



Redcar & Cleveland Report of Consultation on the Draft Local Plan November 2016

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Appendix 1: Individual Comments & Council Responses

Appendix 2: Changes to Local Plan Following Consultation



I Introduction

Introduction

- I.1** The Local Plan is being prepared to replace our existing planning policy framework, currently contained within the Local Development Framework (LDF) Core Strategy and Development Policies Development Plan Documents (DPDs). It sets out our long term development strategy for the borough, for a variety of different types of development including housing, employment, retail and town centres, the natural and built environments and transport.
- I.2** This Report of Consultation has been prepared to set out of how consultation was carried out on the Draft Local Plan, it provides a summary of every comment received in response to the consultation, the Council's response to each comment and details of each change made to the Local Plan document (either resulting from consultation or due to other reasons).
- I.3** Details of each individual response has been included in Appendix 1 and a full schedule of changes made to the document as a result of the consultation, or any additional work, has been included in Appendix 2.

Supporting Evidence

- I.4** A comprehensive evidence base has been developed over the last few years, with wide engagement from partners and stakeholders across the borough and the Tees Valley. The key pieces of evidence used in preparing the Local Plan include:
- Redcar & Cleveland Strategic Housing Market Assessment, Volumes 1 & 2, and Volume 2 Update (2016);
 - Redcar & Cleveland Draft Local Plan: Housing Land Supply and Allocations Background Evidence Paper (2016);
 - Redcar & Cleveland Strategic Housing Land Availability Assessment (2016);
 - Redcar & Cleveland Five Year Housing Land Supply Assessment 2016//17-2020/21 (2016);
 - Whole Plan Viability Testing - Redcar & Cleveland Local Plan (2013, updated 2016);
 - Redcar & Cleveland Economic Growth Strategy (2016);
 - Redcar & Cleveland Regeneration Masterplan (2010);
 - Redcar & Cleveland Regeneration Masterplan Delivery Plan 2012 - 2017;
 - Redcar & Cleveland Gypsy and Traveller Accommodation Assessment (2015);
 - Redcar & Cleveland Town Centre Study (2016);
 - Renewable and Low Carbon Study for the Borough of Redcar and Cleveland (2015);
 - Redcar & Cleveland Employment Land Review (2016);
 - Redcar & Cleveland Borough Council Strategic Flood Risk Assessment (2016);
 - North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation (2010);
 - Redcar & Cleveland Open Space Assessment (2016);
 - Redcar & Cleveland Borough Council Leisure Provision Strategy (2011);
 - Redcar & Cleveland Borough Council Playing Pitch Strategy (2015);

- Redcar and Cleveland Local Wildlife and Geological Sites (2015);
- Tees Valley Geodiversity Action Plan (2011); and
- Guidelines for the Selection of Local Wildlife Sites in the Tees Valley (2010).

- 1.5** The full evidence base can be found at www.redcar-cleveland.gov.uk/localplan.
- 1.6** The Cabinet approved the Draft Local Plan on the 24th May 2016, following which a period of public consultation took place between 27th June and 8th August 2016.
- 1.7** The purpose of the Draft Local Plan was to set out the Council's preferred policy approach for the Local Plan and to give stakeholders and the general public the opportunity to comment on the document and whether there are other factors the Council should consider.
- 1.8** All of the issues raised from the comments received have been taken into account, and it is considered that a number changes should be made to the plan as a result of these. In addition and, given we are required to prepare the Local Plan using an extensive and robust evidence base, a number of changes have also been recommended due to emerging evidence and to reflect other material changes.

Consultation Process

- 1.9** We have, so far, undertaken two consultations in preparing this Local Plan. The Local Plan Scoping Report (July 2015) set out, in broad terms, what we thought the Local Plan ought to contain, and provided the opportunity for anyone to comment on this. The Draft Local Plan subsequently set out our preferred strategy, policies and site allocations and our consultation provided the opportunity for anyone to comment on it.
- 1.10** Consultation on the Draft Local Plan took place between 27th June and 8th August 2016. We made copies of the plan available in all libraries in the borough and on our website. All of our supporting documents were also made available online. During this period, the Planning Strategy Team hosted 13 drop-in events across the borough. The list of venues and dates is set out in Table 1 below.

Table 1 Consultation Drop-in Events

Location of Drop-in Event	Date and Time
Council Staff/Member Drop In, The Heart, Redcar	Monday 27 th June (11.30am – 2.30pm)
Brotton Library, Linden Road, Brotton	Monday 4 th July (2pm-7pm)
Lockwood Parish Council Building, Davison Street, Lingdale	Tuesday 5 th July (2pm – 7pm)
Redcar & Cleveland Community Heart, Ridley Street, Redcar	Wednesday 6 th July (2pm – 7pm)
Ormesby Children's Centre, Daisy Lane, Ormesby	Thursday 7 th July (1pm – 5pm)

Skelton Civic Hall, Coniston Road, Skelton	Friday 8 th July (2pm-6pm)
Inspire2Learn, Eston Civic & Learning Centre, Normanby Road, Eston	Monday 11 th July (2pm-7pm)
Saltburn Community & Arts Association, Albion Terrace, Saltburn-by-the-Sea	Tuesday 12 th July (1pm-6pm)
Sunnyfield House, Westgate, Guisborough	Wednesday 13 th July (2pm – 7pm)
Loftus Town Hall, High Street, Loftus	Thursday 14 th July (2pm-7pm)
Marske Leisure Centre, High Street, Marske-by-the-Sea	Friday 15 th July (2:30pm – 6:30pm)
Kirkleatham Pavilion, Kirkleatham, Redcar	Wednesday 20 th July (2pm-7pm)
Nunthorpe Youth & Community Centre, Nunthorpe Academy	Thursday 21 st July (2pm – 7pm)

- 1.11** Information about the consultation, including the dates and times for the drop-in events, was publicised through the Council magazine (“this is Redcar & Cleveland”), the Council’s Twitter and Facebook pages, and directly contacted over 2,500 consultees via email or letter. The Evening Gazette also published a press release.
- 1.12** The Localism Act 2011 places a requirement on us, as a Local Planning Authority, to engage constructively, actively and on an on-going basis with a range of organisations, including neighbouring planning authorities and infrastructure providers. Throughout the plan making process we have worked closely with the Duty to Cooperate bodies to meet our obligations. A ‘Duty to Cooperate Statement’ will be published alongside the Publication Local Plan detailing all the activity we have done with these organisations.
- 1.13** Consultation has also been carried out with the Cabinet Member for Economic Growth, and the report has been considered by Regulatory Committee ahead of its consideration by Cabinet.



2 Summary of Comments Received

- 2.1** During the consultation we received 657 comments from 186 individuals and organisations. We also received two petitions; the first of these concerning the site allocation adjacent to Rye Hills School (76 signatories), and the second seeking additional commitment from the Council for new development in Loftus (220 signatories).
- 2.2** The number of comments received on each section or policy is set out in Table 2 below.

Table 2 Number of Comments Received by Chapter or Policy

Chapter / Policy or Page Number	Section / Policy Title	Number of comments received
Whole document	Draft Local Plan	51
Chapter 1	Introduction	38
Chapter 2	Sustainability and Design	3
Policy SD1	Sustainable Development	8
Policy SD2	Locational Policy	23
Policy SD3	Development Limits	15
Policy SD4	General Development Principles	17
Policy SD5	Developer Contributions	11
Policy SD6	Renewable and Low Carbon Energy	12
Policy SD7	Flood and Water Management	4
Chapter 3	Local Spatial Strategies	0
Policy LS1	Urban Area Spatial Strategy	9
Policy LS2	Coastal Area Spatial Strategy	11
Policy LS3	Rural Communities Spatial Strategy	16
Policy LS4	South Tees Spatial Strategy	4
Chapter 4	Regeneration	19
Policy REG1	Coatham	6
Policy REG2	Kirkleatham	4
Policy REG3	Skelton	14

Chapter 5	Economic Development	0
Policy ED1	Protecting and Enhancing the Borough's Centres	13
Policy ED2	Cleveland Retail Park	5
Policy ED3	Hot Food Takeaways	1
Policy ED4	Retail Development on Industrial Estates and Business Parks	2
Policy ED5	Advertisements	1
Policy ED6	Protecting Employment Areas	8
Policy ED7	Cleveland Gate Mixed Commercial Development	2
Policy ED8	Rural Economy	3
Policy ED9	Leisure and Tourism Development	11
Policy ED10	South Tees Motorsports Park	0
Policy ED11	Caravan Sites and Tourism Accommodation	3
Policy ED12	New Hotel and Guest House Accommodation	4
Policy ED13	Equestrian Development	1
Chapter 6	Housing	0
Policy H1	Housing Requirement and Delivery Phasing	23
Policy H2	Type and Mix of Housing	11
Policy H3	Housing Allocations	35
Policy H3.1	Low Grange Strategic Site	2
Policy H3.2	Swan's Corner, Nunthorpe	6
Policy H3.3	Gypsy Lane, Nunthorpe	2
Policy H3.4	Morton Carr Lane, Nunthorpe	4
Policy H3.5	Longbank Farm, Ormesby	1
Policy H3.6	Spencerbeck Farm, Ormesby	1
Policy H3.7	Normanby Hall	2
Policy H3.8	Normanby High Farm	4

Policy H3.9	Former Redcar & Cleveland Town Hall and surplus adjacent land	1
Policy H3.10	Former Eston Park School, Eston	2
Policy H3.11	Corporation Road, Redcar	3
Policy H3.12	St. Hilda's church, Redcar	2
Policy H3.13	Connexions Campus (South), Redcar	3
Policy H3.14	Land adjacent Rye Hills School, Redcar	5
Policy H3.15	Wykeham Close, Redcar	1
Policy H3.16	Grosmont Close, Redcar	1
Policy H3.17	Roseberry Road, Redcar	1
Policy H3.18	Land at Mickle Dales, Redcar	5
Policy H3.19	West of Kirkleatham Lane, Redcar	4
Policy H3.20	Marske Road, Saltburn	4
Policy H3.21	Wilton Lane, Guisborough	2
Policy H3.22	Park Lane, Guisborough	4
Policy H3.23	Cleveland Gate, Guisborough	10
Policy H3.24	Belmangate Field, Guisborough	65
Policy H3.25	Land at Galley Hill, Guisborough	5
Policy H3.26	Home Farm, Skelton	2
Policy H3.27	Stanghow Road, Skelton	2
Policy H3.28	Kilton Lane, Brotton	4
Policy H3.29	Newbury Road, Brotton	2
Policy H3.30	Former Rosecroft School, Loftus	11
Policy H3.31	Low Cragg Hall Farm, Carlin How	2
Policy H4	Affordable Housing	10
Policy H5	Sub-division and conversion of buildings to residential uses	3
Policy H6	Houses in Multiple Occupation	1

Policy H7	Gypsy, Traveller and Travelling Showpeople Accommodation	1
Chapter 7	Natural Environment	0
Policy N1	Landscape	8
Policy N2	Green Infrastructure	20
Policy N3	Provision of Open Space, Leisure and Community Facilities	9
Policy N4	Biodiversity and Geological Conservation	6
Chapter 8	Historic Environment	0
Policy HE1	Conservation Areas	8
Policy HE2	Heritage Assets	3
Policy HE3	Archaeological Sites and Monuments	0
Chapter 9	Transport	0
Policy TA1	Demand Management Measures	8
Policy TA2	Travel Plans	2
Policy TA3	Improving Accessibility within and beyond the Borough	17
Policy TA4	Sustainable Transport Networks	4
Appendices		0
Appendix 1	Implementation Plan	4
Appendix 2	Glossary	0
Appendix 3	Proposed Site Allocations	0
Appendix 4	Housing Delivery Schedule	0
Appendix 5	Proposed Green Space Standards	0
Appendix 6	Policies to be Deleted	0
Appendix 7	Key Diagram	2
	Total	657

Summary of comments received

2.3 Summaries of each comment received, and details of each change that has been made to the plan, are set out fully in Appendix I. The key changes are also summarised in Table 3 below.

2.4 The proposed changes to the plan have been agreed by the Local Plan Steering Group, which consists of a cross party group of Members supported by relevant officers of the Council.

Table 3 Summary of Key Issues and Changes Made

Topic Area	Issue Raised	Change Made
Housing	<ul style="list-style-type: none"> Objections to specific sites, most notably Belmangate Field, Guisborough and Land adjacent to Rye Hills School, Redcar. 	<ul style="list-style-type: none"> Further assessment has been undertaken on these sites, with Belmangate Field being removed due to the impact its development would have on the Conservation Area. The land at Rye Hills School has been retained as an allocation as it is not required for education purposes.
Housing	<ul style="list-style-type: none"> Some developers and landowners contend that the housing requirement is too low to meet the Objectively Assessed Need for the borough, whilst other consultees thought it too high. 	<ul style="list-style-type: none"> No changes have been made as a result of this. Further work has been done on our evidence base, which reinforces both our assessed level of need and the level of housing required to meet the strategy.
Housing	<ul style="list-style-type: none"> Additional sites put forward for allocation. 	<ul style="list-style-type: none"> Most of the “deliverable” sites that were put forward offered a more sustainable opportunity to develop than already identified in the plan. However, some additional land has been identified for housing development at the former Abattoir site in Boosbeck, and in two locations in Loftus (see below).
Housing	<ul style="list-style-type: none"> Removal of housing allocations where development has started. 	<ul style="list-style-type: none"> Where development has already started on any of the housing sites, we have

		removed the allocation from our policy as it is no longer required. We have also updated policies where there has been a change of planning status, where there is new information available or where recommended through the Habitats Regulations Assessment.
Housing	<ul style="list-style-type: none"> Some developers drew attention to recent court judgments which confirmed that sites of 10 or fewer dwellings are exempt from affordable housing requirements. 	<ul style="list-style-type: none"> Affordable housing policy amended to remove requirements on smaller sites, in line with recent court judgments, and to clarify the requirements in respect of rural exception.
Regeneration / Loftus	<ul style="list-style-type: none"> Significant response from local residents and the Town Council seeking further support for new development and regeneration in Loftus. 	<ul style="list-style-type: none"> A specific policy has been included to set out the Council's commitment to achieving regeneration in Loftus. Additional housing land at the former Rosecroft School and the former Handale Primary School has also been allocated to provide further development opportunities in Loftus.
Economic development	<ul style="list-style-type: none"> Request to include obesity considerations as part of the Hot Food Takeaway policy. 	<ul style="list-style-type: none"> Hot Food Takeaway policy amended to include obesity considerations.
Economic development	<ul style="list-style-type: none"> New evidence recommends changes to district centre boundaries in Eston and Saltburn, to include town centre uses that are adjacent to the existing boundaries. 	<ul style="list-style-type: none"> Changes made to district centre boundaries at Eston and Saltburn.
Economic development	<ul style="list-style-type: none"> New evidence recommends wording changes to ensure consistency with the National Planning Policy Framework. 	<ul style="list-style-type: none"> Wording changes made.

Economic development	<ul style="list-style-type: none"> The Habitats Regulations Assessment recommends removal of Bran Sands Lagoon from employment allocation and development limits, to reflect its importance to protected species. 	<ul style="list-style-type: none"> Bran Sands Lagoon and other marine areas removed from employment allocation.
Renewable energy	<ul style="list-style-type: none"> National Park requested a tightening of policy wording with regards to landscape impact. 	<ul style="list-style-type: none"> Policy wording amended to address National Park Authority's concerns.
Renewable energy	<ul style="list-style-type: none"> Concern that too much of the rural area identified as being potentially suitable for wind and solar energy development. 	<ul style="list-style-type: none"> The mapping reflects our up to date evidence base, and is merely a starting point in considering development options. As such, no change has been made.
Renewable energy	<ul style="list-style-type: none"> Some minor errors identified on the Policies Map detailing areas suitable for solar development. 	<ul style="list-style-type: none"> Errors have been corrected.
Transport and Accessibility	<ul style="list-style-type: none"> Request to include safeguarded route of the new Dockside Road on the Policies Map. 	<ul style="list-style-type: none"> Safeguarded route included on the map.
Throughout	<ul style="list-style-type: none"> The Sustainability Appraisal recommends wording changes to ensure economic, environmental and social objectives are met, and that policies are suitably comprehensive and clearly worded. 	<ul style="list-style-type: none"> Changes made to wording.
Throughout	<ul style="list-style-type: none"> The Habitats Regulations Assessment recommends that the distance threshold for developments requiring an Appropriate Assessment be reduced from 16km to 6km (distance between development and the Teesmouth and Cleveland 	<ul style="list-style-type: none"> Threshold reduced in relevant policies.

	Coast Special Protection Area)	
Throughout	<ul style="list-style-type: none"> The Habitats Regulations Assessment advises that the Council should commit to preparing a Recreation Management Plan to address the identified disturbance issue. 	<ul style="list-style-type: none"> Commitment to preparing a Recreation Management Plan has been included.
Throughout	<ul style="list-style-type: none"> Numerous comments recommending wording and mapping changes. 	<ul style="list-style-type: none"> Changes made as appropriate.

Appendix I: Individual Comments & Council Responses

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Policy SD3 Development Limits	45
Policy SD4 General Development Principles	51
Policy SD5 Developer Contributions	57
Policy SD6 Renewable and Low Carbon Energy	61
Policy SD7 Flood and Water Management	66
Policy LS1 Urban Area Spatial Strategy	68
Policy LS2 Coastal Area Spatial Strategy	71
Policy LS3 Rural Communities Spatial Strategy	75
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Policy ED1 Protecting and Enhancing the Borough's Centres	100
Policy ED2 Cleveland Retail Park	105
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Policy ED4 Retail Development on Industrial Estates and Business Parks	108
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Policy H1 Housing Requirements	123
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Policy H3 Housing Allocations	140
Policy H3.1 Low Grange Farm Strategic Site	157
Policy H3.2 Swan's Corner, Nunthorpe	158
Policy H3.3 Gypsy Lane, Nunthorpe	161
Policy H3.4 Morton Carr Lane, Nunthorpe	162
Policy H3.5 Longbank Farm, Ormesby	164
Policy H3.6 Spencerbeck Farm, Ormesby	165
Policy H3.7 Normanby Hall	166
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Policy H3.9 Former Redcar & Cleveland Town Hall, Eston	169
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Policy H3.14 Land adjacent Rye Hills School, Redcar	174
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Policy H3.28 Kilton Lane, Brotton	221
Policy H3.29 Newbury Road, Brotton	223
Policy H3.30 Former Rosecroft School, Loftus	224
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Section/Policy

Draft Local Plan

DRAFTLP_378

Full Name: F and L Collings

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Sincere thanks to R&CBC officers for the information and inclusion of stakeholder and consultees in the Draft Local Plan (DLP) to enable amendments prior to finalisation and ultimate adoption next year. We appreciate the opportunity to submit observations, suggest alternatives and are willing to meet with Council officers should the need arise.

Officer response:

Comment noted.

DRAFTLP_281

Full Name: Martyn Coy

Organisation:

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Thank you for consulting the Canal & River Trust in relation to the Redcar & Cleveland Draft Local Plan Consultation. As the Trust are not responsible for the River Tees in your district, we have no comments to make.

Officer response:

Comments noted.

DRAFTLP_174

Full Name: Pat Bailey

Organisation: Spencerbeck and Overfields Community Association

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Concerned that Spencerbeck and Overfields Community Centre will be affected by the proposals.

Officer response:

The Council considers that there are no specific proposals in the Draft Local Plan that would adversely affect Spencerbeck and Overfields Community Centre.

Section/Policy

Draft Local Plan

DRAFTLP_222

Full Name:
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: Yes

Comment summary:

Loftus needs more help. Improvements should be made to Zetland Road and the High Street and the Congregational Church, Arlington Chapel, Empire Cinema and the Bus Station included. improvements should be made to the road through which is too narrow. Loftus is an ideal place to encourage tourism in East Cleveland.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_146

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

The Duty to Co-operate Firstly, I would like to confirm that in our view ongoing requirements under the Duty to Co-operate are being met in terms of co-operation between our two authorities. As you know there has been regular liaison. I note that earlier comments have largely been incorporated in this later draft - we offer our thanks for this. Specifically on housing, we acknowledge that your Authority is planning on meeting a level of housing need significantly above your objective assessment of need. Your Strategic Housing Market Assessment (SHMA) has covered the whole of the Redcar and Cleveland area including the small part of the National Park within its boundaries. This area has been identified as a single housing market area. No request has been made to us for the National Park to accommodate any new development to meet Redcar and Cleveland's needs. Although we are in the early stages of plan making we do not anticipate that a request will be made from us asking for any need arising from the National Park to be accommodated within Redcar and Cleveland's planning authority area. Consequently I can confirm that we do not envisage any outstanding issues on housing supply that will require further assessment through the Duty to Co-operate. Should you wish to provide a joint statement for the forthcoming Examination in Public please let me know.

Officer response:

Comment noted.

DRAFTLP_442

Full Name: Barry Smith
Organisation:
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

I support the draft local plan as it would appear that there is no planned development south of the A174 that would affect the operation of Yearby Airstrip. The continued operation of this asset of community value assists the Council in one of its key proposals i.e. to encourage the provision of recreational facilities. It further supports the Government's General Aviation Strategy.

Officer response:

Comment noted.

Draft Local Plan

DRAFTLP_112**Full Name:** Maria O'Neil**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

I (Loftus shop owner) would like to see: Redevelopment of space on West Road and Zetland Road. Would like all buildings that are pease bricks to stay, but understand some may have to go. Take the con's church down. Reuse named or initialled bricks to build wall of the well and use the steeple as a roof. The rest of the area to be developed into a garden as it was in 1876. No more one bedroom flats, no converting large town houses to flats or shared accommodation, this only brings in bad tenants and there are more than enough within the town. Redevelop the bus station. Take out front to make car park and make a play factory this could open the Royal pub to a restaurant and bar. Extend planning on Rosecroft to playing fields and find another entrance, i.e. through Arlington or from South Loftus. Open entrance from North Road to Hummersea Hills. Move allotments from right to left of North Road and fence. This would get rid of Colditz reputation and may allow the rest of Hummersea Hills to be developed and finished. A caravan static and tour either Hummersea cliffs or South Loftus. Take old cinema on Deepdale Road down and make tennis courts at the back of the leisure centre. Football pitches are overgrown. Reinstate them and put in skate park. But flood lights up connected to the Leisure Centre. Garage at on Deepdale Road to have bungalows built, as it is flat area and near other bungalows and Luke Senior hall. Personally don't think three storey houses are good. Would like to see three bedroom houses built they are then priced out of bad landlords range, so responsible people would rather live there. Old Handale school to be sold or developed into houses the same as the old Police Station. Old Webster Field applied for housing some years ago but was refused on access, but permission was given to the tea room at Skelton going towards Marske/Redcar. This access is an accident waiting to happen but was allowed. The old foundry opposite Station Hotel either to clean up or allow development. Old Arlington Church needs to be cleared and opened for redevelopment. Unsure if you are able to take properties away from owners who have allowed them to rot but there must be a legal way of making them redevelop the front of the building. Could money made from rates on empty properties, which rise when property remains vacant, be ringed for the redevelopment of the town or does it just go into Redcar and Cleveland's pot.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_494**Full Name:** Chris Renahan**Organisation:** Stockton on Tees Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Stockton-On-Tees Borough Council support the contents of the Local Plan. As you will be aware the Council have begun the process of preparing a new Local Plan following a review of the evidence base. The evidence base review includes a Strategic Housing Market Assessment (incorporating objectively assessed housing needs), Employment Land Review and Town Centre Uses study. Throughout the preparation of this Council's emerging Strategic Housing Market Assessment (SHMA), adjoining local authorities, including Redcar & Cleveland, have engaged with us as we begin to identify the housing market area for the Borough and our Objective Assessment of Housing Need. It is anticipated that this study will be published in the near future and will inform any future comments we have on the emerging Redcar & Cleveland Local Plan. Following completion of the SHMA and the other evidence base documents we will look forward to continuing our collaboration with you under the duty to cooperate.

Officer response:

Comment noted.

Section/Policy

Draft Local Plan

DRAFTLP_105**Full Name:** Ms Spencer Jeffries**Organisation:** Network Rail**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Request to be consulted on all DPDs or site-specific proposals that could affect their infrastructure.

Officer response:

Comment noted.

DRAFTLP_537**Full Name:** Jordan Gresham**Organisation:** Taylor Wimpey (Uk) Ltd**Agent Name:** Mr Steven Longstaff**Agent Organisation:** England Lyle Good**Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

The Draft Local Plan is set in the context of the Council's aspirations to reverse the current trend for population decline, and must align with the aspirations of the Corporate Plan (Our Plan 2015-2017) and Regeneration Masterplan to achieve the targeted growth of 14,000 new jobs over the next 15 years. TW fully support the Council's key outcomes and plan priorities and have used these to consider whether the draft polices will deliver these outcomes.

Officer response:

Comment noted.

DRAFTLP_48**Full Name:** Milly Metcalfe**Organisation:** Marine Management Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Officer response:

Comment noted.

Section/Policy

Draft Local Plan

DRAFTLP_443

Full Name: John Stonehouse

Organisation:

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: No

Comment summary:

I would like you consider adding my land for development, located in Lingdale, Saltburn by the Sea. I have attached a map and a google earth image with the land highlighted. There are three areas of land and I own all the land. We have taken a picture of the ordnance survey map national grid sheet reference number at centre of this superplan - NZ6616. The submitted plan outlines three areas of agricultural land, as follows: i). west of Lingdale ii). south of Wilkinson Street, Lingdale iii). Stanghow Road, Lingdale

Officer response:

West of Lingdale: This site is in open countryside remote from the settlement and has an irregular configuration. The site is not in a sustainable location and is unsuitable for residential development. South of Wilkinson Street: This is a comparatively large site which extends to over 9 ha. and its development would be disproportionate to the size of the settlement and contrary to the aims of the locational strategy set out in Policy SD2, which seeks to focus development in the most sustainable locations. In the latter regard, Lingdale is considered a lower order settlement with limited service provision, and is remote from the main built up areas of the borough. There is also no evidence to suggest that there is any demand for large-scale residential development at Lingdale. Furthermore, it is not clear whether satisfactory access could be achieved from Wilkinson Street. Stanghow Road: This site is not well-related to the built-up area, would not represent a logical extension to the settlement and its development would promote encroachment towards Stanghow. Notwithstanding all the above, sufficient land has been identified on more sustainable and suitable sites to meet the Council's housing supply aspirations over the plan period. The continuing availability of these sites will be recorded in the SHLAA.

DRAFTLP_376

Full Name: Janet Jeffrey

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

How can the Plan not include the NYMNP area? See attached for full comments

Officer response:

The North York Moors National Park is the planning authority for their area and, as such, all planning matters including the preparation of a local plan will be done by the Park Authority.

DRAFTLP_6

Full Name: Mr J Stonehouse

Organisation:

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: No

Comment summary:

Get rid of all the councillors and the planners. i could have come up with a better draft in 5 minutes on a fag packet, which is probably what you lot did except it took you several years! Tell the councillors for Grangetown don't waste time knocking on doors looking for for votes cause you are worse than useless. Every single plan for Grangetown taken out, so you can spend our taxes on the sheepshagging yorkshire lot. Must be time to change the road signs again. What a waste of time, space and money you lot are.

Officer response:

Comment noted.

Section/Policy

Draft Local Plan

DRAFTLP_369

Full Name: Jan Boyes

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Loftus should be promoted in the Plan. See attached comments.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_345

Full Name: Margaret Darcey

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Absolutely disgusting Loftus is not included in the plan and in the Council's 15 year vision!

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_233

Full Name: Guy Hall

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Loftus needs to be a priority. Provide private housing led regeneration for Loftus, bringing new families to the area and supporting the High Street. Create car parking on the High Street, tidy up/regenerate the High Street and reduce takeaways.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy

Draft Local Plan

DRAFTLP_377

Full Name: Janet Jeffrey

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Changes I would like to see - The Council to be more involved in their Wards (Communities). To be stuck behind a desk, attending an appropriate number of meetings is not helping us! Where are the changes? Improvements? etc. Especially health and wellbeing, learning disabilities, dementia. Lack of support, closure of facilities, communication etc.

Officer response:

The Local Plan itself deals with the development of land and cannot address the issues raised. Your comments have, therefore, been shared with other parts of the Council.

DRAFTLP_203

Full Name: Mr A J Halfpenny

Organisation: Belmont Community Group

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Spend less of the town hall reconstruction. Should we be supporting a completely new town in the less developed East Cleveland?

Officer response:

Comments noted. The provision of a new town is now supported by national policy, however it is considered that it is not currently an appropriate mechanism for delivering sufficient new housing for the current plan period. However, the Council will look at options for a new settlement in a future review of the plan.

DRAFTLP_108

Full Name:

Organisation: Guisborough Rugby Club

Agent Name: Mr Neil Thomas BSc MRICS

Agent Organisation: Thomas Stevenson

Submission type: E-Mail

Agree with section?: No

Comment summary:

Support the protection of existing open spaces and leisure facilities. The Club does not consider that the existing draft Development Plan and Policies Map affords the Club the protection of policy N3 sufficiently explicitly. The Rugby Club proposes that the Clubs Belmangate ground be allocated as open space subject to policy N3 within the Development Plan and referenced as such on the Policies Map. A site plan showing the land that is the subject of the proposal is attached.

Officer response:

The Council agrees and will identify private sports grounds as protected open spaces, and amend the policy accordingly.

Section/Policy

Draft Local Plan

DRAFTLP_121

Full Name: Mrs Carol Clifford

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

I think it is an absolute disgrace that Loftus has not been included in this plan. How much does Coatham, Kirkleatham and Skelton want spending on them. Why aren't we included? Has anyone been to visit our High Street? Does no one want to help us? R&C are a disgrace. Want Loftus High Street included in plan. Skelton does not need anymore money spending on it. the new houses will generate business. Also all you are doing is taking services in Loftus, etc. away from our town.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_122

Full Name: Peter Clifford

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Just looked at R&C's 15 year Plan. Once again Loftus at 'bottom of the pile' not mentioned at all. Why not? We are a town over-looked by the Borough Council. Coatham, Kirkleatham and Skelton. Why? Does no one on the Council want to help us? Want Loftus included. Just read your draft local plan. Grow the economy - how? Shops are shutting - your putting everything in Skelton. 'Improve quality of life' - Don't make me laugh. 'Develop great places to live' - How??? Spend money on Loftus A174, to tidy the Market Place and High Street.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_120

Full Name: Margaret Darcy

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Loftus once more left in the cold. What's happening to the town? What help will you give - not on 15 year plan. Skelton gets everything we see nothing. What's happening to Junior School left to rack and ruin? Shops empty - you are giving everything to Skelton and taking away from our shops.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy

Draft Local Plan

DRAFTLP_197

Full Name: Marian Toulson

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

For too long Loftus has been ignored by various councils since the early 1980s. It is now in a dilapidated state. The council do not seem to care about the town, but many inhabitants do. We are the forgotten town on the edge of the borough but pay the same high council tax so why can't we have the share of the grant. Loftus could be the gateway to the North Yorkshire Moors and beautiful towns and villages. Let us try and get it back to what it once was - a lovely market town and attract tourists and visitors. This would bring in trade to help with struggling businesses and shops. Priority for Loftus must be the High Street - Zetland Road in particular. What was Dodd's shop should be demolished to make way for much needed car park, or row of houses for younger people of Loftus to live in. The two chapels in Loftus need attention. Once again demolition would be the best course of action. Pavements are in a terrible condition. Could we have some money allocated for planters and hanging baskets. Can we have the Saxon Princess back and set up a museum in the town. Loftus is very historical. The old bus station is an eyesore - owners must be made to demolish it or turn it into a retail establishment

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_219

Full Name: Mrs Paula Limon

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

The Council should invest more of its money into Loftus including improving shop frontages, providing flower beds, flower baskets and converting the old primary school into a museum/visitor centre. Also, empty shops could be converted into period looking housing to attract young people to the area. The bus garage should be bought and demolished and turned into public open space.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_215

Full Name: mrs kay stonehouse

Organisation:

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: No

Comment summary:

Loftus seems to get forgotten about by the council. Something should be done about all the derelict buildings- Arlington chapel could be turned into parking space for the residents of Arlington street. The church at the bottom of Westfield terrace should be knocked down and made into an area with seats and flower beds. The idea of the terrace between Dodds shop down over being knocked down and turned into a green area with grass and trees would be an improvement, however it would mean some businesses re-locating. I see there is planning permission in for building houses at the bus garage, this would certainly be an improvement, but what about the Royal public house, could this also be re-developed to housing?

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy

Draft Local Plan

DRAFTLP_448

Full Name: Frances Cunningham

Organisation: Network Rail

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Would encourage the inclusion of a policy statement which makes it clear to developers that no new crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will require to be provided at the developers expense. Request that the council includes the following policy within the IDP: 1 The council has a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway or impact upon rail infrastructure; 2 Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; and 3: The developer should assess the impacts any development could have upon the railway infrastructure.

Officer response:

Comment noted. The suggested text will be included in the IDP.

DRAFTLP_492

Full Name: Andrew Whitehead

Organisation: Natural England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Detailed comments on the HRA were provided. These set out areas of agreement and provided the following recommendations: We have previously advised a strategic approach to managing the effects of recreational disturbance, including the provision of alternative greenspace and access management, and this approach should be pursued. A Recreation/ Foreshore Management Plan is proposed, and we welcome this approach. A number of measures are identified within the recommendations section, and ideally these should all be incorporated into the Management Plan. Policy SD5 details areas where the Council will seek developer contributions to fund infrastructure and other community benefits including improvements to biodiversity and heritage assets, including habitat creation'. This could be expanded to include wardening, interpretation and access management. The wardening detailed within the report focusses on safeguarding SPA bird nesting sites this could be expanded to include public liaison and education (verbal interpretation), and also policing of beach zoning should this element be progressed. The management Plan also provides an opportunity to identify likely costs for the provision of these elements, and detail how developer contributions could be used. We would be happy to assist or comment on the document as it is produced. It should also be noted that that interpretation section of the report appears incomplete.

Officer response:

Comments noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site. SD5 will be updated to add reference to mitigation and on-going management.

DRAFTLP_73

Full Name: Cllr Philip Thomson

Organisation: Redcar & Cleveland Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

There is reference in the Draft to S.P.D.s. All 'associated' policy documents should be listed in a clear appendix. This will avoid any doubt about the relevance of Supplementary Policy Documents not included in the Local Plan text. Within the Appendix List there should be links to allow access to the additional documents.

Officer response:

Comment noted. A list of associated documents will be included in the plan.

Section/Policy

Draft Local Plan

DRAFTLP_495

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We have assessed the Sustainability Appraisal Report and support the considerations that have been identified in the Sustainability Appraisal and have been taken forward in the Local Plan. However, we have the following minor comment to make. Sections 4.7.58, 6.5.7 and page 26 of the Sustainability Appraisal and section 4.2.7 of the Sustainability Appraisal-Non Technical Summary recommends discussion with north west water' in regard to new housing development. We think this is meant to read Northumbrian Water' and not north west water'.

Officer response:

Comments noted, the consultants will be advised of this point and asked to update the Sustainability Report accordingly.

DRAFTLP_518

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Given that the time table for submission to the Secretary of State is March 2017, can the Local Plan document be brought up to date by then as far as possible. Much of the current narrative will be out of date by submission date and certainly by adoption date

Officer response:

The Local Plan will be brought up to date during its preparation, but the version that is submitted to the Secretary of State is required to be the same that is agreed by the Council for Publication. Changes to bring the Local Plan up to date may be acceptable, and can be considered through the Independent Examination.

DRAFTLP_221

Full Name: Sarah Yates
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

To be included for Loftus - development of derelict shops into residential dwellings, improvements to High St/A174, focus on tourism, develop public transport and investment. Why is there a solar farm in the cemetery?

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters. The solar designation was a mapping error which will be corrected.

Section/Policy

Draft Local Plan

DRAFTLP_519

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

There is much reference to other documents and Regulations in the Draft. A concise but not exclusive index needs to be considered to allow follow up and cross referencing.

Officer response:

Comment noted. A list of associated documents will be included in the plan.

DRAFTLP_565

Full Name: Mr Ben Stephenson
Organisation: Persimmon Homes
Teesside Ltd

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Persimmon Homes wish to fully endorse the comments made of behalf of the Home Builders Federation (HBF) and request that Redcar & Cleveland Borough Council fully considers the issues highlighted within their correspondence.

Officer response:

Comments noted.

DRAFTLP_586

Full Name:
Organisation: RSPB

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Outcome 3: The RSPB welcome the recognition given to the coastline and world class natural environment as assets which contribute to the quality of life enjoyed by existing residents, future generations and help to attract new investment. Designated sites provide a core for wider wildlife tourism opportunities and ecosystem services, contributing to the attractiveness of the borough. However, we would like to see a change of wording so that The Local Plan will ensure that opportunities are taken to protect, promote and enhance (rather than develop) our unique assets. (where this relates to designated sites).

Officer response:

Comments noted, and the change will be incorporated into the final version of the plan.

Section/Policy

Draft Local Plan

DRAFTLP_525

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

With the considerable potential for economic regeneration afforded by the SSI site, should there not be a specific policy section addressing this land potential and its magnitude.

Officer response:

Land at the former SSI site is allocated in the plan for employment development. In the absence of any firm proposals for redeveloping that site, the allocation of the site in this way will allow for a significant degree of flexibility to help deliver appropriate development in the future.

DRAFTLP_530

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Given the apparently insurmountable delay on the provision of completions on development sites, how robust is the AMR going to be in evaluating performance and influencing policy making and response actions? Also, is there a predetermined annual timetable for AMRs?

Officer response:

The AMR reports on completions for each year to 31st March. Whilst there is an inevitable delay in reporting this information, the AMR remains an important tool for considering the long term effectiveness of policies. There is a statutory duty to prepare AMRs, but there is no predetermined timetable.

DRAFTLP_440

Full Name: Louise Tait
Organisation: Environment Agency

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We are pleased that there is a requirement for appropriate remediation for proposed housing site allocations listed within Chapter 6: Housing. The remediation likely to be required within the area occupied by SSI steel is also appropriately highlighted. We recommend that any future remediation should: 1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination. 2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health. 3. Refer to the contaminated land pages on GOV.UK for more information.

Officer response:

Comments noted.

Section/Policy

Draft Local Plan

		Comment summary:	Officer response:
DRAFTLP_81			
Full Name:	Mr Dave McGuire	The NPPF explains that Local Planning Authorities should set out the strategic priorities for the area, including strategic policies to deliver (inter alia) the provision of health, security, community and cultural infrastructure and other local facilities Paragraph 171 falls within the section of the NPPF that sets out advice on the evidence base that Plans need, and deals with Health and Well-Being. This advice is amplified in the section of the NPPF that deals with promoting healthy communities. In light of the above, it is Sport England's policy to challenge the soundness of Local Plan and Local Development Framework documents which are not justified by; - An up to date playing pitch strategy (carried out in accordance with a methodology approved by Sport England) - An up to date built sports facilities strategy (carried out in accordance with a methodology approved by Sport England). By up-to-date' Sport England means prepared within the last 3 years for Playing Pitch Strategies, and 5 years for Built Sports Facilities Strategies Our understanding is that Redcar and Cleveland's Playing Pitch Strategy dates from 2015, whilst the Built Facilities Strategy dates from 2010. The latter document is now out of date and given the opening of a new pool within Redcar would benefit from a refresh.	Comments noted. The Local Plan is based on the most up to date evidence base that the Council has available.
Organisation:	Sport England		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
<hr/>			
DRAFTLP_605			
Full Name:		The RSPB welcomes the opportunity to respond. Our comments (attached) relate to both the Draft Local Plan and the associated Habitat Regulations Assessment. We are pleased to see that the Council have considered some of our submitted comments relating to the Draft Local Plan 2013, which was subsequently withdrawn. However, some of our suggestions/advice still remains. We note that further iterations of both documents will be produced and will welcome the opportunity to further contribute to the development of the Local Plan. We hope that you find our comments/suggestions helpful and we are very happy to further discuss these with you.	Comments noted.
Organisation:	RSPB		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
<hr/>			
DRAFTLP_307			
Full Name:	Mr Bob Moodie	When the Plan is finally drafted and agreed what will be the process for future planning decisions in relation to it?	Planning legislation requires that planning applications be considered against the adopted development plan, unless material considerations indicate otherwise. As such, once the Local Plan is adopted, any planning applications that are submitted to the Council will be considered against the policies in the Local Plan.
Organisation:	East Cleveland Community Organisation		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		

Section/Policy

Draft Local Plan

DRAFTLP_226

Full Name: M E Garbutt
Organisation: community forum
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

More development and investment needs to take place in Loftus including: 1 The pavements near the dole-office and the bus stop there is caked gum. 2 Pavements are dangerous and need improved. 3 Overhead wires on Loftus High Street are untidy. 4 Building have fallen into disrepair 5 More promotion regarding the Saxon Princess, in her home town is required. 6 There is a need to demolish some parts and have seating and green parks.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_235

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

In summary: Has received many comments that the draft Local Plan is easy to use, clear and logical. The loss of the last Local Plan has cost Guisborough, in particular with the many housing developments within the town. The lack of any such document has left the town and borough defenceless against developers who can see an easy prey. It is estimated that the approvals in Guisborough will account for over a quarter of the housing required through the plan period. The Infrastructure to support this appears to have not been met but this is the responsibility of such bodies as the NHS and other outside bodies to deal with demographics to assist also with school places within the town. Through the recession and austerity imposed by central government we have seen the boroughs population fall quite markedly as younger people look for employment elsewhere and a better standard of living. Next year the residents of this borough could be looking at an increase again in an adult social care levy of 2% and perhaps an increase in council tax also of about 2%. Not much incentive as a young couple wanting to bring up children in their own neighbourhood but perhaps an incentive to move away to more prosperous areas or even countries. We have seen an improvement in health in our borough and residents living longer which is to be welcomed but poverty remains a problem if you have no money to live with. We have many social and economic problems within the borough but if we get the local plan right this will help us solve these future problems.

Officer response:

Comments noted.

DRAFTLP_245

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Some of the policies look at potential issues from an economic viewpoint not quality of life/health ie Policy ED3 the hot food takeaways. How can we ensure a strong health link throughout? Also what are the intended links between Neighbourhood Plans and local Planning?

Officer response:

Various policies in the Local Plan will lead to health improvements. The principal of sustainable development is to encourage people to walk or cycle rather than use the private car. The plan also seeks to secure developer contributions to fund new open space areas and provide sport and leisure facilities. However, the policies will be reviewed again to see how they can be amended to help improve health and wellbeing.

Section/Policy

Draft Local Plan

DRAFTLP_536

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We have listed all the policies to be given up when the proposed new Local Plan is approved. Could a list of all then remaining policies be made including SPDs?

Officer response:

When the Local Plan is adopted, the development plan for Redcar and Cleveland will be contained within it, plus the Joint Tees Valley Minerals and Waste DPDs. It would be inappropriate to list the policies through an SPD, but a separate list of policies can be provided.

DRAFTLP_297

Full Name: Mr Bob Moodie
Organisation: East Cleveland
Community
Organisation

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Have specific sites been identified for fracking and if so what is the extent and location of land that is being identified for this type of extraction? Will the nature of this extraction impact on homes and or communities, or will they be fully protected from these operations?

Officer response:

Minerals planning is not within the scope of this Local Plan. As such, the impact of fracking and potential fracking sites have not been subject to consideration through the preparation of the Local Plan.

DRAFTLP_313

Full Name: Barbara Hooper
Organisation: Historic England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The plan appears to contain an excellent strategy for the historic environment and we commend the Council on how it has integrated heritage considerations throughout the plan. However, we cannot find any mention of the evidence base relating to the historic environment and supporting the plan. Given the comprehensive nature of the strategy and heritage policies, it is clear that the council has a good understanding of its assets, and it may therefore just require the evidence base to be more prominently identified and cited. We are also unclear which of the plan policies are strategic in nature, and it is unclear from the information provided how development sites have been selected, and how they have been evaluated for impact upon the historic environment. Again this may be easily resolved through greater cross-referencing within the plan.

Officer response:

It is intended to commence a process of creating statements of significance to complement HE listings, although when there will be opportunity to do so is not known. Conservation area condition surveys will be carried out as part of the on going Conservation Area Management Plan work.

Section/Policy

Draft Local Plan

DRAFTLP_370

Full Name: Annie Teesdale

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Loftus has been neglected and needs investment. Issues include: Rubbish in market place. Absent landlords Parking problems West end Co-op to be alternative company Restore main road Derelict buildings

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_170

Full Name: Ray Hensby

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Comments in relation to Infrastructure: The road to and from Marske and Saltburn - what will happen to the rail bridge. Local flooding: there are flooding issues in Marske and further housing development will increase flood risk. More housing will increase traffic levels.

Officer response:

There are no proposals in the Local Plan that will affect the rail bridge. The Council has undertaken a Strategic Flood Risk Assessment and any major housing schemes will be required to include measures to ensure that the risk of flooding is reduced, or at least no worse, as a consequence.

DRAFTLP_398

Full Name: F and L Collings

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

We would emphasise our desire to maintain rural aspects of Skelton. e.g. vital hedgerows, protection of green spaces, perhaps undertaking works to encourage more wildlife and creating a new nature reserve off Saltburn Lane. We are not adverse to development per se but are concerned that recent and future development is out of proportion and unsustainable. There appears to be a fundamental shift from a rural to an urban settlement.

Officer response:

The Local Plan has identified the open spaces which the Council would like to protect from development, and certain hedgerows will continue to be protected from development.

