what is meant by „realising the potential to focus on“ this asset. The protection and enhancement of the nature conservation interests, as required by statutory provision, landscape character, recreation, access and green infrastructure are key drivers for this area. They should not be jeopardised, but protected, enhanced and integrated with any development and strategic planning whilst taking into account climate change and flood risk. The plan should set out clearly what is meant by „realising the potential to focus on the river Tees“ and ensure that the natural and recreational assets are protected and enhanced.</p> <p>9th, 15th and final points, should also include the need to encourage and make provision for cycling and walking, both as part of sustainable travel and transport and to promote healthy lifestyles. The need to encourage modal shift from private cars to public transport should also be noted, in line with PPG13. The final point should also recognise the River Tees and its environs as a valuable wildlife asset with potential for access and recreation.</p>	
64/4/0 Natural England,	Objection	<p>8th point does not indicate what is meant by „make the most of „ the Borough's natural assets. This should perhaps clearly state that these assets will be protected and enhanced with improved public access including appropriate provision to establish a continuous coastal access route linking with a suitable crossing of the River Tees.</p> <p>12th point; where previously developed land is to be reused any existing biodiversity or geological conservation interest should where possible be integrated and enhanced as required in PPS9 paragraph 13.</p>	
64/5/0	Objection	We do not consider it appropriate that Policy 10 should be relied on to ensure that the plan has no adverse effect on the integrity of a European Site. Individual Policies must be assessed and modified as	

Respondee	Type	Comment	Council Response
Natural England,		appropriate where an adverse impact, alone or in combination with other plans or projects, is likely. This is necessary to ensure that an adverse assessment at a later stage, subsequent DPD or development proposal, does not render the core strategy policy provisions meaningless. See above.	
64/6/0 Natural England,	Objection	The vision makes no reference to reducing the impacts of climate change, mitigation and adaptation measures (PPS1) or encouraging walking and cycling routes(PPG13), which have been enhanced and promoted. Appropriate text should be added to the vision. Point 11 should also including enhanced walking and cycling provision linking with wider strategic networks including future provisions for continuous coastal access. Point 13 must be delivered without significant adverse impact on the Borough's environmental assets. We support point 15 but consider it should be achieved as part of a multi-functional strategic green infrastructure approach including foot and cycle routes (in line with RSS policy). Point 16. As with Point 15 this should be part of strategic green infrastructure. We also expect this to integrate biodiversity in line with objective 8 and PPS9 paragraph 14.	.
64/7/0 Natural England,	Objection	Objective 5 should also seek to encourage travel and transport on foot and cycle, establishing and maintaining a safe and integrated network of footpaths and cycle routes, linking to public transport hubs residential, employment and retail areas (not just schools and shops) and green spaces including recreation facilities/areas, nature reserves and the wider countryside (in line with PPG13 and PPS7) for both enhanced access opportunities for residents and visitors and to encourage healthy lifestyles. 7. Please	.
64/8/0 Natural England,	Objection	Objective 6 should also recognise the opportunities to improve health through walking the way to health initiatives and use of the green infrastructure network as highlighted in Objective 8 and in line with RSS Policy 24 (j).	.
64/9/0 Natural England,	Objection	We welcome the intent of this objective but consider it should clearly recognise the wider, multi-functional aspects of Green Infrastructure. The value of green infrastructure in delivering aspects of Objectives 5 and 6 in particular should be recognised, along with its role in flood management as through SUDS, acting as soak away areas and storm water reservoirs. Green infrastructure has a key role to play to encourage travel and transport on foot and cycle, contributing to active and healthier lifestyles and social cohesion, relevant in relation to both objectives 5 & 6 Green infrastructure should extend throughout and beyond the plan area and not be confined to the Borough. The reference to the character and appearance of the landscape in Objective 9 should be transferred to Objective 8, as landscape character is an important component of the natural environment rather than the built environment (in line with PPS7).	.
64/10/0 Natural England,	Objection	We strongly support the objective that energy efficiency will be at the heart of all new development, this should also improve energy efficiency in existing property, business and infrastructure. We are however particularly concerned that the wording „More renewable energy will be produced and used, „ is potentially misleading and might be rephrased along the lines of : “More energy will be generated from renewable resources whilst overall energy consumption will be reduced, “ Our previous comments on climate change adaptation and mitigation measures should also be considered here. (re lack of climate change policy). These comments should also be reflected in paragraph 2.5.	.

Respondee	Type	Comment	Council Response
64/11/0 Natural England,	Objection	This objective should recognise the impacts of climate change and ensure measures to avoid and overcome adverse impacts are addressed for existing sites and new development. This should meet the requirements of the RSS (including RSS Policy 3) – see comments on omission of climate change Policy above.	.
64/12/1 Natural England,	Objection	<p>We would expect the Spatial Strategy to include environmental aspects including the spatial dimensions to biodiversity, landscape character and the strategic green infrastructure network along with development and regeneration, this should recognise the spatial implications of coastal squeeze, impact of and adaptation to climate change, including flood management.</p> <p>This will contribute to compliance with RSS; including RSS Policy 8, which expects plans and strategies to protect and enhance the environment, including biodiversity, landscapes and through the provision of green infrastructure and PPS12 requirements.</p> <p>Government policy in PPS9 expects local authorities to identify opportunities to enhance priority habitats, and to maintain habitat networks which should also be advocated in the overarching spatial strategy.</p> <p>At point 6 we are concerned that in safeguarding land at Seal Sands for chemical industries key environmental aspects including the requirements of the Habitats Directive / Habitats Regulations may not be met. This might also apply to other development along the River Tees. We consider that the Core Strategy should not rely on assessment of individual development proposals, as implied by CS10, but should ensure that strategic proposals can be delivered without adverse effect on European Sites, and thus not make aspects of the core strategy meaningless. We would expect the justification in paragraph 6.3 to also recognise objectives for environmental protection and enhancement, in line with the Governments sustainability objectives.</p> <p>At 6.6 should also recognise foot and cycle travel in reducing the need to use private cars.</p>	.
