



Consultation Statement

Incorporating updated consideration of Community Impact Assessment and Determination of Likely Significant Environmental Effects Determination and Statement of Reasons

Supplementary Planning Document: Local Design Guide

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Document Overview

Consultation undertaken in the preparation of the SPD

Introduction

The purpose of this statement is to provide details about the consultation which has taken place during the production of the draft Supplementary Planning Document (SPD): Local Design Guide and the following supporting documents:

- Strategic Environmental Assessment Consultation Screening Report
- Strategic Environmental Assessment Determination and Statement
- Community Impact Assessment

Regulation 12 of the 2012 Town and Country Planning (Local Planning) Regulations requires that before a Local Planning Authority adopt an SPD it must: Prepare a statement setting out:

- the persons the LPA consulted when preparing the SPD;
- a summary of the main issues raised by those persons; and
- how those issues have been addressed in the SPD.

In accordance with the relevant regulations, the draft SPD and supporting documents were subject to a SEA screening consultation and also a public consultation. This Consultation Statement sets out how this was undertaken, the comments which were received and what changes have been made to the document as a result.

Public Consultation Period

The Council made the draft SPD and supporting documents available in accordance with relevant regulations and invited members of the public, relevant authorities, general consultation bodies, specific consultations bodies, duty-to cooperate partners, and any other interested party on the Council's Local Plan Consultation Database to make comments on the documents.

The consultation period within which representations could be made was between Monday 21st November 2022 and midnight on Monday 19th December 2022. Consultation was undertaken in accordance with the Consultation Plan which is contained within Appendix A. A list of the organisations consulted is included at Appendix B.

Public Consultation Responses

A total of 13 responses were received providing comments on the contents of the draft SPD. These responses can be summarised as falling into three main categories.

- **Development Industry-** Taylor Wimpey, Persimmon Homes, Bellway Homes
- **Local Residents-** 4 responses
- **Organisations-** British Sign and Graphics Association, Canal and River Trust, Natural England, Tees Archaeology, Tees Valley Combined Authority and The British Horse Society

A schedule of the comments received to the draft SPD document and the Council's response is included at Appendix C. Supporting the draft SPD were three Technical Guidance and Standards Appendices; comments received to these appendices and the Council's response is provided within Appendix D.

SEA Screening Consultation

A preliminary SEA Screening Report was prepared and forwarded to the 'Consultation Bodies' – the Environment Agency, Natural England and Historic England for comment on content and conclusion in July 2022 for a period of 6 weeks. The comments received can be viewed in the SEA Determination and Statement of reasons document (see Appendix E). Following on, Stockton on Tees Borough Council determined that the draft SPD was not likely to have significant environmental effects. Accordingly, it was considered that an environmental assessment of the SPD was not required.

The SEA Screening Report and SEA Determination and Statement of reasons document were made available throughout the public consultation.

Proposed changes to the draft SPD arising from the public consultation are minor in nature and have not changed the scope or purpose of the SPD, made 'new' policy, or allocated/established policies for the development of sites or areas of the Borough. Therefore, it is considered that the initial determination (contained within Appendix E) remains valid.

Community Impact Assessment

The Community Impact Assessment which informed the preparation of the draft SPD did not identify inequalities that required a major change to the SPD in order to proceed to public consultation. The wide ranging evidential and consultation activities in the preparation and subsequent adoption of the parent policies in the Local Plan, the consultation and engagement in respect of the SPD, meant that the Council did not consider that the SPD would unlawfully discriminate against any group or individual, or provide the grounds for such discrimination. Furthermore, it was considered that the Council had demonstrated 'due regards' across all protected characteristics.

The Community Impact Assessment was made available as part of the public consultation process. Proposed changes to the draft SPD arising from the public consultation have been minor in nature and have not changed the scope or purpose of the document. Accordingly, there the outcomes of the initial Community Impact Assessment remain unaltered.

Appendix A

Consultation Plan

Consultation period, requirements, and approach

Consultation Period

21st November 2022 to 19th December 2022 (4 weeks)

Statutory Requirements

To fulfil the requirements of:

- The Town and Country Planning (Local Planning) (England) Regulations 2012
- The Stockton-on-Tees Statement of Community Involvement (2016)

Approach to consultation

To ensure a transparent and holistic consultation the Council propose the following approach to consultation which meets statutory requirements.

How will decisions be made and what feedback will be given?

The Councils approach to this is detailed within the Statement of Community Involvement.

Identified activities

Brief description of activity	Date	Who is involved	What are the expected outcomes
Council Members Briefing Session – inviting council members briefing session	Prior/early stages of consultation period	Council Members	Awareness Raising
Publish SPDs and Supporting Documents on website- Consultation page	Start of consultation period	Inclusive Growth and Development to send documents to Communications Team to upload	Awareness Raising Detailed responses at both the strategic and local level
Use of corporate Facebook and Twitter accounts- to publicise consultation	Throughout consultation period as appropriate	Communications Team	Awareness Raising Detailed responses at the local level through response form
Letter/email to those on Consultation Database- stating where documentation is available and how to respond. Those included on the Local Plan consultation	Both letters and e-mails to be sent at start of the consultation period	General and specific consultation bodies and duty to co-operate bodies as detailed within regulations. This includes local residents, local voluntary/community sector organisations, local	Awareness Raising Detailed responses at both the strategic and local level

Brief description of activity	Date	Who is involved	What are the expected outcomes
database will be sent an e-mail/letter.		businesses, and national organisations/agencies	
E-mail to chair of Community Partnerships- stating where documentation is available	Start of consultation period	Forum members and Inclusive Growth and Development	Awareness Raising Detailed responses at a local level through response form
Email to all Council Members- stating where documentation is available	Start of consultation period	All Council Members to alert them of the consultation and also to allow them to publicise it where it affects residents in their ward.	Awareness Raising Detailed responses at both the strategic and local level
Make SPD and Supporting Document available within libraries and customer service centres/principal office	Throughout consultation period	Library Service	Awareness Raising Detailed responses at a local level through response form
Awareness raising via Catalyst	During consultation-notice in Catalyst E-Bulletin.	Inclusive Growth and Development, Catalyst, voluntary, community and social enterprise (VCSE) sector	Awareness Raising Detailed comments at local level from the voluntary. community and social enterprise (VCSE) sector through response form
Attendance at meetings of groups	Subject to interest	Should interested groups provide a formal invitation to the Council to attend a meeting to discuss the SPD this will be considered by officers.	Awareness Raising Detailed responses at both the strategic and local level

Appendix B

Organisations Consulted

Accent Group	Civil Aviation Authority
AECOM	CLA North
Airport Operators Association	Cleveland Fire Brigade
Appletons Chartered Surveyors	Cleveland Police Headquarters
Arcus Consultancy Services Ltd (Planning Division)	Coal Authority
Arriva	Coast & County Housing
Arup	Colliers International
Atisha Buddhist Centre	Community Welfare Trust
Augean PLC	Conaco Phillips Petroleum Co. UK Ltd
Avant Homes (North East)	Concept Town Planning Ltd
Avison Young	Connect Property North East Ltd
Baines Goldston	ConocoPhillips Petroleum UK
Bangladeshi Muslim Welfare Association	Co-operative Group
Banks Developments	Council for British Archaeology
Banks Property Ltd	Countryside Properties
Baptist Union of Great Britain	Cowpen Bewley Village Residents Association
Barratt David Wilson Homes North East	CPRE
Barratt Homes	Crathorne Parish Council
Barton Willmore	Churches Regional Commission in the North East
Barton Willmore (on behalf of Church Commissioners)	Crown Estate Office
Bede Sixth Form College	Cushman and Wakefield
Bellway Homes	Dalton Warner Davis Chartered Surveyors
Billingham Town Council	Dalton Warner Davis on behalf of Wellington 2004 Estate Company
Bishopton Parish Council	Darlington Borough Council
Blackett Hart and Pratt	David Kitchen Associates
BNP Paribas	Davis Planning Partnership
BOC	DEFRA
BOC Gases	Deloitte Real Estate
British Geological Survey	Department for Transport
British Toilet Association	Design Council
BT Group plc	DevPlan
BTCV	Dodds Brown
Building Design Consultant	DPDS Consulting Group
Building Research Establishment	DPP Planning
Business & Resident Action Group (Norton High Street)	DTZ
Cameron Hall Developments c/o England and Lyle Ltd	Durham County Council
Campaign for Real Ale	Durham Diocesan Secretary
Canals and Rivers Trust	Durham University
Carlton Parish Council	Eaglescliffe Preservation Action Group
Carter Jonas LLP	Education Funding Agency
Carter Jonas LLP on behalf of DG Dale and Sons	Education Training Collective
Castlegate Shopping Centre	EE
Catalyst	Egglecliffe & Egglecliffe Parish Council
Caterpillar Stockton	Egglecliffe Youth Group
CB Richard Ellis Ltd	ELG Planning
CH2M (Highways England)	Elwick Parish Council
Charles Church	Emery Planning
Childrens Society	Endeavour Housing Association
Chris Thomas Ltd	Endeavour Partnership
Church Commissioners	Environment Agency

Esh Developments	Inshore Fisheries and Conservation Authority
Estate Directorate, Ministry of Justice	Inter Terminals
Federation of Small Businesses	Interserve Construction Limited
FFT Planning	Jayline Travel
Fields in Trust	Jeffrey Tarren & Associates
Firstplan	JigSaw Planning
Fordy Marshall	Jomast Developments
Forest Enterprise	Jon Tweddell Planning
Forestry England	JWPC Limited
Freight Transport Association	Karbon Homes
Friends of Tees Heritage Park	Kirklevington & Castle Levington Parish Council
Friends of the Darlington Stockton Railway	klr Planning Ltd
Friends of the Earth - Middlesbrough & Redcar	KLR Planning Ltd (on behalf of GMI Developments)
Garden History Society	Knight Frank LLP
Gentoo Homes	Lafarge Aggregates Ltd
Geoplan Ltd	Lambert Smith Hampton
George F White	Letch Lane Residents
Gerald Eve LLP	Lexington Communications
Girsby Parish Council	Lichfields
GL Hearn Property Consultants	Limes Developments
Gladman Developments	Local clinical commissioning group
GO Northern	Long Newton Parish Council
Great Stainton Parish Council	Lovell Johns
Greatham Parish Council	Lovells
Greenergy Terminal Limited	Maltby Northern Edge Resident's Group
Grindon and Thorpe Thewles Parish Council	Maltby Parish Council
Groundwork Trust	Marine Management Organisation
H J Banks & Co. Ltd.	Marrons Planning
Habiteq	Matthew Trotter & Miller Architects
Hale	Metropolis PD
Hambleton District Council	Michael Mealing (Planning)
Hartburn Residents Association	Middlesbrough Borough Council
Hartlepool Borough Council	Middleton St George Parish Council
Hartlepool Water	Miller Homes
Health & Safety Executive	Ministry of Defence
Hedley Planning Services	Montagu Evans LLP
Hellens Group	Montague Evans on behalf of British Land
Highways England	Nathaniel Lichfield and Partners
Highways England - Northumberland & Durham	Nathaniel Lichfield and Partners on behalf of Wynyard Estates
Hilton Parish Council	National Farmers Union
Hindu Culture Centre	National Grid
Historic England	Natural England
Historic Towns Forum	Network Rail
HJ Banks & Co Limited	Newby Parish Council
Hobson 7 Smith, Builders	NFU
Home Builders Federation	NG Bailey
Home Group	NHS England North
Home Office	NHS Estates
Homes England	NHS Hartlepool and Stockton-on-Tees CCG
How Planning	NHS Property Services Ltd
Husband and Brown Limited	NHS Stockton - Public Health
Ian Derby Partnership	North East Ambulance Service NHS Trust
Indigo Planning	North East Chamber of Commerce
Industry Nature Conservation Association	North East Civic Trust
INEOS Chlor Vinyls Ltd	North East Community Forests
Ingleby Barwick Town Council	North East Land and Planning Agency
Inovyn Enterprises Ltd	North Star Housing Group