Section/Policy

Draft Local Plan

DRAFTLP_406

Full Name: Eric George Allinson

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Protect the natural and historic environment - I agree. except add "and exploit same". I am thinking of my home town of Loftus, where we have an abundance of both natural and historic features i.e. Saxon Princess, Lewis Hunton, Alum/Ironstone mining, double cliffs, fantastic local walks. Exploit them all - give the funding to Loftus

Officer response:

Comment noted, the Local Plan sets out the planning policies for the Council and does not deal with funding issues.

DRAFTLP_407

Full Name: Kath Cornes

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Loftus - I would like to see our community proud again. I would like to see the market place a tree lined road through. A place to stop. I would like to see the houses that have been boarded up, knocked down and be replaced with a seating arrangement. No reality shops. Houses that people have chosen for themselves. No tacky tacky houses. Our quality of life upgraded where we don't have to go out of town. Our town has lots of history we want to keep it that way.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_408

Full Name: John Pawson

Organisation:

Agent Name: D Brough

Agent Organisation: Plans to Expand

Submission type: Letter

Agree with section?: In Part

Comment summary:

Submission of land allocation at Wilton Bank, Saltburn - See attached

Officer response:

Sufficient land has been identified to meet the Council's housing supply aspirations over the plan period, with development directed towards the most sustainable sites and locations. The site is therefore not required to meet requirements and is not, moreover, well related to the adjacent proposed development to the north. The availability of this land will be recorded in the SHLAA.

Draft Local Plan

DRAFTLP_282**Full Name:** Mr Peter Nicholas
Horsley**Organisation:** Mineral Products
Association**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The Draft Plan properly recognises the importance of minerals infrastructure in paragraphs 3.27 and 6.186 (minor typo take incorporate). Reference in the Draft Plan is made to the Tees Valley Joint Minerals & Waste DPDs adopted in 2011. The Draft Plan sets out the vision until 2032, whilst the Joint Minerals Plan is up to 2026. The adoption of the Joint Minerals Plan, predates the National Planning Policy Framework (March 2012) and accompanying Planning Practice Guidance (2014). The PPG identifies the role of the district council, as the local planning authority, in safeguarding minerals. Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways: - having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; - in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and - when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction. Planning authorities should safeguard existing, planned and potential storage, handling and transport sites. The Draft Plan needs should recognise the safeguarding requirements of the NPPF, PPG and the Tees Valley Plan Policy MWC1: Minerals Strategy. It is imperative that the Local Plan safeguards minerals resources and minerals infrastructure through appropriate policies, ensure appropriate buffers (circa 250m) to ensure these valuable resources and sites are not sterilised.

Officer response:

Minerals planning issues are not within the scope of this Local Plan. Consideration will be given to minerals planning when the Joint Tees Valley Minerals and Waste DPDs are reviewed.

Section/Policy**1****INTRODUCTION****DRAFTLP_50**

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Welcome the policy of selecting the right mix of sites which will satisfy supply requirements whilst also promoting sustainable development. This will allow farmers and growers in rural areas to adopt this and support the local economy.

Officer response:

Comments noted.

DRAFTLP_379

Full Name: F and L Collings
Organisation:

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Vision and Approach - supports statement on maximising re-use of PDL and looks forward to new school and Church Hill. Welcomes statement on protecting natural and historic assets as Skelton is defined in the DLP as rural and future development must accommodate wildlife and natural green spaces.

Officer response:

Comments noted.

DRAFTLP_382

Full Name: F and L Collings
Organisation:

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Page 10, 1.103 - "We need to safeguard the natural environment" - Welcome this recognition.

Officer response:

Comments noted.

INTRODUCTION**DRAFTLP_178**

Full Name: Northumbrian Water
Organisation: Northumbrian Water Ltd
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: Yes

Comment summary:

As the statutory water and sewerage undertaker for the Redcar & Cleveland area we would like to extend our support to Redcar & Cleveland Borough Council (RCBC) to help deliver the vision set out in paragraph 1.50. We will look to work the Council in any way we can to support the delivery of the overall vision of the local plan. We strongly support the comments made regarding critical drainage infrastructure in the borough in paragraphs 1.108 to 1.112. We welcome the councils forward thinking approach by ensuring well planned and phased utility infrastructure and that the importance of future planning is recognised to enable sustainable growth. In addition it is also pleasing to see the council have recognised the role climate change will play in the increased risk of flooding. We have previously worked with the Council on various studies in the borough and helped deliver the infrastructure delivery plan, we look forward to working again in the future to ensure infrastructure delivery remains a priority in the borough. We also agree with and support the text in paragraphs 1.119 to 1.121 regarding Water Supply and Drainage. It is also very pleasing to see that the Council have taken a proactive approach to the management of new development and flood risk within paragraph 1.117. We have worked with the council to identify areas at risk of flooding from the sewerage network and helped develop the updated strategic flood risk assessment. We will continue to engage with RCBC to manage flood risk in the borough

Officer response:

Comments noted.

DRAFTLP_173

Full Name: Steve Wilson
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: Yes

Comment summary:

Thank you for consulting Scarborough Borough Council on the above document. With reference to Para 1.13 on the Duty to Cooperate I can confirm, on behalf of Scarborough Borough Council, that both local planning authorities have and will continue to work closely in the formulation of the respective Plans for each area. In doing this there has been early consideration of strategic cross-boundary issues of which, in respect of the two authorities, these are considered to be very limited. Close working on the Potash Mine took place (now approved) and potential impacts considered by each authority. Both authorities support the improvements to connectivity between the Tees Valley area and Whitby to improve access to housing and employment opportunities. As stated above cross-boundary issues are very limited, in part due to the geographic split and the expanse of National Park between the two Local Plan areas. In respect of housing, the requirement is noted and the fact that Redcar and Cleveland is not seeking Scarborough Borough to meet any of its requirement. Likewise Scarborough Borough is seeking to fully meet its housing requirement and does not require Redcar and Cleveland or other adjoining authorities to take up any of that requirement. It is unclear at the moment as to the position of North York Moors National Park Authority and their housing requirement, however, for information SBC has based their OAN (the demographic portion) on the full Borough area that incorporates the National Park area. This means that some of NYMNPAs potential demand is already included in our housing provision set out in the OAN. Through attending the Tees Valley Development Plans Forum and one-to-one meetings Scarborough Borough Council will continue to work closely with R&C on their respective emerging Local Plans and consider that the Duty to Cooperate has been successfully met by both parties.

Officer response:

Comments noted.

Section/Policy**1****INTRODUCTION****DRAFTLP_152**

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Paragraph 1.102 - The reference to the North York Moors as a place for recreation is supported.

Officer response:

Comments noted.

DRAFTLP_114

Full Name: Mr Martin Coleclough
Organisation: Middlesbrough Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

The Council welcomes the recognition in: Paragraph 1.113 that we will work with neighbouring authorities to ensure cross boundary infrastructure issues are addressed to deliver growth; Paragraph 1.126 that proactive joint working with neighbouring authorities will be undertaken to establish a high quality, safe and secure transport network; Paragraph 1.130 that the outputs from the SHSMAR have been taken into account during the preparation of the Local Plan.

Officer response:

Comments noted.

DRAFTLP_608

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Highways England is generally supportive of the spatial priorities identified and in particular the intention to improve transport and access.

Officer response:

Comments noted.

INTRODUCTION**DRAFTLP_454****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Vision for Redcar and Cleveland Natural England welcomes the commitment set out within the visions to ensure continued protection and enhancement of the biodiversity, natural environment, designated sites and coastline area within the borough, and the further enhancement of pedestrian, cycle and equestrian routes.

Officer response:

Comments noted.

DRAFTLP_51**Full Name:** Mr Andy Stephenson**Organisation:** National Farmers Union**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

The involvement of green infrastructure plays a key role in flood management and reducing risk both in rural and urban areas. Carefully planned schemes should be incorporated into developments along the length of watercourses consulting with landowners throughout all stages of the project to maximise benefits.

Officer response:

Comments noted.

DRAFTLP_381**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Given the substantial housing development in recent decades Skelton certainly does not display the greatest unmet housing needs. The need for further housing in the next decade and beyond is questionable. Population growth in rural Skelton of around 50% in the last two decades, unequal population growth throughout the R&CBC area.

Officer response:

Comments noted

INTRODUCTION**DRAFTLP_607**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Highways England is generally supportive of the vision and the aspiration to deliver economic growth and sustainable communities supported by good quality transport infrastructure. We support the intention to focus the majority of development in the most sustainable locations within the borough.

Officer response:

Comments noted.

DRAFTLP_52

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Welcome the Strategic Flood Risk Assessment (SFRA) being incorporated into the process of assessing sites for future development and therefore in ensuring new developments are located on low risk sites where possible.

Officer response:

Comments noted.

DRAFTLP_61

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: No

Comment summary:

Para 1.92: Reference to the need for more detached and higher value houses is not commensurate with this borough's recent planning decisions. There are numerous examples of housing developers within the borough applying for a change in previously agreed planning permission so as to reduce the numbers of detached and high value houses.

Officer response:

The need for additional detached dwellings has been identified through the research undertaken for the Strategic Housing Market Assessment (2016). The strategy underpinning the Local Plan includes the provision of this type of housing to meet the needs and aspirations of people who might otherwise leave the borough in order to find such housing, as has been the case over a number of years. However, it is also recognised that the majority of housing will be delivered by the private sector who will only build what they are able to sell and may choose to deliver alternative house types to meet the demands of the local housing market.

INTRODUCTION

DRAFTLP_140

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Loftus Town Council is disappointed that there is so little specific reference to rural East Cleveland and the settlements within it, including Loftus, Carlin How, Skinningrove, Liverton Village, Liverton Mines and Easington (Loftus Parish). Outcome 1 of the Plan is identified as Grow our economy and create more jobs. Policies ED1 and ED6 appear to be of most relevance to the Loftus Area, and the Council agrees that this outcome has to be a priority, however it has a concern that there is little emphasis on introducing new jobs, eg by expanding the Tourism sector. Outcome 2 is identified as Develop great places to live. Loftus Town Council is concerned by how little housing development is envisaged in the Loftus area by the Draft Local Plan, and members were surprised as they recalled that within the Regeneration Masterplan had a significant theme of Living in Loftus.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_20

Full Name: mr malcolm croll
Organisation:
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: No

Comment summary:

Withdraw the term Greater Eston as it was not brought in by the boundaries commission or residents or referendum and the wards are individual areas.

Officer response:

Greater Eston is a term used by the Council to refer collectively to the wards of Eston, Grangetown, Normanby, Ormesby, South Bank and Teesville and, as such, does not require ratification by the Boundary Commission. It is considered appropriate, in some circumstances, to recognise the collective area in this way, and in other circumstances to refer to wards individually.

DRAFTLP_59

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

Given the activity and size of the retail facility at Cleveland Retail Park I would suggest that this has a high ranking in terms of retail facility, more so when linked to the nearby Low Grange centre.

Officer response:

Redcar is the largest retail centre in the borough, and meets the national policy definition of being a town centre and this is reflected in Policy ED 1. Cleveland Retail Park is considered to be out-of-centre, and its role and function are recognised through Policy ED 2. This approach aligns with the national policy aim to prioritise town centre development within the centres, to promote sustainable patterns of travel.

INTRODUCTION

DRAFTLP_365**Full Name:** Vicky Gallone**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Concerns about capacity within the primary schools of Redcar East and the pressure from further housing developments. Suggests that a new primary be built on the land adjacent to Ryehills School to create a learning campus like Saltburn/Huntcliff.

Officer response:

The Council's education service has been consulted and concluded that there is no need to provide additional schools in East Redcar to accommodate the impacts arising from additional housing development identified in the Local Plan.

DRAFTLP_409**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Housing Strategy 1.42 In this context it is vital that the Council provides affordable starter homes for those seeking a place on the housing ladder and 1/2 bed bungalows for older, less able residents. Too much new build' has been of the executive type which does not meet the needs of the younger, or older, generation. 1.50 CPRE welcomes the stated prioritisation of brown field sites and the appearance of green field sites at the bottom of the priority list. However, the Council does not have a good record in achieving the brown field priority. We can only hope that the Council will do better under this Local Plan

Officer response:

The plan aims to deliver a range of housing to meet needs, and many of the housing allocations include a requirement to provide a proportion of bungalows. With regards to the development of previously developed land, the Council has allocated all known, deliverable and appropriate sites for development within the plan. However, we recognise that a significant proportion of previously developed land is constrained and/or not viable for development, and it would not be appropriate to rely on such sites to deliver the development required.

DRAFTLP_514**Full Name:** Theakston Estates**Organisation:****Agent Name:** Neil Westwick**Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Overall, Theakston Estates supports the vision for Redcar and Cleveland and wishes to assist in delivery of sustainable development by significant contribution to meet housing need through high quality family housing at Flatts Lane. Welcome vision of providing majority of development in the most sustainable locations in the urban area and whilst we recognised the benefits of using previously developed land, this should not be at expense of meeting housing needs. Theakston Estates supports vision for growth, both in respect of providing a range of quality housing and growth of a successful and resilient economy. However, the Plan is fundamentally flawed by failing to meet the full objectively assessed need for housing over plan period.

Officer response:

Comments noted, however the Council considers that the Local Plan does meet the objectively assessed need for housing in the borough.

INTRODUCTION**DRAFTLP_527**

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council

Agent Name:**Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The original Masterplan had as one of its objectives the remediation of 400 hectares of land. This aspiration has been dropped, never having been started, but should reference not be made to land reclamation as a particular objective?

Officer response:

A paragraph on remediating brownfield land will be included in the introduction.

DRAFTLP_583

Full Name:
Organisation: RSPB

Agent Name:**Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Vision for Redcar and Cleveland the majority of development will take place in the most sustainable locations in our urban and coastal areas Please see also our comments regarding SD2 Locational Policy.

Officer response:

Comment noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process.

DRAFTLP_584

Full Name:
Organisation: RSPB

Agent Name:**Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Vision for Redcar and Cleveland: The RSPB welcomes the intention to enhance important natural and historic assets, and suggest a change of wording to obtain the maximum benefit from this: The designated international, national and local nature conservation sites will continue to be protected and enhanced. Opportunities will continue to be taken to expand and reconnect habitats and communities of wildlife and ensure that the variety of species and habitats both in rural and urban areas is increasing.

Officer response:

It is considered that the Vision adequately sets out, at a high level, what the Council wishes to achieve and, as such, does not believe it is necessary to include more detailed wording as suggested.

INTRODUCTION**DRAFTLP_585**

Full Name:
Organisation: RSPB
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Para 1.55 - We welcome the preparation of Habitat Regulations Assessment (HRA) including the Appropriate Assessment (AA) at this stage so that it can be progressed alongside other local plan preparations and its evidence utilised to underpin the Plan. We note that the recommendations made in the HRA have been used in finalising the Draft Local Plan. However, we are concerned that some recommendations do not appear to be have been implemented or policy wording amended these are: SD3 Development Limits ED6 Protecting Employment Areas SD6 Renewable and Low Carbon Energy ED13 Equestrian Development

Officer response:

It was not possible to include all of the recommendations in the Draft Local Plan prior to consultation, but all the recommendations will be incorporated in finalising the plan for Publication.

DRAFTLP_528

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

With regard to development, Policy SD2 Location Policy (1,2,3) sets out some basic targets for use of previously developed land. Given the amount of land on the ex SSI site and the Wilton site, I would ask that consideration be given to altering the target on PDL from 60% to 70%. With regard to General Development Principles SD4 (1,2,3) I would ask for consideration to be given to altering the target on minimum PDL from 60% to 70%.

Officer response:

Policy SD2 does not set out targets for previously developed land- a reference is made to 60% in the implementation plan and monitoring framework but this was included in error. The policy does aim to prioritise the development of previously developed land, but it is recognised that a significant proportion of such land in the borough is either constrained and/or suffers from a lack of development viability. A target of 60% is, therefore, not deliverable.

DRAFTLP_62

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Table 2 Are the totals correct? Should they read Net 31 and Gross 574?

Officer response:

The table has been taken from the Strategic Housing Market Assessment (2016), which acknowledges that some totals do not add due to rounding. The text accompanying the table will be updated to better explain this.

INTRODUCTION

DRAFTLP_524

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Will the Growth Strategy be agreed and in detail to allow a more detailed description to be included in the final draft?

Officer response:

The Economic Growth Strategy has been agreed by the Council, and the text will be updated. Given the amount of information already contained within the plan, it is considered that a brief summary of the Economic Growth Strategy is more appropriate than a detailed description.

DRAFTLP_24

Full Name: Cllr Liz Westhead
Organisation:

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

1.105. I agree we have an increasing number of paths and cycle ways, but a lot more attention needs to be given to the community facilities needed to support these.

Officer response:

Comments noted. The Council will continue to support the development of new community facilities where appropriate.

DRAFTLP_145

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Outcome 3 is identified as Improve Quality of Life, and appears to be focussed around the Natural Landscape, Heritage and Transport. Loftus Town Council sees these issues as all being crucially tied into opportunities for economic development. Loftus is a small, deprived but historic urban town situated in a stunning rural environment with geology and archaeology of national importance, access to the coast and to the North York Moors National Park, and the Council had hoped that the Local Plan would enable the sensitive development of tourism/recreation based on these assets to boost the local economy. However, the Plan does not appear to acknowledge the possibility of developing more facilities for visitors in this area. Transport and Accessibility are major problems, with insufficient public transport limiting residents' employment prospects - particularly in Teesport and out towards Whitby, and lack of parking provision limiting the number of potential visitors who stop in the town.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

INTRODUCTION

DRAFTLP_237

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Point 1.7, figure one - add the Health and Wellbeing Strategy as a key document (Local Plans and Strategies). Note: Planning which takes account of and supports local strategies to improve health, social and cultural wellbeing for all, and delivers sufficient facilities and services to meet local needs is a core planning principles within the NPPF (para. 17, final bullet point). (according to TCPA doc reuniting health with planning healthier homes, healthier communities, 2012. Point 1.26 to 1.38 - Portrait of the Borough, but no mention of health. How about including: There are significant health issues in the Borough; for example, life expectancy is lower than the national average at 78.6 versus 79.5 years for men and 82.1 versus 83.2 years for women . Furthermore, the difference between the least and most disadvantaged areas is 10.0 years for men and 5.7 years for women. We also have high levels of child obesity, with about one in ten starting school obese which increases to one in five by the end of primary school and again, this varies in the Borough from 15.3% in Hutton to 34.0% in Teesville amongst Year Six pupils (aged 10/11 years) . Point 1.52- add the Health and Wellbeing Strategy and/or Joint Strategic Needs Assessment (<http://www.teesjsna.org.uk/redcar-and-cleveland/>) as a key piece(s) of evidence Outcome 2: Develop great places to live (page 23). Amend Clean, safe and attractive neighbourhoods to Clean, safe, healthy and attractive neighbourhoods Outcome 3: Improve quality of life (page 26 onwards). There's not much about health in here. Need to consider some drafting. Point 1.103 Change exercise to physical activity.

Officer response:

Strategy can be added to list once complete.

DRAFTLP_287

Full Name: Matthew Good
Organisation: Home Builders Federation Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Duty to Co-operate Paragraph 1.14 of the consultation document notes that a Duty to Co-operate Statement will be produced alongside the Publication version of the plan. The HBF will therefore reserve our opinion upon compliance with the duty until this part of the evidence base is published. It is, however, worth noting that in terms of housing whilst the 2016 Strategic Housing Market Assessment (2016 SHMA) identifies the area can be described as self-contained there are strong relationships with Middlesbrough and other Tees Valley authorities. It is therefore important that the statement highlights what discussions and resultant actions have been taken with regards to these relationships.

Officer response:

Comments noted. The Council has, and will continue to, work with other Duty to Cooperate bodies in order to properly understand and respond to any strategic and cross-boundary issues.

DRAFTLP_288

Full Name: Matthew Good
Organisation: Home Builders Federation Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The Council should also resist utilising SPDs as a vehicle for introducing policy requirements and burdens outside of the formal plan making process. The NPPF (paragraph 153) clearly states; Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development Vision for Redcar and Cleveland & Themes The vision and themes are generally supported and provide a positive framework for the plan policies. Viability Paragraph 1.59 indicates that the 2013 Whole Plan Viability Testing document is to be updated. The HBF supports such an update and recommends that the Council fully engage our members in its production to ensure that it is based upon sound evidence and assumptions

Officer response:

We note the support for undertaking viability testing. However, the Council does not consider that it is utilising SPDs to introduce policy requirements.

INTRODUCTION**DRAFTLP_380****Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Extend statement on Skelton Industrial estate LDO (1.73) with - "The LDO, and lack of planning consent required does not apply to site 51, notably the Skelton Industrial Estate expansion and proposed mixed development site".

Officer response:

Para 1.73 will be amended to clarify that only part of Skelton Industrial Estate is covered by the LDO and other parts of the site will be brought forward in accordance with Policy REG3.

DRAFTLP_314**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Para 1.50 Visions and Objectives We welcome the references to protect and enhance the historic environment within the vision and objective 3. However, the list of supporting evidence does not appear to include an adequate , up-to-date and relevant evidence base on the historic environment (as required by NPPF para. 158). While this may exist, and is being used in drawing up the plan, it should be referenced. In order to set out a positive strategy for the consideration and enjoyment of the historic environment, as required by the NPPF para. 126, it will be essential to demonstrate how there is sufficient information to assess the significance of heritage assets, and implications of the policies.

Officer response:

It is not the intention for para 1.50 to list all of the supporting documents that have been taken into account, rather it is a summary of the key documents. We do not consider it appropriate to do so within the Local Plan itself, and that the plan is compliant with NPPF para 126.

DRAFTLP_21**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

1.35. No mention of developing tourism.

Officer response:

Tourism is included elsewhere in the plan, and this paragraph will be amended to make reference to it.

INTRODUCTION**DRAFTLP_354**

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Page 18 - Where it says "The majority of development will take place in the most sustainable locations in our urban and coastal areas. We will maximise the re-use of previously developed land and limit the unnecessary development of greenfield sites. Settlements will continue to maintain their individual identities, protected from coalescence" the following should be added "Protects the strategic gap between Saltburn/Marske/ Redcar ?

Officer response:

It is considered that the Vision adequately sets out, at a high level, what the Council wishes to achieve and, as such, does not believe it is necessary to include more detailed wording as suggested.

DRAFTLP_22

Full Name: Cllr Liz Westhead
Organisation:
Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

No mention of development of lower Westfield set in Loftus

Officer response:

The Westfield development has already commenced and the housing being delivered has been taken into account in calculating the housing requirement and need for further site allocations. As such, there is no need to include a policy for that site.

SUSTAINABILITY AND DESIGN**DRAFTLP_587****Comment summary:****Officer response:****Full Name:**

Sustainability and Design: The RSPB welcome the inclusion of a definition and explanation of sustainable development in the Local Plan.

Comment noted.

Organisation: RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**DRAFTLP_175****Comment summary:****Officer response:****Full Name:** Mr J D Wiggins

There is no reference to the Tees Valley Metro. This could provide links to Guisborough.

The Tees Valley Metro is not a project that the Council considers will come forward during the plan period. As such, it is not appropriate to include this in the Local Plan

Organisation: Manless Green Farm**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**DRAFTLP_236****Comment summary:****Officer response:****Full Name:** Cllr Bill Clarke

The town of Guisborough has suffered and has now moved on from being a Historic Market Town to being a commuter hub for larger employment areas such as Middlesbrough, Stockton and further afield. This means residents want to or have to travel to work and shop so this must be addressed quickly before the next generation see this gap and move away from the area. Through no protection of a local plan developers have hit Guisborough extremely hard and the town has now increased its boundaries with no hint of design or structure. Planning applications came in where developers saw an opportunity to make a profit and there was no protection or forethought about a town plan and so we have a top heavy town with many residents but not a high street, decent shops or services to supply them with. This could though be partly off-set by the latest developments on Rectory Lane on the old Esco site and Springwood Road. We will wait and see what transpires. The draft plan is aspirational and a vision but paragraph 2.9 on page 39 refers to 40% of new developments will be located in the rural areas. As Guisborough in my crude comparison states, we will have built over 25% of these dwellings and there will not be much further to go to achieve this target. Guisborough has developed as far as it can and limits now must be set so that these do not move any further.

The Council recognises the recent, and significant housing developments that have taken place in Guisborough. The preparation of the Local Plan will help to ensure that our planning policies are up to date which, in turn, will provide the Council with a sound basis for determining planning applications and controlling proposals that do not accord with the plan.

Organisation: Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part

Section/Policy**Policy SD 1****Sustainable Development****DRAFTLP_179**

Full Name: Northumbrian Water
Organisation: Northumbrian Water Ltd
Agent Name:

Comment summary:

We are pleased to see the inclusion of Policy SD1 which sets out a presumption in favour of sustainable development in line with the National Planning Policy Framework (NPPF). We fully support the inclusion of minimising flood risk as a characteristic of sustainable development; this is something we believe is a key characteristic in making a development sustainable and should be considered by all types of new development.

Officer response:

Support noted.

Agent Organisation:

Submission type: Web

Agree with section?: Yes

DRAFTLP_538

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff

Comment summary:

Taylor Wimpey (TW) support the inclusion of draft Policy SD1 (Sustainable Development) as it accords with national planning guidance.

Officer response:

Comment noted.

Agent Organisation: England Lyle Good

Submission type: E-Mail

Agree with section?: Yes

DRAFTLP_116

Full Name: Mr Martin Coleclough
Organisation: Middlesbrough Borough Council

Comment summary:

The Council welcomes the recognition in Policy LS1 that the feasibility for a providing a Park and Ride facility at Nunthorpe will be investigated.

Officer response:

Comment noted.

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Section/Policy**Policy SD 1****Sustainable Development****DRAFTLP_188****Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

We are pleased to see the inclusion of Policy SD1 which sets out a presumption in favour of sustainable development in line with the National Planning Policy Framework (NPPF). We fully support the inclusion of minimising flood risk as a characteristic of sustainable development; this is something we believe is a key characteristic in making a development sustainable and should be considered by all types of new development.

Officer response:

Support noted.

DRAFTLP_609**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Highways England is supportive of the general principle of taking a positive approach towards the presumption in favour of sustainable development as promoted by the National Planning Policy Framework and therefore have no particular concerns with this policy.

Officer response:

Support noted.

DRAFTLP_311**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland Community Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Is there a specific plan for carbon reduction and reusable energy site development?

Officer response:

There is no specific strategy for reducing carbon emissions, however the plan seeks to implement the governments carbon reduction plans through a number of policies.

Section/Policy**Policy SD 1****Sustainable Development****DRAFTLP_410****Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The implication here is that the Council will effectively rubber stamp' any housing application that is submitted, irrespective of its impact on the environment. This would ignore the fact that the NPPF is not good governance because it focuses on the possible economic benefits of house building at the expense of the social and environmental benefits. Also, the Government, through it's All Party Strategy Group, has referred to the need for a strong, healthy and just society'. A presumption in favour does not meet this more balanced approach to housing, or any other, development. In recent years the Council has allowed Redcar and Guisborough to be subjected to urban sprawl and for the strategic gap/green wedge between other local communities to reduce to the point of being almost within touching distance. This has not benefitted the area socially or environmentally, in fact quite the reverse. Green field areas have been lost and more pressure placed on society by the failure to provide essential resources eg shops, schools, medical centres within new development. It is important that in the future the Council address these issues.

Officer response:

Comment noted. The Local Plan includes policies to limit urban sprawl in the future. The Local Plan also includes a policy to seek developer contributions to fund infrastructure if required to mitigate the impact of the development.

DRAFTLP_355**Full Name:** Mrs T Meadows**Organisation:** Saltburn, Marske and
New Marske Parish
Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Councillor Lambert used the sustainable development argument very effectively when objecting to the latest application for the micropub in Marske. Worth remembering for any future undesirable developments?

Officer response:

Comment noted.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_577

Full Name: G M Collins
Organisation:
Agent Name: GVA Grimley Ltd.
Agent Organisation: GVA
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

Policy SD2 sets out that development will be directed to 2.1 the most sustainable locations in the borough. The policy sets out the settlement hierarchy which will be used to guide development, Normanby is placed in the Urban Area, where the majority of development will be focussed in the urban and coastal areas. We fully support that Normanby should be placed in the urban area category and we agree that development should be guided to the urban and coastal areas. This is in line with the sustainability objectives of the NPPF

Officer response:

Comment noted.

DRAFTLP_400

Full Name: Eric George Allinson
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: Yes

Comment summary:

I agree except please limit the growth in rural areas - do not spoil our rural areas.

Officer response:

Comment noted. The plan aims to ensure a balanced approach to development, to meet the needs of urban and rural communities.

DRAFTLP_49

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: Yes

Comment summary:

With regards to development in the countryside being restricted to that which meets rural and other exceptional needs' and specific identified local and rural needs', we would welcome clarification on what constitutes other exceptional needs'. Does this refer to the restrictions listed in SD3? Development of existing agricultural businesses for a variety of purposes often enhances and improves the long term viability of the business.

Officer response:

Comments noted. We can confirm the exceptional forms of development that may be acceptable to the Council are set out in Policy SD3.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_539

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: No

Comment summary:

Overall Policy SD2 provides a more appropriate basis for the distribution of housing development throughout the Borough than previously proposed. However, TW remain of the view that a locational strategy which adopts a much finer grain approach that is flexible and responsive to changing needs and demands would be more appropriate for the Borough. There are some demonstrably sustainable settlements (e.g. Marske & New Marske) where the Plan does not propose any housing development. The lack of proposed housing allocations in some settlements is not adequately justified in the Draft Local Plan and does not accord with the suggested approach to direct development to the most sustainable locations in the Borough. TW strongly suggest that in addition to further housing allocations around the Urban and Coastal areas, some housing allocations are required in more settlements than currently proposed to meet the significantly higher housing requirement. There are no housing allocations proposed in Marske despite it being located within the coastal area, which alongside the urban area is proposed to accommodate 60% of new development and being one of the most sustainable settlements in the Borough. TW consider that there are more suitable sites in Marske of a more appropriate scale for housing development such as Land at Grundales. Object to the location of New Marske within the hierarchy given its scale and the need to be allocated some level of housing development to help sustain the vitality and viability of the settlement. TW consider that New Marske should be within the Coastal Area given its scale and relationship with Marske, Saltburn and Redcar. Support the identification of Guisborough as the only Rural Service Centre in the Borough and welcome the provision of additional development. Object to the reference in the policy that states priority will be given to the development of previously developed land and the reuse of existing buildings. This is contrary to the NPPF which states (paragraph 111) that development on brownfield land should be encouraged rather prioritised. The wording of Policy SD2 should therefore be amended accordingly and brought in line with the NPPF.

Officer response:

The aims of the Locational Policy are considered to be met in the most sustainable location when considering the borough as a whole. It is recognised that housing is not being promoted in every settlement, but such an approach is considered unnecessary and could lead to an unsustainable pattern of development.

DRAFTLP_455

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

The AA will determine whether a plan or project will have an adverse effect on the integrity of the site. We therefore suggest the wording is changed as follows: The acceptability of development proposals in a particular location will depend, among other things, on the type of use proposed. An Appropriate Assessment will be required for all development that, either alone, or in combination with other plans or developments is likely to have [delete: 'an adverse' and insert] 'a significant' effect on a Natura 2000 site.'

Officer response:

Policy wording will be amended as suggested.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_566**Full Name:** Mr Ben Stephenson**Organisation:** Persimmon Homes Teesside Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

At top of hierarchy are settlements within the urban area to the west of the borough, followed by the coastal towns and villages to the east. The rural area, albeit split into tiers, is bottom of the hierarchy. While we would not necessarily disagree with the overall principle of the strategy, we fail to see the distinction in terms of access and local services between Guisborough a 'Rural Service Centre' and the towns and settlements in the higher 'Coastal' tier. Persimmon Homes would therefore advocate an uplift in the settlement hierarchy, equal with the Coastal category to allow the settlement to be the focus of further development. Persimmon believe this can be achieved without compromising the objective of minimum of 60% of new housing on previously developed land and ensuring rural development is of an appropriate scale to the settlement in which it takes place. NPPF encourages the effective use of PDL. SD2 therefore goes beyond the remit of the NPPF by prioritising brownfield land over alternative sites. The policy is therefore contrary to the NPPF and cannot be supported. It is therefore recommended that the current wording of the policy is amended to 'encourage' the use of previously developed land rather than 'priorities' its use.

Officer response:

The separation of Guisborough as a rural service centre, and the other rural settlements, is well established in local planning policy and is a reflection of the size of Guisborough and the range of services within the town. In terms of PDL, the policy will be amended to better align with the NPPF and reference to the 60% target will be removed.

DRAFTLP_289**Full Name:** Matthew Good**Organisation:** Home Builders Federation Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The policy identifies that priority will be given the re-use of previously developed land. This statement is considered contrary to the NPPF. The NPPF (paragraph 111) refers to encouraging rather than prioritising the effective use of previously developed land. The PPG (ID: 10-009) specifically refers to encouragement through incentives such as lower planning obligations or different funding mechanisms and the Government are providing encouragement through the introduction of brownfield registers. It is therefore recommended that the policy text be amended to replace priority' with encourage'.

Officer response:

The policy wording will be amended to better align with the wording of the NPPF.

DRAFTLP_124**Full Name:** Mrs Catherine Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

centre a lot of the development on East Cleveland towns, the coastal and urban areas have been getting a lot of money spent on them for a long time, places like Loftus just seem to be an inconvenience to you,

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy**Policy SD 2****Locational Policy****DRAFTLP_14****Full Name:** Mr Paul Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Urban and Coastal areas should not be prioritised over East Cleveland towns. Towns such as Loftus seem to attract less funding every year.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_510**Full Name:** Mr Mark Gabriele**Organisation:** Bellway Homes (NE Division)**Agent Name:** Shaun Cuggy**Agent Organisation:** Barton Willmore**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Our Client fully supports the representations prepared by the HBF and in particular the comments they have made in relation to policy SD2 Locational Policy.

Officer response:

Comment noted.

DRAFTLP_615**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

As stated in response to Policy LS1, whilst Highways England is supportive of the principle of focusing new development within the coastal area and the intentions relating to improving connectivity, which focuses predominantly on improving sustainable transport provisions. Until we understand the full spatial distribution of development, including the quantum proposed, it will not be possible to determine whether there could be any implications for the SRN as a consequence of this development. As stated in response to Policy SD2, it would be useful to understand how the site allocations identified in Policy H3, along with employment allocations, which are currently not fully understood (as alluded to in the accompanying technical note), contribute to the overall development aspirations for these locations. We would recommend that this is included either within Policy SD2 and / or within these individual spatial strategy policies.

Officer response:

Comments noted. The Council will continue to work with Highways England in preparing the Local Plan.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_610

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

In general, Highways England is supportive of locating development in the most sustainably accessible locations, where access to a variety of sustainable modes of transport, employment opportunities, services and facilities is at its greatest. Such locations tend to be within more central urban locations and we are therefore supportive of the intention to deliver 60% of development in these locations. The priority given to previously developed land is also supported along with the proposed sequential approach identified for selecting site allocations. However, it would be useful to understand how the site allocations identified in Policy H3, along with employment allocations, which are currently not fully understood (as alluded to in the accompanying technical note), contribute to the overall development aspirations for these locations. We would recommend that this is included either within this policy and/or within the individual spatial strategy policies.

Officer response:

Comments noted. It is not possible to accurately determine the precise level and type of employment development that will take place on the allocated sites. However, the Council will continue to work with Highways England so that the potential impacts can be understood.

DRAFTLP_555

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Story Homes recognises the key role of Guisborough as a Rural Service Centre and support the acknowledgement within the supporting text to Policy SD2 that within the rural area, the majority of development will take place within Guisborough and the East Cleveland towns. Story Homes considers that allocating an arbitrary 40% to the rural' subarea provides no certainty as to how the 40% target will be delivered. In order to deliver the 40% target a strategy setting out the distribution of this target is required, which would include allocating specific numbers to the main settlements and then demonstrate delivery by linking this to specific housing allocations within Policy H3. Guisborough is capable of accommodating at least half of the 40% target for the rural' sub-area. Story Homes objects to the sequential approach to development proposals that is set out within the policy and which gives priority to the development of previously developed land and the reuse of existing buildings, and limiting development in the countryside. This is considered to be inconsistent with the NPPF which, while encouraging the use of previously developed land, does not seek to prioritise this over sustainable greenfield sites. There are a number of risks associated with adopting a strategy that seeks to direct development to previously developed sites including the fact that a significant percentage of previously developed land is often located outside built up areas; viability issues and residential development on previously developed land is not always compatible with surrounding uses.

Officer response:

The Council does not consider that aim of delivering at least 60% new development in the urban and coastal areas (and thus no more than 40% new development in the rural area) as arbitrary, and the strategy for its delivery (in relation to housing) is set out through the Housing section of the plan, in particular through Policy H3 Housing Allocations. Prioritising PDL is a key Council policy, agreed by the passing of a motion by Borough Council. However, the wording will be amended in view of comments relating to the NPPF.

DRAFTLP_588

Full Name:
Organisation: RSPB
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The RSPB is concerned that the policy will aim to: e. achieve a minimum of 60% of all new development taking place in the urban and coastal areas The RSPB recognise the importance of key industries in the borough to the local and national economy, but consider further planning is required to ensure that industrial expansion is compatible with the area's protected wildlife populations, particularly in coastal locations. Development that could cause direct disturbance or displacement of notified populations from the SPA, or associated functional land could have an adverse effect on the integrity of the SPA and Ramsar site.

Officer response:

Comments noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_25**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Loftus town is currently working very hard to encourage tourism and improve its sustainability, and your plan ignores any developments and appears to regard Loftus parish as not worthy of any council attention.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_589**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Provision for the need for Appropriate Assessment for all development likely to have an adverse effect on a Natura 2000 site (either alone or in combination) within Policy SD 2 is supported. 2.1.3 However, we would advise caution in deferring any consideration of the viability of development allocations to the planning proposal stage, which could lead to wasted resources being put into the preparation and submission of unviable applications, or lack of due consideration being given to the combined effects on Natura 2000 sites at the individual application stage. This approach can lead to serious doubts over the deliverability of the allocations and thus the soundness of the overall plan. At the scoping stage of the 2013 plan, the RSPB recommended investing in further data and evidence gathering to make informed and evidence-led decisions in the HRA. We recommend that a strategic master plan for the conservation and enhancement of biodiversity is produced: this should include assessment of biodiversity assets within the borough and identification of appropriate management measures, a Recreation Management Plan and any other strategic mitigation considered necessary to ensure no adverse effects Natura 2000 sites and other biodiversity assets. This could be produced working with an appropriate nature conservation body. It is important to note that in order for mitigation for adverse effects on a Natura 2000 site to be considered effective it must be secured for the duration of the effects being mitigated for. Where this relates to development (e.g housing) the mitigation must be in effect for the lifetime of that development (in perpetuity). Please see our separate comments in this regard to individual policies.

Officer response:

Comments noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process.

DRAFTLP_515**Full Name:** Theakston Estates**Organisation:****Agent Name:** Neil Westwick**Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Support thrust of policy which directs development to most sustainable locations in Borough, focussing on urban and coastal area. However, have concerns about giving priority to development of previously developed land. Policy approach which prioritises PDL use, rather than encourages, would be inconsistent with NPPF. No requirement or endorsement of sequential approach to identifying housing allocations when formulating Local Plans. Danger that Council will continue to meet housing requirements by perpetuating past approaches and strategies allocating sites which are not able to be developed without considerable public support. Suggest amendments including removal of sequential approach from policy.

Officer response:

The policy will be amended to better align with the wording of the NPPF. A sequential approach has been used to select the sites in order to promote a sustainable pattern of development, and should remain within this policy.

Section/Policy**Policy SD 2****Locational Policy****DRAFTLP_357**

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Specifically says that development will be within the development limits and limited in the countryside more leverage to protect green field sites? Might be worth remembering to refer to Policy SD3

Officer response:

Comments noted. Policy SD3 is already referenced within this policy.

DRAFTLP_392

Full Name: F and L Collings
Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

The land to the west of site 51 does not comply with the sequential approach and should be removed from the LDP. Agree with restricting development of greenfield outside of development limits and to restricting countryside development to that which meets rural or exceptional needs.

Officer response:

The majority of the site at Skelton has been allocated for employment development since 1999 and, as such, is already within the development limits. The Employment Land Review has confirmed that, if we continued to allocate the site for this purpose, there would be an oversupply of such land in the rural area. Therefore, the Council has re-allocated the site for mixed commercial and residential development.

DRAFTLP_393

Full Name: F and L Collings
Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

2.10 - "controlled by development limits." Agree. Please adjust site 51 to exclude the area outside the development limit."that helps to improve the quality of life for our residents." Perhaps this sentence should be expanded thus: 'nor encourage or permit development that adversely impacts on the quality of life for our residents'.

Officer response:

The majority of the site at Skelton has been allocated for employment development since 1999 and, as such, is already within the development limits. The Council considers that there is no justification for it to be removed. Matters relating to quality of life are detailed further in Policy SD4.

Section/Policy**Policy SD 2****Locational Policy**

DRAFTLP_394**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

2.15 - "The development limits have been determined through retaining the existing boundaries". Agree with this statement but please adjust the site 51 boundary as per the May 2013 S&BN DP.

Officer response:

The para goes on to say that amendments have been made to accommodate new allocations. In any case, the majority of the site to which is referred has been within development limits since being identified for development in the 1999 Local Plan.

DRAFTLP_411**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

It is important that the Council maintains this sequential approach by prioritising brown field sites. The Council has stated this intention in previous Plans but has failed dismally. More effort is needed this time.

Officer response:

Comment noted. The Local Plan has allocated all known, appropriate, and deliverable previously developed land for development.

DRAFTLP_496**Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Gladman support the identification of the Urban and Coastal areas as the focus for development given the settlements' population and extensive range of services and facilities. However, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. Para 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential, therefore, that the needs of the sustainable rural settlements across the borough are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability. In addition, Gladman consider that the level of development allocated to the rural area should be a meaningful contribution to ensure the ongoing overall vitality and viability of the rural settlements as required by para 55 of the Framework. The level of growth aimed towards sustainable rural settlements should therefore be sufficient to ensure that the housing needs of the rural population of the borough can be addressed. It must be recognised that they may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered in any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and are not lost because of a lack of support. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

Officer response:

The Council considers that directing up to 40% of new development to the rural area represents meaningful growth. It is neither necessary, nor appropriate, to identify sites in each rural settlement.

Section/Policy**Policy SD 3****Development Limits****DRAFTLP_53**

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Welcome the allowance for appropriate diversification of an existing agricultural or forestry activity' and housing essential for farming, forestry or the operation of rural based enterprise'. Both development types assist in securing the long term future of agricultural businesses.

Officer response:

Comment noted.

DRAFTLP_509

Full Name: Mr Mark Gabriele
Organisation: Bellway Homes (NE Division)

Agent Name: Shaun Cuggy

Agent Organisation: Barton Willmore

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Our Client supports the amendments made to the development limits under this policy and the Policies Map, and in particular the extension of the development limits around Nunthorpe to incorporate their land at Swan's Corner within those limits.

Officer response:

Comment noted.

DRAFTLP_46

Full Name: Mr Michael Bulmer
Organisation:

Agent Name: Mr Rod Hepplewhite
BSc (Hons) MRTPI

Agent Organisation: Prism Planning

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Act for owner of land at Low Cragg Hall Farm, Carlin How, and have acted in securing outline planning permission for residential development. Proposals to amend development limits of Carlin Howe to include the residential development site at Low Cragg Hall Farm within the defined settlement boundary are whole heartedly supported.

Officer response:

Comment noted.

Section/Policy**Policy SD 3****Development Limits**

DRAFTLP_611**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

It is noted that this policy provides less of a focus on brownfield development compared to the previous policy, however the provisions within Policy SD2 are particularly robust in this respect and therefore Highways England has no concerns with this policy.

Officer response:

Comment noted.

DRAFTLP_358**Full Name:** Mrs T Meadows**Organisation:** Saltburn, Marske and
New Marske Parish
Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

"clear distinction between the urban area and the countryside. This approach helps to prevent uncontrolled urban sprawl and is critical in delivering sustainable development" - This is pleasing to see.

Officer response:

Comment noted.

Section/Policy**Policy SD 3****Development Limits**

DRAFTLP_556

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

Story Homes objects to the identification of development limits on the Proposals Map and the various restrictions which Policy SD3 seeks to set on proposals coming forward outside of development limits. This is considered to be contrary to the NPPF which provides a more flexible approach towards settlement growth and development. The NPPF does not specifically recognise settlement boundaries and there is no preclusion of the development of edge of settlement sustainable greenfield sites where it is considered appropriate. This is set down within paragraph 52 of the Framework: The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. In addition, the imposition of development limits is contrary to the spirit of the NPPF which requires that local planning authorities plan positively (paragraph 157) and seek to boost significantly the supply of new housing (paragraph 47). At paragraph 14, the NPPF requires that Local Plans have sufficient flexibility to adapt to rapid change and taking into account that development limits seek to control the supply of land that is available for housing, this policy will not encourage flexibility across the Plan period and will instead represent a significant constraint to housing delivery. Based upon our contention that the OAN set out within the Draft Local Plan is insufficient, it is therefore likely that the identification of development limits will, by limiting housing supply, further constrain delivery within the Plan period. As such, Story Homes considers that the identification of development limits runs contrary to the need to increase housing delivery to the level identified by Regeneris and that it effectively sets maximum limits on housing delivery targets which is not compliant with national policy. As such, Policy SD3 should be deleted. As a further observation, it is notable that one reason for redrawing the development limits is to reflect consents that have been granted for residential development outside development limits. This fundamentally demonstrates that housing outside development limits can, in line with the NPPF, be considered appropriate in certain circumstances and the adoption of a policy that precludes this is counterproductive within a Local Planning Authority area where housing land supply has regularly fallen below the 5 years required by the NPPF. A further example in support of development outside of development limits is provided by the Council themselves who propose the allocation of Site 284 (Policy H3.24) on a site currently outside development limits for Guisborough. As such, this demonstrates the danger of setting a policy on development limits

Officer response:

The Council considers the identification of development limits as being important for distinguishing the built-up areas from the countryside. The approach set out in the plan identifies sufficient development land to meet identified needs. Therefore, the approach is considered to be NPPF compliant, both in regards to planning positively and also protecting the countryside.