64/13/2 Natural England,	Objection	<p>This Policy might be titled 'Sustainable transport and travel'.</p> <p>We welcome Point 1 but suggest it should refer to all private motorised transport, not only cars. The policy should also include relevant provision to provide continuous, integrated and safe coastal access around the Tees estuary. Footpath/cycle links in new development should also integrate with the existing rights of way network and the wider green infrastructure network. The recreational value of integrated cycle and footpath networks should also be recognised. Point 4 iv) could also include a new station at Cowpen Bewley to help provide sustainable access to the Teesmouth National Nature Reserve and the Saltholme RSPB reserve. Point 4 v) should also provide for linking public access to natural green space, the overall green infrastructure network and the nature reserves as mentioned in 4 iv) above. This can also contribute to national networks including coastal access.</p>	.
64/14/3 Natural England,	Objection	<p>Point 5. We suggest that at least 10% energy requirements should be met from renewable sources, including on site provision. (in line with RSS Policy 39). This should not be constrained as the Strategic Vision sets out a vision of the next 15 years and thus should meet if not exceed the UK Renewable Energy Strategy for 20% renewable energy by 2020. It is also not clear how provision will be made to address energy demands in existing properties, businesses etc which will be necessary if the UK target is to be met. This policy should also apply to renovation/ conversions of property not just new build.</p> <p>Point 6 may include a typographic error in the references to both centralised and decentralised energy systems.</p> <p>Point 7 should be considered in the Habitats Regulation Assessment to ensure as there will be no adverse effect on European sites.</p>	.

Respondee	Type	Comment	Council Response
64/15/4 Natural England,	Objection	<p>Point 8 should also seek to create and manage new areas of biodiversity interest in line with Government Policy in PPS9 paragraphs 11, 12 and 14. This is particularly relevant in Stockton where internationally important nature conservation sites are located in areas liable to coastal squeeze and the impacts of climate change. This point should refer to local landscape character. The provisions of point 8 should be included as part of strategic green infrastructure.</p> <p>Point 9 should also seek reduction in waste generation.</p> <p>This policy and the justification text should embed the adoption of future good practice, technological advances and enhanced targets during the life of the DPD.</p>	
64/16/6 Natural England,	Objection	<p>Point 1 – Durham Tees Valley Airport should be included in the Habitats Regulation Assessment with regard to impacts of flights on European sites, e.g. air pollution from flights.</p> <p>Point 5 - As indicated in CS1 point 6 we are concerned that in safeguarding land chemical industries key environmental aspects including the requirements of the Habitats Directive / Habitats Regulations may not be met.</p> <p>Point 6 - We are also concerned that allocations for port related uses along the River Tees could raise similar issues and concerns with regard to the Habitats Regulations.</p> <p>We consider that the Core Strategy should not rely on assessment of individual development proposals, as implied by CS10, but should ensure that strategic proposals can be delivered without adverse effect on European Sites, and thus not make aspects of the strategy meaningless. If sufficient detail is not available in the Core Strategy to ensure no adverse effect the CS should ensure that subsequent DPDs address the likely significant effects and include policy and where relevant appropriate avoidance and mitigation measures in order to avoid adverse effects on the integrity of European Sites.</p> <p>Point 8iv should also include opportunities for eco-tourism especially related to the River Tees, the important nature reserves in the area along with nearby coastal locations.</p> <p>In the justifying text paragraph 9.4 this does not address reviewing allocations if existing permissions are not developed. See representation summary.</p> <p>This policy should recognise the contribution of green infrastructure as a community facility and should demonstrate how the policy points 2 and 3 integrate into the wider strategic green infrastructure network in line with RSS policy 2 and policy 10.6 (a).</p> <p>In the justification 11.3 should encourage walking and cycling to access open spaces, sports and recreation facilities. Demonstrate how the policy points 2 and 3 integrate into the wider strategic green infrastructure network in line with RSS policy 2 and policy 10.6 (a).</p> <p>In the justification 11.3 should encourage walking and cycling to access open spaces, sports and recreation facilities.</p>	<p>Already included. Green infrastructure is already mentioned in Policy CS10 and the focus on improving walking and cycling to access services and facilities is a common theme throughout the document.</p>
64/17/7 Natural England,	Objection	<p>Point 6 - due to the absence of environmental aspects in the plan's Spatial Strategy (CS1) we consider this policy inadequate to address environmental issues and impacts, in line with PPS12, PPS9 requirements.</p>	

Respondee	Type	Comment	Council Response
64/18/8 Natural England,	Objection	Point 3 - As elsewhere we consider this policy should recognise the role of integrated green infrastructure as a key aspect of the character of housing provision in line with RSS requirements.	.