North Tees Limited	Sabic UK Petrochemicals Ltd
North Tees NHS Trust	Sadberge Parish Council
Northern Consortium of Housing	Saddington Taylor
Northern Gas Networks	Sanderson Weatherall obo JG Eaglescliffe (Holdings)
Northern Powergrid	Sanderson Weatherall on behalf of Lidl UK
Northumbria Garden Trust	Satnam Group
Northumbrian Water Ltd	SAVE
Norton Village Association	Savills
Npower Renewables	School of Architecture, Planning & Landscape
Ofcom	Seamer Parish Council
Office for Nuclear Regulation	Sedgefield Town Council
Office of Rail and Road	Sembcorp Energy UK
Office of Durham Police, Crime and Victims Commissioner	Shire Consulting on behalf of Barclays Bank
Office of Police & Crime Commissioner for Cleveland	Shri Guru Nanak Gurdwara & Sikh Community Centre
Openreach	Shuttleworth Picknett & Associates LLP
Oxbridge Residents Association	Sita UK
P&M Properties	Society for the Promotion and Advancement of Romany Culture
PD Ports	Society for the Protection of Ancient Buildings
Peacock & Smith	Solutions Northern
Peacock & Smith on behalf of Kirklevington Property Co	South Tees Mayoral Development Corporation
Peacock and Smith on behalf of Morrisons	Southlands Management Ltd
Pegasus Group	sp&architects
Persimmon Homes	Spawforths
Philips Petroleum	Sport England
Picton Parish Meeting	SSA Planning Limited
Places for People	SSA Planning Limited (on behalf of KFC Ltd)
Plainview Planning Ltd	St Modwen
PlanInfo	St. James's Street Property Management
Planning Potential	Stagecoach
Planning Prospects	Stagecoach Transit
Planning Team, Bond Dickinson	Stainton and Thornton Parish Council
Planning Works Ltd	Stephenson Halliday
Planware Ltd	Steve Hesmondhaigh & Associates
Police & Crime Commissioner for Cleveland	Stillington & Whitton Parish Council
Preston Farm Developments	Stockton Renaissance
Preston on Tees Parish Council	Stockton Residents' Association
Primeland Consultants Limited	Stockton Sixth Form College
Prism Planning	Stockton Town Pastors
PX Group	Story Homes
Quod	Taylor Wimpey
Rae Watson Development Surveyors	Tees and Hartlepool Port Authority Ltd.
Railway Housing Association	Tees Archaeology
Ramblers Association, Stockton	Tees Valley Combined Authority
Rapleys	Tees Valley Local Access Forum
Redcar and Cleveland Borough Council	Tees Valley Nature Partnership
Redmarshall Parish Council	Tees Valley Rural Community Council
rg+p Ltd	Tees Valley Wildlife Trust
RGB Ltd	Teesside Humanist Society
Richard Burt Design	Teesside International Airport
Road Haulage Association - Northern Office	Tetlow King Planning
Robert Halstead Chartered Surveyor	The Ancient Monuments Society
RPS Group Plc	The Co-operative Group
RSPB	The Council for British Archaeology
Rudby Parish Council	The Energy Workshop
Sabic	The Gardens Trust

The Georgian Group	Westbury Mosque
The Gypsy Council UK Office	Williams Gallagher
The National Federation of Gypsy Liaison Groups	Wolviston Parish Council
The Planning Bureau Ltd	
The Sirius Group	
The Theatres Trust	
The Twentieth Century Society	
The Victorian Society	
Thomas Eggar LLP on behalf of Asda Stores Ltd	
Thornaby Town Council	
Thoroughbred Homes Ltd	
Thorpe Thewles Residents Association	
Three	
Tithe Barn Land	
TM Urban Developments	
Tomlinson Hall	
Transco	
Traveller Law Reform Coalition	
Turley Associates	
Turley Associates on behalf of Tees Valley Airport	
U.K Land Estates	
University of Durham	
Vernon and Co	
Viewpoint	
Virgin Media	
Vodafone and O2	
Ward Hadaway	
Wardell Armstrong	
Wellington Square Shopping Centre	
Westbury Mosque	
Williams Gallagher	
Wolviston Parish Council	
The Planning Bureau Ltd	
The Sirius Group	
The Theatres Trust	
The Twentieth Century Society	
The Victorian Society	
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Turley Associates on behalf of Tees Valley Airport	
U.K Land Estates	
University of Durham	
Vernon and Co	
Viewpoint	
Virgin Media	
Vodafone and O2	
Ward Hadaway	
Wardell Armstrong	
Wellington Square Shopping Centre	

Appendix C

Schedule of comments to the Local Design Guide SPD and the Council's response

Development Industry

Ref	Comment received	Council response / change
	ELG Planning on behalf of Taylor Wimpey UK Ltd	
1	Whilst overall Taylor Wimpey have limited concerns with the approaches suggested in the SPD to ensure appropriate considerations are taken into account when preparing and developing proposals, they do have some concerns/comments on some of the suggested requirements as outlined below. Critical to the success of such Design SPD's is ensuring that they are used as guidance and not applied rigidly as many sites, particularly in area where viability is sometimes challenging,	Comment noted
2	Page 26 Whilst early-stage engagement with the Lead Local Flood Authority (LLFA) would be assist with understanding the requirements for the surface water drainage strategy early in the design process, appropriate resources must be in place to ensure that dialogue and responses are received in a timely manner.	Comment noted
3	Page 28 Swales and detention basins are not always achievable on all sites so whilst it is acknowledged that these are the preferred method of surface water storage, the SPD should also make it clear that underground storage is also acceptable, when above ground storage is not appropriate. Underground storage is often the only viable solution on smaller sites and more urban sites which may be more challenging in engineering terms.	Minor amendment made to articulate that underground storage should only be considered when other preferable options have been discounted.
4	Page 29 The SPD suggests that it will be necessary through planning applications that proposals align with guidance and adoptable standards and how multiple benefits of good SuDs design have been achieved. Taylor Wimpey consider that such information must be proportionate to the scale and nature of the scheme and the type of planning application. The level of information needed to support an outline planning application should be significantly less than a full application when a detailed layout is being considered. It is also considered that the level of information needed for a reserved matters application when matters relating to drainage are subject to conditions on the outline planning approval should be limited to demonstrating that the area shown for the SUDs basin(s) is sufficiently sized to meet the requirements of the development.	Minor amendment made to address comment.
5	Page 30 There does not appear to be any justification for the suggested 8m buffer from the bank of a watercourse. If this is based on specific guidance, then it needs to be quoted in the SPD otherwise the suggested requirement needs to be justified.	Minor amendment made to address comment. The recommendation aligns with the SFRA.
6	Page 32 Taylor Wimpey supports the suggestion that appropriately design SUDs basins can count towards a site's amenity open space requirement. This is a pragmatic and sensible approach.	Comment noted
7	Page 34 The majority of the SUDs features mentioned are not appropriate to the types of housing developments that Taylor Wimpey promote so it needs to be made clearer in the text that not all features will be relevant to every development. Taylor Wimpey would also have concerns over requirements for features such as rain gardens which are not required from a drainage perspective and are likely to add further cost burdens to developments at a time when build costs are rising exponentially.	The paragraph is clear that developments should include the 'effective use of SuDS' and the list of 'natural features' is not exhaustive. Minor amendment made.
8	Page 38 Taylor Wimpey object to the maximum recommended walking distances to bus stops as there is no policy basis for this requirement and	The 'maximum recommended walking distances' are those contained within the

Ref	Comment received	Council response / change
	<p>for the reasons set out below, they do not think that the distances are appropriate. Moreover, it is not the purpose of SPDs to create new policy.</p> <p>There is nothing in national planning policy to support the suggested maximum walking distances. It is envisaged that the suggested 400m requirement has been obtained from the document entitled 'Guidelines for Planning for Public Transport in Developments' published in 1999 by the Institute of Highways and Transportation (IHT) where paragraph 6.20 states: "the maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m"</p> <p>However, it should be noted that the document also makes it clear that these walk distances are not fixed stating that:</p> <p>"These distances are quoted for guidance, and should not be followed slavishly if that would lead to complex or indirect bus routes". (paragraph 6.20,).</p> <p>"Bus stops should, ideally, be located to minimise walking distances, yet maximise the potential catchment areas" (paragraph 6.26).</p> <p>Furthermore, there appears to be no reference to any research or empirical evidence within 'Planning for Public Transport in Developments' to back up the suggestion that the maximum walk distance to a bus stop should be 400m and Taylor Wimpey are not aware of any other document that does this.</p> <p>By contrast, another report published by the IHT in 2000, 'Guidelines for Providing for Journeys on Foot', does provide some empirical evidence stating that on average people are prepared to walk 1.0km (paragraph 3.30) and that this figure differs little by age or sex, remaining constant since 1975. In the same section of the document Table 3.2 goes on to suggest that the same 1.0km distance is an acceptable walking distance for commuters.</p> <p>In summary the two IHT documents do not appear to 'marry up'. The more recent document suggests 1km, not 400m. In comparing the two, the 400m maximum walking distance in 'Planning for Public Transport in Developments' is introduced with no apparent research/evidence and in any event the document describes that it "should not be followed slavishly".</p> <p>In contrast 'Providing for Journeys on Foot' does provide evidence to suggest that people, on average, are prepared to walk much further than 400m, indeed up to 1,000m. Additionally by providing a range of distances in Table 3.2, this IHT document implies that people are prepared to walk greater distances to different land uses and their associated 'attractiveness'.</p>	<p>Chartered Institute of Highways and Transport publication 'Buses in Urban Developments' (2018). These recommended walking distances are intended to enable the bus to compete effectively with the car and to benefit a wide range of people with differing levels of motivation and walking ability.</p>
9	<p>Pages 39 – 42 Taylor Wimpey don't have any major concerns over the general principles of the suggested street typologies but would again re-iterate that this should only be guidance and should not be slavishly applied. However, Taylor Wimpey do not consider that driveway accesses need to be restricted on primary streets in the majority of circumstances. For example, the primary street at Morley Carr Farm has driveways along it and it is very successful in design terms.</p>	<p>The detail for each street typology is clearly identified as 'typical' typologies.</p>
10	<p>Page 43 It is suggested that streets should be free from engineered traffic calming measures unless considered essential. Whilst Taylor Wimpey has no issue with this guidance, there is often conflict between what is requested through Design SPDs such as this and then the requirements</p>	<p>Comment noted</p>

Ref	Comment received	Council response / change
	of highways engineers through the Section 38 adoptions process. For this Design SPD to be successful those conflicts need to be resolved.	
11	<p>Page 45 It is suggested that car parking spaces will be required to meet minimum required standards, but no confirmation is provided on what the standards are. To make it clear and to avoid any confusion these details should be included within the SPD.</p> <p>In relation to car parking, it also suggests that a 900mm wide allowance will be required in addition to the area dedicated for car parking space(s). The Council already have an adopted policy in the local plan requiring M4(2) and M4(3) and in part both of these already deal with access to the property so additional guidance in the SPD is unnecessary. Moreover, if it is rigidly applied to every circumstance / plot it will reduce the amount of garden areas to the front of the properties with no/limited benefit. Taylor Wimpey therefore consider that this is a matter that should be left to Building Regulations.</p>	<p>Local parking standards are contained within the Parking Provision for Developments SPD.</p> <p>The 900mm requirement is for taken from Approved Document M: Access to and use of buildings. M4(1): Category 1 – Visitable dwellings require this 900mm (see para 1.6 of the document). Noted that approach routes vary for different categories of homes within building regulations, so amendment has been made.</p>
12	Page 46 Taylor Wimpey would also suggest that in curtilage frontage parking is also appropriate for some semi-detached typologies as has been successful on a number of their developments including Morley Carr Farm. As such, Taylor Wimpey would suggest that semi-detached houses also need to be included.	The document does not discount the potential for in curtilage frontage parking for semi-detached properties. No amendment is required.
13	Page 55 This section recommends that excessive use of retaining walls and structures should be avoided. Taylor Wimpey would always seek to minimise the amount of retaining walls and structures required on a scheme but sometimes depending on the nature of the site and required drainage solution, this is not always possible.	No amendment is required in respect to this matter.
14	Page 57 Whilst Taylor Wimpey will always consider the character of the area when developing new proposals for a development site, it is clear that a large proportion of new build housing comes forward on greenfield site usually in areas which have already seen a significant amount of new development. As such, there is usually little by way of exiting vernacular. Therefore, “standard stock housing types” are the majority of the time reflective of the character of the area and therefore not inappropriate. Moreover, just because a housetype maybe from a standard range it does not automatically means it is not appropriate in design terms for the context. Each site must be considered on its own merits.	We wish to encourage new sites to create their own character through the appropriate placement of house types and architectural detailing to create a sense of place and aid legibility. In our experience the mass provision of standard stock housing types previously delivered within this region do not support the governments approach to Building Better, Building Beautiful. Standard stock types the majority of the time are actually driven by the market because of housing delivery demands rather than offering choice for the consumer. Wording clarified that use of standardised housing stock should still include varied material palettes and architectural detailing to create distinctive and characterful places.
15	Page 66 Taylor Wimpey consider that it is unreasonable for the Council to expect developers to provide commuted sums where new trees are to be adopted. The long-term maintenance of trees within the highway and	The justification and calculation for commuted sums is contained within Appendix 5 of the Open