DRAFTLP_564

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

Policy Map 3 demonstrates the extent of the development limits that the Council propose to draw around Guisborough. Story Homes has stated their position earlier within this response in respect of the imposition of development limits. However, setting this to one side, Story Homes consider that the extent of the development limits indicated to the west of Guisborough do not effectively round off' this settlement. It is evident that the Council has sought to extend the development limits to the west of the settlement to include consented development sites at Galley Hill and Pine Hills and this is confirmed within their Review of Development Limits Evidence Report (May 2016) that forms part of the Local Plan evidence base. This does however, ignore the fact that clear defensible boundaries exist to the north in the form of Stokesley Road, the A173 to the west and the Guisborough Forest and Walkway to the south which, coincidentally, corresponds with the boundary of the Redcar and Cleveland Local Plan area. As such, Story Homes considers that the development limits should, if retained, be extended to the west to correspond with existing natural boundaries as this would provide greater flexibility within Plan period and offer the potential to extend growth in the direction that is least constrained around Guisborough.

Officer response:

The Council considers that the proposed development limits adequately identify sufficient land to meet identified needs and the overall aims and objectives of the plan. Development limits are an appropriate policy mechanism that helps to protect the countryside from inappropriate development, in accordance with the NPPF. As such, the development limits in this part of Guisborough are considered appropriate for this local plan.

Section/Policy**Policy SD 3****Development Limits****DRAFTLP_497****Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Policy SD3 on Development Limits is unsound. It represents a blanket approach to development outside of the defined settlement policy boundaries which does not accord with the presumption in favour of sustainable development set out in the Framework. Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. In addition, loss of the countryside should be a matter that should be weighed in the planning balance against the need to significantly boost the supply of housing and the other benefits of a particular scheme. Policy SD3 as written is therefore contrary to the Framework and should be substantially reviewed to reflect the guidance contained above. In particular, the policy should be flexible enough to be able to accommodate new development, outside of existing development boundaries, to allow the Council to quickly address any issues in a shortfall in housing land supply against the plan requirement.

Officer response:

The Council considers the identification of development limits as being important for distinguishing the built-up areas from the countryside. The approach set out in the plan identifies sufficient development land to meet identified needs. Therefore, the approach is considered to be NPPF compliant, both in regards to planning positively and also protecting the countryside.

DRAFTLP_335**Full Name:** Darren Dugdale**Organisation:** ddd design limited**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Please find attached drawing. 34 Stanghow Road, Lingdale I have indicated a red line around the proposed land that we are requesting to be included within the development limits of the new local plan. We believe it's a modest and natural expansion of the settlement at the existing edges/boundaries. It will have minimal impacts on sustainability aims.

Officer response:

As part of the preparation of the draft Local Plan, the Council has undertaken a review of development limit boundaries. A number of changes are proposed, including amending the boundary at Lingdale Primary School to exclude the playing field; this is consistent with a wider approach which seeks to more accurately reflect the extent of the built-up area. In applying this approach, there is no reasonable justification for adjusting the boundary to include the subject site. The existing development boundary on the southern approach to Lingdale wraps around the curtilage of several residential properties, including No.34 which is the first of these dwellings. The subject site is a backland site to the east which extends well beyond the curtilage of No 34, is not strongly related to it and mostly comprises open land extending towards Stanghow.

DRAFTLP_41**Full Name:** Mr M Scaife**Organisation:****Agent Name:** Mr Rod Hepplewhite
BSc (Hons) MRTPI**Agent Organisation:** Prism Planning**Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to Draft Local Plan Policy SD3 insofar as it refers to the Development Limits around Yearby. With reference to the attached Google Earth image, it is suggested that the Development Limits be revised at the north east corner to include the plot of the holiday cottage that was built in 2014 following the grant of planning permission on 30th October 2013. The proposed revision to the Yearby's Development Limits would regularise the situation on the ground, bringing the holiday cottage residential development within the village's settlement boundary.

Officer response:

The permission to develop the holiday cottage was granted due to the exceptional circumstances of that application and, as such, it is not a location that would be generally suitable for other types of development. Therefore, the Council does not consider it appropriate to include the site within development limits.

Section/Policy**Policy SD 3****Development Limits****DRAFTLP_493****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

HRA Natural England welcomes the recommendation to remove Bran Sands Lagoon from the allocations within Policy SD3 and ED6, and agree that this would remove the potential for these policies to have an adverse effect on the integrity of the Teesmouth and Cleveland Coast SPA and Ramsar site.

Officer response:

Comments noted.

DRAFTLP_540**Full Name:** Jordan Gresham**Organisation:** Taylor Wimpey (Uk) Ltd**Agent Name:** Mr Steven Longstaff**Agent Organisation:** England Lyle Good**Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Taylor Wimpey welcome the much needed review of the development limits. Lack of review since the 1999 Local Plan has acted as considerable constraint to housing delivery with all applications being considered as departures putting developers off submitting applications. Council must learn from this and put in place a flexible criteria based policy mechanism within the emerging Local Plan that would allow the Council to give positive consideration to development proposals on sustainable but unallocated sites outside adopted development limits in circumstances where it can be demonstrated that the actual supply of housing land is falling well short of meeting the Borough's objectively assessed housing requirements.

Officer response:

Comments noted. The Council has been clear in Policy H1 that it will work with the development industry to bring forward sites should it become apparent that there is no 5 year supply of deliverable housing land.

DRAFTLP_578**Full Name:** G M Collins**Organisation:****Agent Name:** GVA Grimley Ltd.**Agent Organisation:** GVA**Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Development Limits have been identified on the Policies Map. We are supportive of the development limits which have been re-drawn. The High Farm Site which is being developed out by Taylor Wimpey and Normanby High Farm Site H3.8 is now located within the development limits. We fully support the development limit being drawn to include the High Farm Site and the Normanby High Farm Site H3.8 / SHLAA 419, however we object to SHLAA site 418 (North of High Farm) being excluded from the development limits, as we regard that is should also be allocated for housing. Site 418 would be a logical extension to the existing High Farm Development, which in part is occupied. Under our response to Draft Policy H1 of these representations we set out why we believe the housing requirement set by the Council is too low / unsound and should be increased. This means that the Council should allocate additional sites to meet a higher requirement. Consequently, the Council will need to revisit / re-draw the development limit boundaries in our view settlement limits should be redrawn to encompass site 418 which we request is also allocated for housing.

Officer response:

The Council considers that sufficient sites have been identified to meet needs, and there is no requirement to redraw development limits in this location.

Section/Policy**Policy SD 3****Development Limits****DRAFTLP_590**

Full Name:
Organisation: RSPB
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Allocated Development Limits within the Draft RCBC Local Plan could potentially result in applications for developments, which alone, or in combination, could have an adverse effect on the integrity of Natura 2000 sites within the influence of the borough. Development limits are currently to the boundary of protected sites, including the Teesmouth and Cleveland Coast SPA, and include supporting areas outside the designated areas that are known for their waterbird congregations. The areas of Dabholm Gut and Bran Sands Lagoon, which are currently within the allocated development limits, have been surveyed by the Industry Nature Conservation Association since 2006, because they support an increasing population of waterbirds, including a significant number of redshank, in addition to other bird populations from the waterbird assemblage of the Teesmouth and Cleveland Coast SPA and Ramsar site. Development should be avoided in such functionally related areas around the SPA. We do note, however that the HRA recommends removal of Bran Sands from the allocations pertaining to this policy and ED6 (Protecting Employment Areas). Please see our further comments pertaining to the HRA/AA.

Officer response:

Comments noted. The recommendations of the HRA will be incorporated into the Publication Local Plan.

DRAFTLP_155

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

Loftus Town Council would like to see consideration being given to relaxing the Development Limits of the town and nearby villages.

Officer response:

The Council has considered and rejected the relaxation of development limits in the small rural areas due to the potential for unsustainable patterns of development. Full details of this can be found in the Review of Development Limits Background Evidence Report (May, 2016)

Section/Policy**Policy SD 4****General Development Principles****DRAFTLP_612**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

Highways England is generally supportive of this policy. In particular, we welcome the requirement for new development to be supported by adequate infrastructure, services and community facilities to serve the development and designed to optimise the potential of the site to support local facilities and transport networks. Further we particularly welcome the inclusion of criteria r.' which states that a Travel Plan will be required for all strategic and significant development proposals that will generate large amounts of traffic and movement.

Officer response:

Support noted.

DRAFTLP_54

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

Great importance should be placed on securing the long term security of best and most versatile agricultural land as such land is not only an asset for the landowner but also the wider economy is meeting food production needs.

Officer response:

Comment noted. Good agricultural land will be protected will be protected under policy SD4.

DRAFTLP_498

Full Name: Mr Phill Bamford
Organisation: Gladman
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

The provisions of Policies SD4 should be set within the context of development viability to accord with the provisions of the Framework (paras 173 and 174). Flexibility should be built into the Policy to state that the Council will have due regard to viability issues' when considering development proposals against this policy.

Officer response:

Comment noted. Viability assessment will be updated as required. Policy will be amended to include a paragraph at end of justification text to state that due regard will be given to viability when considering development proposals against this policy.

Section/Policy**Policy SD 4****General Development Principles****DRAFTLP_557**

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

Story Homes considers that Policy SD4u is not sufficiently justified where it requires that a Local Employment Agreement and Local Procurement Plans be in place for developments where the value exceeds £5M. At paragraph 2.30 the Plan refers to the Council encouraging developers to provide opportunities for employment and training for the local labour market but it is unclear how this has been translated into a distinct policy requirement and why the Council considers this to be a justified request [Our Emphasis]. In addition, it is considered that such a requirement would conflict with the NPPF at paragraph 204 where it sets out the three tests that planning obligations are required to meet. These tests are listed at paragraph 5.1.

Officer response:

Policy will be amended to state that an LEA and Local Procurement Plan will be encouraged rather than required. Further guidance on the use of LEA and LPP's will be included in the Developer Contributions SPD.

DRAFTLP_291

Full Name: Matthew Good
Organisation: Home Builders Federation Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

The policy, part u, places a requirement for Local Employment Agreements and Local Procurement Plans upon developments where the value exceeds £5million. It should be noted that the industry already provides significant amounts of training and employment opportunities. The HBF has recently launched a new initiative with the Construction Industry Training Board to train 45,000 workers by 2019 (further information can be found on the HBF website). The proposed policy requirements would appear to duplicate these commitments and are likely to place additional, unjustified, burdens upon the industry. It is also questionable whether the policy requirements would meet the planning obligations tests set out within NPPF paragraph 204. It is therefore recommended that part u be deleted.

Officer response:

The Local Employment Agreements and Local Procurement Plans do not just relate to house building. However, note that the housing building industry has launched an initiative with the CTTB to train 45,000 workers by 2019 and agree that these types of schemes should be taken into account when considering the need for Local Employment Agreements (LEA). Policy will be amended to state that an LEA and Local Procurement Plan will be encouraged rather than required where it is feasible and appropriate to do so and that other training schemes will also be taken into account.

DRAFTLP_567

Full Name: Mr Ben Stephenson
Organisation: Persimmon Homes Teesside Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

In line with para. 204 of the NPPF, Persimmon Homes would question whether part O, which requires development proposals to incorporate an artistic element, is necessary to make a development acceptable in planning terms. It therefore places an unjustifiable burden on developers which has the potential to impact on viability. Persimmon Homes therefore recommend that the policy is amended to 'encourage' rather than 'require'. Part T requires a Health Impact Assessment where development is likely to have a significant impact on health and wellbeing. While it is considered unlikely that a residential development of any size will have a significant impact, Persimmon Homes note that there is no formal methodology for undertaking HIA. They can be undertaken by everyone, there is no registration of qualified practitioners and no way of reviewing the quality of a published HIA. We would therefore question the appropriateness of such a requirement and recommend that it is removed from the policy. Part U places a requirement for Local Employment Agreements and Local Procurement Plans upon developments where the value exceeds £5 million. Persimmon Homes believe that this should not be a 'requirement' but rather 'encouraged' through negotiation with developers where it is feasible and appropriate to do so. If training programmes are to be provided then it is essential that consideration is given to existing training and apprenticeships provided by developers and the HBF initiatives to avoid duplication of commitments.

Officer response:

The policy does not 'require' an artistic element but only encourages developers to incorporate an artistic element in the design of the development. The Local Employment Agreements and Local Procurement Plans do not just relate to house building. The policy will be amended to state that a LEA and LPP will be encouraged rather than required to ensure flexibility.

Section/Policy**Policy SD 4****General Development Principles**

DRAFTLP_82		Comment summary:	Officer response:
Full Name:	Mr Dave McGuire	Sport England considers that draft policy could be amended to incorporate or make direct reference to Active Design's principles. The document can be found at the following location on our website; https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	Comment noted. Policy will be amended to include reference to active design principles and the Sport England guidance.
Organisation:	Sport England		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
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DRAFTLP_591		Comment summary:	Officer response:
Full Name:		The RSPB welcomes the inclusion of the following wording within this policy: g. will not result in an adverse impact on a Natura 2000 site, either alone or in combination with other plans or projects. and that development proposals will be expected to: m. Respect or enhance the landscape, biodiversity However, the wording within this policy should also reflect the requirement in paragraph 113 of the National Planning Policy Framework that ...distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks. Where Policy SD4, part (c), refers to the unacceptable loss or significant adverse impact on environmental assets, this should not be limited to those considered important to the quality of the local environment and should make distinctions between the hierarchy of international, national and local designations. This includes consideration of statutory protection above and beyond any importance to the quality of the local environment, particularly for European designated Natura 2000 sites and nationally designated Sites of Special Scientific Interest. It is recommended that this policy makes a distinction between the requirements to protect internationally, nationally and locally important environmental assets and provides for their enhancement.	The distinction between internationally, nationally and locally important designations is made in policy N4, it is therefore not considered necessary to repeat this within policy SD4
Organisation:	RSPB		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
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DRAFTLP_272		Comment summary:	Officer response:
Full Name:	Mark Harrison	The Coal Authority welcomes the wording of the supporting text at paragraph 2.23 which highlights that due to past and present mineral activity in Redcar and Cleveland, there are areas of possible ground instability. The supporting text advises that where there is a potential of land instability, applicants may be required to carry out an investigation and assessment of the ground to ensure its stability or, alternatively, that any instability can be overcome by appropriate remedial or preventative action. The Coal Authority considers that the LPA should give potential consideration to the incorporation of this requirement as one of the specific criteria listed within Policy SD4. Reason - To ensure that issues of coal mining legacy are adequately addressed in line with the requirements of the NPPF, paragraphs 109, 120 and 121.	Policy will be amended to include a requirement to undertake a Land Stability Assessment to assess the risk from mineral activity.
Organisation:	The Coal Authority		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
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Section/Policy**Policy SD 4****General Development Principles****DRAFTLP_149**

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Offer support to Policy SD4. The issue of maintaining and improving dark night skies is one of the policies in our Management Plan (Policy E20). Could a reference be made to the need to avoid light pollution be made to help us achieve this aim? For example through an additional bullet at Policy SD4 or through also reducing light pollution at Policy SD4 (l)?

Officer response:

Comment noted. Policy will be amended to include reference to the need to avoid light pollution.

DRAFTLP_180

Full Name: Northumbrian Water
Organisation: Northumbrian Water Ltd

Agent Name:
Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

Policy SD4 - fully support points F and L. We will work with the Council and developers to ensure there is adequate infrastructure available for specific sites. Policy SD4 would benefit from an important additional criteria, as part of those set out in (a) to (g), we believe suitability of a site or location is also dependent on not increasing flood risk at either the site or further downstream. We request that this additional wording be considered and included in the policy. Under (h) to (p) of the same policy we encourage the Council to reference Northumbrian Water's preferred design standards for sewers of 1 in 30 years and also to encourage developers to consider water conservation and recycling as an integral element of new development. Under part (q) to (u) of policy SD4 we would encourage the Council to seek comprehensive Flood Risk Assessments and Sustainable drainage design schemes for any major development or where new development has the potential to impact on existing flood risk.

Officer response:

The policy will be amended to ensure that flood risk at either the site or further downstream is taken into account when considering the suitability of a site or location.

DRAFTLP_456

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

To ensure consistency with the wording of the Habitats Regulations we advise that criteria g is amended to read: will not result in an adverse[delete impact on and insert] 'effect on the integrity' of a Natura 2000 site, either alone or in combination with other plans and projects'. We welcome the inclusion at criteria m for development proposals to respect or enhance landscape, biodiversity geological features, the historic environment and designated and non-designated heritage assets within the borough.

Officer response:

Agree with comment - policy will be amended.

Section/Policy**Policy SD 4****General Development Principles**

DRAFTLP_396**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The need to protect wildlife corridors, green space and unlit pockets of vegetation and fields is critical for bats and other wildlife. There is evidence of bat activity and nesting sites in close proximity to the site.

Officer response:

Comment noted.

DRAFTLP_395**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Request removal of private land from site boundary.

Officer response:

Comment noted.

DRAFTLP_315**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Welcome and support this policy, the term 'unacceptable loss' in part (c) might be open to different interpretations. The NPPF refers to the need for 'clear and convincing justification' for harm (in paragraph 132, when referring to the most important heritage assets), while elsewhere a balanced judgement is required to assess the harm or loss against the public benefits. The policy wording may need to provide greater clarity on how proposals will be assessed.

Officer response:

The detail of this policy requirement is set out in Section 8.

Section/Policy**Policy SD 4****General Development Principles**

DRAFTLP_187**Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

We would encourage the Council to consider the implications of potentially siting sensitive development in the vicinity of existing treatment works facilities. We encourage a reasonable encroachment gap in order to avoid any nuisance issues of odour or noise on new development. In recognition of this, we encourage the Council to take into consideration The Code of Practice on Odour Nuisance from Sewerage Treatment Works by DEFRA 2006 which provides guidance for Local Authorities on the production of Development Management policies and processing of planning applications which may impact on Sewerage facilities. Also note that the Council makes reference to fluvial and coastal flooding, which although the most recognised, are not the only means of flooding. Sewer flooding is also a risk and occurs when sewers are overloaded due to heavy rainfall events and other climatic anomalies. As part of sewer flooding and surface water management Urban Creep should be considered. This is the loss of permeable soft landscaping surfaces within urban areas in favour of more impermeable hard standing thus creating increased surface runoff which contributes to sewer flooding and other problems. We encourage the Council to be more proactive in the management of urban creep through the Development Management process and policies.

Officer response:

Policy will be amended to refer to The Code of Practice on Odour Nuisance from Sewerage Treatment Works by DEFRA 2006. Policy SD7 will be amended to include reference to sewer flooding and 'urban creep'.

DRAFTLP_592**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Para 2.27: The RSPB recommends that a general development principle is to incorporate biodiversity enhancement measures, to provide net gains where possible, similar to the explicit policy to include an artistic element, but not limited to major development. This could range from inclusion of appropriately placed 'swift-bricks', or other on-site enhancements, which can help to address biodiversity decline and encourage urban wildlife.

Officer response:

Policy will be amended to incorporate biodiversity enhancement measures in developments.

Section/Policy**Policy SD 5****Developer Contributions****DRAFTLP_83****Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

The inclusion of open space, sport and recreation within this policy's scope is supported.

Officer response:

Comment noted.

DRAFTLP_115**Full Name:** Mr Martin Coleclough**Organisation:** Middlesbrough
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

The Council welcomes the recognition in Policy SD5 that developer contributions will be sought for road and highway improvements.

Officer response:

Comment noted.

DRAFTLP_613**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Highways England is generally supportive of this policy and the use of planning obligations to secure contributions towards the delivery of infrastructure improvements. Further, we welcome that planning obligations will be required towards highway infrastructure and sustainable transport measures. We are also supportive of utilising CIL to obtain contributions towards the cost of transport infrastructure. It is noted in paragraph 2.37 that the Council may introduce CIL at a later date as a mechanism for securing developer contributions and therefore should this position change in the future, we would welcome further consultation on the proposed CIL and accompanying charging schedule.

Officer response:

Comment noted.

Section/Policy**Policy SD 5****Developer Contributions****DRAFTLP_499****Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The provisions of Policies SD5 should be set within the context of development viability to accord with the provisions of the Framework (paras 173 and 174). Flexibility should be built into the Policy to state that the Council will have due regard to viability issues' when considering development proposals against this policy.

Officer response:

The viability study will be updated, and the development industry consulted, as appropriate. Planning obligations will continue to be sought in accordance with the provision of the CIL Regulations. Para 2.35 sets out the approach that the Council will take within the context of viability

DRAFTLP_446**Full Name:** Frances Cunningham**Organisation:** Network Rail**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Request that the policy includes a requirement for developer contributions to deliver improvements to the rail network where appropriate.

Officer response:

Policy will be amended to include a requirement for developer contributions to deliver improvements to the rail network to ensure rail improvements are delivered where required.

DRAFTLP_568**Full Name:** Mr Ben Stephenson**Organisation:** Persimmon Homes Teesside Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Para. 173 of the NPPF emphasises the importance of plans and sites being deliverable. In an area with historically low achieved sales prices, viability is therefore a significant concern. It is imperative that cumulative impacts of policies do not threaten the viability of sites. We therefore welcome the announcement by the Council that further viability work will be undertaken prior to the next stage of the consultation proves however we would request that the study engages with the development industry to ensure that any assessment is grounded by realistic assumptions. It is also important that obligations are not set at the thresholds of viability to provide flexibility for changing economic conditions. To aid flexibility we request a reference in wording of policy stipulating that planning obligations will only be sought 'where viable'

Officer response:

The viability study will be updated, and the development industry consulted, as appropriate. Planning obligations will continue to be sought in accordance with the provision of the CIL Regulations. Para 2.35 sets out the approach that the Council will take within the context of viability

Section/Policy**Policy SD 5****Developer Contributions****DRAFTLP_558**

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

With regard to Policy SD5, Story Homes considers it to be vital that planning obligations reflect the three tests set out within the paragraph 204 of the NPPF where they seek to ensure that obligations are: Necessary to make the development acceptable in planning terms; Directly related to the development; Fairly and reasonably related in scale and kind to the development. In addition, it is recognised that, as stated at paragraphs 1.58 and 1.59 of the Draft Local Plan, the Whole Plan Viability Testing report is due to be updated later in 2016. As such, Story Homes considers that Policy SD5, and all other policies in the Draft Local Plan that are linked to viability, will require review once the updated viability work has been undertaken in order to ensure that the policy is sufficiently robust and can be justified as required by the NPPF.

Officer response:

Comment noted. The viability study will be updated, and the development industry consulted, as appropriate. Planning obligations will continue to be sought in accordance with the provision of the CIL Regulations. Para 2.35 sets out the approach that the Council will take within the context of viability.

DRAFTLP_301

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Where affordable housing is not to be provided on any given development and developers are being asked for off site contributions to meet the need/demand, where is the land allocation for these homes?

Officer response:

This will differ from site to site and would be decided through consultation with social housing providers.

DRAFTLP_238

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Point 2.29 - what training needs are there around health needs assessments? If a developer does one, who is going to review it and how will they know if it is any good? Plus can we consider using a Healthy Urban Planning Checklist (or similar) see http://www.tcpa.org.uk/data/files/Health_and_planning/Health_Phase_2/Healthy_Urban_Planning_Checklist.pdf - as part of the HIA approach? Point 2.30 Social Value - I think what you are proposing is great in terms of social value it would be useful to clarify how meeting the obligation(s) will be monitored and implications of not meeting it clarified (this may be covered in the Local Employment Agreement & Local Procurement Plan). I'd also like to see something promoting a commitment to social value.

Officer response:

Comment noted. Further investigation will be carried out on the use of Health Needs Assessments. Guidance on the use HIA's will be developed in the future.

Section/Policy**Policy SD 5****Developer Contributions**

DRAFTLP_276**Full Name:** Rachael Wigginton**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

There is no mention of Redcar adopting CIL in their draft Local Plan and, even if there was, there would be no comment since we would not be seeking developer contributions from any of these proposals.

Officer response:

Comment noted.

DRAFTLP_457**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We welcome the inclusion of improvements to landscape, water environments, biodiversity and heritage assets within the list of matters for which developer contributions will be sought. HRA Policy SD5 details areas where the Council will seek developer contributions to fund infrastructure and other community benefits including improvements to biodiversity and heritage assets, including habitat creation'. This could be expanded to include wardening, interpretation and access management. The wardening detailed within the report focusses on safeguarding SPA bird nesting sites this could be expanded to include public liaison and education (verbal interpretation), and also policing of beach zoning should this element be progressed. The management Plan also provides an opportunity to identify likely costs for the provision of these elements, and detail how developer contributions could be used. We would be happy to assist or comment on the document as it is produced.

Officer response:

Policy will be amended to include on-going management. Further detail could be included in the SPD when this document is updated.

Section/Policy**Policy SD 6****Renewable and Low Carbon Energy****DRAFTLP_458****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Natural England welcomes the inclusion of environmental impacts as an issue to be considered when determining renewable energy applications. Furthermore we welcome the safeguard provided by the cross reference to Policy N4, and the exception tests contained within that Policy.

Officer response:

Support noted.

DRAFTLP_44**Full Name:** Mr Sacha Rossi**Organisation:** NATS Safeguarding**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

NATS has reviewed the Redcar & Cleveland Borough Council Draft Local Plan and has no specific comments to make. However, being concerned with the renewable energy aspects, namely wind turbines, please find attached some generic information. Elements of this can be included in any literature or in any case should be made available to applicants in order to familiarise themselves with NATS and the potential for an impact on aviation.

Officer response:

Response noted. Consideration will be given to how the generic information can be made available to applicants.

DRAFTLP_55**Full Name:** Mr Andy Stephenson**Organisation:** National Farmers Union**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

With appropriate controls, the NFU believe farming can play a key role in meeting the Government's renewable energy targets. The Government's commitment to produce at least 15% of energy from renewable sources by 2020. Since 2007, the NFU has led a joint agricultural Climate Change Task Force in recognising the many opportunities for agriculture and land management to tackle climate change, and in developing a Greenhouse Gas Action Plan for our sector. We have submitted robust responses to government consultations on its Renewable Energy Strategy and incentive schemes for renewable electricity, heat and transport fuels. With 75 per cent of UK land area in the agricultural sector, the NFU believes that its members are well-placed to capture renewable natural energy flows, while maintaining our traditional role in food production as well as the delivery of other environmental and land management services. It is the NFU's stated aspiration that every farmer and grower should have the opportunity to diversify their businesses and create 'green' jobs by supplying renewable energy services.

Officer response:

Comments noted.

Renewable and Low Carbon Energy

DRAFTLP_412**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

This indicates the potential for large areas of East Cleveland to become industrialised by turbines and small/medium scale solar energy. This is totally unnecessary and would not fit with the Councils stated intention to develop the area for tourism. In respect of solar energy, there are ample brown field sites and commercial buildings/structures where solar panels could be placed. It is important for planners to be inventive in their choice of locations and not opt for green field sites, thus contravening the Council's intention to prioritise the use of brown field sites for development. This should apply to renewable energy as much as housing. Also, all new build housing, commercial and industrial--should come complete with appropriate solar panels. Regarding turbines, the Government's cut back on on shore' turbines and it's agreement to give local communities the final say on siting should prevent this being an issue. Given the current economic climate the proposed renewable energy visitor centre is a non-essential development. There are far more important areas in which to channel the cost of such a centre. It could only be justified if all costs ie building, running, updating of information where met by the renewables industry.

Officer response:

Areas were identified as potentially suitable for wind and solar energy on the basis of the Renewable and Low Carbon Energy Study for the Borough of Redcar and Cleveland (2015). This study identified areas by combining the results of an assessment of technical potential, based on a refinement of the Department of Energy and Climate Change methodology, and a landscape sensitivity assessment. For technical reasons not all brownfield sites are suitable for renewable energy and therefore greenfield sites are also identified, having taken into consideration relevant constraints and landscape sensitivity. It should be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind or solar energy. Site specific assessment and a full planning application will still be required including consideration of cumulative impacts. Reference to a renewable energy visitors centre will be deleted from LS2 as there is uncertainty of the deliverability of this project.

DRAFTLP_37**Full Name:** Cllr Steve Kay**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The Draft Local Plan identifies areas where it is proposed to make wind turbines and solar arrays permissible. There are too many of such sites identified for East Cleveland, which is already scarred by wind turbines. Incredibly, the sites identified for solar arrays are, in many cases, right up to, or very near to, the boundary of the National Park. In my opinion, the sites identified for wind and solar installations should be confined to the former industrial sites near the Tees.

Officer response:

Areas were identified as potentially suitable for wind and solar energy on the basis of the Renewable and Low Carbon Energy Study for the Borough of Redcar and Cleveland (2015). This study identified areas by combining the results of an assessment of technical potential, based on a refinement of the Department of Energy and Climate Change methodology, and a landscape sensitivity assessment. It should be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind or solar energy. Site specific assessment will still be required including consideration of cumulative impacts. Policy SD6 will be updated to add specific reference to protection of the North York Moors National Park within the policy text.

DRAFTLP_101**Full Name:** Miss Carmel Hainsworth**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

How do you define 'small' - is this the size or number of turbines? Present single turbine at Brotton I would define as huge. A concentration of turbines will not attract visitors and will greatly change the nature of the area, making it similar to an industrial landscape rather than pleasant rural and conducive to wildlife. The existing turbines are ugly, especially the one in the Kilton Lane area. Solar development would be preferable as these panels can be landscaped to hide them from general view. Communications - 'drop ins' assume people have knowledge of plan details, they do not unless internet users. Presentations would be more helpful as even 'net info' does not fully explain the Council's plans and motives.

Officer response:

The Renewable and Low Carbon Study for the Borough of Redcar and Cleveland considered turbine height to be the most important determining factor for the assessment of landscape sensitivity, since it is the scale of the turbine which generally defines whether or not it can be accommodated in the landscape. The study defines small wind energy development as one or more turbines, less than 50 m to tip. The number of turbines would also be an important factor in determining the suitability of a development in a landscape and would be considered on case by case basis in accordance with the issues identified in policy SD6, including cumulative impacts and sensitivity and capacity of the landscape. Size definitions for wind and solar energy development will be added to the supporting text of policy SD6. Comments on the drop-in sessions noted.

Renewable and Low Carbon Energy

DRAFTLP_156

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

Loftus Town Council notes the proliferation of areas considered suitable for small scale turbines and for medium and small scale solar development, and believes it is the first time that it has seen such on a map. Members of the Council expressed a preference, in general, for solar arrays over wind turbines, but question (and would be opposed to) the introduction of a solar array as shown in the centre of the Cemetery at East Loftus - this would appear to be an insensitive and inappropriate location.

Officer response:

Comments noted. The Renewable and Low Carbon Study for the Borough of Redcar and Cleveland identified areas as potentially suitable for solar or wind energy by combining the results of an assessment of technical potential and a landscape sensitivity assessment. It should be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind or solar energy and site specific assessment will still be required, including consideration of cumulative impacts. The cemetery was mapped in error as potentially suitable for solar energy and has now been removed.

DRAFTLP_285

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Has it been decided to identify WT sites away from EC and on to industrial areas in the Borough, as these rural areas and communities have already been scarred with a number of WT's? WT's should be located on industrial classified land and the various major objection campaigns from local people have resulted over the last 7 years, to wind farms in rural areas. So given the Government agreement to give local communities the final say on the sighting of these, this shouldn't now be an issue, so will the plan take care of unwanted developments such as these in future and protect the rural communities? Will local communities be given the right to veto wind farms and turbines? Will a minimum separation distance be determined, based on the heights of WT's, from homes, as other councils have done?

Officer response:

Areas were identified as potentially suitable for wind and solar energy on the basis of the Renewable and Low Carbon Energy Study for the Borough of Redcar and Cleveland (2015). This study identified areas by combining the results of an assessment of technical potential, based on a refinement of the Department of Energy and Climate Change methodology, and a landscape sensitivity assessment. It should be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind or solar energy, and that a full planning application and site-specific assessment will be required. Policy SD6 also supports renewable energy developments where they are located in the South Tees and Wilton Industrial areas. The Government Ministerial Statement (June 2015) states that when considering applications for wind energy development, local planning authorities should only grant planning permission if the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. Whether the proposal has the backing of the affected local community is a planning judgement for the local planning authority.

Section/Policy**Policy SD 6****Renewable and Low Carbon Energy**

DRAFTLP_298**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Solar farms should be restricted to non-rural areas, preferably on brownfield sites and placement on infrastructure and industrial/commercial buildings, where visual intrusion is deemed acceptable. There are ample brownfield and industrial sites available and proposed installations on greenfield land and on elevated/high hillsides and the likes, where they are obtrusive and highly visible, should be refused/rejected. Full focus and protection to preventing unwanted industrial type developments and other eyesores being given approval to developers, needs to be in place in EC and in proximity to the NYMNP areas. The EC rural landscape needs fully protecting to maximise its added value potential to the Borough and beyond.

Officer response:

Areas were identified as potentially suitable for solar energy on the basis of the Renewable and Low Carbon Energy Study for the Borough of Redcar and Cleveland (2015). This study identified areas by combining the results of an assessment of technical potential, based on a refinement of the Department of Energy and Climate Change methodology, and a landscape sensitivity assessment. It should be noted that these areas do not provide a definitive statement of the suitability of a particular location for wind or solar energy, and site-specific assessment to ensure the impacts are deemed acceptable. Policy SD6 will be updated to include specific reference to the North York Moors National Park and its setting to ensure that the character and landscape of the National Park is not undermined by potentially visually dominant development around its perimeter.

DRAFTLP_593**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The RSPB welcomes the commitment by RCBC to support and encourage renewal and low carbon energy schemes. Climate change is one of the greatest long-term threats to wildlife, and renewable energy is an important part of the solution to tackling this threat. The RSPB notes the policy wording that we will support appropriate schemes for wind and solar energy where they are located within the South Tees and Wilton industrial area and other suitable areas as identified on the Policies Map. The Policies Map 2016 identifies potentially suitable broad locations for the following type of renewal energy developments: Small scale turbines Medium and small scale solar development Small scale solar development 2.5.1 However, we also note RCBC's decision not to specifically allocate for renewal and low carbon technology within the Local Plan stage and RCBC's intention to amend the policy wording (as detailed within the AA - Table B.4. Consideration of Measures to avoid or reduce LSE) to include the following wording: Sites being brought forward for small and medium scale wind turbine deployment should be subject to survey to assess their use by the bird species that are qualifying interests of the North York Moors SPA and the Teesmouth and Cleveland Coast SPA and Ramsar site. Where the presence of the relevant species is confirmed, an assessment on the relevant bird species, including assessment of the risk of mortality from turbine blade strikes shall be undertaken Whilst any proposal should be subject to robust assessment as described above, we strongly advise that the Council undertake an assessment of the suitability of the broad locations already identified (as they relate to potential impacts upon the interest features of Teesmouth and Cleveland Coast and North York Moors SPA). Please see our separate comments regarding deferral to planning application stage.

Officer response:

Comments noted, this issue will be considered further through the HRA.

Section/Policy**Policy SD 6****Renewable and Low Carbon Energy**

DRAFTLP_147

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Main comment is around identification of suitable areas for small wind turbines and medium and small scale solar developments adjoining the National Park boundary. We understand rationale and logic for approach, however we would ask for some additional policy safeguards to make sure that the character and landscape of the National Park is not undermined by potentially visually dominant development around its perimeter. This is particularly the case with solar panels as Redcar and Cleveland lies to north of National Park and solar arrays would likely to be orientated to the south which could potentially be harmful to the setting of the Park and the public enjoyment of the landscape, particularly when viewed from the higher open areas which characterise the northern part of the Park. We would suggest: Policy SD6 - The 2013 draft included reference to the need to minimise the impact of renewable energy development on the North York Moors National Park at Policy SD6, which has now been removed. We would ask that specific reference to the National Park is reinstated or a cross reference to Policy N1 is made within the policy as this policy does recognise that high importance will be given to protecting the landscape setting, scenic beauty and special qualities of the North York Moors National Park as is set out in the Framework regarding nationally designated landscapes. We would also ask that the policy refers to "The North York Moors National Park and its setting". Reference to impact on recreation is supported.

Officer response:

Comments noted. Policy SD6 will be updated to include specific reference to the North York Moors National Park and its setting to ensure that the character and landscape of the National Park is not undermined by potentially visually dominant development around its perimeter.

DRAFTLP_316

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We support measures to exploit renewable energy sources. However, we also recognise that some renewable energy technologies have the potential to cause serious damage to irreplaceable historic sites, which are themselves an integral part of the wider environmental and sustainability agenda. We therefore welcome the recognition within (d) that the impact on heritage assets and their setting should be considered. This should also include cumulative impacts. High-quality design can play a key role in minimising any adverse effects of projects. Fundamental to achieving high-quality design is a sound understanding of the character and importance of the historic asset involved, whether at the scale of individual buildings and sites or more extensive areas and landscapes. Historic England has produced guidance on the historic landscape and renewable technologies viewable on our website. Given the rapidity with which renewable energy technologies are evolving, renewable energy projects and their associated infrastructure should be reversible where possible.

Officer response:

Comments noted. Supporting text will be updated to state that renewable energy projects and their associated infrastructure should be reversible where possible.

Section/Policy**Policy SD 7****Flood and Water Management**

DRAFTLP_56	Comment summary:	Officer response:
Full Name: Mr Andy Stephenson	Pleased to see that as part of the planning process measures should be taken to assist in the management of water and flood risk. We would encourage consulting with all relevant bodies in determining whether a flood risk exists. Landowners with specific local knowledge should also be consulted as part of the process which we would be happy to help facilitate.	Comment noted. Landowners will be contacted where necessary to assist with identifying particular flood risk issues. However, the Environment Agency flood risk maps will remain the main reference point.
Organisation: National Farmers Union		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: Yes		
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DRAFTLP_459	Comment summary:	Officer response:
Full Name: Andrew Whitehead	We welcome the commitment within this policy to ensuring SuDS is incorporated in the drainage proposals for all new development, unless it can be demonstrated to be inappropriate. SuDS can have beneficial impacts upon biodiversity as well as fulfilling its primary role of drainage management. We also welcome the inclusion of the hierarchy of surface water discharge.	Comment noted.
Organisation: Natural England		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: Yes		
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DRAFTLP_430	Comment summary:	Officer response:
Full Name: Louise Tait	In general, we are in support of Local Plan Policy SD 7: Flood and Water Management. We welcome the following text in Policy SD 7, which encourages drainage from previously developed sites to be as close as reasonably practicable to greenfield runoff rates. For previously developed sites, the peak runoff rate from the development to any drain, sewer or surface water body for the 1-in-1 year rainfall event and the 1-in-100 year rainfall event, must be as close as reasonably practicable to the greenfield runoff rate from the site for the same rainfall event. Water Framework Directive There are a number of waterbodies in Redcar and Cleveland that fail to meet the objectives of the Water Framework Directive. A number of these waterbodies, notably the Tees estuary and Tees estuary (South Bank) waterbodies are heavily modified. Measures to mitigate this historical modification need to be identified and implemented. In this context, we welcome the inclusion of section 2.56 which references the duty to have regard to the Northumbria River Basin Management Plan and the objectives of the Water Framework Directive. We welcome the inclusion of section 2.57. However, we recommend that, in general, all new development should seek to protect and restore the natural channel morphology of watercourses, wherever possible and not only as a measure to deal with flood risk and drainage considerations.	Policy will be amended to require all new development to protect and restore the natural channel morphology of watercourses rather than just the measures to deal with flood risk and drainage.
Organisation: Environment Agency		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: Yes		

Section/Policy**Policy SD 7****Flood and Water Management**

DRAFTLP_181**Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Fully support Policy SD7. We are pleased to see the Council request a 50% reduction in surface water run off on Brownfield sites and peak Greenfield run off rates for Greenfield sites We support this entirely, but would encourage the Council to go one step further and seek to achieve a minimum of 50% reduction in surface water run off as per the Non Statutory Technical Standards for Sustainable Drainage Systems (draft March 2015 DEFRA). Support the requirement for major development to submit a drainage strategy incorporating SuDS where appropriate. Support the statement that drainage systems should not adversely impact on the water environment and should seek to enhance water quality. Para 2.53 states "Before deciding on the scope of a site-specific Flood Risk Assessment, the Strategic Flood Risk Assessment should be consulted along with the Local Planning Authority, Lead Local Flood Authority and the Environment Agency. We feel in this instance we could provide valuable information, particularly around sewer flooding, that could contribute to the Flood Risk Assessment and would welcome engagement from this early stage. We ask that Northumbrian Water is included in the list on consultees required for any site specific Flood Risk Assessment.

Officer response:

NW will be added to the list of consultees. The guidance has been consulted and it does not mention achieving a 50% reduction in surface water run-off. The policy will be amended to reflect the guidance requirements.

Section/Policy**Policy LS 1****Urban Area Spatial Strategy****DRAFTLP_12****Full Name:** mr malcolm croll**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

No comments.

Officer response:

No comments.

DRAFTLP_13**Full Name:** mr malcolm croll**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

No comments.

Officer response:

No comments

DRAFTLP_182**Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

With regard to not only the Local Spatial Strategies policies, but also the Regeneration and Housing site specific policies, we note various references to Flood Risk Assessments and / or Sustainable Drainage schemes. We have concerns that this approach on individual sites may appear inconsistent to the reader and would, by default, encourage developers of sites where it is not explicitly set out to avoid undertaking any flood risk or sustainable drainage studies. We advise the Council to reconsider its approach in these policies and either adopt a more consistent approach throughout all of the site specific development policies on the subject of flood risk and sustainable drainage, or clearly identify in the relevant development chapters why certain sites have been identified for further flood risk and drainage assessment and design and that all development sites should still make full and due regard to policy SD7.

Officer response:

Comments noted. Revisions to the relevant policies will be considered, however, Policy SD7 is clear that all development proposals will be expected to take account of flood risk and that all major proposals will be required to develop a drainage plan.

Section/Policy**Policy LS 1****Urban Area Spatial Strategy****DRAFTLP_579**

Full Name: G M Collins
Organisation:
Agent Name: GVA Grimley Ltd.
Agent Organisation: GVA
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

Policy LS1 sets out the urban area spatial strategy, which includes the area of Normanby. It states that the Council and its partners will aim to: c) develop new housing throughout the Greater Eston area to provide a mix of house types and tenures, including affordable housing and special needs housing, to meet the needs and aspirations of local residents We agree with the Council's aspiration to provide for a mix of house types to meet the needs and aspiration of residents. The allocation and delivery of sites 418 and would assist the Council in achieving this objective, at a location that the Council considers sustainable.

Officer response:

Comments of support are noted. The Council has assessed all sites that are submitted for inclusion into the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and Locational Strategy (SD2)

DRAFTLP_541

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

TW do not object to Policy LS1 and support the Council's regeneration objectives in the urban area but suggest that the Council should place greater emphasis on the delivery of housing in Nunthorpe as one of the most sustainable locations and the strongest market area in the Borough.

Officer response:

Support for the objectives is noted. The sustainability of the Nunthorpe area is acknowledged through Policy SD2 and its inclusion within the Urban Area. This area is at the top of the settlement hierarchy and the focus for new development, with the Council aiming for 60% of all new development to take places in the Urban and Coastal Areas.

DRAFTLP_614

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Whilst Highways England is supportive of the principle of focusing new development within the urban area and the intentions relating to improving connectivity, which focuses on improving sustainable transport provisions. Until we understand the full spatial distribution of development, including the quantum proposed, it will not be possible to determine whether there could be any implications for the SRN as a consequence of this development. As stated in response to Policy SD2, it would be useful to understand how the site allocations identified in Policy H3, along with employment allocations, which are currently not fully understood (as alluded to in the accompanying technical note), contribute to the overall development aspirations for these locations. We would recommend that this is included either within Policy SD2 and / or within these individual spatial strategy policies.

Officer response:

Comments noted. It is not possible to accurately determine the precise level and type of employment development that will take place on the allocated sites. However, the Council will continue to work with Highways England so that the potential impacts can be understood.

Section/Policy**Policy LS 1****Urban Area Spatial Strategy****DRAFTLP_317****Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We welcome the very positive approach to the historic environment evident throughout the spatial strategies. However, the wording of the clauses would be strengthened by referring to the significance of the heritage assets.

Officer response:

Support noted. The clause will be amended to include reference to the significance of heritage assets.

DRAFTLP_27**Full Name:** Mr Ross Anthony**Organisation:** The Theatres Trust**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

The Theatres Trust is pleased the draft plan recognises the importance of safeguarding cultural and community facilities and is supported by a clear description of the term 'community facilities' in the glossary. While 'maintain and, where necessary, enhance sports and community facilities', and 'safeguard and enhance buildings, sites, settings and areas of heritage and cultural importance' do address Para. 70 of the NPPF, we recommend strengthening the policy along the lines of: The council will safeguard and, where necessary, enhance sports and community facilities unless: replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site. This may need a separate policy.