64/19/10 Natural England,	Objection	<p data-bbox="465 153 1688 244">Due to the existing nationally and internationally important environmental assets of the Stockton area and the requirements of Government Policy PPS9 requiring protection we would recommend this policy is re-titled Environmental Protection and Enhancement.</p> <p data-bbox="465 280 1688 400">This policy, as referred to elsewhere in the Core Strategy and SEA/HRA is key to ensuring that development and regeneration within the Borough should be delivered without adverse impact on environmental assets. We do not consider Policy 10 is worded adequately to meet government policy, international obligations or RSS Policies 33 and 34 with regard to nature conservation interests.</p> <p data-bbox="465 437 1688 557">We consider that much of the Policy, and point 2 in particular, is drafted as a vision statement rather than an enforceable / deliverable policy. We feel this policy relied too heavily on the justification text to establish meaning, rather than to provide supporting information and evidence. Clarification is required as to the meaning of Point 2 and its spatial application.</p> <p data-bbox="465 593 1688 684">We are also most concerned that there is no section of this policy to address protection and enhancement of landscape character, supported by evidence of landscape character assessment as set out in PPS7 and to deliver RSS Policy 31 requirements.</p> <p data-bbox="465 721 1688 995">As indicated elsewhere we do not consider that CS10 Point 1 is adequate to afford strategic protection of the internationally important features of the area and must be complemented by the appropriate allocations, evidence base and criteria and site related policies throughout the LDF, including the Core Strategy. Point 1 must ensure that the development and subsequent after use will meet the requirements of the Habitats Regulations, as amended. This will necessitate mitigation or ultimately compensation if it cannot be secured by avoidance. The key nature conservation areas including the SPA/Ramsar site, National Nature Reserve which must be subject to protection and enhancement are not adequately defined on the strategic map, the single bird emblem (approximating the location of the NNR), cannot be used to demonstrate the extent of these key interests.</p> <p data-bbox="465 1032 1688 1147">The Strategic Diagram indicates the Haverton Hills / Seal Sands corridor is subject to CS10. This is included in point 7 with regard to tourism, we consider that this area should also be included as iv) in point 3. We would like to see positive enhancement to this area linked to the future management and improved access to the nature reserves on Teesside, thus contributing to point 7ii).</p> <p data-bbox="465 1184 1688 1331">Point 4 might be modified 'the integrity of the designated sited will be protected and enhanced in line with relevant legislation ' the supporting text should then refer to PPS9, circular 06/2005 and the amendment to the Habitats Regulations. This should also include reference in the supporting text to the requirements with regard to protected species in regeneration, development, green infrastructure management and environmental enhancement.</p> <p data-bbox="465 1367 1688 1509">Point 5 we remain concerned that the creation, restoration, management and integrity of habitat networks as part of new development and elsewhere in the Borough, as addressed in PPS9 paragraph 12, is not clearly addressed. This is both an integral part of strategic green infrastructure and should help the natural environment including wildlife and habitats to adapt to the impacts of climate change and should extend beyond formal wildlife corridors.</p>	<p data-bbox="1727 153 2159 770">Partial change made. Policy CS10 has had 'protection' added to the title and relevant national policy and circulars have been highlighted in the justification to identify where information about different designations can be found. However, the Council believe that the nature of the policy is in line with that required in a Core Strategy, landscape character is to be included in the Environment DPD, habitat networks are covered by national policy PPS9 and it appears that coastal squeeze is not a key issue for this area. The nature of the Haverton Hill / Seal Sands Corridor as outlined on the Strategic Diagram has been discussed and clarified at a meeting with Natural England.</p>

Respondee	Type	Comment	Council Response
		<p>We are concerned that Point 9 does not offer adequate flexibility with regard to costal squeeze and the impacts of climate change, including existing proposals for managed costal realignment long the Tees estuary.</p>	
		<p>We welcome the reference to Green Infrastructure in justification 13.3 but feel this could be more clearly embedded in policy and recognise the multifunctionality of strategic green infrastructure including habitat networks, foot and cycle networks, recreational and green space, sustainable drainage, flood alleviation etc. We would recommend this policy is re-titled Environmental Protection and Enhancement. The wording of the policy should be amended to adequately meet government policy, international obligations or RSS Policies 33 and 34 with regard to nature conservation interests.</p>	
		<p>Clarification is required as to the meaning of Point 2 and its spatial application. Amend policy to address protection and enhancement of landscape character, supported by evidence of landscape character assessment as set out in PPS7 and to deliver RSS Policy 31 requirements.</p>	
		<p>Point 1 must ensure that the development and subsequent after use will meet the requirements of the Habitats Regulations, as amended. Key nature conservation areas including the SPA/Ramsar site, National Nature Reserve which must be subject to protection and enhancement are not adequately defined on the strategic map, the single bird emblem (approximating the location of the NNR), cannot be used to demonstrate the extent of these key interests.</p>	
		<p>The Haverton Hill and Seal Sands Corridor should be included as iv) in point 3, the area could also contribute to point 7 ii). Point 4 might be modified 'the integrity of the designated sited will be protected and enhanced in line with relevant legislation ' the supporting text should then refer to PPS9, circular 06/2005 and the amendment to the Habitats Regulations. This should also include reference in the supporting text to the requirements with regard to protected species in regeneration, development, green infrastructure management and environmental enhancement.</p>	
		<p>Point 5, we remain concerned that the creation, restoration, management and integrity of habitat networks as part of new development and elsewhere in the Borough, as addressed in PPS9 paragraph 12, is not clearly addressed. Point 9 should be amended to offer adequate flexibility with regard to costal squeeze and the impacts of climate change.</p>	
		<p>The reference to Green Infrastructure in justification 13.3 should be more clearly embedded in policy and recognise the multifunctionality of strategic green infrastructure.</p>	
<p>64/20/0 Natural England,</p>	<p>Objection</p>	<p>13.4 refers incorrectly to the SCAs rather than to SAC (Special Areas for Conservation) (for their habitats and species). This text should also indicate that sites, not only SNCIs, may be reviewed or established during the life of the plan and thus would be subject to the relevant policy provisions. 13.4 refers incorrectly to the SCAs rather than to SAC (Special Areas for Conservation). This text should also indicate that sites, not only SNCIs, may be reviewed or established during the life of the plan and thus would be subject to the relevant policy provisions.</p>	<p>Change made. Paragraph 13.4, Special Conservation Areas have been replaced with Special Areas for Conservation and an additional bullet point added to clarify that further sites may be designated during the life of the plan and will be subject to the relevant policy provisions.</p>

Respondee	Type	Comment	Council Response
64/21/0 Natural England,	Comment	Please correct 'Magnesian Limestone' throughout the document, also Ramsar - which is the place in Iran where the international wetlands conference was held. See above.	.