Ref	Comment received	Council response / change
	associated costs should be the responsibility of the Council in the same way that the long term maintenance of the road themselves are.	Space Recreation and Landscaping SPD.
16	Page 81 Whilst a large number of Taylor Wimpey's housetypes meet the nationally described space standards (NDSS), there are no policies in the adopted Stockton Local Plan which require new houses to meet the space standards. As such, there is no policy basis for the Council to require developments to meet NDSS. It must therefore be made clear in the SPD that this is only a guide and that there is no requirement to meet the standards. Such a policy would need to be brought through an adopted local plan so it could undergo formal examination and scrutiny. As is made clear in the PGG it is not the place of SPDs to set policy.	The use of the word 'encouraged' clearly articulates that this is not a policy requirement.
17	Page 83 Whilst Taylor Wimpey welcome the clear guidance on appropriate separations distances between existing and proposed houses which provides appropriate clarify when designing new developments, they consider that there should be an acknowledgement that these could be relaxed within a development. For example, to achieve a more appropriate design for the context.	Wording within the document, as drafted, achieves the suggested amendment.
18	Page 87 The reference to district heating is unclear. There is no policy basis within the adopted Stockton Local Plan to require consideration of this in new developments. It is therefore Taylor Wimpey's view that it should be made clear in the SPD that whilst district heating would be supported there is no requirement to provide or consider it as part of development proposals. Moreover, Building Regulations are changing significantly in the coming years in terms of energy efficiency and to reduce additional, unnecessary red tape and avoid confusion, matters such as this should be left with the government to manage through the Building Regulations.	Policy ENV 3 of the Local Plan provides policy in relation to 'Decentralised Energy Generation and Supply'. Minor amend has been made to ensure text does not contradict Local Plan policy.
Persimmon Homes		
1	<p>Page 14 Persimmon Homes strongly support the clear parallels between the National Design Guide and the Local Design Guide SPD. Each characteristic is a vital component in the pursuit of good placemaking.</p> <p>However, Persimmon Homes query the justification behind the ordering of the characteristics of the Local Design Guide illustrated on page 14 and why this is such a deviation from the ordering as set out within the National Design Guide. In particular, Persimmon Homes object to the ordering of the Local Design Guide characteristics which places 'Green and Blue Infrastructure' as the second most point to consider in the design process, ahead of 'Movement', 'Built Form' and 'Placemaking'. In order to maintain a degree of consistency with the National Design Guide, it is strongly advised that that this document follows the ordering as set out within the National Design Guide.</p> <p>In addition, query is raised as to the inclusion of 'The Masterplan' as a theme within the Local Design Guide. The masterplan of a development should be the end goal of the design process, and as such this final portion of the design process should be acknowledged as so rather than being an addition theme for consideration. Persimmon Homes would suggest that 'The Masterplan' section be illustrated on this page as the outcome of the combination of all of the previous themes as it is on Page 15.</p> <p>Persimmon Homes object to the Local Design Guide as a whole until such a time that the ordering of the themes within the document are reviewed or justified.</p>	<p>This SPD is clear that following the 'context' theme the following 7 themes are to be undertaken in an iterative manner. Their ordering is designed to aid the design process considerations and is considered appropriate.</p> <p>In addition, the National Design Guide does not stipulate that a specific order is to be followed. The National Design Guide highlights that characteristics "work together" to create a developments physical character.</p>
2	Page 15 Persimmon Homes generally support the illustration on Page 15 outlining the overarching Design Process and agree that 'Engagement/Review' is a valued part of good design. Furthermore, as part of this 'Engagement and Review' element, there should a	Comments noted

Ref	Comment received	Council response / change
	<p>commitment from the Council insofar that they are bound by comments provided during the pre-application stage and remain accountable for such comments provided during this period. This will enable a level of consistency and offer a more streamlined planning process.</p>	
3	<p>Page 16 Persimmon Homes would like to request that further information is provided regarding the additional fees which are incurred as a result of consultation with Natural England and the Environment Agency at pre-application stage. Will the fee be included within the preapplication fee or is this to be covered at the applicant's expense?</p>	<p>Stockton-on-Tees Borough Council does not currently charge for pre-application advice.</p>
4	<p>Page 21 Persimmon Homes object to the wording of the first section of page 21 as the phrasing gives the wrong impression as to the purpose of the document. The phrasing infers that the document is a theoretical piece of work rather than a document to be applied in actual terms. The phrasing at the current time is as follows:</p> <p>“To gain an understand of features (both in natural and built form), a full site appraisal should be carried out prior to developing a design concept.”</p> <p>Persimmon Homes recommend that the document is rephrased to the following:</p> <p>“To demonstrate an understanding of features (both in natural and built form) a full site appraisal should be carried out prior to developing a design concept”</p>	<p>Suggested amendment incorporated.</p>
5	<p>Page 22 Persimmon Homes object to the wording within the first paragraph on page 22. At this early a stage of the design process assessing a site for potential surface water management is not appropriate, rather it would be more appropriate to assess land for flood risk. As such we would advise the rewording of this development from:</p> <p>“It is important to consider the approach to surface water management from the outset as this can have impacions for the layout of a development and the number of homes which can be achieved”</p> <p>This should be rephrased to the following:</p> <p>“It is important to consider any potential Flood Risk from the outset as this can have impacions for the layout of a development and the number of homes which can be achieved”</p> <p>To reiterate this point, it is not appropriate at this early stage in the design process to consider the role, size and position of SuDS on a site as at this stage not enough information will be available to determine the quantity the SuDS are to hold. SuDS should not be considered as Context and so Persimmon Homes would object to its inclusion within this section of the design process.</p> <p>Flood Risk, drainage and topography are factors to be considered at the context stage, should there be existing SUDS on a site then an exception would be made to acknowledge SuDS within the context section of the design process. This would be a factor for consideration within an ‘Opportunities and Constraints’ analysis.</p>	<p>Flood risk and the approach to surface water management are aspects which need to be considered from the outset of the design process and will influence outcomes of the context stage such as the design principles and concept plan for the development. Whilst this stage of the process would not seek to develop the detailed design of any SuDS infrastructure it will be necessary to ascertain topography, natural features and blue routes that would need to be incorporated within the design. This will indicate the likely locations where it may be appropriate to position SuDS.</p> <p>This aligns with guidance from the LLFA as well as that contained within non-statutory technical standards, CIRIA SUDS Manual and Planning Practice Guidance</p>
6	<p>Page 23 Persimmon Homes strongly support the inclusion of placemaking at this early stage of the design process. Page 23 states that following an analysis of the context of the site it is important to begin the consideration of the placemaking principles. However, Persimmon Homes would urge the Council to reassess the ordering of the themes that closely relate to the characteristics of the National Design Guide. It appears unusual that the development sets high precedence on the characteristics of the</p>	<p>Placemaking principles cover all of the themes contained within the SPD. See earlier comments in relation to ordering of themes. No amendment required.</p>

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	<p>National Design Guide and references the importance of placemaking at this early stage yet the Placemaking theme is not covered until after 'Built Form'. Therefore, for ease of reference Persimmon Homes would recommend the Council consider amending the order of the Themes within this document</p>	
7	<p>Page 24 & 25 Persimmon Homes query the relevance of the information included within pages 24 and 25. Whilst it is acknowledged that the inclusion of a table outlining the definitions of the various placemaking principles is important to for a unanimous approach to design, the relevance of this within the context section rather than within the introductory section of the document is queried.</p> <p>Reiterating an earlier point, Persimmon Homes are of the belief that the table on page 25 prioritises the interrelated aspects of design with the inclusion of 'Green & Blue Infrastructure' ahead of 'Movement' and 'Placemaking'. Therefore, would strongly urge that the order of the themes is reviewed across the entire document.</p>	<p>The 'context' stage of the design process is one which is often overlook or undertaken incorrectly. The aspects highlighted are fundamental to developing a 'vision and concept' for a development proposal which form the basis of later stages of the design process. See earlier comments in relation to ordering of themes. No amendment required.</p>
8	<p>Page 28 Persimmon Homes request that further information is provided in relation to the 'adoptable standards' that are referenced in relation to SuDS. Page 28 states that SuDS must be designed and constructed to an adoptable standard. Persimmon Homes wish to enquire what this adoptable standard will be. Equally important is whether the Highways adoption team have been consulted on this matter. Developing this point further, is this an approach by both the LLFA and the Highways adoption team? Will highways drainage be acceptable if it flows into SuDS? Will Highways adoption team accept Green Infrastructure SuDS within the highway? These are all queries which must be resolved to give developers clarity and certainty.</p>	<p>National Planning Practice Guidance requires local planning authority to be satisfied that the minimum standards of operation for the proposed sustainable drainage system are appropriate, and that there are clear maintenance and adoption arrangements in place for the lifetime of the development. Part of this consideration includes whether the proposed standard of construction would facilitate adoption and maintenance by an appropriate body such as the water and sewerage company under the Ofwat-approved Sewerage Sector Guidance. It is also necessary to refer to the non-statutory technical standards as well as industry and local guidance.</p> <p>Is noted that 'The review for implementation of Schedule 3 to The Flood and Water Management Act 2010' is ongoing. It is generally accepted that highways drainage will be acceptable to flow into SuDS where they are designed to accept it. Whether SuDS will be acceptable within the adopted highway will be a matter for consideration in the design of</p>

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		a development with the local highways authority and LLFA.
9	Page 29 Persimmon Homes query the third paragraph of Page 29 which relates to the gradient of slopes of SuDS basins. If a management company is to adopt the SuDS basin and are happy for a different gradient then is this to be deemed unacceptable in the eyes of the Council? The specification detailed within this page should be stated as relating to parameters that the Council are willing to adopt, rather than limiting the scope of adoption for alternate management sources.	Guidance provided is considered to be appropriate for the purpose of this SPD. It is noted that 'The review for implementation of Schedule 3 to The Flood and Water Management Act 2010' is ongoing and may lead to changes.
10	Page 31 As previously iterated, Persimmon Homes wish to state that the Green Infrastructure elements illustrated on the plan on Page 31 will have to be fully reconsidered during the access, design and movement phases of the design process. As such, Persimmon Homes wish to state once again that the consideration of Green and Blue Infrastructure at this stage is unsuitable.	See earlier comments in relation to ordering of themes. No amendment required.
11	Page 32 Persimmon Homes agree with the principles set out within page 32, greenspaces should be easily accessible for all members of society. However, the local context of an area must be considered. The developer must understand the surrounding of a site prior to the determination of place spaces and open spaces. For instance if a site is located next to a large parkland with play areas and other facilities within it then on-site play and open spaces may not be necessary with such facilities in close proximity. Furthermore, access and key movement routes need to be investigated ahead of the design of these Green Infrastructure features.	The comment is addressed by the following extract text on page 32. "The quantity and types of greenspaces, and associated facilities and infrastructure, will depend to some extent on the scale and nature of any given development as well as existing provision within the locality."
12	Page 36 Persimmon Homes wish to enquire whether the Council's Highways and adoptions team have been consulted in relation to the segment of the document. In light of the fact that the decisions stated within this SPD will have a notable impact on the Highways Department, it seems vital that they are in full agreement with the elements stated within this document.	The document has been the subject of internal consultation with all relevant departments.
13	Page 38 Persimmon Homes agree in principle with ensuring that all individuals are within reasonable proximity to public transport links. However, the distances stated within the table on page 38 appear to be somewhat regimented and do not take into account the local context of the site, such as alternative transport facilities or the village composition of more rural settlements. It should be acknowledged within this document that it may not always be possible for these walking distances to be upheld.	The 'maximum recommended walking distances' are those contained within the Chartered Institute of Highways and Transport publication 'Buses in Urban Developments' (2018). Being 'recommended' distances allows for considerations of alternatives as well as local context.
14	Page 39, 40 & 41 Persimmon Homes again wish to enquire whether the Council's Highways and adoptions team have been consulted in relation to these pages within the document. In light of the fact that the decisions stated within this SPD will have a notable impact on the Highways Department, such as street planting and greenery, it seems vital that they are in full agreement with the elements stated within this document. Page 41 makes reference to the colour of Tarmac and Surfacing, Persimmon Homes would request that this is raised with the Highways Adoption team in light of historical issues that developers have faced in the adoption of coloured tarmacked surfaces. Returning to the mention of street planting and greenery on page 39 the inclusion of these across developments will incur notable financial costs	The document has been the subject of internal consultation with all relevant departments. A street hierarchy is a fundamental aspect of National Design Guide. This part of the document provides details of what would be considered a 'typical' response. Such provision aligns with the NPPF

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	<p>associated with their plantation, have the Council considered the viability implications of such planting practices on developers?</p> <p>Page 41 notes that shared surfaces should be 6m in width, with a 0.5m service strip to either side. Persimmon Homes would object to this requirement in light of the fact that this is a greater width than adoptable roads. Whilst 6m is needed for vehicles to reverse out and turn, a 6m width is not required for the full length of a shared surface. Furthermore, a 0.5m strip is not relevant because service corridors will run along one side of a shared driveway. Therefore, Persimmon Homes wish to object to the distances detailed within the table on page 41.</p>	<p>requirement for tree-lined streets.</p> <p>The document provides 'typical' street typologies. The figures quoted for shared surfaces are standard practice locally and are not to be confused with shared driveways. The service corridor is intended for street lighting as it is accepted other utilities may be elsewhere.</p>
15	<p>Page 47</p> <p>Persimmon Homes do not refute the requirement for the provision of waste storage nor their integration into the street scene, however, would disagree on the matter that they "are not visible from the street". Council-run bin collections operate with a large bin collection vehicle, this manoeuvres through streets to collect general waste, recycling and garden recycling, and so if bins are not clearly visible how can they be ensured to be collected?</p> <p>Within the bullet points on page 47 there is some ambiguous phrasing in relation to the distance waste should be carried. This bullet point states that "waste does not need to be carried further than 30m to storage containers". This phrasing is somewhat unclear and does not state what this distance is to be understood in relation to. Secondly, the final bullet point states that "storage containers do not need to be taken through a dwelling unless avoidable", as previously mentioned this wording is somewhat unclear. It would be advisable that further clarification was made as to the Council's understanding of "unavoidable".</p> <p>Therefore, Persimmon Homes would request that some further clarity was made in relation to both of these matters.</p>	<p>Comment 1 - "they are carefully integrated into the street scene (are not visible from the street) refers to avoiding individual bins being stored in the front of dwellings / on street and aims to encourage bin store solutions to avoid this as it detracts from the street scene (This does not include on bin collection days where bins will be moved onto the street as usual). Wording clarified in document.</p> <p>Comment 2- Waste carrying distance is intended to avoid bin stores being located far away from dwellings, potential making it inaccessible or inconvenient to use. Wording clarified in document.</p> <p>Comment 3 – final bullet point refers to the placement of bins/bin stores and the street collection point to ensure they do not have to be brought through the dwelling. Unless unavoidable meaning if specific site circumstances meant this is the only option and would need to be discussed on a case-by-case basis. Wording clarified in document.</p>
16	<p>Page 50 Persimmon Homes, again, wish to raise an objection in regard to the order of the themes throughout this document. The Built Form of a development must be understood prior to the detailed consideration of SuDS. The density of the development will be identified at this stage which will have a notable influence on the size and nature of any SuDS on site. Unless thorough justification is made behind the ordering of Green and Blue Infrastructure ahead of Built Form (and other sections) Persimmon Homes strongly object to the document as a whole.</p>	<p>See earlier comments in relation to ordering of themes. No amendment required.</p>
17	<p>Page 51 indicates that cul-de-sacs do not enhance the urban design of a residential area and that streets should be highly interconnected.</p>	<p>The SPD encourages promotes a connected street</p>