Officer response:

Comments noted. It is considered that the policies within the Draft Local Plan contain sufficient safeguards against the loss of important community facilities in line with the NPPF. Sports and recreation facilities which fulfil a community need are safeguarded through the measures outlined in Policy N3, which include requirements for alternative facilities to be provided or the enhancement of remaining facilities. In addition, Policy ED1 protects services and community facilities, located outside of the centres, where they are important for the day-to-day needs of local communities.

DRAFTLP_532**Full Name:** Cllr Philip Thomson**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

There is reference to a target of Upward Trend in local school exam results. The base line is 2013. Is this not too out of date given the work that is being undertaken currently and Plan will run from 2017. Should the targets not be reviewed annually and we should say this?

Officer response:

The baseline will be updated to the most recent available data, which is now for the 2014/15 educational year. The aim for the plan is to deliver a continued improvement throughout the period and this is reflected in the target. It is not considered, therefore, that the target needs to be reviewed annually.

Section/Policy**Policy LS 2****Coastal Area Spatial Strategy****DRAFTLP_460****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Natural England welcomes the specific reference to the designated sites found within the Coastal Spatial Strategy Area, and the commitment to protecting and enhancing the features of the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar site. We also note the commitment to support the development of new hotels and other visitor accommodation within the Coastal Area this has the potential to increase recreational activity within the designated sites, and thereby increase the potential for disturbance to the interest features of these sites, particularly the birds associated with the SPA, Ramsar site and South Gare and Coatham Sands SSSI, which has been recognised and considered within the accompanying Habitats Regulations Assessment.

Officer response:

Support noted.

DRAFTLP_444**Full Name:** Frances Cunningham**Organisation:** Network Rail**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We support Policy LS 2 Connectivity.

Officer response:

Support noted.

DRAFTLP_356**Full Name:** Mrs T Meadows**Organisation:** Saltburn, Marske and New Marske Parish Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

h. safeguard and enhance Marske District Centre - Useful leverage when objecting to proposed housing development south of Marske ? (Against development of shops/hotels/pubs on the site?)

Officer response:

Comments noted. The south of Marske housing development is subject to a planning appeal and is not part of the emerging Local Plan.

Section/Policy**Policy LS 2****Coastal Area Spatial Strategy****DRAFTLP_542**

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: No

Comment summary:

TW object to the Coastal Area Spatial Strategy on the basis that whilst identifying a number of settlements within the strategy, the Council does not propose to allocate housing sites in all of these settlements, particularly Marske. The Council in Policy SD2 confirm that development will be directed to the most sustainable settlements in the Borough but the proposed spatial strategy does not fully achieve this.

Officer response:

Policy SD2 aims to achieve development in the most sustainable locations through the identification of a settlement hierarchy. It is not considered necessary to allocate housing in every settlement in the Coastal Area in order to achieve a sustainable pattern of development in the Borough.

DRAFTLP_413

Full Name: mr stuart white
Organisation: CPRE
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

There needs to be a significant improvement in the Council's approach to Redcar town centre. At the present time it is a disgrace to the Borough. Much of what has been done was ill-conceived consequently we have under used resources eg The Hub and a rusting vertical pier. Council policies have led to the loss of significant retailers eg M&S and there are too many £ shops and retail outlets selling inferior goods. To add to this Beales, our only departmental store, is for sale. The vast sums spent on the coastal strip"much of it wasted"needs to be matched by a positive attitude to the High Street and its environment by attracting good quality, and varied, retailers. Marske District Centre will not be enhanced by the pending proposal for large development to the south of the town. It will only subject it to urban sprawl and diminish the green wedge/strategic gap between Marske and Saltburn. Consideration should be given to the improvement and development of Skinninggrove as a marine centre for fishing, water skiing and boat trips to enjoy the heritage coast. This would assist the Council's aim to develop the area for tourism.

Officer response:

Comments noted. Policy LS2 sets out the Council's aims to improve and promote the Town Centre as a main service centre. The Local Plan also sets out the Council's support for the principal of tourist development in the East Cleveland and Rural Areas. The proposed development for Marske is part of a separate planning process and is not included within the emerging Local Plan.

DRAFTLP_434

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We advise that reference is made within Policy LS2 with regard to protecting Bathing Water quality within the borough.

Officer response:

The need to protect water quality, including bathing water, is acknowledged in the Local Plan and Policy SD7 includes a requirement for drainage systems to not adversely impact the water quality of receiving water bodies and for new development to seek to improve water quality where possible. Amendments will be made to Policy LS2 to include reference to bathing water quality.

Section/Policy**Policy LS 2****Coastal Area Spatial Strategy****DRAFTLP_318****Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We welcome the very positive approach to the historic environment evident throughout the spatial strategies. However, the wording of the clauses would be strengthened by referring to the significance of the heritage assets.

Officer response:

Support noted. The clause will be amended to include reference to the significance of heritage assets.

DRAFTLP_125**Full Name:** Mrs Catherine Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

stop throwing money at Redcar

Officer response:

Comments noted.

DRAFTLP_26**Full Name:** Mr Ross Anthony**Organisation:** The Theatres Trust**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

The Theatres Trust is pleased the draft plan recognises the importance of safeguarding cultural and community facilities and is supported by a clear description of the term 'community facilities' in the glossary. While 'maintain and, where necessary, enhance sports and community facilities', and 'safeguard and enhance buildings, sites, settings and areas of heritage and cultural importance' do address Para. 70 of the NPPF, we recommend strengthening the policy along the lines of: The council will safeguard and, where necessary, enhance sports and community facilities unless: replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site. This may need a separate policy.

Officer response:

Comments noted. It is considered that the policies within the Draft Local Plan contain sufficient safeguards against the loss of important community facilities in line with the NPPF. Sports and recreation facilities which fulfil a community need are safeguarded through the measures outlined in Policy N3, which include requirements for alternative facilities to be provided or the enhancement of remaining facilities. In addition, Policy ED1 protects services and community facilities, located outside of the centres, where they are important for the day-to-day needs of local communities.

Section/Policy**Policy LS 2****Coastal Area Spatial Strategy**

DRAFTLP_594**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Environment: The RSPB notes the wording contained within this policy in that the Council and its partners will aim to: ab. promote and support the sustainable use of the foreshore and dunes in the South Gare and Coatham Sands SSSI, Redcar Rocks SSSI and the Coatham Marsh Nature Reserve whilst protecting and enhancing the features of the Teesmouth and Cleveland Coast SPA/Ramsar site; and ag. ensure the coastline is managed in an appropriate manner; 3.1.3 The town has an attractive and varied coastal setting extending to include important areas of biodiversity and geological interest. These include the internationally important Teesmouth and Cleveland Coast SPA/Ramsar site, protected by the Habitats Regulations. We welcome consideration of the above within this policy, however, where conflicts exist between potential adverse effects on the integrity of the Teesmouth and Cleveland Coast SPA and current use including recreational access and bait digging, we encourage the preparation of a strategic master plan for the conservation and enhancement of biodiversity. Please refer to Policy SD 2 comments.

Officer response:

Comments noted. The Council is working to develop a Management Plan to address the impact of recreation activities on the SPA and is actively involved in the process of developing a strategic framework for the area around the Teesmouth and Cleveland Coast SPA. The Council will continue to engage with the RSPB during the process.

DRAFTLP_533**Full Name:** Cllr Philip Thomson**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Should there be reference to Town Centre Managers as a Lead Agency? Recent scrutiny of the system left a few questions unanswered about future establishment and the ability to deliver.

Officer response:

Policy LS2 sets out the Council's aims for a strengthened Redcar Town Centre. It is considered that this aim will be best achieved through the cooperation of the multiple parties involved in the management of the centre, including private management companies and the town centre management team.

Section/Policy**Policy LS 3****Rural Communities Spatial Strategy****DRAFTLP_461****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the recognition of the landscape character of the areas peripheral to the North York Moors National Park within this Policy, and the commitment to improving biodiversity and geodiversity assets within the Strategy Area where opportunities arise.

Officer response:

Support noted.

DRAFTLP_151**Full Name:** Mr Paul Fellows**Organisation:** North York Moors National Park**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

The amendment to clarify that green infrastructure routes will be provided into and between the National Park and Guisborough and Nunthorpe is supported. Also the reference to recognise the special character of the landscape in the rural area, in particular the periphery of the North York Moors National Park is supported.

Officer response:

Support noted.

DRAFTLP_28**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Why is RCBC incapable of distinguishing between Carlin How and Skinningrove? SKinningrove is an attractive little village in the valley below, which is doing its utmost to attract tourism. Skinningrove DOES NOT HAVE HEAVY INDUSTRY. CARLIN HOW is the home of the steel works.

Officer response:

Comments noted. Para 3.20 amended to read "The coastal village of Skinningrove nestles in a narrow valley in an area that has become the focus for steel processing and heavy industry".

Rural Communities Spatial Strategy

DRAFTLP_414**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Despite the Council's stated intention to give preference to brown field sites and provide affordable housing it is now conflicting itself by referring to executive housing..in the countryside' which means green field sites. It's quite clear from this that the Council's 'forked tongue' has not gone away! Guisborough has been subjected to massive over development, and the loss of green field sites, without the provision of supportive services, thus applying pressure to those already in place. It is time to call a halt to this continuous expansion. Redcar & Cleveland's population continues to fall therefore there is not the need for the level of housing the Council has in mind.

Officer response:

The Council will prioritise the development of previously developed land through the Locational Strategy (SD2) wherever possible, however, the Council's Strategic Housing Market Assessment 2016 identifies a need to deliver housing to reflect household aspirations which includes a demand for large detached housing. The SHMA also identifies an Objectively Assessed Need for housing of 132 dwellings per year and in order to deliver sufficient housing to enable the retention of additional population, the Council considers that a housing requirement of 234 dwellings per year is appropriate. The allocated sites to meet this housing need are distributed across the borough to deliver a sustainable pattern of development.

DRAFTLP_559**Full Name:** Mr Nick McLellan**Organisation:** Story Homes**Agent Name:** Samantha Ludlow**Agent Organisation:** WYG**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Story Homes supports the aim under Policy LS3a to enhance the role of Guisborough as the principal Rural Service Centre and promote independent businesses including the retail, leisure and tourism sectors, as well as a focus for new housing. Story Homes considers Guisborough to be a highly sustainable settlement in a strong market area that is eminently capable of accommodating further residential development within the Plan period. Based upon the work undertaken by Regeneris which confirmed that an increased OAN over and above that identified within the Draft Local Plan is required, Story Homes considers that at least half of the development proposed within the rural' sub-area must be focused in Guisborough taking into account its role as the main Rural Service Centre. Combined with this, Guisborough is considered to be a sustainable location which is particularly marketable and this is evidenced by the significant number of developments under construction within the settlement that are documented in Table 4 of the Draft Local Plan at paragraph 6.36. To direct further development to Guisborough would be an appropriate approach taking into account paragraph 17 of the NPPF which states that plans should take account of market signals. However, with regard to the East Cleveland towns listed under Policy LS3, Story Homes questions the marketability many of these settlements in comparison to settlements such as Guisborough and, therefore, the ability of these towns to contribute significantly to housing delivery within the Borough. In addition, Story Homes supports Policy LS3k which seeks to promote Guisborough (and East Cleveland) as tourist destinations. It is considered that such an approach is consistent with paragraph 28 of the NPPF where it seeks to support sustainable rural tourism and leisure developments. Story Homes therefore considers that the policy should be amended to make clear that at least half of the development within the rural' sub-area is directed to Guisborough to reflect its role as the main Rural Service Centre within the sub-area.

Officer response:

Comments of support are noted. The Council does not consider it appropriate to introduce a target for development in Guisborough of at least 50% of the development within the Rural Area. It is considered that this approach would impact negatively on the economy and sustainability of the other rural settlements, in particular the East Cleveland Towns.

Section/Policy**Policy LS 3****Rural Communities Spatial Strategy****DRAFTLP_268****Full Name:** Michael Bennett**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Services such as health and education are under strain as a result of increased demands. Whilst the provision of these services is not the direct responsibility of the Council, it is your actions, by concentrating housing development in Guisborough (See Policy LS 3 Sustainable Communities) that are contributing to these problems.

Officer response:

The Council has identified Guisborough as a focus for the development that comes forward in the Rural Area as it is considered to be a more sustainable settlement than others identified within this area. This will include retail, leisure and tourism development in order to boost the economy and services within the town. Guisborough is not identified as a focus for development in relation to the whole borough and Policy SD2 aims for 60% of development to be outside of the Rural Area. It also requires that rural development be appropriate in scale to the settlement in which it takes place.

DRAFTLP_543**Full Name:** Jordan Gresham**Organisation:** Taylor Wimpey (Uk) Ltd**Agent Name:** Mr Steven Longstaff**Agent Organisation:** England Lyle Good**Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Taylor Wimpey object to LS3 on the basis that, as outlined previously, there is no provision for further development in a number of more sustainable lower order settlements within the Borough particularly in New Marske, contrary to the Council's own evidence base. Moreover, LS3 confirms that the Council will aim to, develop new housing of an appropriate scale, with a mix of types and tenures, in suitable rural settlements. On this basis, New Marske should be included in the Coastal Area of the settlement hierarchy and land should be identified in New Marske for future housing development. The Council's decision to restrict new residential development in the most sustainable settlement is not justified and does not accord with the aims of the NPPF. Notwithstanding the above, TW support the identification of Guisborough as the principal rural service centre which should be a focus for new housing.

Officer response:

The comments of support are noted. New Marske has been identified as a rural service village within Policy SD2 as it is considered to have more in common in terms of sustainability with the other settlements in this area than with those included in the Coastal Area. Policy SD2 aims to achieve development in the most sustainable locations through the identification of a settlement hierarchy. It is not considered necessary to allocate housing in every settlement in order to achieve a sustainable pattern of development in the Borough. The Local Plan does not prevent future development in New Marske providing it is appropriate in scale to the settlement and its position within the hierarchy.

DRAFTLP_391**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Pleas Skelton is classified as rural but over-development will result in an urbanised Skelton. Large-scale housing in Skelton is unsustainable and contradicts "new housing of an acceptable scale".

Officer response:

The large scale housing development allocated in the Plan for Skelton is part of a mixed use scheme that will also deliver commercial and industrial development to safeguard the industrial estate and the sustainability of the settlement. The development will be expected to provide a significant landscape buffer, highly accessible community green space and sustainable linkages to the existing settlement.

Section/Policy**Policy LS 3****Rural Communities Spatial Strategy**

DRAFTLP_616

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Highways England is currently generally supportive of the overall spatial strategy for delivering new development within rural communities and the intentions relating to improving connectivity, which focuses on improving sustainable transport provisions. However, until we understand the full spatial distribution of development, including the quantum of development proposed, it will not be possible to determine whether there could be any implications for the SRN as a consequence of this development. As stated in response to Policy SD2, it would be useful to understand how the site allocations identified in Policy H3, along with employment allocations, which are currently not fully understood (as alluded to in the accompanying technical note), contribute to the overall development aspirations for these locations. We would recommend that this is included either within Policy SD2 and / or within these individual spatial strategy policies.

Officer response:

Comments noted. It is not possible to accurately determine the precise level and type of employment development that will take place on the allocated sites. However, the Council will continue to work with Highways England so that the potential impacts can be understood.

DRAFTLP_212

Full Name: mrs christine moulder
Organisation:
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: In Part

Comment summary:

Do not agree that development in Guisborough is appropriate in scale. Agree that tourism should be supported and promoted within the area but I believe that overdevelopment is in danger of damaging the asset we have. Congested local roads, car parks and town centre will not support tourism and the setting of historic areas needs to be preserved. There should be possibilities elsewhere within East Cleveland as well to improve town centres and promote rural tourism.

Officer response:

The Council considers that it has selected the most appropriate sites to deliver housing across the rural area whilst, at the same time, achieving a sustainable pattern of development. Tourism is supported across the rural area.

DRAFTLP_192

Full Name: Mr Gordon Davis
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

Loftus should receive more investment. There is a problem with the movement of people in the borough - something has to be done to stop the influx of undesirables that appear to be coming into what was a very desirable place to live.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy**Policy LS 3****Rural Communities Spatial Strategy****DRAFTLP_157**

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Loftus Town Council welcomes the aim to safeguard steel and engineering industries at Skinningrove; considers that there should be support for commercial premises at North Liverton, as well as at Skelton; welcomes the aim to promote East Cleveland as a tourist destination; considers more needs to be done to improve public transport and connectivity; and supports the environmental aims to enhance heritage and landscape.

Officer response:

Comments noted. It is considered that the Local Plan does as much as it possibly can to support the points raised.

DRAFTLP_154

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Outcome 3 is identified as Improve Quality of Life, and appears to be focussed around the Natural Landscape, Heritage and Transport. Loftus Town Council sees these issues as all being crucially tied into opportunities for economic development. Loftus is a small, deprived but historic urban town situated in a stunning rural environment with geology and archaeology of national importance, access to the coast and to the North York Moors National Park, and the Council had hoped that the Local Plan would enable the sensitive development of tourism/recreation based on these assets to boost the local economy. However, the Plan does not appear to acknowledge the possibility of developing more facilities for visitors in this area. Transport and Accessibility are major problems, with insufficient public transport limiting residents' employment prospects - particularly in Teesport and out towards Whitby, and lack of parking provision limiting the number of potential visitors who stop in the town.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_319

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We welcome the very positive approach to the historic environment evident throughout the spatial strategies. However, the wording of the clauses would be strengthened by referring to the significance of the heritage assets.

Officer response:

Support noted. The clause will be amended to include reference to the significance of heritage assets.

Section/Policy**Policy LS 3****Rural Communities Spatial Strategy**

DRAFTLP_23**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Why is Skinningrove considered Rural and not Coastal? It is even more confusing that you show at the bottom of this section, a picture of the coast in Skinningrove

Officer response:

The Council has divided the Borough into the areas identified within Policy SD2 in order to provide a settlement hierarchy and to encourage a sustainable pattern of development across the Borough. Despite being located on the coast, Skinningrove has been identified within the area named as the Rural Area as it is considered to be more closely related to the other villages identified within this area in terms of sustainability.

DRAFTLP_78**Full Name:** Sarah Moulder**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Do not agree with Guisborough as a focus for new housing. Guisborough has provided a disproportionate number of new houses compared to the rest of the borough. This is showing in high vacancy rates and the number of houses on the market and a drop in house prices. The road structure within the town, it's leisure facilities, schools and health centres are under pressure and many of these houses are still to be built

Officer response:

Comments in relation to the infrastructure of Guisborough are noted. The Council has identified Guisborough as a focus for the development that comes forward in the Rural Area as it is considered to be a more sustainable settlement than others identified within this area. This will include retail, leisure and tourism development in order to boost the economy and services within the town. Guisborough is not identified as a focus for development in relation to the whole borough and Policy SD2 aims for 60% of development to be outside of the Rural Area. It also requires that rural development be appropriate in scale to the settlement in which it takes place.

Section/Policy**Policy LS 4****South Tees Spatial Strategy****DRAFTLP_462****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Natural England welcomes the commitment within this Policy to protecting European sites, and safeguarding and improving areas of biodiversity interest, and the commitment to encouraging integrated habitat creation and management. We also welcome the inclusion of wording to encourage improvements to access, interpretation and wildlife conservation and enhancement across the area.

Officer response:

Support noted.

DRAFTLP_595**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Environment: The RSPB notes the wording contained within this policy in that the Council and its partners will aim to: v. enhance the environmental quality of employment through well planned boundary treatments; x. protect European sites, and safeguard and improve sites of biodiversity interest particularly along the River Tees and the estuary and encourage integrated habitat creation and management; y. enhance the environmental quality of the River Tees and coastline; and aa. encourage improvements to access, interpretation and wildlife consideration and biodiversity across the area. Protection, safeguarding and improving sites with biodiversity interest along the River Tees and the estuary and encouragement of integrated habitat creation and management is supported. However, consideration should be given to potential conflicts between adverse effects on the integrity of the Teesmouth and Cleveland Coast SPA and encouragement of recreational access. This could be achieved through the preparation of a strategic master plan for the conservation and enhancement of biodiversity, please refer to comments on Policy SD 2. 3.31 We welcome the inclusion of the wording within the policy that: Despite a history of industrial development, the River Tees and estuary retain important wildlife sites, in particular the Teesmouth and Cleveland Coast SPA/Ramsar site, protected by the Habitat Regulations. All developments should be considered against the requirements of Policy N4 Biodiversity and Geological Conservation Considerable investment and effort has been made on the part of the RSPB and other charitable organisations to ensure the protection and enhancement of habitats and communities of wildlife in the River Tees and estuary. Please see recommendations for Policy SD2. Please see our separate comments regarding deferral to planning application stage.

Officer response:

Comments of support are noted. The Council is working to develop a management plan to provide measures to address the impact of recreation activities on the SPA and Ramsar site and is actively involved in the development of a strategic framework for the area around the Teesmouth and Cleveland Coast SPA and Ramsar Site. The Council will continue to engage with the RSPB during the process.

DRAFTLP_320**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We welcome the very positive approach to the historic environment evident throughout the spatial strategies. However, the wording of the clauses would be strengthened by referring to the significance of the heritage assets.

Officer response:

Support noted. The clause will be amended to include reference to the significance of heritage assets.

South Tees Spatial Strategy

DRAFTLP_617

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Highways England is currently generally supportive of the overall spatial strategy for delivering new development within South Tees, including at the Tees Valley Enterprise Zone at Wilton International Teesport, at South Tees and Redcar steelworks sites and within the South Tees Industrial Estates and Business Parks, to deliver economic growth. However, as stated in response to the other spatial strategy policies and as identified in the accompanying technical note, until we understand the full spatial distribution of development, including the quantum of development proposed, it will not be possible to determine whether there could be any implications for the SRN as a consequence of this development. Again, we need to understand the overall development aspirations for these location and would recommend that this is included either within Policy SD2 and / or within these individual spatial strategy policies. It is noted that the policy includes reference to improving access links between the South Tees and the strategic road network', and supporting, improvements to the strategic and local road networks to support economic growth'. This makes it even more critical that the potential implications of development within these locations is understood to ensure that the SRN is capable of supporting the desired level of economic growth and that any improvements that are required, have been identified and assessed for their suitability as part of the Plan making process. This approach is supported by Department for Transport, Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development, the principles of which are unchanged within emerging Highways England draft replacement policy, The strategic road network Planning for the future. Circular 02/2013 states that: capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage.' This emphasises the need to ensure that the Plan and its supporting evidence base has robustly assessed the transport and infrastructure needs and any improvements which may need to be delivered to support the Plan's overall development aspirations. Further comment on specific improvements has been provided in response to Policy TA 3.

Officer response:

Comments noted. It is not possible to accurately determine the precise level and type of employment development that will take place on the allocated sites. However, the Council will continue to work with Highways England so that the potential impacts can be understood.

Section/Policy**4****REGENERATION****DRAFTLP_208****Full Name:** Mr Andrew Lombard**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Support the regeneration of Redcar.

Officer response:

Comment noted.

DRAFTLP_234**Full Name:** Paul Barwick**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Include Loftus in the plan and make it a priority. The town is a principal town for Cleveland Potash and should be prepared for fresh families as it is more affordable than Whitby.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_346**Full Name:** Margaret Darcey**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus not included. Why does Skelton, Kirkletahm and Coatham get mentioned/in the plan. Appalling. Make it a more attractive town, more footfall would help/bring new shops to the High Street, and help regenerate Loftus, not just by waiting for funding from the lottery but its about time RCBC spent money on Loftus.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

REGENERATION

DRAFTLP_344**Full Name:** Mr & Mrs Golightly**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

The regeneration of Loftus. Yet again nothing to be done in Loftus. The high street is so run down shops derelict, church on the crossroads in such a run down state needs to be demolished, old bus station asbestos roof needs to be removed for safety. We pay one of the highest council tax in the area, higher than newer houses in nearby villages, where on these estates there are new parks built but Loftus nothing! On Rosecroft Lane we could have a park or a nature reserve soothing for the community to enjoy.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_343**Full Name:** MS VIVIENNE HALL**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Forget the living in Loftus Project this is an easy 'get out' for the Council. RCBC should include Loftus fully in the Draft Plan under Regeneration! Where do I begin! [changes I would like made]. Once a thriving Market town RCBC have left this town to 'Rot'. No growth. No private housing. Closing down of secondary school. Whilst we see other neighbouring towns flourish, I think it is absurd you have not mentioned Loftus in the Plan, how does Skelton need Regeneration they have just had 1 million pound through the lottery fund. Coatham - why? Kirkleatham All we hear is Redcar! Well enough is enough and its about time you looked a little bit closer at Loftus and identified it as an area of beauty, miles from North Yorkshire Moors on route to Whitby, why don't you use this to RCBC advantage and bring back a pretty market town, use RCBC money instead of letting us hope for the heritage fund. We are all high Council tax payers in my area band E & F, its an absolute disgrace you do not plan to regenerate this town. Private housing led Regeneration = new families + footfall shops = thriving town.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_342**Full Name:** Mrs Gillian Purver**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus should be RCBC number 1 priority. Why Kirkleatham, Coatham, Skelton? We have had no money spent on this town ever, we have a lot of beautiful areas, but the high street is an eyesore, plus not new private housing planned which would help businesses and regeneration. Would like to see a better future for Loftus to have it included in the plan. Priority housing (private) led (Wimpey, etc.), regeneration. Successful in Skelton, now our turn. 42 years ago, last large private housing. Private housing + new families + shops surviving on the High Street = better future. Areas that need attention are : The building/ empty shop next to mine on Station Road. The church opposite the traffic lights on high street/ Westfield terrace All the empty derelict shops at the bottom of the high street on the way up to the Market place The gap between the Arlington pub and the houses that used to be a chapel The old bus garage at East Loftus More car parking is needed down the bottom of the high street We need to attract new people into Loftus and we will never do this unless our High Street which is on the main coastal route to Whitby is a lot more pleasing on the eye for people passing through.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

REGENERATION

DRAFTLP_349**Full Name:** Paula Grey**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

The town [Loftus] needs new housing. Shops that are boarded up need attention. Children's play areas need improvement. Leisure facilities.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_260**Full Name:** Leanne Morrison**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus should be included in the plan and regenerated instead of Skelton. Loftus should have: a private housing estate to prepare for the families seeking work at York Potash Sports complex play areas High Street improved- landscaping and car parking

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_256**Full Name:** Mr C Collinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus High Street does not have to be left to rot with boarded up shops. The shops are fine buildings, so spend regeneration money on turning the well built properties into homes. Regenerate Loftus and the High Street.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

REGENERATION**DRAFTLP_252****Full Name:** George Hall**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus should be included in Regeneration policy. Disagrees with Skelton, Coatham and Kirkleatham. Loftus needs investment.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_218**Full Name:** mr michael Lindsey**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Loftus was a thriving town. Now there are derelict shops and buildings which are detrimental to the look of the town. We need to encourage young families to live here by building new affordable homes for them to buy. Redevelop the high street, get rid of the shops from Dodds old shop to the opticians , relocate the existing two businesses. We desperately need more parking spaces. To benefit young people and visitors we could think about, a BMX track and skate park, off road biking and extreme sports, a state of the art play area with climbing wall, all weather 5 a side football pitch, mini golf, a campsite/caravan park, pocket parks and open spaces.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_158**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Loftus Town Council needs to make the Borough Council aware that it has received a lot of adverse comments from residents regarding the identification of just three places, Coatham, Kirkleatham and Skelton, for significant regeneration. The Council notes that there are plans to re-establish horticulture and catering projects and other vocational opportunities for young people at Kirkleatham, welcomes this but considers it must point out the difficulties of accessing Kirkleatham from East Cleveland due to lack of direct public transport - provision of transport would be needed to make these vocational opportunities available to all.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

REGENERATION

DRAFTLP_123**Full Name:** Mrs Elizabeth Garner**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Changes - to stop undesirables getting moved into Loftus. They supposedly have been careful who they've moved into the new Hummersea Estate. Instead, they are letting them move into Private Rented accommodation on West Road, Newcomen Terrace, Dundas Street and Station Road, which is the first impression the public get passing through Loftus. The rubbish in some of the back streets is disgusting especially behind the job centre to Whitecliffe Terrace and over the road behind the pet shop. We also have a problem with dog dirt and rubbish as we love on the snicket going up to Westfield/Hummersea Hills. We have even had needles pushed into our hedge. My husband has to regularly clean it our usually having 2 to 3 sacks of rubbish.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_11**Full Name:** MS VIVIENNE HALL**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Loftus should be included in the Plan to widen aspirations as it needs to be improved. The 15 year vision has no plans to develop it with infrastructure or regeneration or private housing with road networks. Since, 1974 when the Arlington Estate was developed there has only been small pockets of private developments and without major house builders the town will go into further decline. Instead of overfilling Skelton Primary and having a rebuild which is mentioned in the Regeneration section, focus on the schools you have in Loftus and develop private housing around them. There is nothing in the Plan to increase population in Loftus. The development of York Potash should be taken into consideration as it will encourage people to live in the area. A sports complex should be developed alongside the development on the Rosecroft School site and the road network to this location should be improved.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_259**Full Name:** Maria Willis**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The town needs new regeneration. Shops closing that are boarded up. Children need places to go to, parks etc.

Officer response:

The Local Plan supports regeneration across the borough, and the reuse of retail units when they become empty.

REGENERATION**DRAFTLP_299****Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The draft document is very comprehensive covering a myriad of issues and perhaps there needs to be more prioritisation. In terms of the 3 main regeneration areas cited, we believe first priority should be given to Kirkleatham followed by Skelton. The Redcar area has already had a disproportionate spend and new development at Coatham could well have a negative impact on facilities in Redcar which currently is operating below capacity. High priority also is the development of a shipping terminal for polyhalite at Teesport and its further development as a deep water container port. Further industrial development of the Wilton site needs to be encouraged and perhaps linking this with a private road to connect it directly with the port and thereby reducing HGV traffic movements on the main local highways.

Officer response:

The Regeneration policies are not ordered in terms of their priority to the Council, which is committed to delivering regeneration in the 3 areas identified. The Teesport schemes are supported by the Council, and have permissions in place to progress. Wilton continues to be identified for heavy industry and the Council will continue to support its development. There are no proposals for a private road, and no indication of the scheme's deliverability. Therefore, it would be inappropriate to include this within the Local Plan.

DRAFTLP_305**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

When will a Coatham Masterplan document be released which has been referred to since 2010 and further referred to in Redcar & Cleveland Regeneration Masterplan Delivery Plan 2012 -2017?

Officer response:

The Council does not currently have the resources to prepare and deliver a masterplan for Coatham, but will work closely with any interested developers to ensure a suitable scheme is delivered in accordance with the policy.

DRAFTLP_526**Full Name:** Cllr Philip Thomson**Organisation:** Redcar & Cleveland
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

There is to be a requirement of a Brownfield Site register to be compiled. Should there not be reference to this in the Plan? Can we have one in place?

Officer response:

The requirement to maintain a brownfield site register is separate to the Local Plan, under different legislation. A reference will, however, be included within the plan.

REGENERATION

DRAFTLP_246

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Guisborough is a historic town and its cries out for help for sustainability and maintenance. As a market town some of the shop fronts need urgent maintenance and assistance with appearance. The cobbles are in need of maintenance and improvement. If the local authority took some yearly maintenance on and assisted shop owners with advice and where to seek funding perhaps this could be overcome. The purchase of the old town hall by the local authority is to be welcomed and hopefully in the coming years this building will become an inspiration and beacon of what can be achieved with partnership working but only time will tell.

Officer response:

The ongoing maintenance of towns is not a matter for the Local Plan. Your comments will be passed on as appropriate.

Section/Policy**Policy REG 1****Coatham****DRAFTLP_463**

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

This Policy area lies in close proximity to the Teesmouth and Cleveland Coast SPA and Ramsar site, and allocates land for leisure, tourism and visitor uses. It therefore has the potential to lead to increased visitor pressure within the SPA. We note and welcome the inclusion within the Policy of the requirement for any proposal to undertake a screening exercise to determine the need for AA.

Officer response:

Comments Noted.

DRAFTLP_415

Full Name: mr stuart white
Organisation: CPRE
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: No

Comment summary:

The Redcar area has already had a disproportionate spend in comparison to the rest of the Borough, with many of the facilities currently operating below capacity. Development at Coatham could have a negative impact on these facilities and themselves operate below capacity. Consideration needs to be given to re generating other areas of the Borough in preference to Coatham eg Skinningrove

Officer response:

Comments noted. The Council is committed to delivering regeneration across the borough, subject to resource availability. A further policy has been included to reflect the Council's 'Living in Loftus' project.

DRAFTLP_618

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Highways England has no specific concerns at this stage with the principle of development at Coatham, however as already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN. The accompanying technical note provides further detail in this respect.

Officer response:

Comments noted, the Council will continue to work with Highways England as it prepares its Local Plan.

Section/Policy**Policy REG 1****Coatham**

DRAFTLP_596

Full Name:
Organisation: RSPB
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Land at Coatham (8.7 ha) is allocated for a mixed use development comprising leisure, tourism and visitor uses. Any proposal will be required to carry out a screening exercise to determine the need for an appropriate assessment. The Teesmouth and Cleveland Coast SPA and Ramsar site at Coatham has experienced a recent decline in wintering knot and the loss of the breeding colony of little tern. Unmitigated or inappropriate development at Coatham is likely to have an adverse effect on this SPA, because of its proximity and existing combined pressures on its notified bird populations. It is recommended that this policy explicitly includes mitigation, as recommended for Policy SD 2. In an effort to address the effects of coastal change, the second edition of the Environment Agency's Shoreline Management Plan for the River Tyne to Flamborough Head recommended consideration of a transition between the development area and Coatham Sands. This recommendation has not been included in the HRA assessment. Please see our separate comments regarding deferral to planning application stage.

Officer response:

Comments noted. The Council is developing a recreation management plan to provide mitigation for recreation impacts from increased visitor numbers and reference to this will be made in the policy. Further consideration of the issue will be given through the Habitat Regulations Assessment.

DRAFTLP_433

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We would expect a sequential test to be undertaken for the allocation and development of any sites in flood zones 2 and 3. This would include Local Plan Policy allocation REG 1-Coatham (proposed leisure and tourism uses) which is partly located in Flood Zones 2 and 3. We acknowledge and support the reference in Policy REG1 (criterion e) which identifies that where development is proposed in flood zones 2 and 3, proposals should meet the sequential and exceptions tests and be supported by a Flood Risk Assessment.

Officer response:

The SFRA has assessed all potential site allocations to terms of flood risk. The assessment has identified which sites are at risk from flooding and recommended deallocating some sites. This recommendation has been used where 10% or greater of any residential or mixed-use site entailing residential is in Flood Zone 3a. The 10% threshold is not included within any policy, it is merely considered that it may be possible for developers to avoid any flood zone when less than 10% of the site area is at risk. Part of site REG1 (Coatham) falls within Flood Zone 3a. However, only 9.27% of the site is within flood Zone 3a. Therefore, the SFRA does not recommend deallocating or undertaking an Exception Test for this site as recommended by the Environment Agency. Where less than 10% of a site falls within Flood Zone 3a (as in this case) the SFRA recommends that a review of site layout / and or design at the development planning stage is required in order for development to proceed. It should be noted that REG 1 only permits leisure, tourism and visitor uses, which is classed as a less vulnerable use' in the Flood Risk Vulnerability Classification table in the FRCC-PPG, which is allowed in Flood Zone 3a in any case. It should also be noted that a large part of the allocated site in Flood Zone 3a has already been developed, including the boating lake. It is recognised that if the site is developed, a Level 2 SFRA or site-specific FRA would be required to inform on site layout and design. The developer would need to consider the site layout with a view to removing the site footprint from the flood zone that is obstructing development or alternatively to attempt the incorporation of on-site storage of water into the site design. If it is not possible to adjust the site boundary to remove the site footprint to a lower risk zone (for more vulnerable uses), the Exception Test will need to be undertaken and passed as part of a site-specific FRA.

Section/Policy**Policy REG 1****Coatham**

DRAFTLP_29**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part

Comment summary:

The Yorkshire Coast is the whole stretch from Redcar to Whitby and includes Skinningrove and Loftus. Loftus deserves similar treatment to Kirkleatham. It has a market square, Town Hall and beautiful church and a rich history. We don't want tourists to just stop at Kirkleatham.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

Section/Policy**Policy REG 2****Kirkleatham****DRAFTLP_321**

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:

Comment summary:

We welcome and support this policy, and its very positive intention for a conservation-led approach to Kirkleatham. The references to English Heritage in para. 4.16 should now read Historic England, and we will be happy to continue to work with the local authority in delivering conservation-led regeneration in this area.

Officer response:

Comment noted, and change to text will be made.

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

DRAFTLP_438

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:

Comment summary:

Paragraph 4.14 of Policy REG 2: Kirkleatham identifies that opportunities should be sought to restore landscape features such as local watercourses by de-culverting.' We are pleased that this has been highlighted with specific reference to the Kirkleatham area.

Officer response:

The historic watercourses are an integral part of the Kirkleatham landscape, linking the former estate parkland on the south side of the A174 with the village. Taking the opportunity to re-instate these features whilst also meeting SUDS requirements would be a good outcome. However, I believe one issue will be the downstream channels leading north of Kirkleatham, which may also require maintenance.

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

DRAFTLP_416

Full Name: mr stuart white
Organisation: CPRE
Agent Name:

Comment summary:

Any regeneration needs to be sensitive to Kirkleatham's history, buildings and status as a Conservation area.

Officer response:

Of course any development proposals will be considered against policies and established conservation philosophies.

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Section/Policy**Policy REG 2****Kirkleatham**

DRAFTLP_619**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Highways England has no specific concerns at this stage with the principle of development at Kirkleatham, however as already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN. The accompanying technical note provides further detail in this respect.

Officer response:

Highways England's interest only relates to the Highway beyond Greystones roundabout, being the A174.

Section/Policy**Policy REG 3****Skelton****DRAFTLP_43****Full Name:** Miss J Gabbitas**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Was concerned to receive leaflet outlining plans for Homebase type development, McDonalds drive through and units which could be used for unwanted retail opportunities, near Skelton ASDA. Considering R&C in the Draft Local Plan are bemoaning that Redcar and Guisborough should be vibrant towns, why are these type of units built near a 'village' (which R&C class North Skelton and Skelton Green as) being broached. The policy also talks about retaining the 'unique' character of these places. However, Skelton is considered an East Cleveland Town (page 37). Don't think we need a McDonalds or what is starting to be an out of town retail centre. In the Draft Local Plan R&C are proposing 400 houses (200 very soon) and potentially a school near the ASDA site (pgs. 79-81). So why on pg. 116 does it only mention 57 houses to be built in Skelton, Home Farm and Stanghow Road. Despite this, although a massive shame to lose yet another part of the green belt, I have no reservations about new houses or school being built here as long as there is a large amount of Green Space for public enjoyment. So on behalf of myself and other Skelton residents I ask the questions - What are we? What do we want to be? And where do we draw the line?

Officer response:

Pages 78 - 81 refer to the mixed allocation, Policy REG3, which identifies land at Skelton for up to 400 houses (200 of which are expected within the plan period) and commercial uses. Page 116 is a summary of the Policy H3 Housing Allocations. Two of these allocations, Policy H3.26 Home Farm and Policy H3.27 Stanghow Road, are in Skelton and total 57 dwellings. Their separation within the document is a reflection of the different type of allocation, the former being a mixed site, the latter being purely housing allocations. Policy H1 (page 108) does, however, clarify what the housing requirement is and how it will be delivered: 'The minimum requirement will be met through: completions already achieved since April 2015; further completions on existing development sites; the housing land allocations set out in Policy H3; the mixed use allocation set out in Policy REG3 (Skelton); and other sites with residential planning permission'.

DRAFTLP_383**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Site 51 are is incorrect. See attached comments and map.

Officer response:

Land to the west of the Saltburn Lane has been included within the boundary of the allocation, in addition to the land shown within the Skelton and Brotton Neighbourhood Development Plan 2013, as the extended site was promoted through the Strategic Housing Land Availability Assessment in 2014 and was included within R/2014/0762/SC. However, a smaller area of land associated with and including private dwellings on Saltburn Lane has been removed from the allocation.

DRAFTLP_399**Full Name:** Mr and Mrs T Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Site boundary is incorrect and includes private land. No need for further houses in Skelton. Need further school places and the Church Hill development to go ahead - see submission Need to preserve the railway boundary and greens spaces for wildlife and rural character. Evidence of bats in the area.

Officer response:

The Policies Map will be amended to remove the private dwellings from Saltburn Lane from the allocation. The Council considers that there is a need to plan for 234 net additional dwellings a year throughout the plan period and has sought to provide a range of sites across the borough to facilitate a sustainable pattern of growth. The housing allocated through REG3 is part of a mixed-use development that will provide a sustainable development that will provide opportunity for improved quality industrial development. The development will be required to provide an additional school, should a need be demonstrated, a deep planting buffer along the eastern fringe of the site and ecological surveys and appropriate mitigation. The Church Hill development was approved in 2012 as a residential scheme of 262 units and without the inclusion of a school.

Section/Policy**Policy REG 3****Skelton****DRAFTLP_417****Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At present Skelton has a thriving village centre, which will be further enhanced as a heritage village over the next three years following the £1m grant from the Heritage Lottery Fund. This will be supplemented by a further £400,000 from the Council, Wharton Estate and various private grants. It is important that the Council recognises this and supports local business by ensuring that any development along the A174 will not impact on the High Street through loss of trade. Development of the existing industrial estate is important. It is gratifying that new businesses have opened but there is plenty of scope for new build and the occupancy of empty units.

Officer response:

Comments noted. The Council recognises the importance of the Skelton Local Centre and Policy REG3 only supports commercial uses alongside the existing ASDA store where they would not significantly harm the vitality and viability of the Local centre. Any proposals for town centre uses will be required to follow the sequential assessment approach set out in policy ED1 and be supported by an impact assessment where they exceed the threshold.

DRAFTLP_620**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Highways England has no specific concerns at this stage with the principle of development at Skelton, however as already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN. The accompanying technical note provides further detail in this respect.

Officer response:

Comments noted.

DRAFTLP_390**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Does not agree with provision of school on the site. Permission granted for school at Church Hill which is more suitable than an Industrial estate expansion area.

Officer response:

The Church Hill development is a residential scheme of 262 units that does not include the provision of a new school. A school will be provided on the allocated site only if it is considered necessary to provide sufficient school places to support the housing development and to ensure that additional housing does not lead to a deficiency in school places in the Skelton area.

Section/Policy**Policy REG 3****Skelton****DRAFTLP_389****Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

requests professional evidence that neighbouring properties will not flood after the development and compensation is needed. Development should be mindful of SSSI to the north.

Officer response:

Comments relating to the SSSI are noted. The Council's Strategic Flood Risk Assessment (2016) considers that the layout and design of the scheme should be developed to take account of areas of flood risk but does not recommend removal of the site from the Plan. A planning application for development on the site will be expected to be accompanied by a site specific flood risk assessment to demonstrate that it does not increase flood risk elsewhere. A sustainable urban drainage system will also be required.

DRAFTLP_388**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

4.33 - " some level of contamination and/or ground stability issues". Geological and historical land use: mine entrance and immediate vicinity is a potential weakness and relevant surveys required.

Officer response:

Comments noted. The policy acknowledges the presence of mine workings and requires ground surveys and any necessary mitigation to be provided.

DRAFTLP_386**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Supportive of improvements made to Skelton Industrial Estate but want focus to be on utilising brownfield before the development of greenfield. Concerned that development of the extension site first will result in vacant Industrial Estate premises.

Officer response:

The Redcar and Cleveland Employment Land Review (2016) considered that the number of vacancies on the existing Industrial Estate has been influenced by deficiencies in the quality of the buildings available on the existing site and take up on the estate is expected to remain at modest levels. It is considered that the proposed mixed use allocation will assist in the retention of an industrial offer in Skelton as it will make land available for commercial and industrial development that would allow for the provision of modern units of an appropriate size to encourage potential users. This may then allow the redevelopment of the existing site in the longer term.

Section/Policy**Policy REG 3****Skelton****DRAFTLP_385****Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

4.25 - Site is not all agricultural land, as referred to in para. as private home and garden is included in the site. See attached map and comments.

Officer response:

Comments noted. The area of land associated with and including the private dwelling has been removed from the allocation.

DRAFTLP_384**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Site 51 boundary incorrectly includes respondents land - see attached comments Green space, as outlined in the policy, is essential. Due to the location of the mine entrance, we agree that suitable and extensive surveys are necessary prior to the submission of development applications.

Officer response:

Support for requirements for green space and ground investigations noted. Land to the west of the Saltburn Lane has been included within the boundary of the allocation, in addition to the land shown within the Skelton and Brotton Neighbourhood Development Plan 2013, as the extended site was promoted through the Strategic Housing Land Availability Assessment in 2014 and was included within R/2014/0762/SC. However, a smaller area of land associated with and including private dwellings on Saltburn Lane has been removed from the allocation.

DRAFTLP_134**Full Name:** Skelton Farming Limited**Organisation:****Agent Name:** Emma Williams**Agent Organisation:** How Planning**Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Allocation of REG 3, is strongly supported, as development will contribute to sustaining economic growth in Skelton. Site will be important source of housing supply which will help meet residential needs of the Borough. The western part of the site will be utilised as a long term strategic site for residential development comprising up to 400 dwellings, as well as highly accessible green space. A masterplan for residential development (western part of site) is being prepared and is intended that outline planning application will be submitted in early 2017. It will propose long-term strategic housing development (up to 400 dwellings), which will complement commercial developments within the immediate locality. Previous consultation on draft Masterplan for site was positively received by local residents and stakeholders. At a pre-application meeting with RCBC in 2014, it was agreed that should planning permission be granted, the permission will remain valid for a period of 9 years in order to ensure the site is able to deliver housing in the long-term. SFL has no objection to the provisions of policy REG 3. However policy states that site will be expected to deliver 200 dwellings within the Plan period. Whilst the site may be unable to deliver the allocated 400 dwellings within this timeframe, we ask that the Council considers introducing an element of flexibility to the policy so that it does not preclude any additional and appropriate development from coming forwards at the site within the Plan period should this be necessary in order to meet the Borough's housing needs.