64/22/0 Natural England,	Objection	The 'in combination' effects should be included at the screening stage as this may draw in Policies for appropriate assessment that would not have a likely significant effect alone. See above.	.
64/23/0 Natural England,	Objection	The other plans and projects should not be confined to other development plan documents but any other plans and projects such as the Tees Estuary Management Plan, European Marine Site Management Plans, Tees Management Realignment Scheme amongst others. The absence of reference to climate change issues throughout the Core Strategy suggests that the Climate Change Action Plan, referenced in Table 19 has not been considered. See above	.
64/24/0 Natural England,	Objection	The 'in combination' effects should be fully assessed throughout the process, at appropriate assessment stage, and, as necessary, into subsequent stages of the Habitats Regulation Assessment. See above	.
64/25/0 Natural England,	Objection	Does not recognise the increasing employment at Durham Tees Valley Airport. This should be considered for assessment of increased journeys to the airport by employees and passengers and impacts of increased flights on European sites, including air quality issues. See above	.
64/26/0 Natural England,	Objection	Should also recognise impacts relating to redundancy and decommissioning/removal of developments. See above	.
64/27/0 Natural England,	Objection	Impacts on the River Tees water quality should also include: nutrient status, chemical status, sediment load and river bed disturbance. Disturbance to interest features (birdlife) as a result of recreational use and other issues. This should also include impacts of coastal squeeze and climate change. See above.	.
64/28/0 Natural England,	Objection	Tables 10 - 16. The 3rd column should more appropriately be titled 'Issues likely to affect site integrity' as it does not identify the 'Potential Impact' as titled. See above	.
64/29/0 Natural England,	Objection	Tables 10 - 16 CS3 should be included at least to assess any likely effects of renewable energy developments on European sites. See above	.
64/30/0 Natural England,	Objection	Tables 10 - 16 CS4 should be assessed further with regard to impacts of the Durham Tees Valley Airport on air quality and the North York Moors. See above	.
64/31/0 Natural England,	Objection	Tables 10 - 16 CS10, as the 'environmental protection' policy should not be screened out at this stage which is to identify 'likely significant effect' (LSE) and not 'adverse effect'. Where sites are likely to be affected by the DPD the Appropriate Assessment stage should consider if the policy will in fact secure adequate protection as intended. See above	.
64/32/0 Natural England,	Objection	Tables 17 & 18 missing assessment of North York Moors European sites. See above	.
64/33/0 Natural England,	Objection	CS1 and CS4. The safeguarded land for the chemical industry, especially around Seal Sands, could potentially lead to loss of or damage to undesignated land with functional importance to SPA species,	.

Respondee	Type	Comment	Council Response
		and thus the integrity of the Teesmouth and Cleveland Coast SPA and Ramsar. This issue was raised in the screening stage, Section 3.5, and should be assessed here. See above	
64/34/0 Natural England,	Objection	CS3 should be assessed see comments on screening and the Core Strategy See above	.
64/35/0 Natural England,	Objection	CS10 should be assessed to ensure that it affords adequate and effective protection to avoid adverse effects on the integrity of European Sites both within the plan area and elsewhere in line with the provision of the Habitats Regulations, as amended. See above	.
64/36/0 Natural England,	Objection	<p>Due to the inappropriate methodology, the omissions identified above and issues raised in our comments on the Core Strategy we cannot accept the conclusions of this assessment. Without prejudice we make the following comments on the detailed contents of the conclusion:</p> <p>Paragraph 6.1 includes reference to paragraph 30 which is not present hence we cannot consider this paragraph further.</p> <p>Paragraph 6.2 We generally agree with the three key areas identified in this section which could give rise to potential impacts on the Teesmouth and Cleveland Coast SPA and Ramsar site. However "loss of or damage to undesignated land functionality" may occur on a wide range of habitats (including grazing marsh and brownfield sites) not just inter-tidal areas.</p> <p>Paragraph 6.3 sets out that many issues will be the subject of other DPDs. If, as is likely, these DPDs are critical to ensuring the Core Strategy will not result in any adverse effect on the integrity of any European Sites we would look to see the CS set out what is to be expected of these subsequent DPDs.</p> <p>Paragraph 6.4 As indicated in our comments on the Core Strategy we do not consider Policy CS10 to be adequate to ensure no adverse effect on the integrity of a European Site. See above.</p>	.
64/37/0 Natural England,	Comment	<p>3.3 and 3.4 correct the reference to the Regional Spatial Strategy (not plan).</p> <p>Objective 2, 10 and elsewhere it would be more appropriate to refer to 'generation rather than' production' of renewable energy.</p>	.