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	<p>Persimmon Homes wish to state that it is not always possible for fully interconnected streets throughout a site. In some instances a developer may be required to provide cul-de-sacs for viability purposes or to adhere to the built form of the surrounding areas.</p>	<p>network and discourages streets/spaces which lead to nowhere. This is an established national design principle.</p>
18	<p>Page 54 Persimmon Homes welcome the inclusion of the ratio proportions that are provided on page 54, stating the general height and weight proportions that are to be deemed acceptable. However, one measurement which would significantly aid developers in relation to this is what the minimum front-front distances are. Providing the ratio proportions does not offer detailed information on the exact distances that the Council will deem acceptable. Therefore Persimmon Homes would request that the minimum separation distances are provided to aid developers in interpreting this document.</p>	<p>This is covered within the 'privacy and amenity' section of the SPD.</p>
19	<p>Page 61 discusses the incorporation of gateways and squares into the design of developments. Persimmon Homes welcome the inclusion of these design detailing's to help to create a memorable and unique place, however would request that it should be stated that these features should be included 'where appropriate' to the scale and context of the site. In some instances it would not be appropriate to incorporate these design features and as such this SPD should be reflective of this.</p> <p>In addition, Persimmon Homes would query the definition of the term Node. What is 'happenings'? Where did this definition come from?</p>	<p>It is not considered necessary to include such wording within the document as existing text confirms that their inclusion would be considered/determined through the design process.</p> <p>Wording clarified in document for term Node.</p>
20	<p>Page 63 Persimmon Homes fully support the inclusion of Squares as a design feature in this document. However, this document appears to overlook the opportunity that squares hold for visitor parking. Therefore, it is recommended that a consideration for parking is mentioned within page 63.</p>	<p>The SPD is designed to provide the design principle of these areas without being overly prescriptive.</p>
21	<p>Page 64 Persimmon Homes do not object to the socio-environmental value that nature holds within a development, however wish to know whether the Street Trees section of the SPD has been considered in relation to viability. Is there to be a commuted sum for the incorporation of street trees? If so what price will this be? Equally important is whether the Highways adoption team have been consulted on this matter, as this is a matter that will have a considerable impact on their department. Therefore, Persimmon Homes raise the question as to what the Highways adoption team's view is on this section of the SPD. Until such a time that there is support from the adoptions team, Persimmon Homes cannot support the adoption of this SPD.</p>	<p>Tree-lined streets are a requirement of the NPPF. The justification and calculation for commuted sums is contained within Appendix 5 of the Open Space Recreation and Landscaping SPD. The document has been the subject of internal consultation with all relevant departments.</p>
22	<p>Page 68 Mirroring comments made previously, Persimmon Homes wish to enquire whether this document has undergone a thorough consultation process with the adoptions team. It is vital that prior to the adoption of this document as an SPD the adoptions team are in full support of the elements detailed within this document.</p>	<p>The document has been the subject of internal consultation with all relevant departments.</p>
23	<p>Page 69 Persimmon Homes would advise the re-wording of the first sentence within the third paragraph of page 69 due to the current wording offering limited flexibility in design. It is advised that there is a re-wording to include the phrase "where appropriate". This will result in the start of the third paragraph to be amended to as follows:</p> <p>"It is recommended that your development attempts to integrate where appropriate local vernacular including materials and, art and craft traditions."</p> <p>The inclusion of the phrase "where appropriate" allows developers to assess the context of the area and deviate slightly from the local</p>	<p>Wording amended to include where appropriate.</p> <p>The document aims to avoid the over-use of standard housing stock where standard housing is applied to any site within the borough without any variation to materiality, layout, scale, to consider existing surrounding vernacular, or in the instances of modern contexts,</p>

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	<p>vernacular where it is considered to be inappropriate for the proposed development.</p> <p>Another point made on Page 69 which Persimmon Homes raise issue with is the discussion of discouraging stock housing within new residential developments. Firstly, referring back to the map on Page 11 illustrates that the majority of housing across Stockton is from a 'modern housing' period. In light of this, the integration of a degree of stock housing may in fact be in keeping with the local architectural styles, materials, and character, therefore conflicting with the argument being made in the latter end part of the paragraph. In light of the above, it does not seem appropriate for the Council to state that developments must refrain from stock housing and as such Persimmon Homes request that this paragraph is disregarded from the SPD.</p>	<p>any attempt to create a new distinctive character within the site. The result of over-using standard housing stock is it erodes the potential for new characterful places to emerge. Wording of document clarified that use of standardised housing stock should still include varied material palettes and architectural detailing to create distinctive and characterful places.</p>
24	<p>Page 83 Persimmon Homes object to the separation distances that are detailed within the table on Page 83 due to the fact that they prevent the opportunity for mews to be integrated within the development. These specified distances limit the creativity of designing attractive and distinctive places and conflict with the 1:1 ratios provided in regard to mews on page 54.</p>	<p>The document is clear that the separation distances have been successful in achieving acceptable levels of privacy and amenity between dwellings. However, the document continues to outline that there may be instances where varied separation distances may be appropriate, ensuring adequate levels of privacy and amenity are achieved. Wording of document clarified.</p>
25	<p>Page 86 There are a number of bullet points in the third column of page 86 which Persimmon Homes raise strong concern with. One such bullet point refers to passive ventilation and how this can be achieved through openable windows. Persimmon Homes request that the document acknowledges that there are other ways in which passive ventilation can be achieved and that in some instances it can be inappropriate for passive ventilation through open windows in locations which face noise issues.</p> <p>Another bullet point references thermal mass as a as a potential renewable energy source, however as the Stockton region is not a geothermally rich area and so it is not an appropriate renewable energy source in the region, Persimmon Homes query the inclusion of this within the document.</p> <p>Finally, two bullet points (on Page 87) discuss renewable energy and low carbon practices. Persimmon Homes wish to remind the Council that details within this SPD cannot and should not exceed that which is detailed within existing local policy requirements.</p> <p>Persimmon Homes do not wish to infer an objection against the principles behind the energy hierarchy in the pursuit of sustainable design, however many of these considerations detailed on page 86 and 87 are unregulated at this present time, and until such a time that they become regulated it is contrary to good working practice for housebuilders.</p>	<p>Errors have been made in the formatting of bullet points in the production stage of the SPD. Bullet points 'Orientation' to 'Thermal mass' should be sub points to 'Reducing the need for energy'.</p> <p>The SPD sets out considerations within the stages of the energy hierarchy. It is not considered to exceed policy contained within the Local Plan.</p>
26	<p>Page 88 Persimmon Homes wish to enquire what Stockton Council would stipulate are the minimum standards in relation to resilience. For instance, rainwater harvesting is not a current requirement of building regulations and the cost implications of this Green Infrastructure method is not a factor which has been into consideration by developers previously. Is the</p>	<p>All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where</p>

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	factor of viability been taken into full consideration by the Council in the production of this document?	there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. Whilst such plans have not been adopted within the Local Plan we do 'encourage' exceeding them.
27	Page 91 Mirroring comments made previously, Persimmon Homes wish to enquire whether this document has undergone a thorough consultation process with the adoptions team. It is vital that prior to the adoption of this document as a SPD the adoptions team are in full support of the elements detailed within this document.	The document has been the subject of internal consultation with all relevant departments.
28	Page 95 Persimmon Homes wish to raise an issue with the image that has been used for this page of the SPD. Comparatively to the images used on various other pages within the document, this page does not look as professionally illustrated as other pages and thus diminishes the points made on page 94	Amendment to be considered as final document designed.
29	Page 96 and 97 Persimmon Homes raise strong objection to the ordering of the themes on a table on page 96. The ordering on page 96 bears no correlation to the order of the themes detailed at the start of the SPD, which orchestrates the structure of the document itself. The confusion between the order of the characteristics of the National Design Guide, the themes of this SPD and the table on page 96 bear no resemblance to one another. This reiterates the comment Persimmon Homes have been raising throughout their response that this document must align with the National Design Guide for consistency of policy and ease of reference. As such Persimmon Homes raise strong objection to this SPD in its current form until this matter has been explored in further detail.	Amendments to be made to align with document structure. See earlier comments in relation to ordering of themes.
30	<p>Finally, within the first introduction of the Local Design Guide it states that "Whilst focused on residential development many of the principles identified can be translated to commercial and town centre developments at a large or small scale". Whilst this document in theory could be applied to commercial developments, Persimmon Homes query the justification behind there not being even a single page a section which applies the principles detailed within the SPD to commercial and town centre developments to ensure it is applied acceptably.</p> <p>This document is intended to be adopted as a SPD, a document that is to be used as a material consideration in the determination all future planning applications. Therefore, to ensure that this document is applied to its full potential for residential, commercial and town centre development there should be a section which directly relates to each such type so that no developer is prejudiced over a lack of clear information. In light of this Persimmon Homes request additional information be provided in applying this document to commercial and town centre developments.</p>	This SPD is aligned to the National Design Guide and National Model Design Code. Neither of these documents provide specific sections on commercial or town centre developments but provide a range of principles that can be utilised to create well-designed places.
31	<p>In light of all of the comments raised above, Persimmon Homes cannot in good mind support the adoption of this SPD in its existing form and so must state their objection.</p> <p>Most notably within these objections is the inconsistency between this Local Design Guide's themes and the National Design Guide's characteristics, in particular the ordering of the themes within this document. It deviates from the National Design Guide and there appears to be no justification behind placing Green and Blue Infrastructure as the second theme for consideration. Secondly, Persimmon Homes wish to</p>	<p>It is noted that the document is suggested to be appropriate as a Supplementary Planning Document which is its intention.</p> <p>This SPD is clear that following the 'context' theme the following 7 themes are to</p>

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	<p>enquire as to the consultation with the Highways Adoption Team in light of the fact that there are so many elements within this document which will have notable implications on the department. Finally, the last objection to the document lies in the form of viability implications for developers which may not have been fully considered by the Council.</p> <p>Subject to the recommendations as set out within this letter, Persimmon Homes would consider the Local Design Guide more appropriate for adoption as a Supplementary Planning Document.</p> <p>As a national housebuilder, Persimmon Homes have a keen local interest and are eager to ensure a suitable planning framework is established in Stockton. Therefore, we are happy to assist the Council in moving forward with this document.</p>	<p>be undertaken in an iterative manner. Their ordering is designed to aid the design process considerations and is considered appropriate.</p> <p>In addition, the National Design Guide does not stipulate that a specific order is to be followed. The National Design Guide highlights that characteristics “work together” to create a developments physical character.</p> <p>The document has been the subject of internal consultation with all relevant departments.</p>
Lichfields on behalf of Bellway Homes		
1	<p>Before referring to the specifics of the document, we would like to make clear that this SPD, if adopted, should be considered as guidance only and does not carry more weight than the Local Plan. In this regard, the SPD should be suitably flexible and applications should be assessed on a case by case basis when being considered against the SPD.</p>	<p>Comment noted</p>
2	<p>Page 30 of the Draft SPD states that:</p> <p>“Where existing watercourses are identified a buffer will be required from the top of the bank to deliver or maintain existing riparian habitat and provide access for maintenance. We recommend a minimum distance of 8m for this buffer.”</p> <p>In response, the guidance states that the buffer begins at the top of the bank but does not clarify what the buffer is between nor does it clarify the definition of “top of the bank”. Bellway Homes would recommend that rather than being specific about an 8m buffer, which appears to be an arbitrary measurement, that an appropriate buffer is determined on a case-by-case basis.</p>	<p>This recommendation aligns with the EA recommendation outlined within the Stockton-on-Tees Strategic Flood Risk Assessment. Such a buffer allows for ecological enhancement and ease of access for maintenance works.</p>
3	<p>Page 34 of the Draft SPD states that: Designs should include effective use of SuDS which incorporate existing water courses and introduce new ‘natural’ features such as green and brown roofs, swales, ponds and rain gardens.</p> <p>In response, ‘natural’ features such as green and brown roofs can have severe implications in viability, given the cost of installation. As such, Bellway Homes would recommend adding ‘where considered appropriate’ to the end of the aforementioned paragraph to provide a developer with a degree of flexibility over which SuDS features are incorporated.</p>	<p>The paragraph is clear that developments should include the ‘effective use of SuDS’ and the list of ‘natural features’ is not exhaustive. Minor amendment made.</p>
4	<p>Page 38 of the Draft SPD states that the maximum recommended walking distances to bus services of different frequencies.</p> <p>In response, we refer to the CIHT publication ‘Guidelines for Planning for Public Transport in Developments’ (1999) which states “it is more important to provide frequent bus services that are easy for passengers to understand than to reduce walking distances to bus stops by a few metres”. Established technical papers regarding highways design and public transport often note 400m as an ideal distance to walk, however more up-to-date research including data from the National Travel Survey</p>	<p>The ‘maximum recommended walking distances’ are those contained within the Chartered Institute of Highways and Transport publication ‘Buses in Urban Developments’ (2018). Being ‘recommended’ distances allows for consideration on a case-by-case basis.</p>