Officer response:

Comments noted. While the Council expects that the site will only be able to deliver approximately 200 dwellings within the plan period, due to outstanding commitments in Skelton, Policy REG3 does not prevent an increased rate of delivery should circumstances change and the western area of the site is allocated for up to 400 dwellings.

Section/Policy**Policy REG 3****Skelton**

DRAFTLP_128

Full Name: Julie Wright
Organisation: Skelton & Brotton Parish Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The roads around Skelton Industrial Estate and Pheasant Fields Lane desperately need addressing as they are in a terrible state of repair. The roads through Skelton Industrial Estate are used by local residents to access Asda. This use will increase with the new retail development. Not everyone accesses the site via the bypass. To visitors from outside the area who may be accessing companies within the Industrial Estate, or potential new owners of Industrial Estate Units the roads are not a very good advertisement for the area, and could dissuade potential businesses from settling up in Skelton. They may decide to set up elsewhere.

Officer response:

The roads are in a variety of multiple ownerships and, as such, the Council is not able to make improvements to them.

DRAFTLP_387

Full Name: F and L Collings
Organisation:

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Agree that residential development should not take place until existing commitments are completed. Do not consider that additional dwellings are needed in Skelton in the short to medium term. The Church Hill development and school must be completed before approving large scale housing.

Officer response:

Support noted. The Church Hill development is a residential scheme of 262 units that does not include the provision of a new school. The construction of this development is progressing and it is expected that the construction of the housing on the allocated site will commence only in the later stages of the existing development.

Section/Policy**Policy ED 1****Protecting and Enhancing the Borough's Centres****DRAFTLP_183**

Full Name: Northumbrian Water
Organisation: Northumbrian Water Ltd

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: Yes

Comment summary:

It should be recognised in policy that economic development also has a duty to manage surface water and policies relating to it should encourage the integration of SUDS as the housing policies do.

Officer response:

Policy SD7 requires major development to include SUDS in drainage schemes, where appropriate, and will apply to all types of development including industrial and town centre uses.

DRAFTLP_621

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Highways England is generally supportive of this policy and the use of the sequential assessment approach in accordance with the provisions within the NPPF. Consequently, we do not currently have any concerns with the approach for new main town centre uses, including future retail and leisure development, provided that it is delivered in accordance with the proposed impact assessment. Measures to maintain and enhance access to the centre by sustainable modes of transport, and encouraging multi-purpose trips as included in criteria j.' can also be particularly supported, where these contribute towards maintaining and enhancing the vitality and viability of the town and district centres.

Officer response:

Support noted.

DRAFTLP_464

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

This policy sets out a hierarchy of centres within the Borough and implies a sequential assessment as per the NPPF favouring locations within existing centres. We welcome the inclusion of this Policy to enhance town centres, as this may relieve some of the pressure from visitor numbers on the designated sites which lie outside of the central areas.

Officer response:

Support noted.

Section/Policy**Policy ED 1****Protecting and Enhancing the Borough's Centres****DRAFTLP_322****Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the reference to promoting the re-use of vacant buildings, especially those of heritage value and at risk.

Officer response:

Support noted.

DRAFTLP_159**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

The Council notes the reduced area of the defined District Centre in Loftus, and the aspirations to encourage a diversity of use and to bring upper floors back into use - if delivered, these could enhance the aesthetic appearance of the Centre, which should address some concerns of residents.

Officer response:

Support noted.

DRAFTLP_88**Full Name:** Jill Christie**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

I am happy to support the boundary changes to the business centre of Loftus.

Officer response:

Support is noted.

Section/Policy**Policy ED 1****Protecting and Enhancing the Borough's Centres**

DRAFTLP_30**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Guisborough is nearly as far from Loftus as it is from Redcar. It is time RCBC stopped thinking about "jewels in crowns" and provided Loftus with (more entertainment, perhaps?) but certainly facilities that befit a staging post into the tourist areas of the Yorkshire Coast and the North York Moors.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_450**Full Name:** Edinburgh House**Organisation:****Agent Name:** Nick Diment**Agent Organisation:** GL Hearn**Submission type:** Letter**Agree with section?:** No**Comment summary:**

welcome the establishing of a retail hierarchy and recognition that Redcar town centre is the principal centre in the Borough they are concerned that as drafted the Local Plan requires any increase in floorspace of a Centre by 10% to undertake a Retail Impact Assessment (along with out-of-centre development). This is contrary to the town centre first approach and the advice set out in the NPPF. In any event this threshold does not appear to be backed up by an up-to-date evidence base. As drafted, this places in and out-of-centre development on the same sequential basis. The imposition of an in centre impact threshold will add further to the constraints of bringing forward town centre development and result in increasing pressures to bring forward edge and out-of centre sites. ED1 seeks to ensure that the extended PSA (which now includes Regents Walk) as shown on Policies Map 1 will be the focus for A1 uses, where at least 75% of units will be retained as A1. Such an approach fails to recognise: that centres are more than just A1 retail; and the changing requirements of occupiers. The justification for the A1 retention threshold appears to be based upon maintaining the status quo (para.5.9) and not a detailed assessment of Redcar town centre's health. Further consideration should be given to the positive benefits arising from allowing greater flexibility in the PSA which could include reducing the number of vacancies. Furthermore, such a blanket approach across the PSA ignores the changing role of such frontages within Redcar and prevents frontages responding to changing occupier demand. It also prevents the ability of complementary non A1 uses co-locating, creating interest and a sense of place.

Officer response:

A threshold for a Retail Impact Assessment for in centre development is considered to be necessary in order to protect the viability of other centres in the catchment for the development. The threshold of 10% of the centre floorspace will allow larger developments to proceed without an RIA than in areas outside of the centres. The Council considers that this is inline with the town centre first approach in the NPPF. The PSAs are intended to allow flexibility for a range of uses within the centres, while providing a means of safeguarding the retail function, and are considered to be inline with para.23 of the NPPF. The thresholds set within ED1 have been set with regard to the Town Centre Study 2016.

DRAFTLP_3**Full Name:** Mrs Joyce Charlesworth**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Need to have a proper Tourist Information Centre in the middle of Redcar High Street even if there is one at the Beacon as the Beacon is not suitable when the wind is off the sea. A central site would encourage more people to find out what is happening in the town or close by plus should have information about our parks and what is available in them.

Officer response:

Comments noted. While Redcar no longer has a dedicated Tourist Information Office, tourist and contact information and is available in both the Hub and the Redcar Beacon, which are located on the sea front and easily accessible to visitors.

Section/Policy**Policy ED 1****Protecting and Enhancing the Borough's Centres**

DRAFTLP_404**Full Name:** Eric George Allinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Agree. But too late for Loftus as many empty properties.

Officer response:

Support for ED1 noted. The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_449**Full Name:** Edinburgh House**Organisation:****Agent Name:** Nick Diment**Agent Organisation:** GL Hearn**Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Welcomes the preparation of a new Local Plan and the recognition of the role the centres play in contributing to the local economy, the commitment to protect the vitality and viability of Redcar town centre and extending the PSA to cover Regent Walk. Has concern that ED1 and ED2 are not consistent with the NPPF and that the plan as a whole does not adhere to the town centre first principle of the NPPF.

Officer response:

Support is noted. The Council considers that policies ED1 and ED2 are consistent with the NPPF and the town centre first principle as outlined in response to comments 450 and 451.

DRAFTLP_15**Full Name:** Mr Paul Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Loftus highstreet needs to be part of the master plan for regeneration, once a bustling market town that was very simmlar to Guisborough it is now a shadow of its former self. The Library side of the high street needs turning back into housing down to the traffic lights crossroad with any businesses relocated to either the marketplace or just past the traffic lights, a ban on further fast food outlets should be put into place and absent lanlords should be held to task for the state of the properties they have left behind.

Officer response:

The Draft Local Plan has reduced the extent of the Loftus District Centre boundary significantly from the previously adopted plan in order to provide a more focussed centre with less vacant units. This will encourage new businesses to locate within or closer to the market place area, although existing businesses will be able to continue trading from their established locations. Policy ED3 seeks to prevent an over-proliferation of hot food takeaways in the borough's centres and these restrictions apply in Loftus District Centre. In addition, the Council is seeking to achieve improvements to Loftus centre through the Living in Loftus programme.

DRAFTLP_255

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Shop fronts and the appearance/design of Westgate need improving. This includes the cobbles which have been ignored for decades in certain parts of the town. The local authority must work in partnership with businesses to improve the appearance of shop fronts, increase foot-fall and tourism.

Officer response:

Comments noted. The Local Plan sets out planning policies for the borough, rather than spending plans. The overarching aim is to ensure appropriate development in all parts of the borough. The Council has an adopted Shop Fronts and Advertisements SPD to ensure that development relating to commercial property is well designed and Policy SD6 requires future developments to be designed to a high standard. Policy LS3 sets out the Council's aim to enhance the role of Guisborough as a rural service centre and to promote businesses and tourism.

Section/Policy**Policy ED 2****Cleveland Retail Park****DRAFTLP_118**

Full Name: Mr Martin Coleclough
Organisation: Middlesbrough Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

The Council is supportive of this policy which seeks to prevent non-bulky goods retailing at this location. The Council welcomes the recognition in paragraph 5.15 that designated centres in Middlesbrough should be protected from further permissions for non-bulky goods retail at Cleveland Retail Park.

Officer response:

Support noted.

DRAFTLP_622

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Highways England has no particular concerns with this policy and new development at Cleveland Retail Park, provided that it is delivered in accordance with the sequential assessment approach and retail impact assessment set out in Policy ED1.

Officer response:

Comments noted.

DRAFTLP_451

Full Name: Edinburgh House
Organisation:

Agent Name: Nick Diment

Agent Organisation: GL Hearn

Submission type: Letter

Agree with section?: No

Comment summary:

Policy ED2 - Cleveland Retail Park is not allocated as a town centre and should not be afforded policy protection. Bulky goods should be directed to the edge of Redcar Town Centre.

Officer response:

Comments noted. However, Cleveland Retail Park is a site that was originally developed specifically for bulky goods retail and its appropriateness for this use is long established. There has been increasing pressure for the removal of restrictive conditions and additional development to facilitate non-bulky goods retail at the park. Policy ED2 seeks to resist any further moves towards non-bulky goods retailing that will increase the draw of the park for retail spend and impact upon the viability and vitality of designated centres. Edge of centre sites will be given preference above Cleveland Retail Park for non-bulky A1 use, in line with ED1.

Section/Policy**Policy ED 2****Cleveland Retail Park**

DRAFTLP_63

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Page 88 Typo The words the' and 'both' need transposing in the first sentence.

Officer response:

Comments noted. 5.15 amended to read "In order to protect the designated centres within both the borough and Middlesbrough.."

DRAFTLP_239

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Point 5.14 - non-bulky goods comparison retail doesn't read right.

Officer response:

Comments noted. Para. 5.14 amended to read "non-bulky comparison goods retail"

Section/Policy**Policy ED 3****Hot Food Takeaways**

DRAFTLP_240

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Can we go further in the light of the Gateshead and Newcastle new Local Plans and SPDs?

Officer response:

The Council has considered options for restricting hot food takeaways and evidence linking takeaways to obesity has been provided by Health Improvement Commissioning Lead. It is proposed to provide reference to these links and advice to applicants within the policy text.

Section/Policy**Policy ED 4****Retail Development on Industrial Estates and Business Parks****DRAFTLP_465****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the inclusion of this policy, which is essentially a change of use policy and will promote redevelopment of brownfield land.

Officer response:

Support noted.

DRAFTLP_119**Full Name:** Mr Martin Coleclough**Organisation:** Middlesbrough
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Middlesbrough Council has concerns with regard to criteria (a) and (c) of this Policy. Criteria (a) guides bulky goods retail to industrial estates and business parks if it cannot be accommodated in existing town or district centres or the edge of such centres. It is recognised that under Policy ED1 an impact assessment for development over 500 sq.m would be required for locations close to Middlesbrough. Notwithstanding this requirement, it is implicit in Policy ED4 that industrial estates are an appropriate location for bulky goods retailing, which could make it difficult to resist inappropriate bulky goods retailing in such locations. The Policy also appears to be run counter to Policy ED6 Protecting Employment Areas, which seeks to safeguard industrial estates and business parks for B1, B2 and B8 uses. Criteria (c) allows small scale retail up to 200 sq.m. in any one unit on industrial estates. Whilst there is no objection to an individual unit being converted to such use, the Policy as currently worded does not reflect the cumulative impact of such proposals. As such, a new local centre could effectively be created by a number of adjoining units being converted over time, with potentially detrimental impacts to existing local centres in both Boroughs. The Council would respectfully request that Policy ED4 is amended to overcome the above concerns.

Officer response:

Comments noted. Policy ED4 does acknowledge that industrial estates can be a sustainable location for bulky goods retail but the policy maintains the sequential approach of the NPPF and protects from an loss of important employment land. It is considered that this approach will allow inappropriate proposals to be resisted. Criteria a to be amended to overcome conflict with ED6. Criteria c amended to allow small scale retail and food uses only when there is a deficiency in this use within the area.

Advertisements

DRAFTLP_466**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Light pollution can have a negative effect on nature conservation (particularly bats and invertebrates). Therefore we would urge consideration of the effects where illumination is proposed' upon protected species.

Officer response:

Comments noted. However, local planning authorities are only able to control the display of advertisements in the interests of amenity and public safety. The Local Plan seeks to protect biodiversity through Policy N4.

Section/Policy**Policy ED 6****Protecting Employment Areas****DRAFTLP_467****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the recognition within this Policy that some of the employment areas are in close proximity to designated sites, and the requirement within the policy wording to ensure that adverse effects on the interest features of the Teesmouth and Cleveland Coast SPA and Ramsar site can be avoided, and mitigation measures secured where appropriate. HRA Natural England welcomes the recommendation to remove Bran Sands Lagoon from the allocations within Policy SD3 and ED6, and agree that this would remove the potential for these policies to have an adverse effect on the integrity of the Teesmouth and Cleveland Coast SPA and Ramsar site. We also welcome the recommendation that the wording of Policy ED6 be amended to include the requirement for a buffer and suitable boundary treatment to avoid the potential to disturbance to Coatham Sands, and agree that implementing this amendment will remove the potential for adverse effect on integrity as a result of this policy.

Officer response:

Comments noted. ED6 will be updated in accordance with the HRA recommendations.

DRAFTLP_401**Full Name:** Eric George Allinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Agree

Officer response:

Support noted.

DRAFTLP_341**Full Name:****Organisation:** West Midlands Metropolitan Authority Pension Fund**Agent Name:** David Staniland**Agent Organisation:** Knight Frank LLP**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

It is interesting that the Draft Local Plan (May 2016) includes a site at Kirkleatham Business Park (Policy H3.19) for 550 dwellings, which was not previously included and is currently allocated as a protected employment area, as was its proposed allocation in the abandoned Local Plan Policies Map (September 2013). Policy ED 6 (Protecting Employment Areas) of the Publication version of the abandoned Local Plan (July 2014) safeguarded up to 343ha of land for the development of specific industrial sectors and a further 64ha for general industrial uses, including the entire Kirkleatham Business Park site. It is interesting that these land areas have been removed from Draft Policy ED 6 (Protecting Employment Areas) in the Draft Local Plan (May 2016). Whilst it is understandable that the 343ha for specific industrial sectors would require a revision following the closure of the Tata/SSI steelworks site, it would appear that the land area (previously 64ha) for the general industrial uses has been removed for the Council's convenience, given the list of sites identified is the same. Clearly this land area will have reduced significantly, given 23ha is now proposed for residential development at the Kirkleatham Business Park site.

Officer response:

The updated Redcar and Cleveland Employment Land Review (2016) found that there was a surplus of general employment land to meet identified needs in the Redcar area, and in other parts of the Borough. In accordance with the NPPF planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The supporting text to ED6 will be updated to reflect the current situation on employment land need.

Section/Policy**Policy ED 6****Protecting Employment Areas**

DRAFTLP_597

Full Name:
Organisation: RSPB
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Land and buildings within existing industrial estates and business parks will continue to be developed and safeguarded for general industrial and business uses (B1, B2 & B8 uses). Some of the above general employment sites lie adjacent to, or are within, the proximity of protected landscapes and nature conservations sites. Where appropriate, proposals will need to demonstrate that there will be no significant adverse impact on the integrity of the Teesmouth and Cleveland Coast SPA and Ramsar site, or other European designated nature conservation sites either alone or in combination with other plans and programmes. Any necessary mitigation measures must be secured in advance of the development in order to meet the requirements of the Habitat Regulations. Development up to the boundary of the Teesmouth and Cleveland Coast SPA and Ramsar site and in sensitive surrounding areas is unlikely to meet the requirements of the HRA, through likely displacement effects on adjacent land, which include high tide roosting and loafing areas at the landward edges of the site, and through loss of functional areas beyond the designated area, which support notified bird populations. It is likely that difficulties would be encountered identifying and securing suitable mitigation for any such adverse effects. There is a need to identify potential adverse effects on the integrity of the Teesmouth and Cleveland Coast SPA, which should include in-combination effects, and other designated sites and secure any necessary mitigation measures in advance of development. This could be better met through a strategic master plan for the conservation and enhancement of biodiversity assets potentially affected by the local plan, including identification of strategic mitigation for development allocations; please see recommendations for Policy SD2. 5.37 The River Tees and its estuary contain a wildlife site of European importance, protected by the Habitats Regulations. This site is known as the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar site and consists of several different but supporting habitats, many of which are located close to industry. Where appropriate, proposals will need to demonstrate that there will be no significant adverse impact on the integrity of protected sites, alone or in combination with other development, plans or projects. The wording no significant adverse impact should be replaced with no adverse effects

Officer response:

Comments noted. Paragraph 5.37 will be amended as recommended. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process.

DRAFTLP_310

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Are the brown field sites mapped out for industrial expansion?

Officer response:

Sufficient land has been identified and allocated in the Local Plan and Policies Map to meet the needs for economic development within the Borough. The reuse of previously developed land is promoted through relevant policies in the Local Plan.

Section/Policy**Policy ED 6****Protecting Employment Areas**

DRAFTLP_209**Full Name:** Mr Andrew Lombard**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

would like to see any environmental impacts from Sirius Mine development transport through to new dock addressed in the plan.

Officer response:

Impacts from the development have been addressed through the planning application process.

DRAFTLP_160**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The Council notes that land at Skinningrove will be developed and safeguarded for heavy industry, and that Land at North Liverton Industrial Estate will be developed and safeguarded for general industrial uses - the Council welcomes this, but would ask how the Borough Council intends to deliver this aspiration for development and safeguarding, and would suggest that more flexibility is needed, possibly increased boundaries or additional sites which could be used, in order to permit the economic development which is needed in this area of high Employment deprivation.

Officer response:

The Redcar and Cleveland Employment Land Review 2016 found no additional need for employment land in these areas. The Council will however safeguard the sites for employment uses through the Local Plan.

DRAFTLP_623**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Highways England has no particular concerns with the principle of safeguarding the existing employment sites identified for general industrial and business use. However, to reiterate, it will be necessary to understand the scale of future development within these locations to ensure that consideration is given to the implications for the SRN and any measures which may be required to mitigate any potential severe impacts on the operation or safety of the network.

Officer response:

Comments noted. It is not possible to accurately determine the precise level and type of employment development that will take place on the allocated sites. However, the Council will continue to work with Highways England so that the potential impacts can be understood.

Section/Policy**Policy ED 7****Cleveland Gate Mixed Commercial Development**

DRAFTLP_247

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The Cleveland Gate mixed commercial development on Rectory Lane utilising the old Esco site and further improvements on Springwood Road are welcome but as a town we need more inward development for jobs, growth and leisure. This will not be easy to achieve but we need to be out there advertising what Guisborough has to offer through what it cannot offer right now. There must be openings here for the right companies but as a local authority we need to highlight this. As one of the many gateways to the National Park on the North Yorkshire Moors we also require more hotel/B & B accommodation. There is a desperate need for this.

Officer response:

Comments noted. Policy ED9 Leisure and Tourism Development supports leisure and tourism development, including tourist accommodation.

DRAFTLP_624

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

At this stage it has not been possible to consider the implications of future commercial development at this location. However, it will be necessary to understand whether there could be any potential impact resulting from development in this location either individually or cumulatively alongside the Plans other development aspirations, as and when further detail is provided in relation to the Plans overall spatial development aspirations.

Officer response:

Comments noted. The Council will continue to work with Highways England so that the potential impacts can be understood.

Section/Policy**Policy ED 8****Rural Economy****DRAFTLP_57**

Full Name: Mr Andy Stephenson
Organisation: National Farmers Union

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Welcome the support for the rural economy both in terms of infrastructure and also the expansion of high speed broadband networks, including 100% high speed network coverage, which will ensure rural businesses are not disadvantaged by their location.

Officer response:

Support noted.

DRAFTLP_161

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

The Council considers the promotion of rural leisure and tourism developments to be essential, including accommodation, catering and leisure opportunities.

Officer response:

Comments noted.

DRAFTLP_468

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

We welcome the inclusion within this policy of the commitment to avoiding impacts and losses from development on areas of best and most versatile agricultural land.

Officer response:

Support noted.

Section/Policy**Policy ED 9****Leisure and Tourism Development****DRAFTLP_150**

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

reference to the North York Moors in subsections (f) and (g) is supported

Officer response:

Support noted.

DRAFTLP_162

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

The Council is disappointed that there is no specific mention of Loftus, with particular reference to the archaeological and geological assets at Street House, Hummersea and the Alum works. There are aspirations to see if these can be developed, and a visitor facility with interpretation and possibly reconstruction of prehistoric and roman settlements, and the concern is that ED8 and ED9 as worded may not support this potential activity. Particular care would be needed due to the proximity of the Heritage Coast, but this sort of project has been delivered sensitively in other areas, and should not be ruled out for rural East Cleveland.

Officer response:

The policy supports leisure and tourism development throughout the borough, including the rural areas in criterion g.

DRAFTLP_560

Full Name: Mr Nick McLellan
Organisation: Story Homes

Agent Name: Samantha Ludlow
Agent Organisation: WYG

Submission type: E-Mail

Agree with section?: No

Comment summary:

In line with the comments made previously in respect of Policy LS3 (Rural Communities Spatial Strategy) Story Homes supports the intention of Policy ED9e to improve the leisure and tourism offer of Guisborough as a market town destination and a gateway to North York Moors National Park. It is considered that such growth will be complementary in respect of the need to grow the settlement and taking into account the role of Guisborough as the principal Rural Service Centre in the borough.

Officer response:

Support noted.

Section/Policy**Policy ED 9****Leisure and Tourism Development****DRAFTLP_89**

Full Name: Kate Barber
Organisation: Loftus Accord
Walking Group

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Insufficient attention has been given to our hopes to develop Loftus as a tourism centre for visitors to use the walking opportunities. Much more flexibility is needed.

Officer response:

The policy supports leisure and tourism development throughout the borough, including the rural areas in criterion g.

DRAFTLP_17

Full Name: Mr Paul Wilson
Organisation:

Agent Name:
Agent Organisation:

Submission type: Web

Agree with section?: No

Comment summary:

redcar, coatham, kirkleatham, guisborough, what a surprise!!!

Officer response:

The policy supports leisure and tourism development throughout the borough, including the rural areas in criterion g.

DRAFTLP_16

Full Name: Mr Paul Wilson
Organisation:

Agent Name:
Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

Like every page of your consultation, more money on Redcar. I would like to propose that the whole planning department comes to live in Loftus and then maybe you wouldn't have such a tunnel vision!

Officer response:

The policy supports leisure and tourism development throughout the borough, including the rural areas in criterion g.

Section/Policy**Policy ED 9****Leisure and Tourism Development****DRAFTLP_4****Full Name:** Mrs Joyce Charlesworth**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Tourist office in central Redcar. Don't know if there is one at the Beacon but a centrally placed office/shop would be better

Officer response:

Comment noted. Policy supports leisure and tourism develop throughout the Borough.

DRAFTLP_296**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland Community Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Is there a Tourism manager in post to drive a new overriding tourism plan? Tourism in EC must be a 'jewel in the crown' opportunity to massively increase the earnings potential for the council and many of the businesses that service this sector and provide associated local employment opportunities. Safe public and private access to EC needs improving and car parking and other public needs, would need to be improved and visually any industrial intrusions and eyesores need to be addressed, to soften the landscape and not industrialise it any further. There must not be any overt industrialisation (e.g. wind turbines/solar installations) which would reduce the attractiveness of the rural areas of EC Full focus and protection to preventing unwanted industrial type developments and eyesores being given approval to developers, needs to be in place in EC and in proximity to the NYMNP areas. What potential do you see for expanding marine sector developments along the EC coast line? Focus should be given to develop say Skinningrove as a marine 'centre of excellence', for fishing/diving/water sports and possible destination boat trips to and from Whitby and Redcar. Can the LP be drawn up to enhance EC, by removing areas previously and already identified for industrial type developments in rural areas? Are new 'coast to coast' or 'down the coast' routes for walkers and cyclists starting or ending at say Saltburn, envisaged to be in the LP? Saltburn is an ideal key destination for starting and finishing. Is collaboration with Scarborough BC and others, to attract growth in tourism to the Borough being implemented in the plan, to promote coastal growth and provide much needed associated employment opportunities?

Officer response:

The Local Plan supports the growth of tourist industry in East Cleveland through Policy LS3 and the Council will work collaboratively with other relevant bodies to progress the actions identified in the Visitor Destination Plan 2014. Appropriate marine development, such as the suggested centre at Skinningrove could be supported by the policies in the plan if brought forward by developers. The Local Plan supports proposals to improve infrastructure and seeks to protect the landscape of the borough, including East Cleveland through the Local Spatial Strategies and Policy N1. Industrial areas in East Cleveland, protected through Policy ED6 or allocated in REG3, are considered important to support the economy of the borough and the Council intends to retain the protection for these areas. A coastal access route north and south of Saltburn is existing and open as part of the England Coast Path, which is a long distance coastal trail around England created by Natural England. The Local Plan proposes measure to improve accessibility within and beyond the borough through Policy TA3.

DRAFTLP_418**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Potentially it is benefit to the Borough that it is able to offer visitors a wide variety of attractive coastal and inland landscapes. Therefore, it is important that the Council gives some priority to the development of tourism through the provision of tourist facilities and a wide ranging advertising programme. This should not be restricted to the important sites eg NY Moors, Heritage Coast but cover other attractive areas within the Borough. The overriding priority for East Cleveland is to tap into its tourist potential through the provision of tourist facilities and associated employment. It requires an infrastructure giving improved access yet done sensitively without detracting from the rural tranquillity. There must not be any overt industrialisation eg turbines, or solar panels which would reduce the attractiveness of the area. The afore mentioned development of Skinningrove would be a good starting point.

Officer response:

The policy supports leisure and tourism development throughout the borough.

Section/Policy**Policy ED 9****Leisure and Tourism Development**

DRAFTLP_469**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Natural England welcomes the inclusion within the policy wording of the need for leisure and tourism developments to carry out a screening exercise to determine whether there will be a need for appropriate assessment under the Habitats Regulations. We do, however, query the basis of the 16km buffer proposed? We also note within the supporting text relating to this policy the recognition that recreational disturbance impacts may already be occurring within the SPA and that with further developments possible further cumulative impacts may occur. The production of a Recreation Management Plan to manage these impacts is an approach supported by Natural England, and we would be happy to comment on this document as it is produced.

Officer response:

A 16km buffer was included in the plan on the recommendation of a previous Appropriate Assessment. Policy will be updated to reflect the latest HRA of the Draft Local Plan which recommends a buffer of 6km based on local evidence.

DRAFTLP_598**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The RSPB notes the decision that the Council has taken to extend the distance set to determine the need for an Appropriate Assessment (16km) arising from this policy. We also note the wording within section 5.54: It is recognised that some Natura 2000 sites, such as the Teesmouth and Cleveland Coast Special Protection Area, are already impacted by recreation and, given the potential for leisure and tourism development coming forward near these sites, some degree of cumulative impact is possible. Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of a Natura 2000 site, either alone or in combination. It is likely that a Recreation Management Plan will be required that sets out the measures that will be adopted to ensure that increased recreational pressure arising from the proposed development will not have a significant effect on a Natura 2000 site. It is our opinion that where the SPA is already being adversely affected by recreation, without mitigation, any further development is likely to result in further detrimental effects. Any mitigation from a Recreation Management Plan must ensure no adverse effects on the SPA. This could work as part of a wider strategic master plan for the conservation and enhancement of biodiversity and planning for strategic mitigation to support development in the borough.

Officer response:

Comments noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process.

Section/Policy**Policy ED 11****Caravan Sites and Tourist Accommodation**

DRAFTLP_163

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

The Council is supportive of provision of additional caravan and camping accommodation, particularly touring caravan and camp sites, in the interests of economic development, provided that this is sensitively located and screened. The Council considers that, whilst the Heritage Coast must not be spoiled, good promotion and access to it is needed.

Officer response:

Support noted.

DRAFTLP_470

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

We welcome the recognition for potential impacts on European sites as a result of this policy, and again query the basis for the 16km buffer proposed?

Officer response:

A 16km buffer was included in the plan on the recommendation of a previous Appropriate Assessment. Policy will be updated to reflect the latest HRA of the Draft Local Plan which recommends a buffer of 6km based on local evidence.

DRAFTLP_599

Full Name:
Organisation: RSPB
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Please see our comments regarding Policy ED9 Leisure and Tourism

Officer response:

Comments noted. The Council is actively involved in a collaborative process for the preparation of a strategic framework for development and habitat conservation in the area around the Teesmouth and Cleveland Coast SPA and Ramsar site, which aims to ensure that the development proposed in this area is compatible with conservation aims. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process.

Section/Policy**Policy ED 12****New Hotel and Guest House Accommodation****DRAFTLP_31****Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

The Loftus area needs support regarding hotel And B + B accommodation. Given encouragement, Loftus and area could make an excellent base for people to enjoy the outdoors and our stunning scenery and it would help the Walkers are Welcome strategy.

Officer response:

Comments noted. Policy and paragraph 5.68 will be amended to make clear that accommodation is supported in suitable areas throughout the borough.

DRAFTLP_164**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Loftus Town Council considers, based on consultation with residents and guests, that there is a need for more visitor accommodation of all levels, but in this rural area particularly Bed and Breakfasts and Holiday Cottages, and this should be actively supported, and not specifically directed just at Redcar and Saltburn. Visitors wanting to visit not only Redcar and Saltburn but also Whitby and the North York Moors could find this accommodation particularly useful.

Officer response:

Comments noted. Policy and paragraph 5.68 will be amended to make clear that accommodation is supported in suitable areas throughout the borough.

DRAFTLP_248**Full Name:** Cllr Bill Clarke**Organisation:** Redcar & Cleveland
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

As one of the many gateways to the National Park on the North Yorkshire Moors we also require more hotel/B & B accommodation. There is a desperate need for this.

Officer response:

Comments noted. Policy and paragraph 5.68 will be amended to make clear that accommodation is supported in suitable areas throughout the borough.

Section/Policy**Policy ED 12****New Hotel and Guest House Accommodation**

DRAFTLP_471**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

This policy directs new hotel accommodation towards Redcar and Saltburn in particular. Sites within Redcar have the potential increase visitor numbers to the SPA and its surrounds. While some protection is offered by Policy ED 9, and the requirement within that policy for leisure and tourism activities to undertake a screening exercise to determine the need for AA, it may be beneficial to explicitly state this again within Policy ED 12.

Officer response:

Comment noted. Add requirement to undertake screening exercise.

Section/Policy**Policy ED 13****Equestrian Development**

DRAFTLP_600**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note RCBC's recommendation that consideration be given to amending the policy wording (as detailed within the AA - Table B.4. Consideration of Measures to avoid or reduce LSE) as follows: Consider whether policy wording can be incorporated into Local Plan (or other RCBC policy and /or byelaws) to manage equestrian use of SAC and SPA habitats, particularly at sensitive times of the year. The RSPB endorses this approach, which could be incorporated into the aforementioned strategic master plan (See our separate comments regarding SD2 Locational Policy)

Officer response:

Comments noted. The Council is committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site and will continue to engage with the RSPB during this process. The policy will be amended to reflect this commitment.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_184**Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

Within policy H1 & H3 it is noted RCBC have committed to the delivery of 234 new homes a year within the region as a minimum target. It is noted that within the Local Plan the phasing of sites is not mentioned and that presently there is no requirement for any form of phasing plan for larger developments. When a site comes forward for planning permission in order to accommodate that site we may have to upgrade our infrastructure. So that development is not delayed it would be very beneficial for us to have a predicted phasing plan of larger sites at the earliest opportunity, this would ensure that we can upgrade our infrastructure at the right time to accommodate development. A suggestion would be to make it a requirement for any site of 250+ dwellings to submit a phasing plan as part of their planning submission.

Officer response:

Comment noted. An indicative delivery schedule is included at Appendix 4.

DRAFTLP_205**Full Name:** KCS Developments**Organisation:****Agent Name:** Mr Phil Jones**Agent Organisation:** Nathaniel Lichfield & Partners**Submission type:** Letter**Agree with section?:** No**Comment summary:**

Redcar and Cleveland Strategic Housing Market Assessment (SHMA) calculates the Borough's objectively assessed need (OAN) for housing during 2015-2032 is 132 dwellings per annum. equivalent to 2,256 net additional dwellings across the plan period. Within the Council's Housing Land Supply and Allocation Background Evidence Paper (June 2016) the Council recognises the need to retain the Borough's working age population, in order to assist with objectives to increase employment, stimulate economic growth, reduce dependence ratios and rebalance the population profile. As such H1 sets out that a net minimum requirement of 234 net additional dwellings per annum. NLP's most recent calculations indicate that Redcar & Cleveland Borough Council is unable to demonstrate a 5 year housing supply. The provision of approximately 200 dwellings at Windy Hill Farm would therefore provide an important contribution towards achieving this supply.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period. The Council's latest Five Year Housing Land Supply Assessment was updated in September 2016. The Council estimates the deliverable supply at 7.3 years for the period 2016/17 - 2020/21.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_165

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Loftus Town Council would like to see additional housing development, supported by suitable infrastructure, within Loftus Parish.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period. To include sites within the plan, there needs to be evidence that they are deliverable and developable. There are currently viability issues in a number of areas including Loftus where development is unlikely to come forward until viability improves.

DRAFTLP_38

Full Name: Cllr Steve Kay
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

The proposed annual house-building target should be reduced by 20%.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_506

Full Name: Mr Mark Gabriele
Organisation: Bellway Homes (NE Division)
Agent Name: Shaun Cuggy
Agent Organisation: Barton Willmore
Submission type: E-Mail
Agree with section?: No

Comment summary:

Whilst, our Client does not object to the proposed requirements at this time, they have concerns over two elements of the policy wording which relate to the proposed 20% buffer and the review mechanism should a five-year housing land supply not be maintained. Wording needs to be made clearer and accurately reflect the requirements of paragraph 47 of the National Planning Policy Framework (NPPF). The use of around 20%' is ambiguous and subject to interpretation, potentially allowing the Council to have a substantially smaller buffer, therefore undermining the proposed flexibility and continuous supply of available hosing land during the plan period. NPPF requires that planning authorities should increase the buffer to 20% in circumstances of persistent under-delivery. As such, we request that the policy wording is amended to remove the reference to around' 20% in order to guarantee the supply of available housing land. Secondly, the final paragraph of Policy H1 states that if it becomes apparent that a five-year deliverable supply cannot be evidenced, the Council will work with landowners and the development industry in seeking to address the shortfall. Our Client does not consider that this approach is robust enough to ensure that appropriate land is identified to address any shortfalls and believe that only a partial review of the Local Plan, as advocated by paragraph 153 of the NPPF, would allow more sites to be identified as appropriate and suitable for development in the short term. In addition, the policy wording should also acknowledge that if a five year hosing land supply cannot be demonstrated, then the relevant housing policies would be considered out-of-date. Our Client fully supports the representations prepared by the HBF and in particular the comments they have made in relation to policy Policy H1 Housing Requirements.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

DRAFTLP_580

Full Name: G M Collins
Organisation:
Agent Name: GVA Grimley Ltd.
Agent Organisation: GVA
Submission type: E-Mail
Agree with section?: No

Comment summary:

It is clear that the OAN for Redcar and Cleveland has been independently assessed through a number of Inquiries and Inspectors have repeatedly concluded that a) job growth is likely to be significantly in excess of that put forward by the Council b) that the local labour force is likely to fall under the Council's OAN likely meaning recession and stagnation of local businesses c) the OAN is likely to be in excess of 350 dwellings per annum. Furthermore, the SHMA, on which this iteration of the Local Plan is based, has been found, at inquiry, to be lacking in several regards. It is untenable that this evidence can be used to support a housing requirement significantly lower than concluded independently at inquiry. The housing requirement should be revisited and increased to respond to the significant criticism levelled at it through the aforementioned appeals and as a result of this further sites should be identified to meet the higher level of need. Whilst these were S.78 appeals and are not necessarily determinative for the Local Plan, it is nevertheless compelling Inspector decisions. Indeed no Inspector has found an OAN of 234 acceptable.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Housing Requirements

DRAFTLP_569

Full Name: Mr Ben Stephenson
Organisation: Persimmon Homes Teesside Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

In line with HBF representations, Persimmon homes wish to re-iterate the following comments in respect of the Council's identified housing requirement: - We believe there is scope for considering an increase to household representation rates (HRRs) particularly amongst younger age groups. Given the Government is actively trying to boost home ownership, particularly amongst younger age groups it is likely HRRs may once again increase in the future. - NPPF is clear housing and economic strategies should be aligned. Whilst 2016 SHMA discusses the TVU Strategic Economic Plan there is no analysis of the likely level of jobs growth that could be achieved by the resultant housing figure. TVU estimates that the share of jobs in Redcar & Cleveland will be 215 jobs per annum. It is recognised that some of these jobs are intended to be taken up by existing working age population but there is no analysis of the amount of jobs which will be required to be filled by migrants to the area. This is particularly important given the significant bias towards an older population in the borough. - While we support a housing target in excess of the OAN and which would reverse the trend of declining population, given recent completion rates over the last 3 years, we do not consider the plan to be sufficiently aspirational. There is clearly pent up demand following years of under-delivery and the plan should aim to build on momentum by uplifting the housing target to an 'aspirational but realistic figure'. We therefore advocate a higher figure above 234 dwellings which should be informed by the above matters and align with the level of completions recently achieved in the borough. In terms of supply the plan identifies 4,682 dwellings over the plan period against a requirement of 3,978 units. We therefore acknowledge and support the Council's approach of identifying a 20% buffer to provide 'choice and competition' in the market. As part of any revised housing target we would expect this buffer to be maintained in line with recommendations from the Local Plan Expert Group.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Housing Requirements

DRAFTLP_561

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

Policy H1 sets out a minimum requirement of 234 net additional dwellings for the Plan period from 2015/16 to 2031/32. This has been set above the Objectively Assessed Need' (OAN) figure of 132 dpa that is identified within the Strategic Housing Market Assessment (SHMA). The supporting text to the policy at paragraph 6.8 (Table 3) considers the annual housing requirement of 234 dwellings to represent a sustainable population growth' option. Story Homes has commissioned Regeneris Consulting to undertake a review of the proposed housing requirement in the Draft Local Plan. Regeneris have recent experience of working within Redcar and Cleveland and were engaged in respect of an inquiry at Longbank Farm, Ormesby (Ref: APP/V0728/W/15/3108546) in early 2016. In this instance, the Inspector agreed with the Regeneris OAN evidence and stated in the Decision Notice of 09 March 2016, that: I am persuaded on the balance of probability that the OAN figure of 355 dpa is the more robust figure. Regeneris have now prepared a review of the Council's evidence base and this is attached at Appendix 2. This review raises a number of concerns with regard to the evidence base and these include, but are not limited to, the following points: There is no evidence base underpinning the 234 dpa scenario nor any of the rejected scenarios. The only evidence base relates to the 132 dpa; There is no analysis of the jobs growth nor the labour force growth that underpins the 234 dpa scenario. This is a major admission as elsewhere the Local Plan outlines specific goals to generate jobs and prosperity; The Council's SHMA concludes that no economic adjustment is required which is not aligned with other Council objectives to promote economic growth. Regeneris have subsequently undertaken their own modelling of the Borough's OAN. This modelling adopted a starting point of 103 dpa between 2015 and 2032 (based on the very latest 2014-based population and household projections), with a modest market signals uplift of +15 dpa along with an average jobs growth of +132 jobs per annum based on an extrapolation of past trends. This jobs growth figure is higher than the most recent economic projections but substantially lower than those of recent years and, as such, is considered to represent a fair and robust view of future economic performance. The result of the economic adjustments made by Regeneris is an OAN of 349 dpa. Regeneris therefore conclude that: If the Council were to pursue the 234 dpa scenario it would simply serve to constrain the predicted potential for economic growth in Redcar and Cleveland. The constraint would be even more severe under the 132 dpa OAN scenario. Story Homes therefore considers that the net minimum requirement of 234 additional dpa over the Plan period is insufficient to meet the actual OAN, which it considers to be the 349 dpa identified by Regeneris, for the Borough. This means that the housing allocations set out in Policy H3 will be insufficient to meet the housing needs of the Borough and, by extension, the Council will be required to make further allocations to meet the increased number of dwellings required across the Plan period. As such, it is clear that the Council's evidence base is flawed and the fact that an independent Inspector has recently supported the OAN evidence presented at appeal by Regeneris (and updated as part of this submission) lends further weight to this view. To proceed with the plan-making process with such a key flaw in the evidence base is at odds with the requirement of the NPPF at paragraph 47 to use their evidence base to ensure that their Local Plan meet the full, objectively assessed needs for market and affordable housing and it is not considered that the Plan could reasonably be found sound on this basis. Story Homes therefore considers that the Draft Local Plan is unsound and that a comprehensive review of the OAN methodology is required before the Plan can be progressed any further. Story Homes notes that, in the case that a five-year deliverable supply cannot be evidenced, the Council will work with landowners and the development industry in seeking to address the shortfall. While a proactive approach to addressing under-supply is welcomed, it should be noted that paragraph 153 of the NPPF recommends that Plans are reviewed in whole or in part to respond flexibly to changing circumstances. As such, Story Homes considers that reference should be made within Policy H1 to the potential triggers for a Plan review in order to ensure consistency with the NPPF. In line with this, these triggers should be included within the Implementation Plan/Monitoring Framework at Appendix 1. Story Homes therefore considers the policy to be unsound as it is not based upon robust evidence. In order for the policy to be made sound, Story Homes considers that the Council should seek to; (a) review

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Housing Requirements

its evidence base; and (b) revise its OAN figure in an upward direction to reflect the robust analysis undertaken by Regeneris and appended to this document.

DRAFTLP_551

Full Name: Mr Chris Munro
Organisation: Homes and Communities Agency
Agent Name: Mr Phil Brock
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

We do not support the phasing delivery schedule (Appendix 4) referred in policy H1. The schedule misses the opportunity to deliver key sites in sustainable locations in the early plan years. With particular reference to the 23ha of land the site' at KBP, the schedule suggests delivery of 15 units within the first 5 years (the site coming on line in 2020/21) with 50 units a year being delivered in the next 10 years until 2030/31 and 35 units in 2031/32. The HCA are keen to bring forward the delivery of this site within the early plan years to provide housing in a sustainable location within the development limits immediately adjacent to Redcar. As such they have commissioned significant technical assessment, and commercial market advice, to confirm the sites suitability, availability and deliverability see response to Policy H3.19 below. As part of this work an illustrative masterplan has been prepared, informed by commercial agents, to set out a number of key development principles, including the development of housing cells to work with the topography and site features, and the development of buffer planting along the western boundary to help integrate development within the wider setting. On this basis it has been confirmed the Site could be developed for around 550 residential units, with associated open space which includes provision for Sustainable Urban Drainage. The masterplan includes the provision of development to be both built in phases but also accommodate more than developer at any one time. The Site is available to deliver, is within single ownership and there are no known land use or other constraints that would prevent this from being fully developed. On this basis the allocation of this site for housing would represent a valuable contribution towards the Council's housing land supply in the early plan years within a sustainable location within the development limits and adjacent to the main urban area of Redcar. The phasing delivery schedule set out in Appendix 4 would seriously prejudice the opportunity the Site presents and defer development unnecessarily. The HCA are currently in the process of developing an outline application proposal on a speculative basis given their commitment to bring forward the site for housing and create a level of market certainty on which to commence site marketing. In consultation with their commercial advisers the HCA provided a submission to the Council's Strategic Housing Land Availability Assessment (SHLAA) in April 2016 and confirmed anticipated delivery as follows Years 1-5 150 units Years 5-10 250 units and Years 10-15 150 units. However, since that time the work towards the submission of an outline planning application has progressed and a potential programme has been developed. The HCA target an outline application submission in autumn 2016, hope to secure a planning determination in early 2017 and subject to gaining approval would look to procure the delivery of the development, following contract agreements with house builder (s), from April 2018. On this basis we consider the project could deliver as follows Years 1-5 100 units Years 5-10 250 units and Years 10-15 200 units. We consider this a realistic delivery of the site and this should be reflected in the Council's schedule of delivery at Appendix 4 accordingly to ensure the benefits of the delivery of the site are maximised in the early plan years and help contribute to the Council's 5 year housing land supply.