64/38/11 Natural England,	Objection	<p>We would look to see Planning Obligations used to secure appropriate environmental provisions including, in line with PPS9, provisions for the creation, restoration, management and enhancement of nature conservation interests. This among other aspects has been referred to in Justification at 14.2 but has not been embedded in policy which is necessary to underpin the SPD. Landscape improvements (rather than character as in 14.2) should also be referred to in the policy.</p> <p>We also feel the third point under 2 should be wider encompassing all aspects of green infrastructure and recognise the needs of everyone in the community who will all benefit from appropriate provisions in terms of health and well being.</p>	.
65/1/0 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>On behalf of our clients, Wynyard Estates, we seek the inclusion of an additional bullet point providing reference to housing development which we consider essential to strengthening economic performance and maintaining the population growth within Stockton on Tees. This additional bullet point would reflect not only the emerging Vision for Stockton on Tees (at paragraph 4.1 to the emerging Core Strategy) but also policy at national and regional level which acknowledges the importance of additional housing development (see PPS 1 and 3 together with Regional Spatial Strategy policies 1 and 28). In the light of the preceding representation and additional bullet point should be added as follows:</p> <p>"Ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live".</p>	Change made. Additional bullet point added to paragraph 2.5: 'Make provision for the development of high quality, decent homes in sustainable locations, and for the improvement of existing stock'.

Respondee	Type	Comment	Council Response
65/2/0 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>Wynyard Estate supports the Council's broad vision for the future of the Borough, as identified at paragraph 4.1 of the Publication Draft Core Strategy.</p> <p>In particular, attention is drawn to, and support provided for the following:</p> <p>"Residents have access to the very best housing, education and training, health care, employment opportunities, sport, recreation and cultural facilities, which ahs created safe, healthy, prosperous, inclusive and sustainable communities, so providing a better quality of life for all. The diversity, quality and character of the natural and built environment, together with the Borough's unique historic assets, are valued, protected, enhanced and optimised for the benefit of everyone."</p> <p>However, reference should also be incorporated within the Vision to Wynyard which is identified at emerging policy CS4 (point 1) as a Key Employment Location within Stockton on Tees. Wynyard Estates seek the inclusion of the following additional test:</p> <p>"Situated at the heart of the Tees Valley City Region, and taking advantage of its historic position astride the River Tees, Stockton-on-Tees is Borough leading the way in economic development and regeneration. Previously developed areas of land along the River Tees corridor have been brought back into use, in line with the aspirations of the Stockton-Middlesbrough Initiative, links to surrounding areas strengthened and Wynyard is a successful employment location."</p>	<p>Repetition of National or Regional Policy. Although Wynyard is identified as a Key Employment Location, no new allocations are required. Development will rely on existing planning permissions. To reference Wynyard in the Vision would give it disproportionate recognition.</p>
65/3/0 Wynyard Estates, Nathaniel Lichfield and Partners	Support	<p>Wynyard Estates support the general content of Chapter 5 of the Core Strategy, specifically the following broad objectives: Objective 1; Objective 2; Objective 3; Objective 5; Objective 6; Objective 7; Objective 8; Objective11; Objective 12.</p>	<p>No change requested. Support welcomed</p>
65/4/1 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>Wynyard Estates object to emerging Core Strategy Policy CS1.</p> <p>Whilst it is recognised that any planning strategy for Stockton on Tees will focus the majority of development in the urban and core areas, on previously developed land, this strategic approach should not be pursued at the expense of a balanced strategy. Presently, as drafted, the emerging Core Strategy Policy CS1 fails to adequately acknowledge development requirements outwith the main urban and core areas.</p> <p>For example, at Wynyard, which straddles the administrative boundaries of Stockton on Tees and Hartlepool Borough Councils, approximately 200 ha, of land are identified as a key employment location in the Regional Spatial Strategy (policy 20). In addition, Wynyard, south of the A689, represents the premier address within Teesside, having a population of around 1,800 persons set within a landscaped environment, including a golf course and village green area.</p> <p>However, the Council's own report 'Planning the Future of Rural Villages in Stockton-on-Tees Borough' (2008) identifies that Wynyard is the largest 'village' within the Borough but, of the 14 surveyed, has one of the lowest levels of services and facilities (for example Wynyard is not served by a primary school and there are no public bus services). Accordingly, the Council's Consultation Statement (October 2008) records on page 54 that the 'Council would support additional facilities and services at Wynyard to serve the existing community'.</p>	<p>Does not conform to the Spatial Strategy. The policy has sufficient flexibility to meet all housing need, including that outside the conurbation.</p>

Respondee	Type	Comment	Council Response