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	<p>demonstrates that, outside London, the average distance people walk to a bus stop is around 600m, and the 85th percentile walking distance is over 800m.</p> <p>Bellway Homes would therefore request that there is some flexibility in this policy in line with national guidance. It is welcomed that the policy is 'recommended' in this regard and Bellway Homes would expect this to be considered as guidance only. To ensure its flexibility, Bellway Homes would request that the word 'maximum' be removed to remain as 'recommended'.</p>	
5	<p>Page 40 of the Draft SPD states that:</p> <p>In curtilage frontage parking should be minimised to allow for frontage planting.</p> <p>In response, Bellway Homes would resist this requirement as this would encourage on street parking which has the potential to block footpaths and impact on the street scene. Paragraph 86 of the National Design Guide states that well-designed parking is attractive, well-landscaped and sensitively integrated into the built form so that it does not dominate the development or the street scene. To require in curtilage parking to be minimised is likely to result in an on-street parking dominated development in conflict with the aims of the National Design Guide. Please also refer to the response regarding page 46 below.</p>	<p>Please refer to parking typologies within the document and the desire for a flexible approach to car parking with a strategy which looks to utilise various parking methods. The intention of the statement is to ensure long runs of frontage parking are avoided as they do not tend to allow appropriate landscaping. Amendment made to reflect.</p>
6	<p>Page 45 of the Draft SPD states that:</p> <p>To ensure all dwellings are visitable to most people a 900mm wide allowance will be required in addition to the area dedicated for car parking space(s). This allowance should be continuous from the adopted highway to the entrance to the property.</p> <p>In response, Bellway Homes would question where the 900mm figure has derived from and its justification. This is not mentioned in the Tees Valley Design Guide & Specification.</p>	<p>The 900mm requirement is for taken from Approved Document M: Access to and use of buildings. M4(1): Category 1 – Visitable dwellings require this 900mm (see para 1.6 of the document). Noted that approach routes vary for different categories of homes within building regulations, so amendment has been made.</p>
7	<p>Page 45 of the Draft SPD also states that:</p> <p>Should garages be proposed as part of a development, they will be required to meet minimum required internal dimension standards to be considered as a car parking space.</p> <p>In response, it should be made clear exactly what is considered the minimum internal dimension standards. If these are those referenced in the Tees Valley Design Guide & Specification, then this should be referenced.</p>	<p>Local parking standards and required garage dimensions are contained within the Parking Provision for Developments SPD.</p>
8	<p>Page 46 of the Draft SPD states that:</p> <p>Courtyard parking to the rear of dwellings enables cars to be removed from the street scene entirely, which is useful for maintaining verge planting, and creating pedestrian priority environments. Safety and security of rear parking courts should be considered within the design as well as how dwellings will be accessed.</p> <p>In response, it is considered that parking courts present an inefficient use of space and should not be encouraged. Whilst appropriate for high-density, flatted developments, on-plot parking for dwellinghouses has significant benefits in terms of reducing sprawl of urban space and</p>	<p>Comments noted. The provision of courtyard parking needs to be carefully considered through the design process but can be successfully delivered in appropriate locations as evidenced by the Derwenthorpe development in York</p>

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	<p>providing a resident with a greater perceived level of security as their vehicle is close. Parking courts however take up valuable space which could deliver additional homes and present challenges with providing natural surveillance, and they are not user friendly for those with disabilities or that require ease of access from house to vehicle. As a result, feedback has historically suggested there can be low demand for rear parking plots from prospective buyers which could lead to undesirable and unsuccessful schemes.</p>	
9	<p>Page 53 of the Draft SPD states that:</p> <p>Corner properties can provide a visual landmark within the site using taller scale, uplifted materiality, and architectural detailing such as windows and porch design. Gable ends should include windows facing out onto the street providing dual aspect onto the corner.</p> <p>In response, Bellway Homes is comfortable with the urban design principles and benefits of providing dual aspect properties. However, it would be useful for the Draft SPD to acknowledge the difficulties of achieving minimum recommended separation distances between habitable rooms for the gable elevation which would be made active. The inclusion of the following phrase would be useful 'where appropriate to achieve good design, minimum recommended separation distances may be relaxed to enable the delivery of dual aspect properties'.</p>	<p>Page 83 of the document which deals with the application of separation distances covers is adequately flexible.</p>
10	<p>Page 56 of the Draft SPD states that:</p> <p>The use of stock housing types within new residential developments shall be discouraged, as they do not respect local architectural styles, materials, or character.</p> <p>Bellway Homes strongly object to the general discouragement of standard house types, and consider that this presents a significant challenge to house building, particularly in relation to large scale developments. Insisting upon this requirement will have significant bearing on viability of sites and will delay/prevent delivery of larger allocations. Bellway consider that improving design on residential schemes can still be easily achieved through careful consideration the material palette and elevational treatments during planning application process, without requiring bespoke housetype designs. Bellway Homes would suggest revising the paragraph to 'Developments which respect local architectural styles, materials and character will be encouraged.'</p>	<p>See comment 23 – Persimmon homes response</p> <p>Wording of document clarified that use of standardised housing stock should still include varied material palettes and architectural detailing to create distinctive and characterful places.</p>
11	<p>Page 64 of the Draft SPD shows images of Nodes within an example residential development. The images on Page 64 are identical to those on page 63, despite showing different features.</p>	<p>Drafting error was made in the production of the document which resulted in duplicate images being used. The correct images will replace the duplicate.</p>
12	<p>Page 66 of the Draft SPD discusses street trees. We wish to highlight that the specification of any street trees within the landscape verge to be adopted by the local highways authority should be suitably flexible to allow for a varied and attractive development.</p>	<p>Comments noted</p>
13	<p>Page 76 of the Draft SPD states:</p> <p>One of the ways to promote social inclusion is ensuring that a development incorporates an appropriate mix of uses which will include local services and facilities and a mix of homes. The range of services and facilities to be delivered will be identified at concept stage being related to the needs and aspirations of the community</p>	<p>Comments noted. It is not considered necessary for the inclusion of such wording as the issue of viability is covered within Local Plan policy SD7.</p>

Ref	Comment received	Council response / change
	<p>In response, the Draft SPD should recognise that including local services and facilities is not viable for all developments. As such, it is considered that aforementioned paragraph should be amended to read:</p> <p>One of the ways to promote social inclusion is ensuring that a development, where it is deemed appropriate and viable, incorporates an appropriate mix of uses which will include local services and facilities and a mix of homes. The range of services and facilities to be delivered will be identified at concept stage being related to the needs and aspirations of the community</p>	
14	<p>Page 83 of the Draft SPD sets out separation distances between dwellings and states that:</p> <p>These distances will increase if there is a variation in ground levels between the properties or a difference in the number of stories as detailed within the Householder Extensions and Alterations SPD. There may be instances where minimum separation distances cannot be achieved or would compromise the site, such as infill sites within urban locations where the local context supports tighter grained streets. Such developments should seek to demonstrate specific design solutions to achieve and maintain acceptable levels of privacy using a reduced offset distance.</p> <p>In response, it is requested that it is made clear that separation distances be 'recommended' to allow for flexibility to be taken on a case-by-case basis in response to site topography.</p>	Amendments made to clarify separation distances are recommended

Local Residents

Ref	Comment received	Council response / change
	Local Resident	
1	Protect our Green environment, separating large building developments of Yarm and Ingleby Barwick. Protect our wildlife and Natural Countryside. Build on Brown Field land rather than on beautiful Green Countryside. PROTECT THE LEVEN VALLEY from further development. Protect the Tees Heritage Park. It was Green Wedge, and should be returned to Green Wedge status.	The SPD does not allocate land for specific purposes. Its purpose is to provide design guidance.
	Local Resident	
1	Page 38, Section 3.3 Movement. The inclusion of recommended maximum walking distances to bus stops is laudable, however, in the past bus routes have been altered to cater for new housing developments and in the process existing residents have then been left isolated with long walks to the nearest bus stop.	Bus routes are not within the remit of this document which seeks to ensure new developments incorporate infrastructure to support bus travel as appropriate.
2	Page 86, Section 3.7 Resources. This section includes the Energy Hierarchy which talks of reducing the need for energy and Maximising potential for energy supply from decentralised, low carbon and renewable energy sources. Building orientation is also mentioned but the encouragement of on roof solar panels is not considered. Preferably solar panels should be installed on new buildings at the build stage but at the very least the structure should enable efficient retrofitting by the owner at a later date.	Reference to photovoltaics is included within the document.
3	Page 88, Section 3.7 Resources. Whilst garages are not specifically mentioned under car parking the recommendation that rooms should be of sufficient size should also cover these when provided as in modern homes owners are often prevented from using them for their intended purpose because of their inadequate size.	The movement section of the document requires garages, where they are to form a parking space, to meet required dimensions (which

Ref	Comment received	Council response / change
		are contained within the Parking SPD).
	Local Resident	
1	<p>The consultation document on which to offer comment is considerable in page content and would require a great deal of spare time to assess thoroughly. Consequently my observations are limited as is my time to scrutinise such lengthy documents. However, I am highly appreciative of the fact that you have given me the opportunity to do so.</p> <p>It is somewhat timely that the consultation on the future design guide of local developments is taking place now and therefore I would draw attention to the current Governments levelling up Minister and Secretary of State Michael Gove who has highlighted poor quality and 'ugly' designed housing developments which Local Authorities should take heed of in the planning process. It is hardly surprising when the majority of open market housing developments which are approved are standard boxes with similar high density layouts with little consideration for the environment they are placed in.</p> <p>Cramming as many houses as possible in a given area is always at the expense of adequate or appropriate parking provision or dedicated green space for recreation. A case in point is the Rings in Ingleby Barwick where on the Rings Road the properties are built facing the main highway but with their parking spaces at the rear of the property. As a consequence residents are choosing the easy option of parking on the main highway itself as opposed to using a back access road to their properties. This has caused ongoing congestion issues and difficulty in vehicles passing each other safely, in fact there have been minor collisions and complaints on social media about the parking on this road which is also a bus route.</p> <p>Another consequence is residents parking their vehicles on the grass verges which were intended to improve the street scene. This damages the verges and might well as be turned into laybys to ease the clear problem created by the estates' bad design layout.</p> <p>Another point I would like to raise is the continued targeting of greenfield and good agricultural land in which to place unattractive developments and is an issue which requires more consideration at the pre-development consultation stage. In fact the Government again through the Levelling Up and Regeneration Bill on December 6th 2022 has now been strengthened to put local communities at the heart of planning policy. Mandatory housing targets will be abolished and there will no longer be the presumption in favour of development at the expense of Green Belt or Green Wedge. This has to be a key consideration by the LPA going forward.</p> <p>Yarm has suffered greatly from a significant surge in housing development in the past 5yrs plus at the expense of greenfield being lost, particularly green wedge in the Leven Valley in addition to areas of the Tees Heritage Park. This should never have been allowed to happen.</p> <p>Local Plans also refer to local ecology and biodiversity in a way that it is always made to sound as though it is to benefit from development, either through SUDs or landscaping. The harsh reality is it is just box ticking as no greenfield site that is turned into a housing development is beneficial for the nature it has replaced or the wildlife which are forced out of their habitats. This habitat loss caused by developer exploitation of greenfield and agricultural sites creates an urbanisation which is irreversible.</p>	<p>Comments noted. The document provides a clear and concise design toolkit to be used throughout the whole of the design and implementation process for new developments. It will provide a common understanding between all stakeholders of what constitutes good design.</p> <p>This SPD expands on policies within the Stockton-on-Tees Local Plan. It remains the purpose of the Local Plan to allocate land for development to meet identified needs.</p> <p>Nutrient neutrality affects the River Tees Catchment Area as well as other catchments across the country. Nutrient Neutrality ensures that development does not add to existing nutrient burdens. The position in relation to nutrient neutrality is constantly evolving with recent announcements being the National Nutrient Mitigation Scheme and amendments to the Levelling Up and Regeneration Bill tabled by the Secretary of State</p>