Officer response:

We note your comments. The delivery schedule has been to help demonstrate a continuous 5 year supply through the plan period, rather than being a restrictive phasing plan. There is nothing to stop this site coming forward more quickly and, indeed, speedy delivery is something we would support. Should a planning application be forthcoming, and a developer be identified, the Council will consider updating the delivery schedule to reflect a more ambitious level of delivery.

Housing Requirements

DRAFTLP_516**Full Name:** Theakston Estates**Organisation:****Agent Name:** Neil Westwick**Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The proposed delivery of a net minimum requirement of 234 net additional dwellings per annum (dpa), as set out in Policy H1, is not justified and would result in a Plan that is unsound and not positively prepared as it would not meet the full OAN. We enclose an up-to-date review of the proposed housing requirement, as well as independently modelled OAN. The report explains the flaws in the Council's OAN approach, which appears to be reliant on methodologies rejected by Inspectors at appeal. The result of economic adjustment in the Regeneris report is an OAN of 349dpa. To pursue the 234pa, will constrain economic growth and would be inconsistent with NPPF objective to significantly boost the supply of housing. We therefore request that the Council undertakes a detailed review of its OAN to set a minimum requirement which we would expect to be at or above 349dpa.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

DRAFTLP_419**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Until this Draft is approved the Council remains vulnerable to speculative builders. 6.1 It is important that the Council meets the needs of all age groups, not just those of working age. 6.2 The working age population will continue to reduce due to the lack of jobs in the area. It will not be encouraged to stay simply by the provision of the right houses in the right places. The Council needs to work hard to encourage business of various types into the area if it is to have any chance of at least maintaining the present population level. 6.3 Too many developments have gone ahead without the provision of any of these facilities, or even within close proximity. This puts pressure on existing, over-stretched, resources. Therefore, there is a need to address this issue when considering developments of any size. 6.5 This indicates that the Council needs to increase the number of bungalows being built and reduce the number of detached executive properties. 6.6 If household growth is estimated at 121 households per annum why do we need 234 additional dwellings per annum? The rejected Option 3 would appear to be more appropriate. 6.13 How is this going to be achieved? Where will the jobs come from to attract this increase?

Officer response:

The Council plans to meet the needs of its ageing population, including the delivery of bungalows on specific sites identified in the plan. However, the Council also has a strategic aim to grow its population by more than the current official projections, with a particular focus on working age households and families. The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_210**Full Name:** mrs christine moulder**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

SHMA Table 3.1 -Vacancy rate in Guisborough is 9.9%. This is higher than the national average, Redcar and Loftus and should have some commentary in the SHMA and Plan and makes the policy of increasing the number of dwellings in Guisborough questionable. SHMA 3.16 - Trends in housing if Guisborough need to be investigated before the Plan is finalised -These are loss of jobs at Boulby/SSI, 5 ongoing Guisborough developments and a loss of house prices and increasing vacancy over the last 6 months. SHMA pg 58 - states increasing population when it is actually decreasing. Policy H3 - calculation of residual number of houses should be more transparent. I cannot find anywhere in the plan a list of completions between the start date 1/4/2015 and 31/3/2016. From the difference between planning permissions and completions remaining in Guisborough at 31/3/2016 it looks as though approx 72 houses were completed in 2015/16. How is it possible to be sure these have been taken into account? The total for the borough at 4682 is significantly more than 17 years at 234 dwellings per year minimum requirement so I assume this is where the 20% buffer comes in. In view of the fact that there is already an ambitious population increase target applied to get to a figure of 234 dwelling p.a. an additional buffer of 20% seems excessive. Given decline in population the ambitious figure for population growth does not appear achievable -my concern is that by identifying sites for such ambitious growth the damage to greenfield sites is effectively already done because developers will home in on the easier greenfield sites in 'desirable' areas. Is it not possible to plead special circumstances when assessing housing need for RCBC as it is one of the few local authorities with a steadily declining population? How will housing needs be reviewed and how often? Will other 'trigger' events between reviews eg large employer movements, housing market changes such as oversupply, price drops, vacancy rates initiate action?

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period. The initial property trawl for the SHMA incorrectly included all premises within a sub-area (including residential, commercial and retail) rather than just residential dwellings. When compared against the list of occupied dwellings, this has artificially increased the reported vacancy rate in sub-areas such as Guisborough, which have higher proportions of non-residential properties. In June 2016, the proportion of long-term (more than 6 months) empty homes in the Guisborough sub-area was 1.4%, which is the same proportion as the boroughwide average.

DRAFTLP_544**Full Name:** Jordan Gresham**Organisation:** Taylor Wimpey (Uk) Ltd**Agent Name:** Mr Steven Longstaff**Agent Organisation:** England Lyle Good**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Taylor Wimpey strongly object to draft policy H1 on the basis that the suggested housing requirement is not based on a robust evidence base. Fundamentally, TW do not believe that the draft Local Plan is consistent with national planning policy guidance in that it does not plan for the Borough's objectively assessed housing needs nor does it seek to significantly boost housing supply, a key requirement of the NPPF. Moreover, it does not tie into the Council's own Corporate Plan and Regeneration Strategy. Therefore, the Council need to identify a significant number of additional housing sites to ensure that the full correctly calculated OAN is met. This is evidenced in the accompanying review undertaken by Regeneris Consulting. In line with the Regeneris analysis, TW consider that the Council must plan, as a minimum, to meet its objectively assessed housing needs of 349 dpa across the plan period. The Council's current approach will serve to constrain the predicted potential of economic growth in Redcar & Cleveland contrary to the clearly defined aims of the Draft Local Plan. It is acknowledged that 2016 SHMA suggests that the Redcar & Cleveland area can be described as self-contained in term of housing. However, the apparent lack of cross boundary discussions is particularly worrying in view of the Council seeking to adopt an extremely low housing requirement. This further highlights that the OAN and proposed housing requirement are incorrect and have not been formulated in line with the PPG guidance and best practice. Taylor Wimpey would suggest that the interrelationship of the housing markets and migration patterns between the two Boroughs must be considered in setting the housing requirement. As it stands not only are Redcar & Cleveland failing to meet the housing needs in their own Borough but as a result of their approach they are likely to place pressure on neighbouring authorities to meet the excess demand. Notwithstanding the above, TW support the provision of a 20% flexibility buffer as suggested in previous representations. The approach is sound and aligns with the recent recommendations from the Local Plan Expert Group.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Housing Requirements

DRAFTLP_292

Full Name: Matthew Good
Organisation: Home Builders Federation Ltd
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

The expression of the requirement as a net minimum is supported. In terms of the evidence supporting the housing requirement we consider that further work is needed and that a higher overall requirement would be justified. Demographic Starting Point Since the publication of the SHMA the population and household projections have been updated. In the case of Redcar and Cleveland the 2014 based projections are broadly similar, although slightly lower than their 2012 counterparts. Given the uncertainty surrounding unattributable population change (UPC) within Redcar and Cleveland the HBF agrees that the 2012 SNPP remain the most valid starting point. The HBF consider that there is scope for considering an increase to HRRs particularly amongst younger age groups. This is because as noted by the PPG the household projections do not take account of policy interventions by Government or previous under-delivery (PPG ID 2a-015). Given that the Government is actively trying to boost home ownership, particularly amongst younger age groups, it is likely that HRRs may once again increase in the future. Market Signals The HBF agrees that many of the market signals analysed within the 2016 SHMA would not appear to warrant a significant uplift upon the demographic starting point. It is, however, agreed that an uplift is required to take account of constrained supply (2016 SHMA, paragraph 5.11). It is, notable, that updated evidence on affordability indicates a worsening trend between 2013 and 2015 within Redcar and Cleveland (CLG live table 576). This is an indicator of market stress and hence an uplift above 10% may be justified. Economic Adjustment 20. Whilst discussion upon the Tees Valley Unlimited Strategic Economic Plan (SEP) jobs growth figure is provided in the 2016 SHMA there is no analysis of the likely level of jobs growth that could be achieved by the resultant housing figure. The Tees Valley Unlimited Management Group estimates that the share of new jobs in Redcar & Cleveland will be 215 jobs per annum. It is recognised that some of these jobs are intended to be taken up by the existing working age population but there is no analysis of the amount of jobs which will be required to be filled by migrants to the area. This is particularly important given the significant bias towards an older population within the Redcar and Cleveland. The NPPF is clear that housing and economic strategies should be aligned, this lack of analysis is considered a failing in the existing evidence base and should be rectified prior to the next stage of consultation. Housing Requirement The HBF supports the Council in choosing a housing requirement which is in excess of the stated objectively assessed housing need. The Council's approach is justified in order to fulfil the NPPF requirements to plan positively and boost significantly the supply of housing. Recent housing completions (2014-15) also indicate a demand for new housing within the area. The Council's chosen option, 234dpa, would reverse the trend of a declining population. However, whilst the challenges facing the authority are recognised the HBF does not consider the chosen requirement to be sufficiently aspirational. It is noted that over the last 3 years completions have averaged 250dpa. This shows the pent-up demand for new properties in the area. To build upon the recent delivery successes and reverse the trend towards a declining population it is recommended that a figure somewhere above 250dpa be considered. The exact level will need to be gauged based upon the identified needs for in-migrants to take up the jobs anticipated within the Tees Valley Unlimited SEP. A figure above 250 would be more aspirational and yet still realistic given the levels of delivery recently experienced. Supply The HBF is supportive of the Council identifying a 20% buffer to the supply. This is considered a pragmatic approach and accords with the recent recommendations from the Local Plan Expert Group. Monitoring The final paragraph of the policy considers mechanisms to ensure that a five year supply of housing land can be maintained. It is recommended that reference also be made to potential triggers for a plan review, if it fails to deliver against the housing requirement. These triggers should also be included within the Implementation Plan / Monitoring Framework in appendix 1.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Housing Requirements

DRAFTLP_340**Full Name:**

Organisation: West Midlands
Metropolitan Authority
Pension Fund

Agent Name: David Staniland

Agent Organisation: Knight Frank LLP

Submission type: E-Mail

Agree with section?: No

Comment summary:

Draft Local Plan Policy H1 (Housing Requirements) advises that housing will be delivered to meet a net minimum requirement of 234 net additional dwellings per annum (dpa) over the Development Plan period from 2015/16 to 2031/32, delivering a total of 3,978 dwellings over 17 years. This figure is substantially higher than that which was identified as the Objectively Assessed Need (OAN) of 132 dpa in the Strategic Housing Market Assessment (SHMA), produced by Peter Brett Associates in February 2016. The figure does not tie in, either, with the dpa which the Planning Inspectorate considered was appropriate in the Appeal decision at Longbank Farm, Ormesby 9APP/V0728/W/15/3018546) on 9 March 2016, where it was concluded that the appellant's view on activity rates was more realistic (in comparison to Peter Brett Associates) and so, on balance, that the OAN figure of 355 dpa was the more robust figure. To reiterate, this figure of 234 dpa has not previously appeared in any of the Council's background evidence, including the SHMA or as a part of the evidence provided by the Council at recent public inquiries. We would therefore question the robustness of this figure and its justification. The Council provide a brief explanation for the figure in paragraphs 6.4 to 6.16 and Table 3 of the Draft Local Plan. It is clear that 234 dpa is a policy on requirement figure, which is driven by the Council's aim of achieving what it describes as sustainable population growth' in Table 3. It has a related population growth figure of 250 a year and has been selected from a series of population growth scenarios, which peak at 404 dpa and 625 additional residents a year. Higher rates of population growth and related housing need are rejected because they are seen as unrealistic when compared with past rates of population change dating back to the 1960s and 1970s (Scenarios 4-6, Table 3). Lower growth, including the SHMA's OAN figure (Scenarios 1-2, Table 3), is rejected on the grounds that it neither reflects the National Planning Policy Framework's (NPPF) requirement that local plans boost significantly' the supply of housing and that it implies housing delivery at rates lower than those previously achieved in the borough. Beyond the brief explanation given in the Draft Local Plan, we cannot determine how far the 234 figure contributes to easing the projected loss of working age residents (or perhaps increasing this cohort of the population). Given the weight that the Council attaches to tackling the loss of working age residents to the borough, this should be made clear. Furthermore, the 234 dpa figure does not appear to be linked to any labour force or employment change projections. Given the Draft Local Plan suggests that the retention of the working age population will assist Redcar and Cleveland's employment and economic growth objectives, this is an important issue and one for which the Council's evidence should allow for the consistency and soundness of its assumptions to be tested. With the Local Plan to be tested at examination in public and the 234 dpa figure central to planned housing provision, we would expect the Council to provide a much more detailed explanation on the calculations which result in their proposed requirement, particularly given these figures have not previously appeared in any of the Council's background evidence. Draft Local Plan Policy H1 (Housing Requirements) advises a requirement of 234 net additional dwellings per annum over the plan period, totalling 3,978 dwellings over 17 years. Draft Local Plan Policy H3 (Housing Allocations) identifies provision for 2,884 dwellings over the Development Plan and Policy REG3 (Skelton), which is a 52ha site allocated for a mixed use development, identifies provision for 200 dwellings during the Development Plan period. The total number of dwellings coming forward on sites identified in Draft Local Plan Policies H3 and REG3 therefore totals 3,084. Notwithstanding our reservations regarding the Council's housing requirement, as set out above, given Draft Local Plan Policy H1 identifies a need for 3,978 dwellings over the Development Plan period, and Policies H3 and REG3 only identify provision for 3,084 dwellings, we would question where the Council anticipate the remaining 894 dwellings are to be delivered? It does not appear that enough sites have been identified to meet the Council's future need particularly given the constraints around Marske, New Marske and Saltburn, where there is very little opportunity for windfall sites to come forward. Were it determined that the Council's requirement for 234 dpa is justified and can stand up to scrutiny at examination, we would expect to see further sites identified for residential development in the Publication version of the Local Plan, to ensure that this requirement can be met.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period. Housing Provision (Policy H3): The housing supply projections also include an estimated 1,798 dwellings on existing development sites and commitments on small sites of fewer than 10 dwellings and therefore comfortably meet the minimum net requirement over the plan period.

Housing Requirements

DRAFTLP_302**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Why do we appear to disregard the Objectively Assessed Housing Need (1) which states "Over the projection period 2012-37 CLG 2012 shows numbers of households in Redcar & Cleveland increasing by 2,530 (101 households p.a.). For the plan period 2015-32 the number increases by 1,975 households (116 households p.a.). This contrasts with the projected population change, which as we have seen is negative, though insignificant. In the Edge scenarios population falls faster, as we have seen but household growth is still positive, though smaller."?

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period. Narrative in Policy H1 will be amended to include more detail on how the OAN differs from the official household projections.

DRAFTLP_300**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Why is there still reference to Regeneration Plan which in 2010 suggested 14.000 job creation when we now refer to just over 2000 net new jobs of the 25,000 within the Joint Tees Valley LEP? With so few new jobs coming to R&CBC what has justified the massive increase, near doubling, of new homes over and above the uplifted figure of 132 pa?

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

DRAFTLP_500**Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Gladman support the identification of a 20% buffer of housing allocations above the housing requirement to support flexibility and ensure that the housing requirement is met and exceeded. This approach is in line with national policy set out in the Framework. Gladman are concerned about a range of matters including the housing requirement. The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council must start with clearly defining an NPPF and PPG compliant OAN by developing an unconstrained requirement which properly follows the guidelines set out at the national level. The Council should then develop a robust housing requirement using this OAN as a starting point.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_304**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland
Community
Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Why do we appear to disregard the Objectively Assessed Housing Need (1) which states "Over the projection period 2012-37 CLG 2012 shows numbers of households in Redcar & Cleveland increasing by 2,530 (101 households p.a.). For the plan period 2015-32 the number increases by 1,975 households (116 households p.a.). This contrasts with the projected population change, which as we have seen is negative, though insignificant. In the Edge scenarios population falls faster, as we have seen but household growth is still positive, though smaller."?

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

DRAFTLP_373**Full Name:** Andrew and Elizabeth
Fox**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Amend para. 6.18 to reads "If it becomes apparent at any point that a five year supply cannot be evidenced we will work with developers and landowners to bring forward additional sites, provided it can be demonstrated that developments would make a significant contribution to reducing the supply deficit, that delivery on other sites would not be compromised as a result and that areas designated as Green Wedges and Strategic Gaps are not used for development

Officer response:

The suggestion would not comply with the National Planning Policy Framework. This states that in circumstances where a five year supply cannot be evidenced, local plan policies that relate to the supply of housing, such as green wedges and strategic gaps, should not be considered up-to-date.

DRAFTLP_625**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The accompanying technical note provides further comment on the Plans housing requirement.

Officer response:

the results of the Tees Valley Area Action Plan update will be taken into account.

Section/Policy**Policy H 1****Housing Requirements**

DRAFTLP_8**Full Name:** MR William Enoch Short**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

My view is that the Draft Plan for Development of the R&C Borough Council is in error on the number of houses required over the foreseeable future. Despite the comment made in the Preface, I consider the formulae upon which this plan is based (the so called OAM), has not given sufficient cognisance to the SSI Liquidation and the subsequent demise of the Iron & Steel Industry on Teesside, and applicable to this council in particular, - an industry which I feel is crucial to this council and employment in this borough and surrounding councils. I feel at the end of the day, employment of people is the most important element to consider; - one can-not pay rent or the mortgage without a job, despite other factors which the OAM formula takes into consideration. I also feel that the decline which has taken place over recent years in the population of this borough will continue in the future. I think also the National Planning Policy Framework (NPPF) and the Government Planning Practice Guidance (PPG), are also inappropriate in so far as any contingency levels and minimum number of houses that are allowed under their rules, and the council should have at least pleaded for a special case on the grounds of the demise of the Iron & Steel Industry an industry which is so special to this area, and hopefully negate having to comply with Government Policy on building a minimum number of houses. Also now we have voted to exit the European Union I acknowledge that it is unknown if it will have a detrimental impact on council plan. My opinion is that at worst it will; in the sense that no help will be forthcoming re the Iron & Steel Industry (despite any assistance that may be given to other European Steelmakers); and, at best it will have no effect at all especially on the job creation front.

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

DRAFTLP_189**Full Name:** Ms carole morgan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Policy H 1 sec 6.6 - "overall population is likely to remain relatively stable" - " 8,900 fewer aged 64 and under" - why the need for so many new houses, particularly on green spaces, adding to urban sprawl? - "8,800 additional people aged 65 and over" - where are the bungalows being built?

Officer response:

The Council has recently completed its Strategic Housing Market Assessment which states that, for the plan period, the Objectively Assessed Need for Housing averages at 132 dwellings per annum (dpa). This work was updated using alternative scenarios in September 2016, and confirmed the original conclusions. In order to deliver sufficient housing to support the retention of additional population, the Council has concluded that a housing requirement of 234 dpa is appropriate and deliverable. In order to ensure continued delivery, and choice of sites, the identification of a 20% buffer in addition is considered to provide sufficient flexibility in meeting this requirement. As such, the Council is satisfied that the approach taken is NPPF-compliant, and represents an appropriate level of housing delivery for the plan period.

Section/Policy**Policy H 2****Type and Mix of Housing****DRAFTLP_403****Full Name:** Eric George Allinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Agree

Officer response:

Support noted.

DRAFTLP_501**Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The housing mix to be included on a site should be dealt with on a site-by-site basis to ensure that flexibility is maintained in order to deliver the right mix of unit size and tenure to suit the prevailing local circumstances at the time. The needs highlighted in the SHMA are a snapshot in time and do not necessarily represent the correct housing mix that is required at the time of any application. Considering housing mix on a site-by-site basis, with reference to the SHMA, will also allow viability issues to be considered on a similar basis as housing mix often has a considerable impact on a site's ability to be developed viably. In this context, the policy should refer to development viability as a key consideration.

Officer response:

The Council recognises that the evidence base for the Local Plan, including the SHMA, will evolve over time. The proposed housing mix for sites included under Policy H3 is reflective of this fact. The Council is confident that each of the sites included under Policy H3 is viable, taking into account the proposed housing mix and any affordable housing requirements. The viability assessment will be updated as appropriate. Policy SD5 and Policy H4 both include viability as a consideration.

DRAFTLP_453**Full Name:** Cleveland Housing Trust**Organisation:****Agent Name:** Mr David Stovell**Agent Organisation:** David Stovell & Millwater**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Cleveland Housing Trust are seeking any definition of affordable housing to reflect the type of housing provided rather than the provider. Registered Housing Associations have previously been the base definition of affordable housing. Cleveland Housing Trust provides the same product but it is not covered by the definition of affordable housing for new development, because they are not a registered provider. There will be other housing charities in a similar position. It would seem to be in everybody's interest to make the definition as broad as possible to cover all organisations wishing to provide affordable housing either to rent or equity share within the Borough. Cleveland Housing Trust like other similar charities are in a position to build affordable housing to supplement that provided by the council and registered providers. It seems to us that this should be encouraged.

Officer response:

The definition does include the possibility for housing provided by organisations similar in nature to registered providers to be classed as affordable housing, where agreement has been made with the Council. However, as tenants of registered providers have significantly greater rights and regulatory protections than tenants of other landlords, the Council would ordinarily expect affordable housing to be provided by registered providers, and would only consider alternatives in exceptional circumstances.

Section/Policy**Policy H 2****Type and Mix of Housing****DRAFTLP_171****Full Name:** Ray Hensby**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The area needs more affordable homes rather than more 4/5 bedroom homes.

Officer response:

The need for affordable homes in the borough has been assessed as part of the SHMA. An appropriate policy in respect of affordable housing has been included at Policy H4.

DRAFTLP_529**Full Name:** Cllr Philip Thomson**Organisation:** Redcar & Cleveland
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

In respect of Affordable Housing the evidence base might be better explained. The table provided for AAHR is not expansive enough and it would be helpful to have more detail from the SHMA. Could this be broken down by settlements. Given that the SMHA is the main evidence based document it would be helpful to state, within the time scale of the Local Plan, when the future surveys would be carried out. Given that some of the statistics relate to a period 2015 - 2032, will these figures be updated for Policy H3?

Officer response:

The plan covers a 17-year period, during which the evidence base will be updated periodically. It is, therefore, felt more appropriate to cross-reference the plan with key elements of that evidence base, rather than include significant amounts of information that may change over time. The SHMA will be updated periodically during the plan period, with the specific timescale dependent upon a range of factors, including budgetary considerations. It is anticipated that the SHMA will be updated at least once every five years.

DRAFTLP_420**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Again we would emphasise the need for affordable, social and bungalow housing. In principal we support the stated mix of housing but the statistics within this document indicate a need for fewer executive houses.

Officer response:

Comments noted. The allocation of sites for executive-style housing represents a total of 147 units from a total anticipated housing delivery of 2,884 units across all sites allocated under Policy H3.

Section/Policy**Policy H 2****Type and Mix of Housing****DRAFTLP_303**

Full Name: Mr Bob Moodie
Organisation: East Cleveland
Community
Organisation

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

With a rising percentage of the population being over 65 during the plan period why is there not a greater emphasis on 1 & 2 bedroom bungalows to meet this perceived requirement? If more properties of this nature are built it would free up 3 and 4 bedroom properties into the market place for families thus helping to reduce outward migration to Middlesbrough, Stockton and areas further a field?

Officer response:

A requirement for bungalows, as part of an appropriate mix of housing, has been included within all appropriate housing site allocations identified in Policy H3.

DRAFTLP_74

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Discussion on expressed needs for affordable housing could be better expanded. The only table shows a global figure. The breakdown by areas would better illustrate the current assessed demand. There should be a clear statement about the process of reassessment, the periods when this will be done and how, during the lifetime of the proposed Local Plan.

Officer response:

The plan covers a 17-year period, during which the evidence base will be updated periodically. It is, therefore, felt more appropriate to cross-reference the plan with key elements of that evidence base, rather than include significant amounts of information that may change over time. The SHMA will be updated periodically during the plan period, with the specific timescale dependent upon a range of factors, including budgetary considerations. It is anticipated that the SHMA will be updated at least once every five years.

DRAFTLP_32

Full Name: Cllr Liz Westhead
Organisation:

Agent Name:
Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

No reference on the map or in the text of the Plan to the undeveloped area that is the bottom of the Westfield site in Loftus.

Officer response:

The Westfield development has already commenced and the housing being delivered has been taken into account in calculating the housing requirement and need for further site allocations. As such, there is no need to include a policy for that site.

Section/Policy**Policy H 2****Type and Mix of Housing**

DRAFTLP_372

Full Name: Cllr Valerie Halton
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

6.28 under supply of bungalows; should we have a planning policy of not allowing loft extensions to existing bungalows

Officer response:

Many loft extensions are allowed by virtue of being not classified as development or allowed under permitted development rights. Notwithstanding, such an approach would not be in line with the principles of the NPPF.

DRAFTLP_362

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

There are demographic changes within the Borough and particularly in this Parish and East Cleveland meaning that households are reducing and there is a need for more single occupancy properties. This Council would like to recommend that all new developments are built with this in mind and include more 1 and 2 bedroom houses instead of 5 and 6 bedroom houses as statistics suggest that families are moving out of the area and will continue to do so for some time.

Officer response:

Policies H2 and H3 both require developments to contribute to the identified housing needs of the borough. It is the case, however, that the draft housing requirement is designed, in part, to increase the population of the borough by more than the official projections, with a particular focus on working age households and families. This will require the development of additional family housing.

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_207****Full Name:** Mr Andrew Lombard**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Support the housing allocations and proposed development limits. Don't think there is any requirement for additional housing south of Marske.

Officer response:

Support for housing allocations noted.

DRAFTLP_75**Full Name:** Geoff Watkins**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

As resident of Saltburn and Area Footpath Secretary for the Ramblers, offer support for Local Plan. Pleased no housing developments planned for Saltburn or Marske beyond those approved by Secretary of State; happy countryside here is identified as a protected area. Pleased that the Plan does not support application for residential development north of Woodcock Wood and west of Flatts Lane. The Ramblers along with other groups, is firmly opposed to further incursions into the countryside to the south of the A174 Parkway.

Officer response:

Comments noted.

DRAFTLP_131**Full Name:** Pauline Price**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

If the appeal for housing in Marske is rejected on 11th October, we are satisfied with proposed developments - realising you have quotas for additional housing.

Officer response:

Comment noted.

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_439**

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

We are pleased that there is a requirement for appropriate remediation for proposed housing site allocations listed within Chapter 6: Housing. We recommend that any future remediation should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Refer to the contaminated land pages on GOV.UK for more information.

Officer response:

Comment noted.

DRAFTLP_190

Full Name: Heather Hodges
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: Yes

Comment summary:

Agree with the Council's Draft Plan as it stands. There are enough houses being built in the borough, and the planned future projects for building houses, are more than enough to meet local needs up to and including 2032. The ones that are planned to be built should be affordable properties to meet the needs of young people and those on low incomes. Changes would like to make - Where houses are planned to be built, priority must be given to providing affordable properties, and only in accordance with the Draft Plan as it stands.

Officer response:

The affordable housing requirements for development sites are set out in Policy H4 which states that on all appropriate developments of 15 or more dwellings a minimum of 15% of the total number of dwellings on sites will be provided as affordable housing.

Housing Allocations

DRAFTLP_562

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

In line with the previous comments on Policy H1 (Housing Requirements), Story Homes considers that the Council's proposed housing requirement figure is below that which is required to meet the full OAN for Redcar and Cleveland. In addition to this, Policy SD2 seeks that 60% of housing will be located in the urban' (Eston, Grangetown, Lazenby, Normanby, Nunthorpe, Ormesby, South Bank and Teesville) and coastal' (Redcar, Dormanstown, Kirkleatham, Marske and Saltburn) sub-areas with 40% to be located within the rural' sub-area broadly comprising Guisborough and East Cleveland. However, further interrogation of the housing allocations suggests that this balanced distribution is unlikely to be achieved. The housing allocations set out under Policy H3 total some 2,884 units within the Plan period up to 2032. Of these 2,884 units, some 279 are within Guisborough while a further 352 are within the East Cleveland towns and Carlin How (which is identified as a service village). In total this equates to 677 units proposed for allocation within the rural' sub-area. As a percentage of the total supply, this equates to a figure of 23.5% of allocations within the rural' sub-area, whilst 76.5% of allocations are within the urban' and coastal' sub-areas. While Story Homes acknowledge that Table 4 at paragraph 6.36 of the Plan indicates that a greater percentage of development is under construction within the rural' sub-area than the urban and coastal' sub-areas, the balance of allocations across the Plan period is of some concern as it is significantly below the 40% figure set out at Policy SD2 and provides little certainty as to the future growth of the rural' sub-area as a whole. As such, Story Homes considers that further allocations are required within the rural' sub-area to correct the current imbalance in the distribution of the allocations as set out under Policy H3. As the main Rural Service Centre within the rural' sub-area, Story Homes considers that at least half of the 40% target should be focused in Guisborough. As set out throughout this response, Story Homes considers that Guisborough is a sustainable settlement with high levels of marketability and clear potential for future growth, particularly to the west of the settlement where constraints are less. As a result of this, and the deficiencies in the OAN referred to within this response, Story Homes considers that further allocations are required in Guisborough in order to provide certainty that the Council can deliver the required level of development in accordance with the NPPF across the Plan period. With regard to the specific allocations proposed under Policy H3, Story Homes wishes to reserve its position on the suitability of these sites to deliver development. It should also be recognised that, in line with the NPPF, housing requirements are to be treated as minimum figures and can therefore be exceeded in order to boost significantly the supply of housing. Based on the above, Story Homes considers it of paramount importance that further allocations are identified within the Plan period. Story Homes considers that Guisborough is an appropriate location to accommodate additional development and that this is consistent with the position of the settlement as the principal Rural Service Centre within the borough. This position is also consistent with Policy SD2 (Locational Policy) which recognises that, within the rural' sub-area, the majority of development will take place in Guisborough and the East Cleveland towns. Story Homes has interests in land to the south of Stokesley Road and consider that the site is suitable of accommodating residential development within the Plan period. A Site Plan is attached and it is considered that the site could accommodate circa 200 units.

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

Housing Allocations

DRAFTLP_267**Full Name:** Michael Bennett**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

In the absence of a valid Local Plan for the past few years Guisborough has been the object and target of most of the major housing developers. The absence of a Local Plan has left the Borough Council defenseless against large-scale housing development in the town. Using figures in your own report, we can see that when taking into account developments already approved and under way, and adding to that the proposed sites contained in Policy H3, the number of new builds during the duration of this draft plan is of the order of 900 new homes in Guisborough. Add also the proposed development (not included in this draft) of what was the old foundry site along Rectory Lane, proposed new builds will exceed 1000 houses during the life of The Plan. In very crude terms taking the numbers in Paragraph 6.8 (an average of 234 new builds per annum) and multiplying by the life of this plan, (15 years), then the Council needs to build some 3510 homes. I must therefore conclude that Guisborough's contribution of 28.5% is to say the least generous towards the overall target the council has set. What also must be acknowledged is that Estate Agents in Guisborough already have about 1000 houses from existing stock on their books which are not selling and there is anecdotal evidence to suggest that the new builds are not being taken up at the rate the developers first thought. This could therefore result in some 2000 being for sale in Guisborough. Paragraph 1.26 of The Plan tells me that the borough has a population decline of 2.8% set against a household growth of 3.8%. Couple that with the last census figures which shows a population decline of 3,900 in the 10 years to 2011, indicating a loss of 390 residents per year. All this tends to show that the need to provide 234 new builds per year is an over estimation by yourselves. I have lived in Guisborough since 1971 and watched the various housing estates such as Hunter's Hill, Pine Hills and Galley Hill all being developed and with each expansion of the town we have seen the infrastructure weaken under the new demands. Many of the roads in the town such as Belmangate, Rectory Lane and Hutton Lane were never designed to take the volume, size and weight of traffic now using the roads. Sewage and drainage systems are at breaking point in several places in the town resulting in flooding which was never the case before these large developments. Other services such as health and education are under strain as a result of increased demands. Whilst the provision of these services is not the direct responsibility of the Council, it is your actions, by concentrating housing development in Guisborough (See Policy LS 3 Sustainable Communities) that are contributing to these problems.

Officer response:

The Council's strategy is to provide sufficient appropriate housing to address the issue of a declining working-age population. The level of development in Guisborough is reflective of its role as the main rural settlement, and takes into account the development for which planning permission has already been granted. We are working with infrastructure providers to ensure that improvements are delivered to support new development.

Housing Allocations

DRAFTLP_312**Full Name:**

Organisation: West Midlands
Metropolitan Authority
Pension Fund

Agent Name: David Staniland

Agent Organisation: Knight Frank LLP

Submission type: E-Mail

Agree with section?: No

Comment summary:

Our client owns land known as The Marske Estate which extends to approximately 370ha, immediately to the south of Marske. An Estate Plan is enclosed with this letter. A parcel of our client's land was previously the subject to an outline planning application, which was refused on 11 March 2015 (R/2013/0669/OOM). This parcel of land is bounded by Longbeck Road, A1085 and A174 and comprises of approximately 49.7 ha of greenfield land. Longbeck railway station is situated immediately adjacent to the north west corner of the site, and Marske railway station is situated immediately adjacent to the north east corner of the site. The site comprises of agricultural land with a fall of approximately 25m from the south east corner to the north west corner. The Council's decision to refuse the application is currently being appealed by our client. The Public Inquiry is due to take place between 11 to 14 and 18 to 20 October 2016. Whilst it is unlikely that the Secretary of State will have made a decision by the Council's next round of consultation on the Local Plan, which will be the Publication version in November 2016, it is anticipated that a decision will have been made by the time the Local Plan is submitted to the Secretary of State in March 2017. Our client's site could, therefore, have implications on the production of the Local Plan. The site was proposed for a residential allocation (Policy H 3.1 Marske Inn Farm Strategic Site) in the Local Plan Policies Map (September 2013). At the meeting of the Borough Council on 31 July 2014, Members resolved not to approve the publication, and subsequent submission to the Secretary of State, of the Local Plan. The principle reason for Member's decision to vote against, and the Council's subsequent decision to withdraw, the Local Plan was principally because of our client's site. At the Borough Council meeting on 31 July 2014, Councillor Thomson presented the motion, which was seconded by Councillor Learoyd, that allocation H3.1 be investigated further as it was deemed to be objectionable. This motion was only withdrawn when Members resolved that the Local Plan be withdrawn completely. As a consequence of the withdrawal of the Local Plan, the planning application on our client's site was refused. The first reason for refusal was due to the development's perceived impact upon the strategic gap between Marske and New Marske, which the Council concluded would result in a substantial built intrusion into an extensive area of countryside beyond the currently approved development limits. The Draft Local Plan Policies Map (May 2016) allocates a new site to the east of Redcar for residential development, which is currently identified in the adopted Development Plan as falling within the green wedge between Marske and Redcar. This is identified as Land at Mickle Dales (Policy H3.18), for the development of up to 100 residential dwellings and is located south of the Rowan Garth development. Given the issues the abandoned Local Plan faced, we would question the inclusion of this site. Surely the Green Wedge designation will face the same level of resistance, given the existing level of protection it is afforded, as our client's site did during the abandoned Local Plan consultation period. It is interesting, given less than two years have passed since the Publication version of the abandoned Local Plan (July 2014), that of the 34 residential sites previously identified in that document, only 16 of those remain in the Draft Local Plan (May 2016). The other 18 sites, including our client's, are no longer included and have been replaced by 15 new sites which make up the 31 residential sites in the Draft Local Plan (May 2016). The above would suggest that the Council have attempted to offset the number of dwellings lost on our client's site (1,000) as a consequence of the withdrawal of the Publication version of the abandoned Local Plan (July 2014), by including new sites which are equally, if not more, contentious than our client's was previously. Reference is made to the Council's Regeneration Masterplan throughout the Draft Local Plan, a selection of which are set out below: At paragraph 1.39 the Draft Local Plan states, the Masterplan, which became adopted policy in 2011, is a 15-year vision for the economy that sets out spatial strategies covering the whole borough, supported by a range of projects that are aimed at stimulating the local economy by improving the quality of the environment and delivering jobs and business growth.' Paragraph 1.52 sets out that some of the key pieces of evidence used in preparing the Local Plan include the Redcar & Cleveland Regeneration Masterplan (2010) and the Redcar & Cleveland Regeneration Masterplan Delivery Plan 2012-2017. Paragraph 1.62 advises that the Council's Regeneration Masterplan sets out an ambitious vision to create 14,000 new jobs, support and

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

Housing Allocations

help create over 800 businesses and secure £1bn of private and £265m of public sector investment in the borough over the next fifteen years.' At paragraph 4.1, it is stated, Redcar & Cleveland Borough Council is committed to the regeneration of the borough. We have our Regeneration Masterplan, setting out a long-term, 15-year vision for the social, economic and physical development of the borough.' At paragraph 5.55 it is advised that, The Council will support leisure and tourism developments within the borough to help deliver the projects set out within the Council's Regeneration Masterplan'. Paragraph 5.60 states that the Regeneration Masterplan supports the growth of the leisure and tourism economy throughout the borough capitalising on the area's natural assets.' The above demonstrates that the Draft Local Plan places clear emphasis on the aims and aspirations set out in the Council's Regeneration Masterplan. The Regeneration Masterplan Delivery Plan (2012-2017) advises at paragraph 4.2 (Investing in Infrastructure to Support Growth, Improving Housing Choice) that the area south of Marske-by-the-Sea has been identified as a potential area for housing growth in the Local Development Framework. The landowner is working up plans which could potentially help meet some of the future housing need in the area. Page 45 of the Delivery Plan document then identifies that development was proposed to come forward between 2015 and 2020. As is set out in further detail below, unlike the Publication version of the abandoned Local Plan (July 2014), the Draft Local Plan does not propose housing growth to the south of Marske-by-the-Sea. The Draft Local Plan is therefore contrary to one of the key aims and aspirations in the Regeneration Masterplan. Whilst we can appreciate that these aims and aspirations may have changed over time, if the Council is going to make reference to, and rely on, the Regeneration Masterplan in the Local Plan, it cannot pick and choose those which it wishes to take forward, whilst completely ignoring others, without explanation. Our client's site was proposed for a residential allocation (Policy H 3.1 Marske Inn Farm Strategic Site) in the Local Plan Policies Map (September 2013). At the meeting of the Borough Council on 31 July 2014, Members resolved not to approve the publication, and subsequent submission to the Secretary of State, of the Local Plan. The principle reason for Member's decision to vote against, and the Council's subsequent decision to withdraw, the Local Plan was principally because of our client's site. At the Borough Council meeting on 31 July 2014, Councillor Thomson presented the motion, which was seconded by Councillor Learoyd, that allocation H3.1 be investigated further as it was deemed to be objectionable. This motion was only withdrawn when Members resolved that the Local Plan be withdrawn completely. As a consequence of the withdrawal of the Local Plan, the planning application on our client's site was refused. The first reason for refusal was due to the development's perceived impact upon the strategic gap between Marske and New Marske, which the Council concluded would result in a substantial built intrusion into an extensive area of countryside beyond the currently approved development limits. The Draft Local Plan Policies Map (May 2016) allocates a new site to the east of Redcar for residential development, which is currently identified in the adopted Development Plan as falling within the green wedge between Marske and Redcar. This is identified as Land at Mickle Dales (Policy H3.18), for the development of up to 100 residential dwellings and is located south of the Rowan Garth development. Given the issues the abandoned Local Plan faced, we would question the inclusion of this site. Surely the Green Wedge designation will face the same level of resistance, given the existing level of protection it is afforded, as our client's site did during the abandoned Local Plan consultation period. It is interesting, given less than two years have passed since the Publication version of the abandoned Local Plan (July 2014), that of the 34 residential sites previously identified in that document, only 16 of those remain in the Draft Local Plan (May 2016). The other 18 sites, including our client's, are no longer included and have been replaced by 15 new sites which make up the 31 residential sites in the Draft Local Plan (May 2016). The above would suggest that the Council have attempted to offset the number of dwellings lost on our client's site (1,000) as a consequence of the withdrawal of the Publication version of the abandoned Local Plan (July 2014), by including new sites which are equally, if not more, contentious than our client's was previously. It is also interesting that the Draft Local Plan (May 2016) includes a site at Kirkleatham Business Park (Policy H3.19) for 550 dwellings, which was not previously included and is currently allocated as a protected employment area, as was its proposed allocation in the abandoned Local Plan Policies Map (September 2013). Policy ED 6

Housing Allocations

(Protecting Employment Areas) of the Publication version of the abandoned Local Plan (July 2014) safeguarded up to 343ha of land for the development of specific industrial sectors and a further 64ha for general industrial uses, including the entire Kirkleatham Business Park site. It is interesting that these land areas have been removed from Draft Policy ED 6 (Protecting Employment Areas) in the Draft Local Plan (May 2016). Whilst it is understandable that the 343ha for specific industrial sectors would require a revision following the closure of the Tata/SSI steelworks site, it would appear that the land area (previously 64ha) for the general industrial uses has been removed for the Council's convenience, given the list of sites identified is the same. Clearly this land area will have reduced significantly, given 23ha is now proposed for residential development at the Kirkleatham Business Park site. The Draft Local Plan Policies Map (May 2016) does not identify any residential allocations, either strategic or otherwise, within or surrounding the settlement of Marske. Neither does the Policies Map identify any employment allocations. It surely cannot be the aspiration of the Council that no development take place at all in or around Marske across the Development Plan period to 2032? Paragraph 1.97 identifies that the greatest unmet affordable housing needs are demonstrated within the Guisborough, Saltburn and Marske / New Marske sub-areas, relating mainly to smaller, general needs units and the needs of older people. If no residential development is proposed in Marske within the Development Plan period how is this need in Marske going to be met? Draft Local Plan Policy SD2 (Locational Policy) advises that development will be directed to the most sustainable locations in the borough, with the majority of development being focused in the urban and coastal areas. Marske is identified as a coastal area, which lies on the second tier of the settlement hierarchy. We would question how development can be directed towards Marske, which the Council identify as being their focus, when the Draft Local Plan Policies Map does not identify any land, either within the settlement or surrounding it, for residential development? Draft Local Plan Policy LS 2 (Coastal Area Spatial Strategy) identifies Marske as a settlement which forms a part of the Coastal Area Spatial Strategy. Point g' identifies that the Council and its partners will aim to promote new housing development on other sites (ie not older housing areas which is covered by point f'). We would question how the Council are going to achieve the aim of promoting new housing in Marske when no land is identified within it for residential development?

DRAFTLP_336

Full Name: John Forster
Organisation:
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

As a Guisborough resident for over 20 years, I am concerned about the number of new houses being built in the town. The character of the town is being slowly changed and I feel that there is increasing pressure on infrastructure such as school places, health facilities, roads and parking in the town centre. The roads in Guisborough were never intended for the number of junctions and volume of traffic which will follow further developments as planned, particularly on Rectory Lane. There are currently at least 5 sites under construction and I note that prices are being reduced and part exchanges offered in an attempt to sell the houses there. I do not believe there is enough demand for all these houses and as a result of these part exchange houses, prices are dropping. I have personal experience of this as I have been trying to sell a 4 bed detached house for over 6 months. Redcar and Cleveland's Housing Strategy predicts a rise of approximately 27.5% in people 65 between 2011 and 2026. However, there is little evidence in Guisborough that this is being properly addressed. The real issue to have been addressed, would have been to look at how this sector could be resolved by building a limited number of 2/3 bedroom bungalows. That way, older members of the community could have downsized, allowing younger and growing families to upsize and maintain the flow of property exchange. Also with the devastaion of local industry, there is now little to attract people into the area. I hope that you will look closely at what is happening in the Guisborough housing market and would strongly urge you to review the housing allocation strategy. Please preserve our historic areas for future generations.

Officer response:

The Council considers that the amount of development identified over the course of the Local Plan reflects Guisborough's role as the main rural settlement. The majority of the development (80%) is on sites currently under construction. The level of activity is therefore expected to reduce significantly over the plan period. Within the site allocations, we have requested the provision of bungalows along with a range of other house types and sizes to meet the needs of all sectors of the community.

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_350****Full Name:** Mr and Mrs A Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

As a resident of nearly 30 years in Guisborough, I would like to object to yet more housing development. I'm particularly concerned about the impact on the GP Surgeries and Schools which are struggling to cope with the present housing being built. I feel that public services in Guisborough will find it hard to cope with the demand of yet more houses.

Officer response:

The Council has consulted infrastructure providers when developing the plan. Development has only been allocated where infrastructure has capacity or where there are plans to increase capacity.

DRAFTLP_512**Full Name:** Mr James Johnson**Organisation:** Avant Homes**Agent Name:** Mr Phil Jones**Agent Organisation:** Nathaniel Lichfield & Partners**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

No provision is made for changing market conditions or fluctuations in local demand. As such, the policy in this context is not compliant with the NPPF requirement for the plan to be positively prepared and flexible. We recommend minor amendments to the final column of the table in Policy H3 which is currently titled Housing Units'. To ensure that the policy contains the necessitated level of flexibility, this column should be renamed Approximate Numbers of Housing Units'. This will ensure that housing developers are afforded the necessitated level of flexibility to respond to market variations and make the best use of the allocated sites.

Officer response:

The column will be renamed 'anticipated housing units'.