		<p>But it is not clear on what basis the Council envisages these important additional facilities and services required to create a sustainable community at Wynyard, would be provided.</p> <p>A Masterplan and Vision Document has been prepared (attached) which illustrate how through the provision of approximately 300 additional residential units a series of additional communities can be provided, including</p> <p>Early public transport penetration of the site; Delivery of a school; Delivery of a community building; Outdoor recreation facilities; Management of the natural and historic landscape; and Increased public access.</p> <p>This approach not only accords with the Vision for Stockton on Tees Borough but also a number of the high level objectives outline at section 5.0 of the emerging Core Strategy building on the success of Wynyard to date, as articulated in the attached documentation. In light of the above representation Wynyard Estates seeks the following alterations to emerging policy CS1 (in conjunction with other representation lodged, specifically in respect of emerging policies CS7 and CS8):</p> <p>3. Beyond the Core Area, housing development will be focused elsewhere within the conurbation, with priority given to sites that support the regeneration of Stockton, Billingham and Thornaby or protect the role of Yarm as a historic town and destination for more specialist shopping needs,</p> <p>5. Outwith the Core Area and Conurbation land at the villages will be released for housing development, to meet defined needs, which directly enables or support the provision of services and facilities contributing to the sustainability of villages.</p>	
65/5/3 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>In respect of Criterion 1 it is understood the requirement to achieve Code for Sustainable Homes Level 4 is operative from the beginning of 2014 and the emerging policy should be amended to reflect this. This point also applies in respect of criteria 2.</p> <p>With regard to Criteria 5 an amendment is sought to ensure compliance with policy 38d of the Regional Spatial Strategy which recognises that instance may occur where, having regard to the type of development involved and its design, it is not feasible or viable to achieve 10% of energy supply from decentralised and renewable or low- carbon sources.</p> <p>Criterion 8 sets a requirement for all new homes to be built to lifetimes standards by 2013. Whilst this is a Government objective it should not be interpreted as a specific policy requirement. In light of the foregoing the following changes are sought: "All new development will achieve a minimum of level 3 of the code for sustainable homes up to the end of 2013, and thereafter a minimum Code Level 4."</p> <p>Criteria 2 should be altered to read: "All new non-residential developments will be completed to a Building Research Establishment Environment Assessment Method (BREEAM) of 'very good; up to the end of 2013 and thereafter a minimum rating of 'excellent.'"</p>	. Need to review

Respondee	Type	Comment	Council Response
65/6/4 Wynyard Estates, Nathaniel Lichfield and Partners	Support	<p>Criteria 5 should be changed to read: "For all major developments, including residential developments comprising 10 or more units, and non-residential developments exceeding 1000 square metres gross floor space, 10% of total predicted energy requirements will be provided, on site, from renewable energy sources, unless having regard to the type of development involved and its design, this is not feasible or viable."</p> <p>Criteria 8 should be amended to read: "..By 2013, the Council will seek that all new homes will be built to Lifetime Homes Standards."</p>	No change requested. Support welcomed
65/7/6 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>As previously submitted in representations relating to emerging policy CS1, Wynyard Estates consider it of vital importance that appropriate facilities are provided at Wynyard contributing to the achievement of a sustainable community. Accordingly, support is expressed for bullet 1 although it is respectfully requested that Wynyard be added alongside Ingleby Barwick particularly in light of the Stockton on Tees Borough Council Consultation Statement (October 2008) page 50 which states the: "Council would support additional facilities and services at Wynyard to serve the existing community" which is continuing to grow as the extant planning permissions are being implemented.</p> <p>With regard to the third bullet point Wynyard Estates agree there is a requirement for policy covering Open Space, Recreation and Landscaping. However, it is not considered appropriate that this should be left to a Supplementary Planning Document which is subject to a lower level of scrutiny than a Development Plan Document. Further, the status of the Council's current Audit of Open Space Sports and Recreation is uncertain, a draft only being available on the Council's website. The following changes are therefore sought to emerging policy CS6:</p> <p>1."Priority will be given to the provision of facilities that contribute towards the sustainability of communities. In particular, the needs of the growing population of Ingleby Barwick and Wynyard should be catered for."</p> <p>3."The quantity and quality of open space, sport and recreation facilities throughout the Borough will be protected and enhanced in accordance with standards set as followed [council to insert]."</p> <p>If the changes to 3 above cannot be achieved within the Core Strategy then it could potentially be incorporated within the emerging Regeneration Development Plan Document thereby ensuring the evidence base is subject to full scrutiny.</p>	Already included. Priority is given to areas where provision of facilities that contribute towards the creation of sustainable communities. Open Space, Recreation and Landscaping SPD is intended to expand upon policy contained within DPDs which will be subject to scrutiny. The SPD will not contain policy.