Ref	Comment received	Council response / change
	<p>Having made the point, no one doubts we are expanding as a population and people need somewhere to live, that is obvious. However, there needs to be rethink at local level guided by the latest initiatives at national level on the approach as to where and how development should be located. This should not be at the expense of removing green wedge to appease developers who prefer the more lucrative locations to maximise profits.</p> <p>My final point is related to Natural England's Nutrient Neutrality scheme which now needs to be factored in at the pre-application and design stage of future developments. Again locations are relevant, new developments near to water courses are under more scrutiny and rightly so. Discharges of surface water run offs into rivers should not be supported and the safest solution for the benefit of the biodiversity which is undermined by nutrients would be to place new development as far away as possible from water courses.</p>	
	Local Resident	
1	<p>Having had to care for 3 elderly and handicapped relatives at times then visit 3 care homes I'm not surprised at the reluctance to go to them. People are moved away from their area, often to other towns. In Billingham Town Centre there are numerous flats and I think many elderly would prefer them as they would see life as they're familiar with. I'm sure they could be made secure with full time guards.</p>	Comments noted.
2	<p>We now have great lorries. tracked vehicles, tractors being used to do simple jobs, usually removing gardens. They're jacked up on pavements etc. I think streets should have weight limits.</p>	Weight restrictions do not fall within the scope of this document. Weight restrictions fall into 2 categories (environmental and structural) and will be applied appropriately by the local highway authority.
3	<p>I've had a stressful time because unattended car park near North Tees Hospital didn't give out tickets despite money being put in [content moderated]. Believe Councils should rule all parking and be paid from parking fees.</p>	Comments noted
4	<p>We are losing greenery with every development. If we do get the High Street green development down to the river I'm sure this will be helping us in a number of ways, i.e. business and health. Trees and shrubs used to be planted in car parks, but this doesn't seem to be the case anymore. This has meant a lot more water lying around and floods in some areas.</p> <p>Complaints of bird droppings onto cars is rather ironic because vehicles are one of the key causes of high CO2 in the atmosphere. But choosing the right trees and scrubs can reduce this a lot. Different conifers, yellow to green to blue, can add a bit of cheer even in the dullest days. A lot of old houses weren't built with car parking in mind, but that doesn't mean the whole, front, side or back gardens should be smothered with concrete, slates, pebbles etc and again shrubs etc can be planted to extract water and clear the air. Prince Charles seemed keen on Green Towns and Cities.</p> <p>There are some streets so narrow its difficult collecting recycling and bins. In [content moderated] wagons need to be directed, inch by inch, between parked cars. But as the roads and paths are narrow the only suggestion I can think of is to ask at least one resident to have a sloping kerbstone to park on the garden.</p> <p>With this in mind, I think all streets should be 20mph and single lane, making country roads should be 50mph. Most drivers do stick to these speeds but some see the no limit signs as a right to roar past others. Its</p>	<p>The SPD seeks to ensure developments incorporate appropriate trees and landscaping.</p> <p>The SPD provides guidance for new developments which, from a highway's perspective, will also need to adhere to guidance within the Tees Valley Design Guide and Specification for residential and industrial development.</p> <p>Amendments to the adopted highways are made by the local highway authority in accordance with relevant legislation.</p>

Ref	Comment received	Council response / change
	not helped when they're encouraged to go faster by 40, 50 and no limit signs. Example is the slip road from the roundabout up the Wolviston Road into Billingham. We have 50mph signs then suddenly 30mph request signs, I think both inward and outward should be 40mph and the 30mph request should be a firm 30mph (and not round the corner).	

Organisations

Ref	Comment received	Council response / change
	Canal and River Trust	
1	<p>Based on the information available, we wish to provide the following general advice on the draft document.</p> <p>We consider the document to be robust, which would help to contribute towards meeting the general aims of the National Planning Policy Framework, notably those identified in part 12 ('Achieving Well Designed Places'), and the Design-related priorities of the Stockton Local Plan.</p> <p>In order to make the SPD as effective as possible, we do request that the following matters relating to Local Design in proximity to waterways are considered:</p>	Comments on the robust nature of the document noted and welcomed.
2	<p>The draft Design Guide states the following:</p> <p>"Where existing watercourses are identified a buffer will be required from the top of the bank to deliver or maintain existing riparian habitat and provide access for maintenance."</p> <p>Whilst this approach may be appropriate for the majority of watercourses in the borough, the wording could discourage the formation of new riverside paths or public engagement with watercourses, including the River Tees, where active engagement without the formation of buffer zones may be appropriate. For example, within the Urban Area of Stockton on Tees, active engagement between new development and the River Tees has helped to improve public engagement and surveillance of waterside spaces, which has helped to increase the use of these spaces for leisure and active travel. There is a risk that the wording above could prevent the engagement of new development with the river, where it would be appropriate.</p> <p>We therefore recommend that the wording above is amended so that it stipulates that the buffer will be required where appropriate, as opposed to being in all circumstances.</p>	Comments noted and amendment incorporated.
3	<p>Page 32</p> <p>This page of the draft document refers to the siting of dedicated spaces or areas for play, informal and formal sport, food production, outdoor events and other activities. This can include riverside spaces and walkways, which can form important spaces for these activities.</p> <p>Surveillance of these areas is important, so as to help to increase the perception of safety of these spaces. We therefore request that the document should refer to siting development to maximise surveillance of these areas, where it would not prejudice existing habitats or biodiversity. This would help to encourage public use of these spaces, increasing their potential contribution to the community.</p>	Comments noted. The document, when read as a whole, ensures that natural surveillance is maximised through the design process. References are made within 'Green spaces for people', 'Security and safety' and 'Frontages'. No amendment is proposed.
4	Page 43	Minor amendment made to ensure support for leisure

Ref	Comment received	Council response / change
	<p>Riverside paths can form segregated traffic-free routes for cycle and pedestrian use.</p> <p>The wording of this part of the report refers to the connectivity of cycle and pedestrian routes to the wider Green Infrastructure Network, which would help to make the document more effective in promoting use of such spaces for leisure and recreation (helping to complement the aims of part 8 of the NPPF ('Promoting healthy and safe communities')).</p> <p>The reference in the document toward encouraging surveillance of off-road routes, including the avoidance of potential 'hiding places' would further help encourage public participation in these areas, which could help improve the quality of riverside paths in the borough.</p>	<p>and recreation benefits of such routes.</p>
	<p>Natural England</p>	
1	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p>	<p>Noted</p>
2	<p>Green Infrastructure</p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>	<p>Comments noted. No specific amendments required as the aspects identified are covered within the SPD.</p>
3	<p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban</p>	<p>Additional text added to cover points raised.</p>

Ref	Comment received	Council response / change
	environment. An example of good practice includes the Exeter Residential Design Guide SPD , which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	
4	<p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p>	No amendments required to the document, when read as a whole, incorporates the matters raised.
5	<p>Other design considerations</p> <p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p>	Additional text added in relation to this matter
6	<p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	Stockton on Tees Borough Council determined following consulted appropriately and determined that the SPD is not likely to have significant environmental effects. Accordingly, environmental assessment of the SPD is not required. Amendments to the document, as a result of consultation, have also been considered and do not alter these findings
Tees Archaeology		
1	Page 10- It should be noted that the HER (Historic Environment Record) is not a document but a database; I would suggest amending the wording to state 'There are numerous documents and resources which will support in understanding the character of Stockton-on-Tees.'	Amendment made
2	Page 10- It might be worth indicating that the Conservation Area Appraisals/Management Plans are in the Conservation Areas and Historic Environment Folder (CAHEF) SPD?	No amendment considered necessary.
3	<p>Page 104- There appears to be a typo in the glossary definition of 'Heritage Asset'. I suggest that the definitions for Heritage Asset and Designated Heritage asset are separated, to provide clarification:</p> <ul style="list-style-type: none"> • Designated Heritage Asset – A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation. Designation highlights a building, site or area's special interest and value to this and future generations and gives it protection under law or policy. • Heritage Asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing) 	Drafting error. Amendment made to accurately reflect Heritage Assets status.

Ref	Comment received	Council response / change
Tees Valley Combined Authority		
1	<p>The Tees Valley Combined Authority is a Mayoral Combined Authority driving economic growth and job creation across Tees Valley. We are a partnership of Darlington, Hartlepool, Middlesbrough, Redcar & Cleveland and Stockton-on-Tees local authorities, working with the regional business community and other partners to make local decisions that support the growth of our economy. We welcome the opportunity to contribute to this Local Design Guide Supplementary Planning Document consultation. TCVA welcomes the focus within the document on quality and sustainability, particularly in relation to:</p> <ul style="list-style-type: none"> • Maintaining and enhancing ecological connectivity to integrate sites with the wider natural environment and contribute to achieving net gains in biodiversity. • Well-designed nature-rich spaces enhancing quality of life and contribute to people's health and wellbeing. • Developments which will enhance sites context and contribute to sense of place • High quality streets providing safe environments and creating developments where people feel safe and secure • Incorporating trees in new developments and maximising opportunities for street trees • Provision of spaces which promote social interaction <p>Following the energy hierarchy and reducing greenhouse gas emissions</p>	<p>Comments noted and welcomed</p>
2	<p>Specifically in relation to cycling and walking, TVCA recommends the following is taken into consideration:</p> <p>Page 43:</p> <ul style="list-style-type: none"> • Wider active travel network references link to the Tees Valley Local Cycling and Walking Infrastructure Plan to ensure onward connections to common destinations. • The SPD should consider/encourage Low Traffic Neighbourhoods <p>Encourage the provision of cycle routes wherever possible or the retention of space for future provision if demand dictates. This is particularly relevant for consideration when allowing for street parking and tree planting, which is much more difficult to take away than to accommodate within the layout from the outset. In addition, TVCA would recommend consideration is given to bus-only links to reduce through traffic but allow public transport permeability.</p>	<p>Reference to the Tees Valley Local Cycling and Walking Infrastructure Plan has been included within the wider reading section. Reference to Low traffic neighbourhoods has been included in response to comment. The document identifies the necessity for a comprehensive network for pedestrians and cyclists. The safeguarding of land for future provision and for bus only links would be considered based on the context of the site as part of the design process.</p>
The British Horse Society		
	<p>The BHS objects to the Stockton-on-Tees Local Design Guide Consultation Draft Supplementary Planning Document on the grounds that the application does not meet the tests of NPPF Paragraph 100. The BHS would be willing to withdraw this objection if definitive bridleways are provided as detailed in the rest of this response.</p> <p>I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity with over 119,000 members which represents the 3 million horse riders in the UK. There are 5,662 horses registered in the Stockton-on-Tees area, this equates to an annual contribution of £31,412,776 to the local economy by the equestrian community. Nationally horse riders have just 22% of the rights of way network and carriage drivers a mere 5%, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.</p>	<p>The response highlights the importance of equestrian routes and the necessity for careful consideration and design through the design of new development.</p> <p>Concluding the response highlights the potential to include a section within the document to provide specific guidance in relation to equestrians or alternatively separate guidance such as that developed within Hampshire (Equestrians in</p>

Ref	Comment received	Council response / change
	<p>Background to comments</p> <p>Increasing pressure for development of houses and industry is making even fewer of those bridleways and byways available. Ancient ‘green lane’ bridleways, byways and unsurfaced roads are being tarmacked as access roads or cycle tracks and engulfed by new development spreading into the countryside. Traffic increases with new development or change of use so roads become even less safe for riders and carriage-drivers (equestrians) to use to access any traffic-free routes there may be. Riders are also increasingly excluded from verges by creation of foot-cycleways – segregated provision for other vulnerable non-motorised users but equestrians are excluded and forced into the carriageway. Historically verges have provided a refuge and could, if mown, provide a segregated route.</p> <p>Safe routes for equestrians are desperately needed because the accident statistics in respect of horses on the roads are horrific. There have been 8,561 incidents reported to the British Horse Society since 2010, 44 people have lost their lives, 1,453 have been injured, 502 horses have been killed, 1,311 horses injured, and 85% of these incidents involved vehicles passing too close to the horse and/or too fast.</p> <p>Failure to accommodate the needs of these users would be contrary to National and Local Policies such as:</p> <ul style="list-style-type: none"> Highways England Accessibility Strategy states: <p><i>‘Our vision focuses on supporting our road users’ journeys, pedestrians, cyclists, equestrians, those with disabilities (such as users with mobility or sensory impairments) and other vulnerable users – while delivering longer-term benefits for communities and users alike.</i></p> <p><i>We want to address the barriers our roads can sometimes create, help expand people’s travel choices, enhance and improve network facilities, and make everyday journeys as easy as possible.</i></p> <p><i>This will be achieved by ensuring our network supports and contributes to accessible, inclusive and integrated journeys which are safe, secure, comfortable and attractive.’</i></p> <ul style="list-style-type: none"> NPPF policy 58 Requiring Good design <p>Create safe and accessible environments.</p> <ul style="list-style-type: none"> Paragraphs 73 and 81 of the NPPF require Local Authorities to plan positively for access to high quality open spaces for sport and recreation which can make important contributions to the health and wellbeing of communities and to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation. NPPF Section 8 <p>Promoting healthy communities</p> <p>Policy 73 access to high quality open spaces for sport and recreation and can make important contribution to the health and wellbeing of communities.</p>	<p>Hampshire: A reference guide for Transport, Planners, Developers and other decision makers)</p> <p>The Local Plan policies provide support for the protection of routes for pedestrians, cyclists and other users, as well as ensuring development proposals respond positively to the context of the surrounding area.</p> <p>The application of the Design Process advocated within the SPD would ensure that existing routes for all modes are identified at context stage and opportunities identified to address gaps in provision.</p>

Ref	Comment received	Council response / change
	<p>Policy 75 Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users. For example, by adding links to existing rights of way networks.</p> <p>Policy 81 local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.</p> <ul style="list-style-type: none"> • Durham Rights of Way Improvement Plan – ‘There are a wide variety of users who are considered through the plan and these include walkers, cyclists, horseriders and off-road vehicle drivers. The ROWIP looks at how all the different elements can work together to fulfil access needs. This network will be referred to as the Access and Rights of Way network (AROW).’ • Stockton-on-Tees Rights of Way Improvement Plan – ‘4.19 It has been well published that physical activity has health benefits and can protect ‘persons’ against heart disease, obesity, diabetes and osteoporosis. Providing a more accessible network for walking, cycling, horse riding and exercise will contribute to improvements to health for residents and visitors of the Borough’ ‘8.1.9 Improving and extending the network for equestrians - to improve opportunities for horse riders’ • ‘The British Horse Society’s report Making Ways for Horses – off-road Equestrian Access in England – Equestrian Access Forum August 2012, highlights the importance of horse riding for health and wellbeing. Access for horse riders, which inevitably involves crossing roads, is central to riding activities without which the level of participation is likely to decline which will have a negative impact on the local economy (Making Ways for Horses – off-road Equestrian Access in England – Equestrian Access Forum August 2012). <p>In order to maximise opportunities within Liverpool City Region to help provide more off-road links for equestrians this development should support the automatic inclusion of horse riders on shared off-road routes, unless there are cogent reasons why this is not possible.</p> <p>The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)</p> <p>Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that:</p> <p>“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”</p>	