DRAFTLP_545**Full Name:** Jordan Gresham**Organisation:** Taylor Wimpey (UK) Ltd**Agent Name:** Mr Steven Longstaff**Agent Organisation:** England Lyle Good**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Taylor Wimpey object to draft policy H3 as it is not consistent with two key requirements of the NPPF; to provide sufficient housing allocations to significantly boost the supply of housing and to meet the objectively assessed needs of the Borough over the plan period. TW fully support the proposal to make provision within the Draft Local Plan to allocate more land than is required to meet the Council's net housing requirement. This approach is sensible and has been widely adopted by many authorities and is robust and sound. However, TW are of the firm opinion that the Council's proposed housing requirement is unjustifiable and would not meet the objectively assessed housing needs of the Borough as clearly evidenced by the Regeneris review. As outlined in the accompanying site specific documents, Taylor Wimpey have a range of suitable, available and achievable sites within the Borough that could accommodate the additional development required to meet the objectively assessed housing needs of the Borough and ensure that the Plan is sound. Sites: Newstead Farm, Guisborough Land at East Nunthorpe Land at Sparrow Park Farm, New Marske Land North & West of Galley Hill, Guisborough Land at Grundales, Marske and Redcar Rugby Club Land North of Marske Road, Saltburn

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_581**

Full Name: G M Collins
Organisation:
Agent Name: GVA Grimley Ltd.
Agent Organisation: GVA
Submission type: E-Mail
Agree with section?: No

Comment summary:

Policy H3 identifies 31 sites for housing allocation in order to meet the proposed housing requirement over the Local Plan period (Policy H1 see response later). Our client's land at Normanby High Farm (H3.8) is identified as a housing allocation to provide 150 houses by 2032. The principle of the site being identified for a housing allocation to provide new homes within the plan period is fully supported and welcomed. We are however disappointed that Site 418 was not bought forward as a housing allocation, where the SHLAA had identified that the site could provide 52 dwellings and as stated in the SHLAA it is assumed that any development would follow on as an extension of the High Farm Scheme.

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

DRAFTLP_517

Full Name: Theakston Estates
Organisation:
Agent Name: Neil Westwick
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

Request that H3 is amended to include reference to Woodcock Wood for 400 units by 2032. Flatts Lane site 'Woodcock Wood' is suitable for housing development and that it would have no unacceptable environmental impacts or create unacceptable impacts on amenity of new and existing residents. There are no insurmountable constraints on the site or its development and is deliverable with the next five years. It is necessary to increase the range of housing allocations to ensure that a five year housing supply is maintained and allocation of the site would significantly assist this.

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

DRAFTLP_264

Full Name: Mr and Mrs A Loughran
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Object to huge number of houses planned for Guisborough. Feels the emphasis should be on starter, two and three bed homes for first time buyers as there is a glut of four bed homes.

Officer response:

Comment noted. The plan is considered to recognise the role that Guisborough plays as the main rural settlement, and that the approach to new housing provision is appropriate in scale. The majority (80%) of the planned housing development for Guisborough is on sites which are already under construction. Therefore the level of new building in the town can be expected to reduce significantly over the course of the plan period. The plan encourages the provision of a range of house sizes, but with a focus on family housing to address the issue of a declining working-age population.

Housing Allocations

<p>DRAFTLP_42</p> <p>Full Name: Mr Brian Upton</p> <p>Organisation:</p> <p>Agent Name:</p> <p>Agent Organisation:</p> <p>Submission type: E-Mail</p> <p>Agree with section?: No</p>	<p>Comment summary:</p> <p>As long term resident of Guisborough, pleas for no more new housing developments in the town. Guisborough is, or was, a small market town and its character is being irreversibly destroyed by inappropriate developments.</p>	<p>Officer response:</p> <p>Comments noted. The majority of development proposed in Guisborough (80%) is on sites which are already under construction; the level of activity can therefore be expected to tail off over the plan period. The other Guisbrough sites included in the plan are considered to be the most appropriate for meeting the housing requirement. The Council considers the level of development in Guisborough, over the plan period, is reflective of its role as the main rural settlement.</p>
<p>DRAFTLP_206</p> <p>Full Name: KCS Developments</p> <p>Organisation:</p> <p>Agent Name: Mr Phil Jones</p> <p>Agent Organisation: Nathaniel Lichfield & Partners</p> <p>Submission type: Letter</p> <p>Agree with section?: No</p>	<p>Comment summary:</p> <p>We provide this response in light of our Client's (KCS Developments) interest in bringing forward a residential development at Windy Hill Farm, Marske. Outline permission for 75 executive dwellings was refused by the Council due to it being outside of development limits, located within a Strategic Gap and within a Sensitive Landscape Area. Our client is seeking to address the concerns of the Council and will be looking to promote a sensitively designed residential scheme that would not adversely impact on the local landscape character and would maintain the integrity of the Strategy Gap. The provision of approximately 20 dwellings would bring a mix of modern quality housing sites to meet needs identified in the SHMAA. Further development will bring economic benefits to Marske and the surrounding area. NLP's most recent calculations indicate that Redcar & Cleveland Borough Council is unable to demonstrate a 5 year housing supply. The provision of approximately 200 dwellings at Windy Hill Farm would therefore provide an important contribution towards achieving this supply. Having regard to the factors considered in assessing site suitability set out in SHLAA Practice Guidance, there are currently no identified physical problems or limitations, other potential impacts or environmental conditions which would preclude the development of the site for housing in the short term. Reduced site area (as illustrated on plan) will significantly reduce the impact of the development on the surrounding landscape and thus address issues previously raised. The site suitability was reflected in the Officer's report to R/2014/0178/OOM which set out the application was acceptable subject to conditions. The site is sustainably located close to facilities within Marske. Therefore, the site is wholly suitable for allocation for residential development. Our client has secured option of the site and can confirm it is available to provide housing within the short term. It therefore has realistic potential to contribute to achievement of the Council's 5 year housing supply. There is confidence that if the site is allocated in the Local Plan and/or planning permission granted, new housing development will be achieved at the site with 5 years. It has been demonstrated that the site is suitable, available and achievable in the next 5 years and is thus deliverable. As such it is wholly appropriate that the site is considered in the SHLAA as a developable site and it is allocated for development in subsequent versions of the Local Plan.</p>	<p>Officer response:</p> <p>The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).</p>

Section/Policy**Policy H 3****Housing Allocations**

DRAFTLP_132**Full Name:** Mr R W Harrap**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Guisborough does not have the infrastructure to cope with the level of development proposed.

Officer response:

The Council has consulted infrastructure providers when developing the plan. Development has only been allocated where infrastructure has capacity or where there are plans to increase capacity.

DRAFTLP_601**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

6.35 The RSPB notes the decision that the Council has taken to extend the distance set to determine the need for an Appropriate Assessment (16km) arising from this policy. Please refer to our recommendations for Policy SD2.

Officer response:

Comment noted.

Housing Allocations

DRAFTLP_228**Full Name:** Mr Ged Groves**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The development of Guisborough: Needs the right Local Plan Needs to take into consideration the number of houses in Guisborough proposed over the next fifteen years in the context of the number of houses already built between 1.4.2015 and 31.3.2016 Needs to take into consideration the current high vacancy rates of 9.9% in Guisborough Should consider the Belmangate field development as having a major detrimental impact on the local conservation area and the quality of life of residents of Belmangate for the relatively small number of houses proposed in the context of the borough development.

Officer response:

It is proposed to incorporate within the plan, under Policy H1, confirmation of housing completions for 2015/16. Under Policy H3, remaining completions as shown in Table 4 takes into account completions in 2015/16. In Guisborough the number of dwellings completed in 2015/16 was 100, out of a gross total of 335. The plan allows for the delivery of a further 856 dwellings on sites in Guisborough. Therefore, estimated planned completions in the town over the plan period to 2032 are 956, which is equivalent to approximately 19% of the total supply. 80% of this supply is on sites currently under construction; it is anticipated therefore that the level of development in the town will fall significantly over the later years of the plan period, while increasing in other parts of the Borough. The figures do not include the Belmangate Field site, as having further considered the potential impact development would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include that site as a housing allocation in the Local Plan. With regard to vacancy rates, the initial property trawl for the Strategic Housing Market Assessment incorrectly included all premises within a sub-area (including residential, commercial and retail) rather than just residential dwellings. When compared against the list of occupied dwellings, this has artificially increased the reported vacancy rate in sub-areas such as Guisborough, which have higher proportions of non-residential properties. In June 2016, the proportion of long-term (more than 6 months) empty homes in the Guisborough sub-area was 1.4%, which is the same proportion as the boroughwide average.

DRAFTLP_626**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The accompanying technical note provides further comment on the proposed housing allocations.

Officer response:

Comment noted. The results of the updated Tees Valley Area Action Plan will be taken into account when finalising the plan. However, it is noted that the impact of the proposed development on the strategic road network is considered to be minimal.

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_570**

Full Name: Mr Ben Stephenson
Organisation: Persimmon Homes
Teesside Ltd

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

H3 identifies sites for residential development. Persimmon Homes fully support the allocation of Belmangate Field for residential development.

Officer response:

Comment noted.

DRAFTLP_552

Full Name: Mr Chris Munro
Organisation: Homes and
Communities Agency

Agent Name: Mr Phil Brock

Agent Organisation: WYG

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

It is noted that the housing site allocations table set out under draft policy H3 identifies the housing allocation H3.19 as Kirkleatham Business Park.' This should be amended to land west of Kirkleatham Lane' for consistency as it is referred to later in the Draft Local Plan at draft policy H3.19. Subject to this amendment, we support the inclusion of allocation H3.19 in draft policy H3 which we consider can make a valuable contribution towards Redcar and Cleveland's housing requirements in a sustainable location within the existing development limits.

Officer response:

Comment noted. Text will be amended.

DRAFTLP_141

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Whilst the Plan does refer at para 6.38 to the small windfall sites of 10 dwellings or less as being an additional and important source of supply, Loftus Town Council considers that such sites, particularly in infill or on previously developed brownfield sites should be actively encouraged as tending to improve the appearance of derelict areas, and that this should be more strongly reflected in the Plan, and not necessarily restricted to 10 dwellings. Members identified potential sites within Loftus as being the former Loftus Junior School (not previously considered for housing, as far as this Council is aware); the former Congregational Chapel, the former Arlington Methodist Chapel, the Royal Hotel and adjacent former bus depot at East Loftus, and the former Cinema on Deepdale Lane.

Officer response:

It is proposed to include a policy in the next draft of the plan relating to the regeneration of Loftus which would seek to address the issues raised and, in support of this to include further housing allocations at the former Loftus Junior School and to extend the land allocation at the former Rosecroft School site (Policy H3.31).

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_531**

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Should there be any correlation between Policy H3 total Supply figures and the Appendix 4 delivery schedule? Might it not be better to have all the relevant statistics together?

Officer response:

There is a correlation. However, Appendix 4 sets out an indicative delivery schedule for all development that is anticipated to take place during the plan period, not just the allocations in H3, and includes sites already under construction. The purpose of this schedule is to illustrate that development can be delivered whilst maintaining a five year supply of deliverable housing throughout the plan period. It would not be appropriate to include all of this information within Policy H3

DRAFTLP_142

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Members were concerned that the cleared site of former houses on the Westfield Estate/Hummersea Hills (not reflected on the map) is not shown as a Housing Allocation on the map, although it does appear in Appendix 4 Housing Delivery Schedule as losing a further 40 dwellings in 2016/17, replaced by 60 in 2017/18 and then 87 more between 2022 and 2027. Members have heard informally that there are currently no plans by the landowner, Coast and Country Housing Ltd, to continue development of this site, but are not aware of the accuracy of this report or the longer term strategy.

Officer response:

The planning permission is already in place for the redevelopment of the Westfield Estate and, as the permission has already been implemented, does not need inclusion in the Local Plan. This is the approach we have taken will all sites where construction has started.

DRAFTLP_447

Full Name: Frances Cunningham
Organisation: Network Rail

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Housing Land Supply and Allocation Background Evidence Network rail objects to the use of the Cat Flat railway crossing as a pedestrian link into Marske for a further 100 houses. Network Rail would require alternative provision for crossing the railway if this site is to be progressed in line with our proposed Level crossings policy. We support the rejection of the following site as we would not support any new crossing over the railway or the increased usage of existing crossings: - 402 Morton Carr Far, - 453 Land at Morton Grange - 158 Redcar Rugby Club - 8 Bridge Farm - 54 Marske Inn Farm Regarding the sites in Nunthorpe the existing crossing is closed to vehicles and we do not support any development which will increase the foot usage of the level crossing without measuring the risk and taking appropriate measures to reduce that risk accordingly.

Officer response:

Comment noted. Comment in relation to background evidence document.

Section/Policy**Policy H 3****Housing Allocations**

DRAFTLP_144

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Members point out that agreement has been made for the development of the York Potash extraction site at Whitby. This could have a significant effect on employment, both during the construction and operation of the site, and members consider that housing in Loftus could be well suited to meet the needs of these employees, and could be needed soon.

Officer response:

The Council agrees that the Local Plan should specifically deal with revitalising Loftus and, as such, a policy will be included in the Publication Local Plan. The policy will reflect the Council's Living in Loftus' project, which we are implementing as part of the Regeneration Masterplan, and will focus on the development priorities in the town. The Local Plan cannot, however, deal with any associated funding issues or other non-planning matters.

DRAFTLP_421

Full Name: mr stuart white
Organisation: CPRE
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We note that 14 of the 31 sites are all, or part, brown field sites. This indicates a good effort on the part of the Council to meet its stated priority of building on brown field sites. However, this is tainted by plans for the development of six sites outside of development limits. There appears to be sufficient land available to avoid this. It is a positive that the larger sites will provide mixed housing and that there are a number of sites within the existing built environment. However, some sites have the potential, if approved, to lead to further applications in the adjacent area.

Officer response:

The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

DRAFTLP_402

Full Name: Eric George Allinson
Organisation:
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Consider purchase and conversion of vacant shops for housing - see attached

Officer response:

The plan encourages the conversion of shops to residential properties where this is appropriate. However, these types of development need to be private led rather than public sector led. These types of developments coming forward will be limited and, therefore, new development sites are required to delivered the required number of houses set out in H1.

Section/Policy**Policy H 3****Housing Allocations****DRAFTLP_185****Full Name:** Northumbrian Water**Organisation:** Northumbrian Water Ltd**Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

It is pleasing to see that H 3.2 has recognised the surface water drainage issues in the area and that there is a requirement to agree a resolution before development takes places. This is something we fully support and will work with the developer of the site to resolve any surface water issues in order to support the development. It is also pleasing to see within Policy H 3.5 that the requirement to protect the water & sewerage assets within the site is included. We will look to work with the developer to accurately locate these assets and advise of the appropriate size easement required. H 3.28 It is pleasing to see that the policy has recognised the drainage issues in the area and that there is a requirement to agree a resolve before development takes places. This is something we fully support and will work with the developer of the site to resolve any capacity issues in order to support the development. Overall though, we note that there is inconsistency regarding the site specific housing policies. Some of the proposed policies such as H3.2 and H3.5 refer to the need to provide a sustainable urban drainage scheme as part of the development plans, while others such as H3.6 do not make such provisions. We encourage the Council to be consistent in its advice and requirements and to ensure that either all site specific policies reference need for SuDS unless there are exceptional circumstances exempting them, or all of the policies should refer back to policy SD7 as a framework for sustainable water management in new development.

Officer response:

Comment noted. Policies will be reviewed and a requirement to provide a sustainable urban drainage scheme will be included where necessary.

DRAFTLP_309**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland Community Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Are the brown field sites mapped out for housing developments?

Officer response:

The sites where development is proposed are shown on the Policies Map.

DRAFTLP_286**Full Name:** Mr Bob Moodie**Organisation:** East Cleveland Community Organisation**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

New houses and the Strategic Housing Land Availability Assessment (SHLAA): What is the current position now regarding the Council meeting its national housing targets in terms of supply and demand? Have sites been identified in the rural communities for small scale (say no more than 12 affordable homes to serve the needs of local people? Has the Master plan incorporating future developments and Regeneration in the Borough been updated, reflecting the current needs and changes in the Borough, since the last one was compiled some 3 or more years ago? Why do we appear to have given up on the Nathaniel Lichfield recommendation, regarding Kirkleatham Business Park which is part of the EZ and with LDO status, in favour of the proposed 500 plus houses to be built there, if we are to provide the new jobs to regenerate the Borough?

Officer response:

The Council published its latest 5-year housing land supply assessment in September 2016 which demonstrates a 5 year supply to 2020/21. Small sites have not been identified, but proposals will be dealt with through the planning application process. The Regeneration Masterplan will be updated in the near future. The housing proposals are for part of the undeveloped land adjacent to Kirkleatham Business Park and do not fall within the EZ / LDO area; other undeveloped land has also been retained for employment uses.

Section/Policy**Policy H 3****Housing Allocations**

DRAFTLP_275**Full Name:** Rachael Wigginton**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The proposed Redcar and Cleveland Local Plan until 2031 seems to be for 4,000 houses total, at 230 houses per year. The largest developments are in the following areas: Nunthorpe, Ormesby, Redcar and Guisborough. Although some of the proposed housing sites in these areas are on previous school sites, there is nothing to say about the impact on NYCC schools.

Officer response:

The Council has consulted NYCC on the plan. It is considered that there is enough capacity in the schools to cope with any increase in pupil numbers as a result of development.

DRAFTLP_143**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Other than at the former Rosecroft site and at Craggs Hall Farm, the limit to development for Loftus very closely follows the existing build - this is not the case in, for example, land to the north of Skelton. This gives little scope in the Loftus area for additional housing including in areas which have been considered in the past - eg north of Loftus in the area bounded by Deepdale Lane and North Road; to the East of South Loftus; further North-east along Micklow Lane; linking Liverton Mines with Loftus; or to the south of the Industrial estate at Liverton Mines. Few of these areas have any special designation regarding sensitive or protected landscapes, although many do have access issues which would need to be addressed. Is it possible to extend the Limits to development without specifically designating any areas as Housing Allocations, to build in more flexibility for the future?

Officer response:

There are few sites that have been put forward for inclusion in the plan by landowners and, as such, we are not able to allocated them for development. Additional land has, however, been identified at the former Rosecroft School site together with a new allocation at the former Loftus Junior School which, alongside the existing consent at Hummersea Hills, have the capacity to broaden the local housing offer over the plan period.

Section/Policy**Policy H 3.1****Low Grange Farm Strategic Site****DRAFTLP_441**

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The northernmost third of the Low Grange Farm Strategic Site at South Bank, identified in policy H3: Housing Allocations, covers the historic Bolckow Terrace' landfill site. It was operated by Langbaugh Borough Council in 1978 (Licence No CLE/St13) and then the British Steel Corporation between 1978 and 1989. It allowed the disposal of non-hazardous' industrial wastes, difficult wastes (possibly including asbestos) and construction wastes (probably including biodegradable wastes). No landfill gas monitoring information is currently available for this site and therefore, we recommend that an extensive ground investigation is undertaken prior to any development in this area.

Officer response:

Comments noted. Condition 7 of the outline planning consent attached to this site (application ref. 2014/0372/OOM) requires the completion of ground investigations and an appropriate remediation scheme prior to development.

DRAFTLP_627

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Low Grange Farm strategic site, but welcome the intentions in criteria e.' that contributions towards improvements to the local and strategic highway network will be required where considered necessary and in criteria f.' which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.2****Swan's Corner, Nunthorpe**

DRAFTLP_117

Full Name: Mr Martin Coleclough
Organisation: Middlesbrough Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

The Council welcomes the recognition in Policy H3.2 that housing development at Swan's Corner will be expected to deliver improvements to the junction of the A1043/A171 and Guisborough Road and any other highway requirements.

Officer response:

Comment noted.

DRAFTLP_507

Full Name: Mr Mark Gabriele
Organisation: Bellway Homes (NE Division)

Agent Name: Shaun Cuggy

Agent Organisation: Barton Willmore

Submission type: E-Mail

Agree with section?: No

Comment summary:

Client does not object to the proposed housing allocations as such, they do object to the identified number of dwellings to be delivered under policy H3.2, as identified in the table. For Swan's Corner the figure attributed to the allocation is for 115 units by 2032. It is considered that the Site can comfortably deliver above this number whilst still forming a sustainable development. As such, we request that the table is amended to allow for the delivery of up to 155 units. It is considered that all of the referenced allocation units within the table should be noted as being approximate, as it is unclear at this stage, except in instances where planning applications have been submitted, what the actual number of units could be, as no rigorous assessment of potential site constraints has been undertaken by the Council. Whilst it is noted that under the separate site policies reference is made to the number of units to be delivered is approximate, it is considered that it would be helpful to make this clear under this policy also. Finally, the policy is unclear as to exactly when housing units will be delivered, only stating whether the sites are expected to deliver within the plan period or after the plan period. Whilst this may allow for the significant boost' to housing delivery in the short term as required by the NPPF, should all developments come forward early on within the plan period, there appears to be no certainty of sustained delivery throughout the entire plan period. It is likely that many of these sites can come forward early in the plan period, including our Client's site, yet there is no apparent acknowledgement of this within policy. Therefore, we would request that anticipated timescales/phasing is applied to each site or at least an acknowledgement that sites can come forward at any point within the plan period, without restriction.

Officer response:

The policy will be amended to reflect the planning permission that has been granted for the site. The Council considers phasing to be unnecessarily restrictive. The delivery of housing will be monitored through the AMR process.

Section/Policy**Policy H 3.2****Swan's Corner, Nunthorpe****DRAFTLP_508**

Full Name: Mr Mark Gabriele
Organisation: Bellway Homes (NE Division)
Agent Name: Shaun Cuggy
Agent Organisation: Barton Willmore
Submission type: E-Mail
Agree with section?: No

Comment summary:

Our Client considers that these artificial policy controls put in place to ensure the delivery of executive-style housing, at a lower density, are unnecessary and could potentially not be implemented, particularly when developers have to respond to and deliver what the market requires. Detailed site analysis and assessment undertaken as part of the planning application and design process will identify the useable areas of the Site and the appropriate density at which development should be delivered, also taking into account market factors. The requirements of H3.2 directly conflict with H2 and NPPF as it seeks to artificially restrict density in order to create an 'executive feel'. It is widely accepted that a sustainable density figure for new housing developments in the UK is 30 dwellings per annum, therefore delivery of only 115 units equates to half the accepted sustainable level. Therefore, request that the site is allocated for 155 units. Client's opinion that requirement for executive-style housing at a lower density should be removed from policy. At the very least, wording amended to allow alternative housing styles/provision, where it is evidenced that executive-style housing is not sought in this location. This would avoid a suitable housing site becoming undeliverable as a result of artificial policy restrictions, should the market change over the plan period.

Officer response:

The policy will be amended to reflect the planning permission that has been granted for the site.

DRAFTLP_213

Full Name: Ms carole morgan
Organisation:
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: No

Comment summary:

Massive improvements are needed to the road infrastructure (to solve the bottleneck at the A1043/A171 junction, to carry the new-development traffic approaching from Guisborough/Stokesley/Grey Towers and the 300 houses to be built at Longbank farm), before any more housing developments are allowed in the area.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_628

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Swan's Corner site, but welcome the requirements in criteria g.' for any required highway improvements in addition to the schemes identified and in criteria h. which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plan's spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.2****Swan's Corner, Nunthorpe**

DRAFTLP_472**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer.

Section/Policy**Policy H 3.3****Gypsy Lane, Nunthorpe**

DRAFTLP_214**Full Name:** Ms carole morgan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

10 dwellings is too many for this site - the surrounding homes are set in spacious gardens. Any new dwellings should mirror this.

Officer response:

The policy is reflective of the planning permission that has already been granted for 10 dwellings (R/2013/0765).

DRAFTLP_629**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Gypsy Lane site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.4****Morton Carr Lane, Nunthorpe****DRAFTLP_100****Full Name:** Nancy Thomas**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

1. Site unsuitable for development - land becomes swap after prolonged rain or snow, and muddy year round suggesting high water table. Small pits appear from time to time as if area has subsided. Seems risk of flooding and/or subsidence. 2. Loss of habitat - woodland is home rich and diverse wildlife habitat, as well as trees there are wildflower meadows, nettles and thistles, an invaluable resource for our declining butterfly population. 3. Loss of public amenity- is a well used and valued woodland by local people, used daily by number of people for dog walking (only suitable place in area) and is looked after by them (litter picking and bramble clearing). Don't want to lose this amenity. Lack of green space in Nunthorpe. Given documented health benefits and levels of proposed development, need woods more than ever. Previously told Council were keen to ensure significant proportion of site was retained as formal open space, including majority of wood, but I would like to propose that the entire area could become formal open space.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_216**Full Name:** Ms carole morgan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Policy H3.2 sec 6.49 and H3.4 sec 6.59 - green land in Nunthorpe should not be for housing. The site should be maintained as a natural space with an area of more formal park layout for seating, picnics. More housing with formal landscaping does not mitigate the loss of natural planting and wildlife habitat. H3.4 sec 6.56- The land has been well-used on a daily basis by local residents. Losing the site will remove the last area from Nunthorpe where dogs can be exercised freely without disturbing other residents. The alternative is to cross the busy bypass with fast-moving traffic, or cross the busy Ormesby bank onto Flatts Lane. c,d,e - A safe cycle route is long overdue between Nunthorpe and Guisborough; the public footpath should be upgraded to a bridleway and continued to join with the disused railway to Pinchinthorpe

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_473**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted; criterion g. will be removed from the policy as the site is more than 6k from the Teesmouth and Cleveland Coast Special Protection Area.

Section/Policy**Policy H 3.4****Morton Carr Lane, Nunthorpe**

DRAFTLP_630

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Morton Carr Lane site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.5****Longbank Farm, Ormesby**

DRAFTLP_631

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Longbank Farm site, but welcome the requirements in criteria b.' for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.6****Spencerbeck Farm, Ormesby**

DRAFTLP_632**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Spencerbeck Farm site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.7****Normanby Hall**

DRAFTLP_45**Full Name:** Mr John Keith Mason**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Object to 25 dwellings for the following reasons: Council changed its 10 year policy after only 4 years and may do so again. Impact on listed building and setting Access, traffic flows & road safety and Environmental issues.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_633**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Normanby Hall site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.8****Normanby High Farm****DRAFTLP_60**

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

It is essential that no highway link is provided between the existing High Farm development and that proposed to the south of the development. Access to any new development will need to come from Skippers Lane as it meets the B1380. Any highway link between two developments will create a through route that would no doubt ease congestion on Normanby Rd but would cause considerable safety risks and congestion where the north of the existing development joins the A1085.

Officer response:

The policy and supporting text confirm that access to the allocation site would need to be from the south, through an extension to the highway at Skipper's Lane.

DRAFTLP_634

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Normanby High Farm site, but welcome the requirements in criteria j.' for a transport assessment and in criteria k. which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comments on Normanby High Farm policy are noted. The technical note will be dealt with from a strategic perspective.

DRAFTLP_474

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Distance criteria applies to overriding policy H3.

Normanby High Farm**DRAFTLP_582**

Full Name: G M Collins
Organisation:
Agent Name: GVA Grimley Ltd.
Agent Organisation: GVA
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Fully supportive of the allocation. However object to criterion D (Prior to the completion of Current High Farm Development), in so far as this part of the policy is overly restrictive and unreasonable. Furthermore in relation to criterion J, 3.9 object to the capping of the number of dwellings at 150. SAJ Transport Consultants have assessed the site and consider that an acceptable vehicular access can be gained from Skippers Lane and also through the existing High Farm development. Furthermore it concludes that the site is capable of accommodating 200 dwellings, without causing a severe impact on the highway network.

Officer response:

Criterion d). is intended to promote the coherent future development of the High Farm site by ensuring the prior completion of the existing development so that the proposed allocation achieves, so far as possible, a logical extension to the development including pedestrian access as required under policy criterion c). The preferred policy approach is informed by the following: 1. The high level of remaining commitments (recorded at 174 as at 31/03/2016) and the fact that most of this land, which accounts for the majority of the outstanding commitments (116), is currently on the open market and in the same ownership as the allocation site. 2. Based on historic delivery rates, the existing development site would be reasonably expected to provide at least five years' housing supply, assuming the final phase is fully taken up. 3. Without the commitment of a second developer there is no indication that the allocation could be developed concurrently alongside the existing site. Given these circumstances it is reasonable, at the present time, to expect that the allocation should follow on as a later delivery phase regardless of access arrangements. The development ceiling of 150 units reflects both the junction capacity limitations and the need to allocate additional greenfield land outside development limits in order to meet the housing requirement, including the 20% buffer as set out in Policy H1. In allocating additional housing land the plan has sought to direct development to the most sustainable locations, and in this regard it is apparent that other preferred allocations, including those in Greater Eston, have better access to local services. As such, and notwithstanding the highway statement, additional development is not required at this location to achieve the Council's policy aspirations in terms of housing numbers.

Section/Policy**Policy H 3.9****Former Redcar & Cleveland Town Hall, Eston**

DRAFTLP_635

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the former Redcar & Cleveland Town Hall site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Section/Policy**Policy H 3.10****Former Eston Park School, Eston**

DRAFTLP_86**Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to the loss of playing fields. For Sport England to accept the loss of playing field to development it must be shown that there is surplus of playing pitches across all pitch sports and age groups both now and into the foreseeable future.

Officer response:

The former playing fields are not in community use and the Playing Pitch Strategy indicates that existing school facilities at Hillsview Academy are also not in community use due to lack of public demand. Nearby public open space at Eston Recreation Ground has sufficient unused capacity to be improved for increased use to satisfy a substantial increase in demand in the local area. As such, the Council considers that the loss of former playing fields should not prevent the sustainable re-use of surplus educational land. Furthermore, the policy allows for off-site contributions towards improving existing open spaces nearby.

DRAFTLP_636**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Former Eston Park School site, but welcome the requirements in criteria a. for a transport assessment and criteria c. which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.11****Corporation Road, Redcar**

DRAFTLP_9		Comment summary:	Officer response:
Full Name:	MR Daniel Oliver Corey	This isn't entirely a 'brownfield' site. Apart from the footprint of the former Saltscar school this site was 'greenfield' playing fields.	The site comprises only the built footprint of the former school. The former Saltscar playing fields to the south have been retained for educational and open space uses. There were incidental green areas on peripheral parts of the allocation site, but most of the land area was occupied by buildings and hardstandings, and the green areas effectively formed part of that built curtilage. Therefore, the site is considered to be 'brownfield' land.
Organisation:			
Agent Name:			
Agent Organisation:			
Submission type:	Web		
Agree with section?:	In Part		
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DRAFTLP_475		Comment summary:	Officer response:
Full Name:	Andrew Whitehead	We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.	Comments noted.
Organisation:	Natural England		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
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DRAFTLP_637		Comment summary:	Officer response:
Full Name:	Mr Chris Bell	At this stage Highways England is not able to provide specific comment on the development proposed at the Corporation Road site, but welcome the requirements in criteria g. for a transport assessment and criteria h. which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.	Comment noted.
Organisation:	Highways England		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		

Section/Policy**Policy H 3.12****St. Hilda's Church, Redcar**

DRAFTLP_638

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the St. Hilda's Church site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

DRAFTLP_476

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer as appropriate.

Section/Policy**Policy H 3.13****Connexions Campus (South), Redcar****DRAFTLP_87****Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to the site allocation due to loss of playing field land.

Officer response:

At the time the plan was prepared, detailed planning permission for the development of the site had already been secured by a volume housebuilder. Development has since commenced and as such the allocation will be deleted.

DRAFTLP_639**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Connexions Campus (South) site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

DRAFTLP_323**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

A number of allocated sites are close to designated heritage assets (for example H3.13, 3.19 and 3.24), or are within (in the case of H3.26. Having a positive strategy for the historic environment (as demonstrated by the plan) can avoid harming the significance of both designated and undesignated assets, including effects on their setting. At the same time, the allocation of sites for development may better reveal their significance (as suggested by Policy H3.26 and paragraph 6.169). However, at present the plan is not clear on how the sites have been selected, and how the impacts on the historic environment have been assessed, and will be incorporated into the layout and design going forwards. For information, Historic England has produced guidance on the Historic Environment and Site Allocations in Local Plans. This is available from

Officer response:

This site was included due it already being granted planning permission. As development has now commenced on the site, the policy is no longer required and will be removed from the plan.

Section/Policy**Policy H 3.14****Land adjacent Rye Hills School, Redcar****DRAFTLP_133****Full Name:** Mr H R Wildon**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

We would like to reiterate our objection to extending Conway Road so it becomes an access entrance for vehicles and pedestrians to a proposed new housing development. This cul- de- sac is already used at certain times as an overflow car park for Ryehills School and church services. Residents from Redcar Lane also use it at times to park their cars if they have any parking problems outside their own houses. Windsor Road is already used for access to the old Ryehills School site and would be adequate for the new development. Therefore I cannot see why you need to extend Conway Road as a second access facility for vehicles and pedestrians.

Officer response:

The supporting text reflects that in seeking to achieve access from the north rather than Redcar Lane as per the policy objective (criterion f), development would be potentially accessible from either road. However, as it has since become apparent that St Augustine's church site may become available for redevelopment, this could affect access and layout arrangements. The text will therefore be simplified to advocate that appropriate vehicular access should be gained from the north via Warwick Road.

DRAFTLP_334**Full Name:** Y Rate**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

I was unable to go the consultation on 6 July 2016. It would have been helpful if you had extended this consultation for 1-6 August for people who would have liked gone to see it and ask questions. I live in Redcar and there is planning permission to build 32 houses on the field at Rye Hills School on Warwick Road. There is a problem with traffic speeding on Warwick Road and Castle Road. We also have a problem with people parking their car on the pavement. A lot of parents take their children to school by car, (Stirling Road, Castle Road and Warwick Road), this causes even more problems during school term. It is hard to get out of Warwick Road and to Redcar Lane and also to get onto Warwick Road from Redcar Lane. I believe building more houses at Rye Hills School will cause even more problems with access to Warwick Road. I also understand that the church on Warwick Road is now up for sale, please could you tell me if any houses will be built on this land. What we need is multistorey car park so that people can park their car in Redcar Town Centre.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_663**Full Name:** Ms Marguerite Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to plan because it does not cover the educational needs of the area in terms of the quantity and quality of education over the next 15 years. There is a particular need to look at the provision of nursery/primary education in Redcar where many new houses are coming on line in the next few years, and the current facilities are highly loaded. The quality of Secondary education is poor when considered against similar areas of the country. For example, Ofsted recently rated Rye Hill School as in the bottom 20% of similar schools in the country. Therefore, strongly object to the proposal to build 30 houses on previously used educational land adjacent to Rye Hills School. This should be considered for nursery/primary school build. It could provide a cost effective build as some services, eg: part use if the playing fields are already there.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

Section/Policy**Policy H 3.14****Land adjacent Rye Hills School, Redcar****DRAFTLP_477****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer.

DRAFTLP_640**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Rye Hills School site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.15****Wykeham Close, Redcar**

DRAFTLP_641

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Wykeham Close site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.16****Grosmont Close, Redcar**

DRAFTLP_642

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Grosmont Close site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.17****Roseberry Road, Redcar**

DRAFTLP_643

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Roseberry Road site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.18****Land at Mickle Dales, Redcar****DRAFTLP_445****Full Name:** Frances Cunningham**Organisation:** Network Rail**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

We are concerned about the allocation of the site under Policy H3.18 particularly as the supporting evidence mentions the use of Cat Flat railway crossing as the key link from the development into the Town Centre. We are unable to support this site unless significant upgrades are made to the crossing.

Officer response:

Objection noted. There is access to services in Marske via the existing highway network if there is a safety issue with the crossing. Policy will be reviewed with either a requirement to improve the crossing or reference to the use of the crossing removed.

DRAFTLP_375**Full Name:** Andrew and Elizabeth Fox**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

An amendment to Policy H1 paragraph 6.18 would go some way towards the retention of the Strategic Gap and the Green Wedges in the Marske/Saltburn /New Marske area. If it becomes apparent at any point that a five year supply cannot be evidenced we will work with developers and landowners to bring forward additional sites provided it can be demonstrated that developments would make a significant contribution to reducing the supply deficit, that delivery on other sites would not be compromised as a result and that areas designated as Green Wedges and Strategic Gaps are not used for development N.B Site 3.18 is not shown on the site allocations map(appendix 3) on your website.It is shown on the printed copy in our library.

Officer response:

The suggestion would not comply with the National Planning Policy Framework. This states that in circumstances where a five year supply cannot be evidenced, local plan policies that relate to the supply of housing, such as green wedges and strategic gaps, should not be considered up-to-date.

DRAFTLP_478**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended as necessary.

Section/Policy**Policy H 3.18****Land at Mickle Dales, Redcar**

DRAFTLP_548

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (UK) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

TW fully support the proposed allocation of Land South of Mickledales, Redcar, for housing development, under Policy H 3.18 (Land at Mickle Dales, Redcar) of the Local Plan. TW has no comments on the policy, other than to suggest that the site could come forward as part of the Rowan Garth development to the north, and criterion d is amended appropriately to reflect this.

Officer response:

Support noted. The policy will be amended to reflect that the commencement of this site is not reliant upon the completion of Rowan Garth.

DRAFTLP_644

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Mickle Dales site, but welcome the requirements in criteria i.' for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.19****West of Kirkleatham Lane, Redcar****DRAFTLP_324****Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

A number of allocated sites are close to designated heritage assets (for example H3.13, 3.19 and 3.24), or are within (in the case of H3.26. Having a positive strategy for the historic environment (as demonstrated by the plan) can avoid harming the significance of both designated and undesignated assets, including effects on their setting. At the same time, the allocation of sites for development may better reveal their significance (as suggested by Policy H3.26 and paragraph 6.169). However, at present the plan is not clear on how the sites have been selected, and how the impacts on the historic environment have been assessed, and will be incorporated into the layout and design going forwards. For information, Historic England has produced guidance on the Historic Environment and Site Allocations in Local Plans. This is available from

Officer response:

The Council's conservation service is content that the development will have no more adverse impact than existing nearby large scale industrial sites.

DRAFTLP_479**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer as appropriate.

DRAFTLP_554**Full Name:** Mr Chris Munro**Organisation:** Homes and Communities Agency**Agent Name:** Mr Phil Brock**Agent Organisation:** WYG**Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Support policy and the development of this site.

Officer response:

Support noted.

Section/Policy**Policy H 3.19****West of Kirkleatham Lane, Redcar**

DRAFTLP_645

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the West of Kirkleatham Lane site, but welcome the requirements in criteria d. for a transport assessment and criteria e.' which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.20****Marske Road, Saltburn****DRAFTLP_360**

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Councillor Lambert is aware of this.

Officer response:

Noted.

DRAFTLP_217

Full Name: MR YOUNGS
Organisation:
Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: No

Comment summary:

This development will only diminish Saltburn's charm.What will visitors see as they approach this once beautiful victorian town but more urban sprawl. This estate will set a precedence for further development of the Saltburn buffer zone,Marske is looking very close.What about south of this site?Hob Hill could be the next target development with no thought for the local community, or green wedge.Keep this thriving town as it was first intended.

Officer response:

This policy has been included due to the planning permission that has already been granted. It will be updated to reflect the latest permission.

DRAFTLP_374

Full Name: Andrew and Elizabeth
Fox

Organisation:

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The amendment we have suggested to Policy H1 paragraph 6.18 below would go some way to ensure the retention of the Strategic Gap and the Green wedges in the Marske/Saltburn /New Marske area:- If it becomes apparent at any point that a five year supply cannot be evidenced we will work with developers and landowners to bring forward additional sites provided it can be demonstrated that developments would make a significant contribution to reducing the supply deficit, that delivery on other sites would not be compromised as a result and that areas designated as Green Wedges and Strategic Gaps are not used for development

Officer response:

The suggestion would not comply with the National Planning Policy Framework. This states that in circumstances where a five year supply cannot be evidenced, local plan policies that relate to the supply of housing, such as green wedges and strategic gaps, should not be considered up-to-date.

Section/Policy**Policy H 3.20****Marske Road, Saltburn**

DRAFTLP_646

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Marske Road site, but welcome the requirements in criteria e.' for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.21****Wilton Lane, Guisborough**

DRAFTLP_92**Full Name:** Susan Hogan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Development will contribute to more flooding because there is nowhere for the rain to drain off.

Officer response:

The policy requires the provision of a sustainable drainage system, and it is a well established principle that new development cannot make flooding worse; it has to be the same or better than before.

DRAFTLP_647**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Wilton Lane site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.22****Park Lane, Guisborough****DRAFTLP_94****Full Name:** Susan Hogan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Cleared parcel of land should be used as an archaeological dig, to see what history lays beneath the land. Afterwards consider using this plot for outdoor recreation facilities e.g. lawn tennis courts.

Officer response:

Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified.

DRAFTLP_137**Full Name:** A W Armstrong**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

There are many merits to the Park Lane site but proximity to a bus route is not one of them. For many pensioners, in need of sheltered accommodation the buses are far away.

Officer response:

Although not a main route, a local bus service connecting to Guisborough Market Place operates during the daytime along Park Lane and there is a bus stop opposite the site.

DRAFTLP_480**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer.

Section/Policy**Policy H 3.22****Park Lane, Guisborough**

DRAFTLP_648

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Park Lane site, however given the scale and type of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.23****Cleveland Gate, Guisborough****DRAFTLP_93****Full Name:** Susan Hogan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Development will contribute to more flooding because there is nowhere for the rain to drain off.

Officer response:

The policy requires the provision of a flood risk assessment and surface water management scheme. Under national policy requirements, new development cannot make flooding worse; it has to be the same or better than before.

DRAFTLP_279**Full Name:** Sylvia Smith**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

If allowed development of these areas will have a serious, irreversible and detrimental impact on the surrounding area and Guisborough as a whole. I would ask that the councillors stop viewing these sites as purely development potential and start appreciating their intrinsic historic and attractive value to the area. Guisborough is already losing many green field sites to development which is changing the nature of the area for the worse and I believe it will have a negative impact on the Towns infrastructure, schools, and local amenities. The local secondary school is reducing it's numbers, the GP surgeries are at stretching point and the roads are becoming increasingly clogged up. Why does Guisborough require any more housing development? There is a downturn in local industry right now and this may worsen, who will be buying new properties? The housing market is already very slow locally with houses being difficult to sell. Why isn't there any value within the local plan for the sites as local amenities rather than development? This area still needs local facilities for public use the Rugby Club (which I believe is also earmarked) should be preserved and improved to provide for social activities as they are now. I am requesting that these areas are REMOVED from the draft local plan for housing development.

Officer response:

Comments noted. The Council considers that the level of development included in the Local Plan for Guisborough reflects its role as the main rural settlement. We are working in consultation with the infrastructure and service providers to ensure that new development is adequately served. The Rugby Club is not included for development within the plan.

DRAFTLP_271**Full Name:** Cllr Dennis Teasdale**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

We have here a proposal to build 135 properties on what I believe should be retained as light industrial land. Guisborough need to attract more industry and jobs. I have not seen any form of aggressive marketing to encourage new industry or relocation of existing small businesses. In this respect I feel we should be looking to try and attract some national wholesale outlets, for example, those that serve parts of the building industry as well as providing retail services alongside trade sales. We should also be encouraging start up' units. We have a limited number on Morgan Drive surely we can encourage more with the right incentives. Housing development on this site seems to me to be the start of a progression of development on to the adjoining fields towards Belmangate (the existing Rugby and Cricket Fields). I would hope I am wrong but once a foot is in the door' it may be difficult to stop even with a strong Local Plan in force. My reasons for concern with this development are similar to those for Belmangate Field in many respects, the main one being we do not need any more development in light of the ongoing developments in other parts of the town. Again I request this development be withdrawn from the Plan and the area targeted for light industry.

Officer response:

The Council considers that this site is suitable for housing development during the plan period and there are no substantive planning reasons why it should no longer be included. The removal of this site is, therefore, not justified. Policy ED7 sets out the policy for the industrial part of this development site.

Section/Policy**Policy H 3.23****Cleveland Gate, Guisborough****DRAFTLP_202**

Full Name: Mr A J Halfpenny
Organisation: Belmont Community Group
Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

I wish to object to the proposal to build development on land to the west of the existing Rugby Club field. This area should be used for further provision of sporting and recreational facilities. This green area should be protected at all costs if the character of the town is to be preserved. Are considerable benefits of this. Previous development in Guisborough was fairly well tolerated but is reaching far too great a scale and is destroying the character of the town. Present activities undermine laudable mission statement in paragraph 2.

Officer response:

Comments noted. The Council considers that the level of development included in the Local Plan for Guisborough reflects its role as the main rural settlement. There are no viable proposals to use this site for leisure purposes and, as such, needs to be considered for other development such as housing.

DRAFTLP_254

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland Borough Council
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Once the Cleveland Gate project is fully underway with what I should think will be the approval for another 135 dwellings on Springwood Road, Rectory Lane must be investigated for a better road safety/strategy management and increased demand. The junctions on Rectory Lane which include the Cleveland Gate complex, Morgan Drive, Enfield Chase, Rectory Avenue/Close, Dorset Road and Hutton Lane must be investigated with a view to better access and traffic management.

Officer response:

The policy requires that a transport assessment be undertaken as part of any planning application. This will properly assess the impact of the development on the local highway network and advise of any improvements that will be required to accommodate the new development.

DRAFTLP_481

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted; site falls outside 6km radius of the protected site.