65/8/7 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>Wynyard Estates object to emerging policy CS7 of the Publication Draft Core Strategy and, by inference, various elements of the accompanying text.</p> <p>At paragraph 12.1 a minor typographical error is noted whereby the Council refers to the period 2004-2021 whereas the actual figures properly refer to the period to 2024.</p> <p>At criteria 1. iii) reference is made to the achievement of a target that 75% of dwelling completions will be</p>	Does not conform to the Spatial Strategy. The 2008 SHLAA sets out how the deliverability of Planning Permissions has been tested. Policy already acknowledges that housing figures are not ceilings and includes reference to the Tees Valley Growth

Respondee	Type	Comment	Council Response
		<p>on previously developed land. However, the justification recognises (paragraph 12.6) policy 29 of RSS for the North East sets down a Tees Valley target that 70% of housing development should be on previously developed land by 2008 increasing to a region wide target of 75% by 2016. This should be properly reflected in the policy assuming the above is achievable on the basis of current and future identified supply.</p> <p>Criteria 2. states that no additional housing allocations will come forward before 2016 as the RSS allocation can be met through existing housing permissions. Whilst numerically sites either completed or with the benefit of planning permission total 9,200 units it is not clear whether the 6,800 commitments on which the Council are reliant to meet housing needs and demands to 2016 are deliverable.</p> <p>In this regard PPS3: Housing, paragraph 58, is instructive:</p> <p>‘In determining how much land is required, LPAs should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged’.</p> <p>At the current time there is no available evidence to demonstrate such an exercise has been comprehensively undertaken; this must be completed if the Core Strategy emerging Policy 7 is to be found sound, based on a robust evidence base. Indeed, in current market conditions the importance of this analysis cannot be overstated as previously achievable and deliverable sites, when planning permission was granted, may now be un-viable.</p> <p>With regard to potential future housing land supply it is noted that Council has released a SHLAA dated October 2008 although this was only made electronically available on 10 December 2008 towards the end of the consultation period. As such, it has not been possible to undertake a through audit of the SHLAA in advance of submitting representations – we, therefore, reserve the right to provide further representations as appropriate.</p> <p>In addition, at criteria 5 reference is made to the Growth Point Programme of Delivery which, since drafting and publication of the Core Strategy, has been approved. Accordingly, given the Council are now committed to accelerating delivery of housing and this will impact upon the trajectory and future allocations, potentially necessitating changes to the Core Strategy.</p> <p>Finally, in addition to the successful Growth Point Programme of Delivery, attention is drawn to paragraph 3.89 of RSS which states that:</p> <p>‘it is emphasised that the gross and net dwelling provisions set out in Policy 28 are guideline figures and do not represent a ceiling; LDFs may make the case for higher figures as appropriate.’</p> <p>This is particularly relevant in light of the foregoing whereby flexibility should be provided for sites which may not deliver residential units following the grant of planning permission and Tees Valley having secured Growth Point status.</p> <p>Finally, pursuant to representations lodged in respect of Policy CS1 provision should be incorporated for modest development within defined Villages and specifically Wynyard to meet housing requirements. It is</p>	<p>Point. It is considered that the focus on sustainable urban locations is consistent with national guidance. Although the focus is on the Core Area, provision is made for housing elsewhere in the conurbation. Provision for the housing needs of rural areas is made through the allowance for infill sites in tier 1 and 2 locations (rural villages) and through a rural exception policy for affordable housing in Policy CS8.</p>

Respondee	Type	Comment	Council Response
65/9/8 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>not appropriate that housing needs within the Villages to be met within urban areas as suggested at paragraph 12.21.</p> <p>At the current time we have not undertaken any analysis of either those communities within the rural area (500 units as stated at paragraph 12.3 of the emerging Core Strategy) or potential capacity within the rural area. However, at Wynyard, the Masterplan identifies a potential capacity of approximately 300 units to be phased at approximately 50 units per annum over the period 2012-2018 or thereabouts. Accordingly, should the foregoing come forward this would total 800 units, around 7% of the Borough's residential output for the period 2004-2024. We consider there is a requirement for the following to be undertaken:</p> <ol style="list-style-type: none"> 1) Analysis of the housing commitments which are to make up supply to 2016, in accordance with paragraph 58 of PPS3, ensuring they remain developable and are likely to contribute to housing delivery; 2) Review of the SHLAA; 3) Consideration of the implications of a successful Growth Point Programme of Delivery; 4) Incorporation of new housing within Wynyard and the Villages as appropriate; 5) Deletion of the 7th criteria of emerging policy CS7. <p>Given the above work may result in significant changes to policy CS7 at the current time we have not submitted proposed changes but, rather, will seek to work with the Council during early 2009 to address the above matters. On that basis, we reserve the right to lodge further representations as appropriate.</p> <p>In accordance with PPS3: Housing (paragraph 22) and policy 30 of the RSS housing mix and affordable housing policies are required to be informed by a shared evidence base. That evidence is to include up-to-date Strategic Housing Market Assessments (SHMA) and up-to-date local housing assessments.</p> <p>It is understood that the Tees Valley SHMA will be made publicly available imminently, officers of the Council indicating that the SHMA will inform an up-date of the 2006 local housing assessment. In light of the emerging information we reserve the right to lodge further representation once the SHMA and local housing assessment up-date are available.</p>	No change requested.
65/10/11 Wynyard Estates, Nathaniel Lichfield and Partners	Objection	<p>Wynyard Estates recognise the requirement for planning obligations to be entered into where appropriate in accordance with the provisions of Circular 05/2005. However, the requirement for compliance with the tests contained within the Circular are of such importance that reference should be included at emerging Core Strategy Policy 11. The following changes are therefore sought:</p> <ol style="list-style-type: none"> 1) All new development will be required to contribute towards costs of providing additional infrastructure and meeting social and environmental requirements as appropriate. 2) When seeking contributions..... 3) Any planning obligation must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fair and reasonable in scale and kind, and reasonable in all other respects. 	Repetition of National or Regional Policy. The changes proposed would result in a repetition of planning policy established in circular 05/05. Inclusion of this text would therefore be contrary to Planning Policy Statement 12 (Local Spatial Planning), paragraph 4.32.