Ref	Comment received	Council response / change
	<p>It is essential that in projects such as this, every opportunity is taken to benefit as many people as possible including those least active in the population (NHS, 2019). Therapeutic and physical benefits of horse riding and carriage driving have been proven for people with disabilities (Favali and Milton, 2010). According to Church et al (2010) over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity. 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p> <p>Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. Most riders and carriage-drivers wish to take their horses out on bridleways and byways, away from motor traffic, for the physical and mental health benefits to animal and human, in exactly the same way as most walkers (with and without dogs) and cyclists.</p> <p>Many are unable to do so because the traffic on tarmac roads is too dangerous for such vulnerable road users, and there are generally so few traffic free routes available to equestrians. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the Changing Lives through Horses initiative.</p> <p>Equestrianism is a popular activity in this part of the UK, and one which contributes significantly to the local economy. The equestrian community in the area affected by the proposed multiuser trail has many difficulties in finding safe access within the area, as identified in the relevant policies. Many of these issues could be addressed and resolved through good planning of future routes. We hope therefore that the applicant will support this, and local equestrians affected by this development, and would be happy to support and facilitate consultation with the local equestrian community.</p> <p>The majority of off-road routes could and should accommodate all non-motorised vulnerable road users— equestrians, cyclists, pedestrians and mobility buggy users—and therefore be truly (nonmechanically propelled) multi-user routes (Multi-user has no legal definition and is often confused in its meaning but generally means all users, not only pedestrians. The BHS takes it to mean all non-motorised users). The BHS works in partnership with other user groups, local and central government to make rights of way and other access areas useful and open to all, and our roads safer for all users. The length of the public right of way network currently amounts to 188,700km, consisting of 146,600km of footpaths, 32,400km of bridleways, 3,700km of byways and 6,000km of restricted byways. Horse riders therefore, currently only have access to 22% of public rights of way and horse-drawn vehicle drivers only 5%. Many rights of way are now disconnected from each other because the roads that should connect them are no longer safe for equestrians to use because of the speed and</p>	

Ref	Comment received	Council response / change
	<p>volume of motorised traffic on them, leaving many equestrians without a safe local route to use.</p> <p>This scheme could make a significant contribution to the safe off road riding that is available to equestrians, who like cyclists and pedestrians are vulnerable road users, in many instances negating the need for equestrians to use heavily trafficked roads to access the equestrian public rights of way network and other areas with equestrian access without the necessity of utilising heavily trafficked road networks.</p> <p>The Society welcomes the Government's policy, expressed by Richard Benyon in 2011, that highway authorities and other providers should accommodate horse riders as well as cyclists and pedestrians on all off road routes where it is practicable. Richard Benyon MP, Minister for Natural Environment and Fisheries wrote to Anne Main MP in June 2011 concerning Alban Way, questioning why horse riders are not permitted to use it. He urged all local authorities to allow horse riders to use cycle trails, routes and any other ways where it is in their power to do so, and to encourage that permission or dedication to happen where it is not in their power. In the Government's view, "Unless there are good and specific reasons not to expressly allow horse riders to use such routes, local authorities should take steps to accommodate them. Local authorities should be making the most of their off-road networks through integration of use. Multi user routes have been shown to be readily adopted and well appreciated by local people. Where they are done well they bolster community cohesion and create a better understanding between users."</p> <p>Mr Benyon stated further that, "Horseriders are particularly vulnerable road users, and cycle routes can provide appropriate and important opportunities to avoid busy roads. There is potential for conflict in any situation where people share a public space, but the possibility of conflict is not reason enough to disregard ridden access; actual conflict could be resolved and any misplaced concerns reduced over time."</p> <p>The BHS agrees with this point of view. Multi user paths represent best value for everyone, users and taxpayers. Research demonstrates that multi user paths present no unacceptable risk to users. Bridleways of all widths, gradients, sightlines and surfaces have been shared by walkers, horseriders and cyclists since 1968.</p> <p>The BHS maintains that horseriders, walkers and cyclists can comfortably pass on a route that has a width of 3m and all can happily coexist on narrower routes with one party giving way to the other as appropriate. Many public bridleways and permissive routes are significantly narrower than 3m, yet reports of it being a problem are very rare; rather it can create a greater feeling of cooperation and tolerance between users.</p> <p>Circumstances vary and every route should be considered independently on its own merits and potential benefits for increasing safety by taking horse riders off roads. A less than ideal width may be acceptable where a narrow off-road route is safer than the alternative road. Passing places and frequent attention to vegetation or adjacent hazards to ensure the full width is available at all times may be adequate mitigation along with promotion of sharing and tolerance between all users.</p> <p>Whilst the Society supports the national initiative to encourage more cycling and walking as part of Active Travel Plans, it is imperative that the applicant recognises that Active Travel also includes equestrians. Central government support for including horses</p>	

Ref	Comment received	Council response / change
	<p>The government's Cycling and Walking Investment Strategy Safety Review says: "1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits"(Jesse Norman, Minister for Transport) https://www.gov.uk/government/consultations/cyclingand-walking-investment-strategy-cwis-safety-review</p> <p>Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:</p> <p>"We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders"</p> <p>And final point by Jesse Norman in debate: "Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing."</p> <p>The 'Walking and Cycling' routes should conform to the governments Active Travel Strategy which states in section 6 of the Active Travel policy Active travel: increasing levels of walking and cycling in England - Transport Committee - House of Commons (parliament.uk) clearly including horse riding [along with skateboarding and roller skating] supported by the Ministerial Statement of Richard Benyon from 2011 stating cycleways should be multi use.</p> <p>Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk) Page 37 deals with the WCHAR assessment which clearly stated that horse riders should be accommodated. Cycle Infrastructure Design specifies Walking, Cycling and Horse-Riding Assessment and Review (WCHAR). '4.5.10 DMRB also contains guidance on undertaking a Walking, Cycling & Horse-Riding Assessment and Review. Although this is applicable to trunk roads, it provides a good basis for assessing the needs of all users along and across interurban roads.'</p> <p>The Health Benefits of Horse Riding in the UK. (Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)</p> <ul style="list-style-type: none"> • 68% of questionnaire respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity. • Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK . 	

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	<ul style="list-style-type: none"> • Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary. • Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability. For further information, please see: https://www.bhs.org.uk/~/_media/documents/marketing/health-benefits-of-riding-in-the-uk-fullreport.ashx?la=en <p>Newly Constructed Paths</p> <p>Any physical creation of new paths to achieve Active Travel objectives within the county is to be welcomed (provided that equestrians are included, as a minimum, on those outside of large town centres), as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. District Authorities should take a strategic approach to Active Travel proposals within their administrative boundary - giving consideration to potential links outside their boundaries that could contribute to a more integrated network and achieve maximum benefit for all users.</p> <p>Use of Existing Public Rights of Way</p> <p>The Society recognise that many of the proposed routes within this consultation are in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs.</p> <p>Active Travel routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. In particular:</p> <ul style="list-style-type: none"> • Where existing routes are considered as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed. For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location. • Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate. • Where proposed new, or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided suitable for all user groups. • Consideration should be given to the use of 'Quiet Lanes' where the speed of traffic is reduced. • Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it must be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians. 	

Ref	Comment received	Council response / change
	<p>Other Considerations to Note</p> <p>Commuting cycling is likely to take place at times other than when recreational use takes place. Thus, a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths.</p> <p>Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new cycle paths should be shared with other user groups unless there is a specific, unresolvable reason not to do so.</p> <p>Use of Traffic Regulation Orders to prohibit use of a public right of way by a specific user group for the benefit of cycling needs to be fully justified and take into account the rights of other lawful users. It should be noted that the Defra Statutory Guidance to local authorities on Rights of Way Improvement Plans, 2002, states in para. 2.2.21:</p> <p>‘There is potential for conflict on ways carrying higher rights between different classes and types of users. Wherever possible proposals for improving rights of way should not unduly benefit one class of user at the expense of another. Improvements that are intended to benefit cyclists, harness-horse drivers, horse riders or walkers should not unduly restrict lawful MPV use of public vehicular rights of way’.</p> <p>Equestrian use must be considered when Active Travel routes are proposed in new developments, so that new links can be created to the countryside beyond. Where new bridges/underpasses are proposed these should be suitable for equestrian use.</p> <p>Effect of excluding Equestrians from Active Travel Routes</p> <p>If equestrians are not an included user on active travel routes, the consequence is that equestrians are left on the carriageway with lorries and cars passing them on the outside and cyclists passing them on the inside, which is another accident waiting to happen. It is therefore important that this aspect is considered in the risk assessment for such routes.</p> <p>Benefits of catering for horses</p> <p>The British Equestrian Trade Association National Equestrian Survey (2019) indicated:</p> <ul style="list-style-type: none"> • £4,174 is spent per horse which represents a significant contribution to the economy • The value of the equestrian sector is £4.7 billion per annum <p>General Statistics</p> <ul style="list-style-type: none"> • 847,000 horses in Britain • 1.8 million regular riders of 3 million total • Lack of access to horses and riding facilities is a barrier for 22% of lapsed riders returning <p>The BHS objects to this policy on the grounds that equestrians are being marginalised with walkers and cyclists being favoured. Throughout this policy equestrians are excluded, the arguments for inclusivity of walkers</p>	

Ref	Comment received	Council response / change
	<p>and cyclists can be extended to equestrians using the mechanism of the Equality Duty. This is a form of discrimination, and the Equality Act 2010 created a Public Sector Equality Duty for authorities to provide equal opportunities for all, which means that an authority needs a cogent reason for excluding equestrians.</p> <p>The BHS would be happy to work with Stockton-on-Tees Borough Council to develop a section of this policy to include equestrians, or create a separate policy around Local Design Guide for equestrians. An example of this that would be a good basis for creating such a document is the Equestrians In Hampshire: A reference guide for Transport, Planners, Developers and other decision makers (https://documents.hants.gov.uk/countryside/Equestrians-in-Hampshire.pdf).</p> <p>The BHS believes that this policy provides great opportunities to provide safe off-road routes for all vulnerable road users including equestrians and we would welcome the opportunity to discuss these opportunities at the earliest stage with the Stockton-on-Tees Borough Council. In order to maximise opportunities within Durham to help provide more off-road links for equestrians they should support the automatic inclusion of horse riders on shared off-road routes, unless there are cogent reasons why this is not possible.</p> <p>We work with local authorities, road safety departments, driving instructors and law enforcement, to reduce the risks to our equine community and are happy to offer any support where needed.</p>	

Appendix D

Schedule of comments to the Technical Guidance and Standards Appendices and the Council's response

Shop Front and Advertisements Technical Guidance and Standards

Ref	Comment received	Council response / change
	British Sign and Graphics Association (BSGA)	
1	We note that this guidance is to replace the 2013 Shopfronts and Advertisements SPD on which we commented at length and which incorporated many of our suggestions. We applaud the brevity of this replacement draft. We offer some further comments which reflect the general approach of national legislation and policy and do not substantially alter the overall tenor of the draft guidance	Comments noted
2	<p>"Fascias"</p> <p>In this section:</p> <p>The second paragraph implies that sign-written wooden fascia boards remain the "traditional" fascia advertisement still in common use. This is unfortunately just not true. Such signs are expensive to make and to maintain; and there are few "traditional" sign-writers now available. The paragraph would be more accurate and better reflect reality by the replacement of the first sentence with:</p> <p>"A traditional fascia advertisement typically comprised a painted timber board with signwriting or applied individual letters in wood or metal."</p> <p>In the first bullet point, line 7, "are" should replace "is".</p> <p>In the fourth bullet point, the assumption is that the fascia advertisement should be designed as part of the overall shopfront. But, in the vast majority of cases, businesses are more likely to be taking over existing shopfronts and altering them only as necessary. What is important in either case (new design or alteration) is that the fascia should "appear" to be an integral part of the overall design of the shopfront. We therefore suggest that "should form an" be replaced with "should appear as an".</p>	Comments noted and amendments made. In relation to the forth bullet point the current wording covers both circumstances of creating a new shop front and also altering an existing shop front, therefore no amendment is proposed; a pragmatic approach is always taken when dealing with small amendments to existing shop fronts.
3	<p>"Box Sign"</p> <p>The second paragraph lacks punctuation. We suggest:</p> <p>"Where box signs are proposed, they should be recessed into the fascia wherever possible. Where this is not possible, alternative solutions, such as a slimline box or flat panel, may be appropriate. However ... the sign's ..."</p>	Amendments suggested has been incorporated.
4	<p>"Illumination"</p> <p>In the second paragraph of this section, "required" should be replaced with "proposed". "Required" suggests an assessment of need, which is not permitted by the Regulations.</p> <p>The reference to the ILE is out of date. This should be replaced with "the Institute of Lighting Professionals Technical Guidance Note No 5". The reference to "that of the Local Planning Authority" should be deleted. You</p>	Amendments suggested have been incorporated. In relation to the final requested amendment text has been amended to "to the satisfaction of the Local Planning Authority"