66/1/4 Costco Wholesale UK Ltd, RPS Group PLC	Objection	<p>The Core Strategy DPD publication draft is not considered flexible enough to deal with changing circumstances and the diverse range of employment opportunities. It is therefore not effective. The publication document does not include a definition of uses suitable on employment land. The current lack of definition could potentially cause uncertainty for the local authority and developers, and may prohibit appropriate employment generating sui-generis uses location within the area of Stockton on Tees in the</p>	Too detailed for the Core Strategy. Employment Land refers to land to be used for purposes as defined by the Use Class order as B1, B2, B8 uses and other appropriate uses

Respondee	Type	Comment	Council Response
		<p>future. This would therefore represent a lost opportunity in terms of clarifying uses suitable on employment land.</p> <p>Sui generis uses are commonly found in industrial estates and are an established and accepted use of employment allocated land. They each generate employment, often at greater levels than B1, B2 and B8. Sui generis uses are an important part of the economy. It is therefore considered that this should also be included within the Core Strategy</p> <p>Employment uses should be defined to allow the recognition of valuable job creation opportunities that arise from a range of businesses that fall outside of B use classes. This will ensure effective and flexible Core Strategy. It is proposed that the inclusion of a flexible definition of uses appropriate on employment land would create an effective policy framework and appropriate guidance for the Local Planning Authority and Developers. It is considered that the following would be an appropriate definition for 'Employment Land' and should be contained within Policy CS4:</p> <p>"All buildings and land which are used or designated for purposes within the Use Class 81,82 and 88 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates."</p> <p>A similar definition should be included within the Economy chapter (paras. 9.1 to 9.12) of the Core Strategy. This would introduce suitable flexibility into the Plan to ensure that all appropriate uses that come forward have a suitable framework against which they could be considered in order to create suitable employment and training opportunities for the residents of Stockton and therefore meeting the objectives (Objective 3) in the Core Strategy.</p>	<p>which can be incorporated in commercial areas without material harm. It is considered that the justification sets out the types of uses which would be considered suitable on employment land sites.</p>
67/1/0 BWEA,	Support	<p>Vision. We welcome the Council's commitment to maximising and exploiting the potential for renewable energy generation in the Borough, as key to delivery of the Council's vision for the future of the Borough, through its key Objectives and Core Strategy policies.</p>	<p>No change requested. Support welcomed</p>
67/2/0 BWEA,	Support	<p>BWEA welcomes the Council's awareness of the economic and employment opportunities that a strong renewable energy industry has to offer the Borough, and the Council's interest in promoting these opportunities through Objective 2.</p>	<p>No change requested. Support welcomed</p>
67/3/0 BWEA,	Support	<p>BWEA support Objective 10, which seeks 'to ensure better use of resources, particularly the re-use of previously developed land'. However, we recommend that this objective is taken further, with carbon reduction included in this strategic objective, as a key consideration in the use of the borough's natural resources. It is important that this key objective of local government is not simply confined to issues of transport or housing, as is currently implied through its confinement to policies CS2 Sustainable Transport and CS3 Sustainable Living.</p> <p>In addition, BWEA wish to emphasise the fact that there may be opportunities for larger scale renewable energy development in the Borough, in addition to building-integrated uses in future residential and commercial developments. There may be particular opportunities for renewable generation next to larger industrial developments, which often have a high energy demand.</p>	<p>Change made. Carbon reduction included in Objective 10.</p>
67/4/0 BWEA,	Comment	<p>BWEA also wishes to point out the wealth of highly skilled training opportunities available in the renewable energy industry, within the wider North East Region. With the New and Renewable Energy Centre (NaREC), and training programmes in renewable energy established in a number of universities</p>	<p>No change requested. Support welcomed.</p>

Respondee	Type	Comment	Council Response
		and colleges across the Region, we believe that the industry has the potential to assist in the delivery of Objective 3 - 'To increase employment opportunities with emphasis on maintaining, enhancing and retaining a highly skilled workforce'.	
67/5/3 BWEA,	Comment	<p>BWEA strongly supports this policy as a means of delivering greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change.</p> <p>While building regulations will be strengthened over the next decade, BWEA recommend the inclusion of a discrete policy, within the forthcoming Development Control DPD, on sustainable design and construction methods, and the introduction of minimum efficiency standards for extensions, change of use conversions, and refurbishments/ listed building restorations. Such a policy would help ensure increases in energy efficiency within the existing building stock, as well as in new build development. BWEA recommend looking at the Renewable Energy Toolkit for planners, developers and consultants, developed by the London Energy Partnership for further guidance: http://www.london.gov.uk/major/environment/energy/docs/renewables_toolkit.pdf</p>	No change requested. Support welcomed.
67/6/0 BWEA,	Comment	<p>BWEA welcomes the explicit encouragement of flagship renewable energy projects within all local area. We also welcome the Council's awareness of the economic and employment opportunities that a strong renewable energy industry has to offer the Borough, and the Council's interest in promoting these opportunities.</p>	No change requested. Support welcomed.
68/1/0 Yuill Homes,	Objection	<p>PPS12 and the Plan Making Manual make it clear that the Core Strategy should lead allocations and can allocate sites where it is clear that there are certain sites that are key to the delivery of the overall strategy and where the location is not open to extensive debate. We feel it is as appropriate for general directions of future growth to be also identified on the Strategic Diagram. The current document contains little scope for alternative sustainable development on any scale should the priority housing sites prove undeliverable. The future direction of long-term growth (supported by appropriate policy on delivery to ensure priority sites are developed first – as set out in our representation to policy CS7) should also be indicated on the Strategic Diagram, both to provide guidance for long-term growth, and to provide a planned, sustainable alternative should the priority sites prove undeliverable. The strategic diagram should be amended to indicate potential future expansion to the west of the Core Area. This will provide a planned alternative should the priority sites prove to be undeliverable, or undeliverable in the timescale set out in the Core Strategy, or to the extent of the housing numbers applied to them in the Core Strategy. The identification of an area of potential future growth supports the principle in PPS12 and the Plan Making Manual of the Core Strategy leading on sustainable development in the area. This would avoid the incidence of 'planning by appeal' in the event of non-delivery of priority sites. The site-specific representation relating to land at Hartburn Grange includes information to support this potential alternative for sustainable growth.</p>	Does not conform to the Spatial Strategy. Focus on sustainable brownfield locations with urban locations is consistent with national guidance.