Ref	Comment received	Council response / change
	<p>have none – nor are you technically competent to produce guidance which differs from that of the ILP.</p>	
5	<p>“Totem signs”</p> <p>Why should these signs be described as displaying “a limited amount of information”? They often carry much information. We suggest that “a limited amount of” is superfluous and simply wrong. It should be deleted.</p> <p>In the second paragraph, line 2, “remain” should be deleted and replaced with “be”. Otherwise, the ridiculous suggestion is that they are only acceptable where they already exist!</p> <p>Why is it considered necessary to state some arbitrary height which is “considered” to be acceptable; and then qualify this with further possible considerations? Why not just say that the height of such signs should be carefully considered in relation to the scale of the premises advertised and the other buildings and features in the surrounding area. “Typically”, totem signs at petrol filling stations and large superstore complexes adjacent to major roads are at least 6m tall. And the reservations concerning their suitability in some generalised areas (shopping streets, residential areas, conservation areas) take no account of the fact that they must have been granted planning permission in such areas in the first place! The advertisements are only a reflection of a decision already made about the premises’ suitability in their surroundings. Hence, there is absolutely no justification for the statement that totem signs are “unlikely to be considered acceptable” in any particular area, where the premises themselves have clearly already been considered acceptable. We suggest that the whole second paragraph be deleted and replaced with:</p> <p>“On such premises, totem signs will generally be appropriate. However, care must be taken with their size, siting and design. Their height should reflect that of the buildings on the site and that of the buildings and any other structures within the surroundings. Special attention should be paid to avoiding any adverse impacts on residential and conservation areas.”</p>	<p>Amendments suggested have been incorporated.</p> <p>In relation to the final paragraph a height of 4 metres has been stated due to the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, Schedule 3, Class 6 allowing advertisements within a forecourt of a business, which is not in area of special control, to be 4.6 metres in height above ground level before planning permission is required. In addition, the circumstances in which advertisements are permitted may vary, some may be submitted with the FUL planning application and others may be submitted separately at a later date. A decision on the advertisements will be made when the application for advertisement consent is submitted and not before. Therefore, the wording within the SPD is to remain unaltered and each application will be dealt with on its own merits.</p>
6	<p>“Conservation Areas and Listed Buildings”</p> <p>This page is full of grammatical areas. Unrelated clauses must be separated by full stops, not by commas. “Boroughs” requires an apostrophe.</p> <p>In the last sentence in the third paragraph, we object strongly to “this may be insisted upon”. The paragraph is correct that signage must be of an appropriate scale and style. But the nature of the signage will always depend on the type of sign proposed and its position in relation to the particular character and appearance of the building. It may well be that “individual lettering” would be totally out of character with the building. We suggest that this sentence be deleted and replaced with:</p> <p>“Where appropriate, the use of individual lettering will be encouraged.”</p>	<p>Amendments have been made to this section of the report to aid the reader.</p> <p>Taking into account conservation areas within Stockton Borough, the use of individual lettering is appropriate. The wording used is still flexible however recognises the buildings of considerable significance within the area to be important.</p>

Play Provision Technical Guidance and Standards

Ref	Comment received	Council response / change
	Persimmon Homes	
1	Age Range Signage- Firstly, Persimmon Homes wish to raise objection to the requirement for age ranges to be provided within any play spaces. This objection is founded on the grounds that specifying age ranges at play areas is counter-inclusive and transforms play spaces into exclusive spaces that should only be utilised by particular groups of society whom fall into a pre-determined age category. This is not to say that discussions can take place between the Council and developer in regard to the complexity of play equipment to be provided and the target audience of the proposed play facility, only that the age of users of a play area should not be specified on any signage within the play area. Therefore, Persimmon Homes strongly object to the inclusion of age ranges to be detailed on any play spaces at future developments.	Areas for Play should be designed to be as inclusive as possible, considering the needs of a whole range of users of different abilities. Well-designed inclusive play spaces and parks welcome people and especially children of all abilities to play, learn and grow together. The wording is designed to provide an indication of the age ranges provision has been design for as guidance for the user. Wording amended to reflect purpose
2	Litter Bin Collection- the most notable objection within this document concerns Litter Bin Collection, this objection is made on viability grounds. Trustmgt equally raised issue with this matter noting that usually litter bin collections are carried out fortnightly in line with maintenance visits. Doubling the number of visits for litter disposal will incur notable increases in the cost of management and maintenance of these play spaces. Have these viability implications been fully taken into consideration by the Council? These additional costs will have a knock-on impact on the nature of play equipment that can reasonably be provided which may not have been taken into full consideration. Furthermore, Trustmgt have stated that they typically find that depending on the size, the area and frequency of use that a fortnightly bin collection is sufficient for play spaces under their management. Therefore, even if justification is provided behind the increase in litter bin collection, the viability implications of doubling this collection seems too great and as such Persimmon Homes strongly object to this deviation from the standard collection practices.	Wording amended to read "litter bins should be emptied at regular intervals to be agreed based on the size and use of the area".

Landscaping and Trees Technical Guidance and Standards

Ref	Comment received	Council response / change
	ELG Planning on behalf of Taylor Wimpey UK Ltd	
1	Page 17 As with some of the guidance in the main SPD, there appears to be no differentiation on the level of detail needed for different types of planning applications. For example, it would not be possible to provide most of the information suggested as part of an outline planning application. In addition, much of the details suggested are not usually available until the latter stages of a project and information which Taylor Wimpey would usually envisage being conditioned. The level of information required to support the various types of application must be proportionate and the majority of information being requested should be conditioned on any planning approval as it is not required to make a decision.	The Design SPD identifies that the document is to be used throughout the design and implementation of a project. Information will be required as appropriate to the application being made.
2	Page 24 Taylor Wimpey consider that it is unreasonable for the Council to expect developers to provide commuted sums where new trees are to be adopted. The long term maintenance of trees within the highway and associated costs should be the responsibility of the Council in the same way that the long term maintenance of the road themselves are.	The justification and calculation for commuted sums is contained within Appendix 5 of the Open Space Recreation and Landscaping SPD.
	Persimmon Homes	

Ref	Comment received	Council response / change
1	<p>Existing Trees- The Shading Study mentioned on Page 12 raises concern, this appears to be at odds with the emphasis that is placed upon retaining trees and designing them into any proposed development. This is not something that our Landscape Consultants have previously encountered and appears to be counter-intuitive with Local Plan Policy ENV5 which states a desire to retain and preserve existing trees within developments. Therefore, in light of the concern raised by Fairhurst, Persimmon Homes would request that the Shade from Existing Trees section is reviewed by the Council so that this SPD does not conflict with local planning policy.</p>	<p>The purpose of a shading study is clearly identified. The layout of a scheme can seek to retain existing trees whilst ensuring any negative shading impacts are avoided.</p>
2	<p>Landscape Proposals for new developments- In regard to future Landscape Management and Maintenance Plans (LMMPs), an objection is raised in relation to the time period that is stated. This Technical Guidance document states that LMMPs must provide details for 25 years, whereas when Biodiversity Net Gain (BNG) is required the condition of the proposals / management is up to 30 years. Perhaps this has been an oversight by the Council, therefore it would be strongly advised that these time periods align with one another. Furthermore, Persimmon Homes would request that whatever is determined as the most suitable time period for LMMPs that future wording of planning conditions is also amended to reflect this.</p> <p>If planning condition wording intends to link the LMMP to BNG then this section of the guidance must be updated to set out how they expect a LMMP to be structure in line with BNG requirements. Therefore, Persimmon Homes request that supplementary information is provided within this document in relation to LLMP and BNG.</p>	<p>Amendment has been made to align with BNG. The SPD should be read alongside validation requirements.</p>

Appendix E

SEA Determination and Statement of reasons

STOCKTON ON TEES BOROUGH COUNCIL

The Environmental Assessment of Plans and Programmes Regulations 2004

Part 9 Determination of Likely Significant Environmental Effects

Determination and Statement of Reasons under Part 9 (1) and (3)

Consultation Draft Supplementary Planning Document

Local Design Guide

Part 9 (1) Determination

Stockton on Tees Borough Council has determined, having consulted Natural England, the Environment Agency and Historic England, that the Draft Supplementary Planning Document: Local Design Guide is not likely to have significant environmental effects. Accordingly, it is considered that an environmental assessment of the SPD is not required.

Part 9 (3) Statement of Reasons

1. The preliminary SEA Screening Report contains the detail of the assessment and reasons. This statement is made to satisfy Part 9 (3) of the Regulations.
2. In making the determination, the Council has taken account of the fact the 'Parent Policies', Strategies and Priorities to which the SPD relates have, in the course of their preparation, been subject to Sustainability Appraisal including SEA and Habitats Regulations Assessment (with Appropriate Assessment).
3. The Council determined at Stage 1 of the Screening Process that SEA is relevant to the SPD. The Council's opinion at Stage 2 is that the SPD is unlikely to cause significant environmental effects in its application to decision taking, particularly as the parent policies in the adopted Stockton on Tees Local Plan have been subject to rigorous assessment in this respect both in preparation and in their final form through formal Examination in Public.
4. The SPD will provide information on the interpretation and implementation of the Council's Local Plan policies. The SPD primarily relates to Local Plan policy SD8 Sustainable Design through which the Council seeks to ensure that new development is designed to the highest possible standard and considers the need to conserve and enhance all aspects of the environment as well as the amenity of the residents in the Borough. Other related policies include SD5 Natural, Built and Historic Environment, H4 Meeting House Needs, T11 Transport Infrastructure, Policy ENV4 Reducing and Mitigating Flood Risk, Policy ENV5 Preserve, Protect and Enhance Ecological Networks, Biodiversity and Geodiversity and Policy ENV6 Green Infrastructure, Open Space, Green Wedges and Agricultural Land and Policy HE2 – Conserving and Enhancing Stockton's Heritage Assets. The SPD does not make 'new' policy or allocates or establishes policies for the development of sites or areas of the Borough. The SPD provides guidance of achieving good design and the approach to site master planning.

5. The SPD provides guidance of achieving good design and the approach to site master planning. In view of the assessment at Stage 2, it is the Council's preliminary opinion, at Stage 3, that an Environmental Report would not be required.
6. Under Regulation 9 (2), the preliminary SEA Screening Report was forwarded to the 'Consultation Bodies' – the Environment Agency, Natural England and Historic England for comment on content and conclusion. The responses received from Natural England and Historic England did not dispute the Council's conclusions at Stage 3. A response was not received from the Environment Agency. A copy of responses is provided within Appendix 1 of this document.

Where can I find a copy of these Documents

A copy of this determination and the Assessment containing the reasons for this determination can be found on the Council's website at: www.stockton.gov.uk/design-SPD-consultation, or inspected at the following Libraries and Contact Centres at the following times (correct at the time of writing):

Location	Normal Opening Times (at time of writing)
Billingham Library	Monday and Tuesday: 8:30am to 7pm Wednesday to Friday: 8:30am to 5pm Saturday: 9:30am to 4pm
Fairfield Library	Monday to Friday: 10am to 1pm and 2pm to 5pm
Ingleby Barwick Library	Monday to Friday: 9:30am to 7pm Saturday: 10am to 4pm Sunday: 10am to 2pm
Norton Library	Monday, Tuesday and Thursday: 9:30am to 5pm Wednesday and Friday: 9:30am to 7pm Saturday: 9:30am - 1pm
Roseworth Library	Monday to Thursday: 9am to 1pm and 2pm to 4.30pm Friday: 9am to 1pm and 2pm to 4pm
Stockton Central Library	Monday, Wednesday and Friday: 8:30am to 6pm Tuesday and Thursday: 8:30am to 8pm Saturday: 9:30am to 4pm
Thornaby Central Library	Monday, Wednesday and Friday: 8:30am to 5pm Tuesday and Thursday: 8:30am to 7pm Saturday: 9:30am to 4pm
Thornaby Library, Gilmour Street	Monday to Thursday: 9am to 1pm and 2pm to 4.15pm Friday: 9am to 1pm and 2pm to 4pm
Yarm Library	Monday, Wednesday and Friday: 9:30am to 5pm Tuesday and Thursday: 9:30am to 7pm Saturday: 9:30am to 1pm

Alternatively, by email request sent to planningpolicy@stockton.gov.uk; by telephone: 01642 393939 or by post to Planning Policy, Stockton-on-Tees Borough Council, Municipal Buildings, Church Road, Stockton-on-Tees, TS18 1LD.

Appendix 1

Responses of Consultation Bodies to the Strategic Environmental Assessment Screening Report

Historic England (received 1st September 2022)

Historic England welcome the opportunity to comment on your emerging Design Guide.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England would like to draw your attention to the need to consider the historic environment at this stage of the plan making process. Heritage assets and their settings should be included within the assessment of sites which are submitted for consideration as part of the Local Plan process and other planning policy work and, should also consider the impact of sites on heritage assets in adjoining local authority areas.

Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

We currently have no detailed comments on your report but may do at a later stage in the process. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Natural England (received 26th July 2022)

Thank you for your consultation on the above dated 20 July 2022, which was received by Natural England on 20 July 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

Natural England agrees with the conclusions of the Strategic Environmental Assessment Screening Report and does not have any further comments at this stage.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.