Section/Policy**Policy H 3.23****Cleveland Gate, Guisborough****DRAFTLP_513****Comment summary:****Officer response:**

Full Name: Mr James Johnson
Organisation: Avant Homes
Agent Name: Mr Phil Jones
Agent Organisation: Nathaniel Lichfield & Partners
Submission type: E-Mail
Agree with section?: In Part

The site is considered to represent a very sustainable location for new housing development and indeed, the Council has acknowledged this through the proposed allocation of the site for housing in the emerging Local Plan. The allocation and development of this site will be highly beneficial to the local economy and provide a significant contribution towards achieving the housing requirement and levels of economic growth needed in the Borough. The plan allocates Cleveland Gate for 135 dwellings by 2032. Avant Homes agree with this allocation and the quantum of development proposed for the entire Cleveland Gate proposals. However, we believe greater flexibility of this policy could be provided through some minor amendments to the draft policy, as it is too rigid as currently written. At present this allocation is for 135 dwellings with no provision made for changing market conditions or fluctuations in local demand. As such, the policy in this context is not compliant with the NPPF requirement for the plan to be positively prepared and flexible.

Support for policy noted. The Council believe 135 dwellings is an appropriate number of dwellings for this site. However, note that with changing market conditions and site design considerations the actual number may be less. Flexibility will be included to allow development of up to 135 dwellings.

DRAFTLP_649**Comment summary:****Officer response:**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

At this stage Highways England is not able to provide specific comment on the development proposed at the Cleveland Gate site, but welcome the requirements in criteria b.' for a transport assessment. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Comment noted.

DRAFTLP_139**Comment summary:****Officer response:**

Full Name: A W Armstrong
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Development in the Springwood area will have a large impact on infrastructure. Leisure facilities are at the opposite side of the Town - young people will generally need to be driven there by car. Traffic levels will increase and nothing is being proposed to alleviate this - there will be a large impact on Rectory Lane, the junction with Dorset Road with Hutton Lane and Rectory Lane. Also New Road is becoming a major throughfare. For the residents of Kemplah House, many of whom have poor eyesight and hearing, crossing the road to access the town centre is very hazardous.

The policy requires that a transport assessment be undertaken as part of any planning application. This will properly assess the impact of the development on the local highway network and advise of any improvements that will be required to accommodate the new development.

Section/Policy**Policy H 3.23****Cleveland Gate, Guisborough**

DRAFTLP_242

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Only asked for the establishment of a footway link onto the Guisborough Branch Walkway. What about cycle links? The Branch Walkway' is a strategic east west cycle link. It was also named a Sustrans strategic route. It provides access to schools, shops, other leisure routes and housing links. All the elements we need for people to be more active.

Officer response:

The proposed development incorporates the reopening of an historic footpath link through the site to the Guisborough Branch Walkway (Sparrow Lane) and in the Council's opinion this is likely to be sufficient to accommodate cyclists as well as pedestrian users, without the need for a dedicated cycleway.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough**

DRAFTLP_571**Full Name:** Mr Ben Stephenson**Organisation:** Persimmon Homes
Teesside Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Persimmon Homes fully support the allocation of H3.24 Belmangate Field, Guisborough for residential development. The site is considered to be a sustainable, available and achievable solution to meeting the town's housing need and can deliver the following social environmental and economic benefits: - Site forms a logical infill opportunity and therefore avoids identifying a site of equivalent size in open countryside. - Site is in close proximity to the centre of Guisborough and will therefore support businesses and services in this location. Convenient access to shops and services reduce the need to travel great distances and reliance on private car. - Site will make positive contribution to market and affordable housing and meet present and future needs and aspirations whilst contributing to readdressing existing imbalances in housing stock. - Will bring economic benefits including direct and indirect job creation, New Homes Bonus and added expenditure in local economy. - Site can be developed in a sensitive manner which respects and complements the character and appearance of the Conservation Area to the north. Importantly the site is supported by one of Britain's largest house builders and should be considered deliverable. We recommend that the yield is amended to 50 units to reflect our plans for the site, which demonstrate units can be accommodated and take into account the need to respect the conservation area, amenity of neighbouring residents and usable public open space. A draft layout can be provided to the Council upon request. Finally, we note that Appendix 4 (Housing Delivery Schedule) identifies the site coming forward from 2025/26. We consider the site to be deliverable with no legal, policy or physical constraints which would prevent the site coming forward within the first 5 years. We therefore ask for this to be reflected in the trajectory

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_225**Full Name:** Jennifer Creek**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to development on this site due to the following reasons: 1 Drains are inadequate to cope with the run off when we have heavy rain. Some of this water will go towards Chapel Beck and Whitby Road but some will run into the gardens, and possibly the houses, on the side of Belmangate. 2 The field is used by bats and barn owls for both roosting and hunting. 3 There are several old hedgerows that would have to be destroyed in order to bring an access road through from Butt Lane to the field. These hedges are several hundred years old. 4 The development would lead to bright street lighting making it impossible to see the night sky.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Belmangate Field, Guisborough

DRAFTLP_270

Full Name: Cllr Dennis Teasdale
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

I have been approached by a number of local residents who are objecting to this proposed development. You will have received by email and written correspondence the concerns and objections of residents. I fully support the objections put forward by residents. There is absolutely no need for this development and the subsequent destruction of ancient field and hedgerows, wild life and the loss of yet more valuable green belt land which could be better utilised for leisure and environmental schemes. With the continuing house building on other sites in Guisborough no more housing is needed. We are starting to see a reduction in house prices because of recent past and continuing building with many more properties on existing established estates are standing empty because of the stagnation in the local housing market caused by overdevelopment. We already have many new proposed properties on existing (ongoing) developments. Guisborough now needs a long period of stability with no further building. I am particularly affected by the proposal to bring in the estate road from Butt Lane and immediately behind 2-20 Whitby Avenue (a flood plain). I live, with my wife, at No.4. The proposed access off Butt Lane is so close to a blind corner (Whitby Avenue/Butt Lane) that, in my opinion, it would cause a severe hazard. This is exacerbated by the fact that it is a one way' system to leave the estate all traffic has to exit down Butt Lane on to Whitby Road. I would also suggest that the increase of traffic from the proposed development (possibly another 80+ vehicles) would present a major problem exiting and entering the estate from the main Whitby Road, a busy route out of Guisborough. Whitby Road estate has, for many years, suffered drainage problems. Previous local authorities and now Northumbrian Water have failed to resolve them satisfactorily. An additional 40 properties is not going to help this situation. From copy letters and emails I have received local residents have ably articulated very logical and sound reasons why this development should be withdrawn from inclusion in the Local Plan. I fully support all I have read and hope common sense will prevail and this proposal is withdrawn.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Belmangate Field, Guisborough

DRAFTLP_269**Full Name:** Michael Bennett**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Having listed all problems with the site ((a) to (k)) and in Paragraphs 6.159 to 6.164, I am at a loss how you can still conclude that the site is suitable for development. Historical interest and value. History of field, as agricultural land goes back to the middle ages and one can still see the remains of the ploughing system known as Ridge and furrow. This is an archaeological pattern of ridges, of historical value and should be protected and not destroyed by development. Also in the north of the site there are six old coaching houses, some still with the original features and harness racks for the horses. Local tradesmen used these buildings. More recent history of the field goes back to the Great War of 1914 -1918. A group of soldiers were billeted on the field and built a small hut with washing facilities, on the site of what is now the Sea Cadets hut. When war ended they developed the site to include football pitch, boxing ring, etc. and handed it to the town. This was the original Guisborough Boy's Club. Modernised over the years and now of brick construction this site and building forms part of the history of the town. Conservation area The three smaller fields to the north of the site are all situated in a conservation area. Despite the promises and undertakings in The Local Plan (Vision for Redcar and Cleveland Paragraphs 1.100 to 1.104 inclusive) and the repeated promises to protect green belt and conservation areas, Policy H 3.24 advocates driving an access road through this area of exceptional flora and fauna in order to access the main field for development. This is simply not compatible with the earlier promises. Listed buildings in the area bound the site and a new build estate on the field would not be conducive in enhancing the area in any way. Streetlights would increase light pollution and have an adverse effect on the quality of life of those bordering the development and on the wild life in the area. Site Access Apart from destroying part of the Conservation area a junction off Butt Lane is neither practical, nor desirous. Would create safety issues. Insufficient sight lines and room to put in place a safe traffic system to allow another junction out onto Butt Lane between Whitby Avenue and Whitby Road. A further 40 houses could well generate a further 100 vehicles entering and leaving the proposed site causing further congestion and probably requiring a dedicated protected right turn into the estate. This of course would not be possible due to the location of Chapel Beck running beside the road. Flora and Fauna The proposed site abounds with nature and the natural habitat, including hedgerows and trees, is the home to many birds that are already appearing on the RSPB list of endangered species. There is also bat activity throughout Whitby Avenue estate and anecdotal evidence of bat roosts in the aforementioned coaching houses and up Butt Lane toward to the old railway line. Any disturbance to the area in the way of vehicle access or house building will undoubtedly disturb the balance of nature and probably see the loss of these species in the area. Flooding. The area alongside Chapel Beck between Belmangate and Butt Lane is susceptible to flooding at times of heavy rainfall, and the field itself stands in water. A recent government guideline suggested that there should NOT be any development on land, which is subjected to flooding. Building on the field can only add to the problem of surface water run-off resulting in more frequent and severe flooding in the area of Whitby Road.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_266**Full Name:** Helen Wynn**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to proposed Belmangate Field development for following reasons: Affect of access road on conservation area, wildlife and hedgerows. Increased traffic at Butt Lane junction affecting safety. Butt Lane is already a flood hazard and proposed would increase the danger across Whitby Road. Loss of Privacy and increased noise from properties. Affect on bat colony No need as 9% vacancy in Guisborough Loss of recreation area for Sea Cadets and Cub Scouts Guisborough has grown but general amenities have not - long waiting times for doctors and increased school class sizes.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_265**

Full Name: Mr and Mrs A Loughran

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Object to 40 new houses at Belmangate Fields. The access which will go across two fields which are conservation areas and will be within yards of the very busy Guisborough to Whitby road and bus routes. Forty houses would probably amount to a minimum of eighty extra cars in and out of the only exit from the Whitby Road estate. I have seen close calls on this road myself and foresee stationary cars on this road and accidents both major and minor.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_263

Full Name: J.V Fairbrother

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Object to inclusion of Belmangate Field as a potential residential development for the following reasons: The proposed access road would have considerable impact in terms of safety, visual amenity, noise, loss of privacy and other disturbance. The Butt Lane junction is already extremely busy and fraught with hazards as the only exit from Whitby estate. Water quality in chapel Beck is a concern which will be exacerbated by new road. Loss of hedgerows forming wildlife corridor.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_262

Full Name: Angela Groves

Organisation:

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: No

Comment summary:

Object to inclusion of Belmangate Field for development for following reasons: Located in a conservation area which should be respected and is part of the charm of Guisborough Light Pollution from street lights and traffic Noise pollution from families and traffic Air pollution from traffic Loss of wildlife habitats Loss of ancient hedgerows Risk of flooding due to poor site drainage. Currently fields offer a sump for rainwater Inadequate space for vehicles to turn into the proposed road off Butt Lane, potentially causing dangerous traffic build up.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_261****Full Name:** Mrs Kirstie Gibb**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to the inclusion of Belmangate Field as a proposed development site for the following reasons: Proposed access through conservation area on land of historic interest. Destroying hedgerows and wildlife habitats and reducing visual amenity of the eastern entrance to Guisborough. Proposed new junction onto Butt lane too close to existing junction onto Whitby Lane causing safety hazard and congestion. New access causing loss of privacy and additional traffic noise for existing houses. Sited on well used field for Sea Cadets and Scouts and special events. Concerns of surface water drainage as paddocks act as natural flood plain. Increased risk of Chapel Beck flooding Too many houses in Guisborough with a lot for sale or to let. Character of town being destroyed and brownfield should be utilised instead of the few green spaces near the centre.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_273**Full Name:** Mr D Oliver**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Currently the stables, sea cadets, and cubs/scout groups provide a learning/recreation opportunity for local residents and their families. You only have to look at the sea cadets web site to appreciate the activities that are undertaken on the ex football pitch area adjacent to the scout/sea cadet buildings. Indeed if the pitch had been maintained by the council, as it used to be, then the area would almost certainly be used even more for a multitude of sporting activities. Whilst I understand that additional housing needs to be built in the Borough, I suspect Guisborough has already built, or has approval to build, more than its share of the overall quota for Redcar and Cleveland. A summary of my other main concerns are as follows- 1. My understanding is that access to Belmangate Field would be from Butt Lane, which means that any proposed road would pass through a conservation area. If the fields within this area were considered worth conserving in 2011 (when the latest Appraisal was produced), what has changed? Indeed a road through these fields would neither preserve or enhance the area, but would destroy it. 2. Providing safe access to the site from either Butt Lane or Whitby Road may cause road safety issues. 3. Loss of valuable wildlife habitat. The beck which runs by the side of Whitby Rd. (between Butt Lane and Belmangate), and the ancient hedgerows which run between the beck and Whitby Avenue, provide a vital wildlife corridor for birds, bats and small mammals. A bat survey carried out recently to demonstrate this is provided (see attached). Guisborough is an old market town steeped in history, and the approach from the east along Whitby Road is the only approach that retains some of that history and character.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_227**Full Name:** Mr Ged Groves**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to Belmangate Field development for following reasons: destroying ancient hedgerows and wildlife habitats and affect the local at population adversely affect the visual quality of the historical eastern entrance to Guisborough and compromise the town's historical status Causing light, noise and air pollution having serious flooding implications for Belmangate Development in Guisborough should: take into consideration the

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_348****Full Name:** Irene Hogan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to development on this site including a the access road that will join Whitby Lane, which is already a busy road and would cause more congestion and accidents. The field is also a conservation area containing old tables that back onto by garden plus houses on either side. These stables house original features and are a habitat for bats plus there is other wildlife in this area.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_224**Full Name:** Dave and Rhona Atkinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to allocation for following reasons: Access hazardous for pedestrians and road traffic. The junction of Butt Lane busy and dangerous. Proximity of new road to property increasing road noise. Loss of wildlife habitats, hedgerows and countryside ambience. Strain on schools, doctors and town parking. Loss of recreation area.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_220**Full Name:** Anne & Geoff Sturman**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Main concerns are: 1. Huge amount of new builds in Guisborough at the present time when the existing housing market has become stagnant as home owners cannot compete with incentives offered by builders. If most of the new houses were starter homes to help people buy their first home it would be good but as far as I can see most are 3/4/5 bedroom family homes. 2. This puts great strain on the school facilities available. The new Laurence Jackson school has just been completed. Will we need temporary classrooms within the next 5 years to accommodate extra pupils? 3. Proposed entrance to the site onto Butt Lane is an accident waiting to happen, traffic coming from the town approach this area from a blind bend in the road. Anything waiting to turn into Butt Lane and then immediately right into the proposed site would cause chaos and be potentially dangerous. 4. Whitby Avenue is already used as a "Rat Run" for motorists coming from Hunters Hill towards Whitby thus avoiding the traffic lights at the bottom of Belmangate. The road is an obstacle course to navigate at the moment because of its width and design. Anyone living on the proposed site would of course do the same to access their homes adding to the problem. 5. Site has been used for many years as a recreation field, primarily used by the Sea Cadets and Scouts. How many more play areas are going to be swallowed up in this way when we are constantly being advised to encourage children to be more active instead of sitting in front of a screen. 6. The destruction of ancient hedges and wildlife. We are already seeing the forest being cut down with what must be devastating effects on wildlife. We need to conserve as much as we can.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Belmangate Field, Guisborough

DRAFTLP_204**Full Name:** MR G Gunn**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

1. Areas to play safely and enjoy games, sport, clubs, etc. in Guisborough are limited. If site was built on two well-trained groups would lose their area. They are the next generation and need help. 2. If a new road was built in the fields by Butt Lane the traffic would be terrible. Traffic problem is already bad. Noticeable we are getting younger generation in area and they will want a safe play area. 3. The infrastructure is huge, police, medical, schools, narrow roads, poor parking in shopping area. Most families have two cars, that is why most young people do not shop in the town, but go elsewhere. 4. Guisborough does not need more homes, as it has little to offer in work, so people have to commute. The houses proposed are sore which will get worse as the town grows. I love the area and surround, it would be terrible to lose the playing field, I wonder how many people know about the USA army there in 1917-18, and the wildlife that would be lost to satisfy someone's greed for money. you wish to help Guisborough: 1. Look at the road width, very few can be widened, Whitby Lane is a classic example. Buses, lorries, help in any way you can. 2. Their is talk from older people born in Guisborough, that when George V playing field came into being, the father of the present Lord Guisborough is claimed to have said 'this playing field in Belmangate will be kept for all time, I believe George V put the playing fields scheme up around 1934-35.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_576**Full Name:** Mr J Moulder**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

We are strongly opposed to the inclusion of this site for the following reasons. 1) Effect on Conservation Area - appears in conflict with HE1 and Key Proposals 'to protect the natural and historic environment of the borough'. 2) Loss of Playing Field/Open Space - to say site is 'largely disused' is not completely accurate. Key Proposal in Local Plan is 'to encourage the provision of additional open space, and sport and recreation facilities'. 3) Road Access - Access road would produce safety risk and impact on amenity of neighbouring properties. Please review in light of SD4 b). 4) Impact on wildlife habitats - supports a variety of species including RSPB red and amber endangered species (please see attachments). Please review N4 which states wildlife corridors will be protected and enhanced. 5) Flooding - lower part of site in Chapel Beck flood risk catchment. Standing water in area following heavy rainfall and development will reduce soak away areas. 6) Impact of house building on Guisborough as a historic market town. Although we understand the pressing need for a Local Plan, there is considerable opposition to the site and its proposed access. We hope that you will remove the site in light of points made.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_249**Full Name:** Cllr Bill Clarke**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

If and when a planning application for a housing development on Springwood Road is made for 135 dwellings which I can see no way this being stopped through the planning system. If this was given the go ahead it means since 2012 Guisborough will have had applications approved for about 1238 dwellings. Way out of proportion for a town this size and this needs managing. Through this I would want the proposal of a development on the Belmangate Field for 40 dwellings deleted from the draft local plan policy H 3.24 on page 159 refers. This area on the Environment Agency website is subject to flood risk and surface water risk. There is no reasonable route in or route out for this development and the one used could increase danger to traffic and pedestrians alike due to the location of this proposed development. It will remove a central recreational area which is secure for children to use from the centre of the town. Many residents can walk here thus removing transport and carbon footprint increases.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_367****Full Name:** Eileen Learman**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Access would be severely affected from the Whitby Road Estate. Butt Lane is the only way off the estate and at times already difficult to negotiate. The Belmangate area in 2000 was flooded badly in the September rains, which in turn could make it difficult for the owners of any new development in that area difficult to insure.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_199**Full Name:** Jean Crow**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

The access road would run along two fields close to neighbouring properties with loss of privacy. Also the proposed entrance from Butt Lane would cause congestion with traffic from Whitby Avenue, also Whitby Lane junction. Guisborough already has numerous new housing developments taking up green field sites. Are all brownfield sites in use? Conservation areas such as wildlife and hedges being destroyed. Loss of playing field site. Town centre parking further under pressure.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_575**Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

It is Sport England's policy to oppose the loss of playing field to development unless one of five exceptional circumstances pertains to the development. The allocation does not suggest that the playing field is to be replaced elsewhere and so it is incumbent on the Council to show that the playing field is surplus to the needs of pitch sport now and for the foreseeable future. The Council's Playing Pitch Strategy does not highlight surplus of pitches, and nor does it identify this site as being surplus, and as such Sport England wish to additionally object to this allocation.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough**

DRAFTLP_574**Full Name:** Ann & Les Jackson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

With regard to the proposed building of forty houses on Belmangate Field. I want to let you know that I strongly objects to this proposal. Whitby Lane is very busy road, can you imagine what it would be like to get in and out of the estate to the houses the road is far too narrow. Then there is the wild life such as bats and swallows what happens to them? The listed buildings like the stables and garages and the boys club. It is my understanding the boys club was given by the late Lord Gisborough . Houses seem to be going up in every green space in Guisborough, can we not keep a small amount of how it used to be?

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_573**Full Name:** Christian and Kim Holliday**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

I am writing to you regarding the proposed development of Belmangate field ,an area of green belt and natural beauty which is adjacent to the priory grounds in Guisborough. What upsets me most of all is that this land is classed as disused Land which In fact couldn't be further from the truth. It is used by various scout groups and sea cadets and has been for the 45 years that I've lived adjacent. The field its self is used for drill practice and various scout training including tent building and team games. The council also class the area as a built up area which is wrong. Belmangate itself is between 200 and 300 years old and is a conservation area, the fields behind Belmangate have never been built on as they follow the road out of Guisborough past the Hall and are the Gateway to the north York moors. The land is also home to some very old buildings including the old stone stables and garages which are very much part of the towns heritage. I'm sure the council are also aware of the fact that the proposed site sits opposite the priory gardens and is therefore with in the priory boundary and therefore the development on such land could only be classed as a total travesty to the history of one of the county's oldest market towns. It's also common knowledge in the town that the drains and suer systems are already unable to cope with the demand and were never designed with future developments in mind, the flooding of Belmangate and the stream on the Whitby road are unfortunately now a regular event. As I'm sure the council are aware there has been much development in the town over recent years and in my opinion we have more than enough houses and are now very close to destroying the identity of what is a beautiful market town, also the building on land which has been used by generations of the towns children boils down to nothing but greed on the hands of the land owners whom themselves have a duty to Guisborough and its people. I would urge the council to visit and view for themselves the importance this land has on the children the residents the wildlife and the heritage of our town.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_429****Full Name:** J&B Greenwood**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The Draft Local Plan itself states that a site is deemed suitable where it b. will not have a significant adverse impact on the amenities of occupiers of existing or proposed nearby properties; c. will not result in the unacceptable loss or significant adverse impact on important open spaces or environmental, built or heritage assets which are considered important to the quality of the local environment; d. minimises the loss of best and most versatile agricultural land; e. avoids locations that would put the environment, or human health or safety, at unacceptable risk; f. has adequate infrastructure, services and community facilities to serve the development; and l. reduce pollution, noise and vibration levels to meet or exceed acceptable limits; m. respect or enhance the landscape, biodiversity, geological features, the historic environment and both designated and non-designated heritage designations that contribute positively to the site and the surrounding area; n. provide vehicular access and parking suitable for its use and location. Proposals require an access road through a conservation area and destruction and degradation of the historic hedgerows, which are extremely rich in biodiversity. Construction would have negative impact on the character of this historic part of Guisborough and would lose a valuable amenity in the heart of our community. Community uses and enjoys the field as a recreation area. Children use this space for valuable outdoor training and exercise. Provides a peaceful and well maintained agricultural area which enhances the lives and wellbeing of those who live alongside it. access route will create serious safety and congestion issues for residents, walkers, cyclists, horse riders and drivers in and around Butt Lane and Whitby Road. This is a very well-used recreation zone because of its bridleway and footpath access. Would place all these users at an unacceptable risk of harm and reduce safe access to these important recreational areas. Have serious concerns about the general infrastructure of the town. There is pressure on the local GP surgeries. Plans do not seem to include suitable additional facilities for current or future residents. The new secondary school opening this September has not had its pupil capacity increased in recognition of the expanding population and fail to see how building more housing in a place where you are unlikely to be able to access essential services will draw working people to the town. For these reasons the inclusion of Belmangate Field in the Draft Local Plan would seem to run counter to the principles of the Plan itself and, therefore, should not be included.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_283**Full Name:** Mrs Janet Claridge**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The proposed development of Belmangate field is a thoroughly bad one for several reasons. Brownfield sites should be built on rather than destroying a green field with its recreational area. Huge numbers of houses are now being built in Guisborough with little sign of new jobs to employ the swelling population of this town and so we do not need more dwellings here. Car parking, GP surgeries and schools are at full stretch and will not be able to cope with such a rapidly exploding population. Although the development of Belmangate field would not affect the views

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_368****Full Name:** I.J Learman**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Objects to the Belmangate development for the following reasons: Loss of open space Unsatisfactory access from Whitby lane and Butt Lane Increased safety hazards for pedestrians and vehicles The access road to the development is 'inelegant' and impairs the visual impact when approaching Guisborough.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_274**Full Name:** Sylvia Smith**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

If allowed development of these areas will have a serious, irreversible and detrimental impact on the surrounding area and Guisborough as a whole. I would ask that the councillors stop viewing these sites as purely development potential and start appreciating their intrinsic historic and attractive value to the area. Guisborough is already losing many green field sites to development which is changing the nature of the area for the worse and I believe it will have a negative impact on the Towns infrastructure, schools, and local amenities. The proposed access road is on a conservation area, this is a lovely environment and the development, basically, will spoil it irreversibly. There are ancient hedgerows and field systems which will be devastated, in other areas this kind of environment is treasured and appreciated why not here? The local secondary school is reducing it's numbers, the GP surgeries are at stretching point and the roads are becoming increasingly clogged up. Why does Guisborough require any more housing development? There is a downturn in local industry right now and this may worsen, who will be buying new properties? The housing market is already very slow locally with houses being difficult to sell. Why isn't there any value within the local plan for the sites as local amenities rather than development? This area still needs local facilities for public use the Sea Cadets and Scout Field should be preserved and improved to provide for social activities as they are now. I am requesting that these areas are REMOVED from the draft local plan for housing development.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_366**Full Name:** Mrs P.M Best**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Objects to Belmangate Field for the following reasons: Impact on historic interest and conservation area. Loss of green space, hedgerows and wildlife Impact on access and movement, road safety and noise from increased traffic Scout hut and cadets use the area Impact on youth participation in sport from loss of accessible recreational sites Impact on views Impact on school places, doctors and dentists Impact on limited parking in the town and road safety from cars looking for parking places.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Belmangate Field, Guisborough

DRAFTLP_363**Full Name:** Louise Needham**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

A development of the nature intended would have a serious impact on the area around it. my specific objections are as follows: Access road being planned and requiring clearing of green space and ancient hedgerows / wildlife habitats in a conservation area - negatively impacting visual amenity of this beautiful part of Guisborough. One of the reasons my family decided to re-locate to Guisborough, and indeed the Whitby Avenue estate, was because of the natural beauty of the woodland surrounding it and careful balance of green space vs housing and commercial. This town is already becoming infamous for being a building site (and being seen as less attractive a proposition as a result) - surely it is at a point where any further development should be confined to brownfield space ripe for re-development as opposed to greenfield sites? Guisborough is already peppered with housing developments which, to my mind, raises serious concerns about ability of infrastructure to cope with ever-increasing population numbers. For example, the existing GP surgeries, town centre parking (already pretty much a no-go) and more importantly for our young family - school places. We have already been warned indirectly that our catchment primary school (Belmont) is expected to be full for enrolments in the next couple of years, which will affect us with our 2 year old daughter even though we are in walking distance... Quite how primary schools (and indeed the secondary school and college) will be able to cope given the extent of current and planned further developments for housing remains to be seen and of concern. More directly and immediately, we worry what impact this proposal will have on the roads around our residence - in particular in terms of traffic, road safety and noise levels - on an estate whose design is currently such that children feel safe to walk alone, ride their bikes etc. The impact of losing a playing field site / recreational area is a massive shame. Time spent outdoors has never been more important, particularly for young people, and removing such areas can only contribute to increasing boredom and disenfranchised groups. If the allotment area will also need to be destroyed, this is also a negative impact on the town. Surely the skills and heritage involved in local, sustainable produce-making has value and should be protected?

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_352**Full Name:** Lizzy Slade**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Would like to see site removed for the following reasons: Proposed site is a conservation area, home to many birds and animals from swallows and kingfishers to bats who not only nest in the loriginal old coach houses now used as garages still with original features but also use the hedrow (dividing the paddocks where the proposed access road will go) as their route through to their feeding sites. The paddocks proposed as the access road have visable rigg and furr ridges going accross the field, this old way of farming dates back to medieval times. These little gems of places should be protected so that many more people can enjoy them. Also on the proposed access road site, the paddocks are prone to flooding with the surface water coming off the scouts/sea cadets field and sitting in the paddocks. If the site was to be built on this water has to go somewhere, which then puts other parts of guisborough at risk of flooding as the water would be directed into the beck which flows through the town. The Beck has already flooded in previous years so adding more water to it would only increase the flood risk. The Sea Cadets/Scouts (Belmongate field) use the field on a regular basis and moving them would mean they may not have the facilities in a safe location to use. Meaning more children may not attend, creating more problems in the area with children causing problems. The proposed access road is just off Whitby Lane/Butt Lane, which is already an extremely well used route not only by residents but people cutting through from Belmongate. This would create more traffic problems and potentially cause accidents as, the access to the busy main road would become very congested.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_351****Full Name:** J Hewitt**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to the proposed development due to the following reasons: Congestion; proximity of the proposed road to Chapel Beck, which is a wildlife habitat. Kingfishers are seen here on a regular basis; the area is used for recreational space; there is nowhere else for children to play; and there has already been a lot of building in Guisborough and it is fast becoming one large housing estate instead of a market town.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_337**Full Name:** John Forster**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

With reference to the western entrance to Guisborough via Stokesley Road, I think that the approach has been spoiled by views of the new development from the A171. I am also very concerned that the eastern approach is under threat by development H3.24 Belmangate field, with an access road at a busy junction and the use of the conservation area off Butt Lane for access. I hope that you will look closely at what is happening in the Guisborough housing market and would strongly urge you to review the housing allocation strategy. Please preserve our historic areas for future generations.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_280**Full Name:** Lisa Collingwood**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The plan to build 40 houses on Belmangate Field would: Put added stress on already over subscribed school and GP surgery and infrastructure. The planned entrance would run through a conservation area and would reduce visually the historic East entrance to Guisborough. This road is already busy and this would add to congestion issues and safety of the turn onto but lane. There would be a loss of privacy for those houses already overlooking the proposed access. There would also be the loss of play field area and ultimately social hall for sea cadets/scouts. This is greenfield land left to the Town for its people as a legacy, there are already many properties for sale but the market remains very stagnant in this area and this proposed plan would further over saturate the market.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_371****Full Name:** Mr Ken Stuart**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to development on this site for the following reasons: Road Safety Traffic congestion issues at the junction with Butt Lane. Destruction of an Ancient hedgelines /wildlife habitats in a conservation area The loss of yet another greenbelt piece of land in the centre of Guisborough Proposed access point at Butt Lane in close proximity to a listed building The loss of yet another Playing field site / recreational area We have seen a large number of new houses built in Guisborough over the last 10 years to a point where this is not a market town as it once was, which in turn is changing the character of the town You should be using brownfield sites elsewhere in the Borough in preference to greenfield sites It is also putting pressure on the infrastructure such as schools GP surgeries town centre parking

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_79**Full Name:** Sarah Moulder**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** No**Comment summary:**

Remove site from plan due to access in conservation area, rig and furrow, old hedgerows and wildlife. The eastern entrance to Guisborough is through the oldest part of the town and this development would damage an area which is important to the landscape qualities of the conservation area and therefore incompatible with policy HE1 "Open Spaces" and paragraphs 8.6 and 8.7 of the Historic Environment Section of policy HE1. Detrimental affect on listed building. Access onto narrow road with speeding traffic and an additional junction could cause congestion and accidents. The road is also prone to surface water flooding.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_99**Full Name:** J&B Greenwood**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

As immediate neighbour of site, development would have a serious impact on the area. Objections: - Access at Butt Lane, already congested and at times dangerous. Many cars park and cause congestion. - Loss of more greenfield sites, why can't brownfield sites elsewhere in the borough be used. - Loss of recreational area for young people. - More pressure on schools, doctors and town centre parking, already problematic. As residents we are saddened by proposals. Give our lovely area what it deserves, kept as a Market town with important Conservation Areas.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_102****Full Name:** KWJ Hannah**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

a) Access and egress - would create an almost impossible situation for the estate. Butt Lane is only egress and drivers use the road as a 'rat run' to avoid traffic lights on Belmangate. Proximity of the junction of Butt Lane and Whitby Lane would create havoc and a road safe issue. b) The destruction of the paddocks and hedges in conservation area. Aware that plan states that preservation of hedgerows and ridge and furrow in the paddocks is a primary concern, but you can't put a road through without destruction of what you are trying to preserve. Field in Belmangate is one of very few green lungs left in Guisborough and should be preserved for future generations.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_97**Full Name:** Ms Linda Steel**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to site being included in the Local Plan due to the following reasons: It is located within a conservation area; loss of natural habitat of wildlife; destruction of ancient hedgelines; it will reduce visual amenity of the old and historic entrance to Guisborough; loss of recreational space; safety issues; brownfield sites should be developed prior to greenfield sites; increased pressure and impact the site will have on local infrastructure; and impact on residents on Whitby Avenue both during construction and once built.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_103**Full Name:** Mr Peter Hutchinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to the development of this site due to the following reasons: There is an oversupply of housing in Guisborough; increased congestion; site is within a conservation area; flood risk; and it would be impossible to provide a safe access into the site.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_104****Full Name:** S&C McKay**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

As Guisborough residents it is our view the plan would have a detrimental effect on the town. Belmangate Field is within one of the few conservation area of the town and the development would destroy wildlife habitat and hedgerows which have been in place for centuries. It also raises concerns regarding access, traffic congestion, safety issues and the proximity of access to Guisborough Hall. The site had been used for many years as a playing field and for events by Sea Cadets and Scouts and would be a great loss. Guisborough has seen numerous housing developments which are having an effect on schools, doctors and services. New developments are also putting pressure on established properties on the housing market making it more difficult to sell. Guisborough would be unable to cope, it is quickly losing its market town status and becoming one large housing estate without the necessary facilities. There are also plenty of sites which are not greenfield which could be regenerated and be more beneficial to the town.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_106**Full Name:** Mr Rosemarie Bell**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to the proposed development due to: The access road is through a conservation area; destruction of ancient hedge lines and wildlife habitats in a conservation area; road safety. Whitby Lane estate only has one way out at present and therefore the proposed development would lead to traffic congestion with Butt Lane and onto the major road leading into Guisborough; the proposed access road to new development would be very near neighbouring properties which would affect those directly loss of privacy, overlooking and traffic noise; the estate would lose its playing field site/recreational area which is extremely popular with children, giving them some local area to play safely; Guisborough has far too few amenities to cope with more housing developments and will cause pressure on school places, GP surgeries and town centre parking; Guisborough also has a lack of recreational facilities, empty shops and good retail facilities, so we don't need more housing; Guisborough is losing all character to the town. It is supposed to be the gateway to the North Yorkshire Moors and a market town. It is /has become a commuting town to larger areas; and we need more green areas not built up conurbations.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_70**Full Name:** Stephen Dalton**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

As an immediate neighbour of the site, proposed development would have a serious impact on surrounding area. Specific objections are: access road through conservation area would reduce visual amenity of historic eastern entrance to Guisborough; access road in close proximity to listed building; road safety and traffic congestion at T junction with Butt Lane; excess traffic noise; loss of well used playing field and recreational area.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_96****Full Name:** John Buckworth**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

1. Question need for more houses in Guisborough given new houses being built to west of town. 2. Surface water from new housing will cause flooding of Chapel Beck. 3. Road is across designated green belt. 4. Road is next to only exit from Whitby Ave. which is 'rat run' for Hunters Hill drivers to miss traffic lights at bottom of Belmangate. 5. Garages are in fact old coach houses with many original features and bats roost in these buildings. 6. Evidence of the old allocation of 'rig & furrow' on north east part of field. 7. Our traditional market town has been destroyed by overdevelopment and has swallowed up our surrounding farmland. Suggest no more houses in Guisborough. Ancient capital of Cleveland is slowly being destroyed. Started with demolition of our ancient route (Northgate) which should have been preserved. Westgate has lost its character with empty shops, takeaways, charity shops. Belmangate is just a throughfare to Hunters Hill. Whitby Lane is too narrow for more traffic. More houses mean more people, cars and puts an increase on our infrastructure, schools, health centre, facilities.

Officer response:

Having further considered the potential impact of the proposed development on the Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_77**Full Name:** Ms Melanie Carlton**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Proposed development would have a serious impact on the area around it due to: Access road through a conservation area, reducing visual amenity of the historic eastern entrance to Guisborough, Numerous recent housing developments in Guisborough, changing the character of the town and no regeneration of the town centre, which is getting more neglected and run down. Pressure on local schools, GP surgeries etc Destruction of ancient hedgelines/ wildlife habitats in a conservation area. Proposed access close to a listed building Road safety

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_98**Full Name:** Mrs Norris**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Objections: 1. Access on Butt Lane will pose traffic congestion/road safety issues. 2. Destruction of ancient hedgerows and great risk of wildlife loss/destruction. 3. Loss of playing field site and recreation area would be a big miss. 4. At least 5 building sites under construction but not finished and not sold in Guisborough, with at least 500 houses on sale. 5. Pity that Belmangate greenfield site should be built on rather than a brownfield site.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_201**

Full Name: Mr A J Halfpenny
Organisation: Belmont Community Group
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Note your vision for the future, the Borough is an excellent environment for everyone living, working or visiting. Unfortunately this ambition cannot by the large amount of new building. Since the major building programme began there has been a visible decline the quality of life for residents. Building has resulted in: 1. increased traffic on High Street; 2. increased traffic noise - particularly on Belmangate; 3. shortage of flexibility and capacity at doctors surgeries. I cannot see any improvement in the situation by building 40 new houses on the Sea Scout and Scouts sites and want to record my opposition to the proposal. Previous development in Guisborough was fairly well tolerated but is reaching far too great a scale and is destroying the character of the town. Present activities undermine laudable mission statement in paragraph 2.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_200

Full Name: Mr Julian Benstead
Organisation:
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: No

Comment summary:

I would like to register my objection to this proposal for the following reasons 1. The visual impact and effect on the character of the local neighbourhood will be detrimental 2. The effect of the development on the appearance of the conservation area will be damaging 3. Building within this greenbelt area is damaging when other brownfield sites are available and more acceptable 4. The proposal for road access from Butt lane will cause inconvenience to existing residents as the Whitby Lane estate has only one exit route

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_107

Full Name: Colin Scollay
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Please see attached document for full comments. Thank you for the opportunity to view the Draft Local Plan at Sunnyfield House. Whilst accepting the need for a development plan, I have some objections regarding Guisborough: - The number of new builds seems out of proportion to the needs of the town. There are many properties for sale on older estates, some of which are unoccupied. - With reference to Belmangate Field, I have attended social functions there for some years and object to its loss as an open space and amenity for the Scouts and Sea Cadets who use it. - As a Civil Engineer (retired) I have concerns about the access from Butt Lane. Firstly, the access road would pass through a conservation area and I question whether this is desirable given the eastern approach to Guisborough is an historical area and relatively un-blighted in terms of development. Secondly, in my opinion, the layout of an acceptable junction at Butt Lane would be difficult to achieve at this particular location.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_109****Full Name:** Mr G Edwards**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

I wish to express my dismay at the proposed Belmangate Field site. This makes a mockery of the word conservation. Guisborough is already saturated with new building sites. Rectory Lane is rapidly overloaded with traffic and is dangerous. Any increase will get serious.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_110**Full Name:** C & H Woodall**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

We appreciate that generally more housing is required in the country but surely Guisborough has reached saturation point. The huge number of houses built on the Pinchinthorpe side of town is already changing the character of the town. We do not have services to cope with even more housing. Getting a GP appointment is a nightmare and schools are already full to capacity. Why do we need to gobble up green fields when there must be brownfields land elsewhere in the borough which could be used. The entrance to Guisborough on this side is visually attractive, why spoil it. The town is already losing its old market character. The junction with Whitby Road at Butt Lane is already a difficult junction and the increase in the number of cars using the junction could cause congestion problems. Does Guisborough really need more houses?

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_111**Full Name:** R&M Dickens**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Feel development of Belmangate Field would be detrimental to the area. Objections are: a. In winter bottom fields flood towards the main road and building a road through it can only make this situation worse. b) There would be a loss of wildlife and ancient hedgerows. c) Many visitors comment on how beautiful the town is from first impressions entering from Whitby, which would be lost. d) Access to new development would cause traffic and pedestrian chaos. e) Concerned about the capabilities of the current sewerage system being able to cope with extra housing. f) GPs are already working to full capacity.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_113****Full Name:** W.B Laidler**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Object to the development of this site due to the following reasons: the proposed development is completely unnecessary; at present it takes a minimum of 10 working days before one can see a G.P; Butt lane is used by a large number of the public; access from the Whitby Road estate onto Whitby road is at peak times quite difficult without adding all the extra cars that your 40 houses will bring; there have been a number of accidents where vehicles awaiting to turn right onto Butt Lane, have been hit from behind by a vehicle speeding round a blind corner; and at present the Whitby Road Estate suffers from occasional sewage problems due to the demand on the ancient system.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_135**Full Name:** Mr and Mrs D and M Docherty**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to development on this site due to the following reasons: Road safety/traffic congestion issues at the junction with Butt Lane; the destruction of ancient hedgelines and wildlife habitats in a conservation area; the loss of a playing field site and recreation area; the provision of an access road through a conservation area; impact on local infrastructure including school places, GP surgeries and town centre parking. Also feel that brownfield sites should be developed in preference to greenfield sites.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_138**Full Name:** A W Armstrong**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

The Belmangate site is difficult as any change of use was not foreseen or allowed for. Scouts and cadets will need to be moved. If the access to Belmangate is regarded as too dangerous and an entry into Whitby Lane estate requires demolition of a house, then a new bridge onto Whitby Lane or a convoluted route to Butt Lane will be needed.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_169****Full Name:** Mrs Maureen Harding**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to development on this site for the following reasons: Threat of flooding; the site is within a conservation area; impact of light and noise pollution; constraints with access and egress; negative impact on village atmosphere; and the town does not have the infrastructure to cope with the additional resources required by an increasing population.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_172**Full Name:** Stephen East**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

As an immediate neighbour to the proposed development I am of the view that a proposed development would have a serious impact on my home, my family's wellbeing, and the area around it. My specific objections and questions are as follows: I chose to purchase my house at 6 Easby Close, Guisborough in 2013 for the following considerations. 1 This is a quiet and peaceful cul-de-sac. 2 Only local cul-de-sac traffic. 3 Complete privacy and not over looked by any property. 4 Beautiful unobstructed view across the adjacent field. 5 Loss of the above would reduce the valuation of my house. Questions if my objections are overruled. 1. Will my present privacy be compromised? 2. Review the proposed plans for the buildings near my house. 3. Quality of buildings at least to my house standard or better. 4. My cul-de-sac remains as is and no further traffic use. 5. No public walkways by my house. 6. Please assist / consider my re-housing in a similar sought after area. Concerns over the impact of surrounding area and community: 1. The proposed access point at Butt Lane is in close proximity to a listed building 2. I have concerns over the road safety and traffic congestion issues that would incur at Butt Lane 3. Loss of privacy to neighbouring properties and traffic noise. 4. Destruction of ancient hedge lines and surrounding wildlife. I regularly see wild rabbits, various birds, hedgehogs in these fields. 5. Loss of playing field and recreation site for the local scouts. 6. Increased demand on local resources and infrastructure such as pressure on school places, GP surgeries, town centre parking etc 7. Access road through a conservation area reducing visual amenity of the historic eastern entrance to Guisborough 8. Guisborough has seen a huge increase of new housing in the recent years raising concerns from many residents. I feel that Guisborough is losing it's charm and identity and I feel that brownfield sites should be used for regeneration and not our historic market town.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_195****Full Name:** Mr EG Looker**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to development on this site due to the following reasons: Conservation area: The proposed road access onto Butt Lane will be across two fields which were part of the original (1971) Conservation Area of Guisborough. This was set up to preserve the townscape by protecting the green and historic entrance to Guisborough. The proposed access road will destroy both ridge/furrows in the fields and the old hedges bordering the fields as well as encroaching visually on the entrance to the town. The proposal goes against the Local Plan Policy HE1 ".....Open spaces.....built development will not be permitted.....within/adjacent to conservation areas...of historic significance and important to the landscape/townscape qualities of the conservation area...."The site is at risk from flooding and will increase flood risk. The access road into Butt Lane is on a very short length of road between Whitby Avenue, which is a blind bend) and A171 (main road junction) and will cause traffic problems especially at busy periods. Distances are small (A171 to proposed outlet only 25m - Whitby Avenue to proposed outlet only 15m. Traffic density into Butt Lane off Whitby Lane estate will increase by 15%. The ingress onto the access almost next to the A171 junction could lead to blocking traffic turning off the A171. The location of the blind bend out of Whitby Avenue into Butt Lane so close to the proposed access road outlet will cause problems. The location of the access road will be very close to the neighbouring properties (2-20 Whitby Avenue) leading to loss of privacy and extra traffic noise. Policy LS3 states that the Council seeks improvements to sports and community facilities" rather than build on Belmangate Field, a former playing field. The Council should be promoting it as a useful community facility, complementing the current use by the Sea Cadets. Guisborough has already lost a significant amount of green space near the town centre e.g. Cleveland Gate, Enfield Chase. The Cricket and rugby fields only have limited access for the public. The Belmangate field is needed to fulfil the open space requirement in this area. Development under construction (Para 6.36, table 4) show 617 households are being built or will be built in Guisborough out of 1798. This is 34%. When taking current development and new development into account, 18.8% of development will be in Guisborough. In relation to its population and the population of Redcar and Cleveland (17,777 in Guisborough, 135,177 in Redcar and Cleveland equivalent to 13.1%. This will expand the town considerably.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_196**Full Name:** C & L Storey**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Strongly object to proposal. Apart from the fact that we will probably be overlooked, we are concerned about the sea scouts and scouts who have use of the field. Proposed access point at Butt Lane is not safe and will cause congestion as estate is one way. Traffic between Belmangate crossroad and Guisborough Hall often speeds and can be dangerous accessing and leaving Butt Lane. Understand the area for building is a conservation area and one of the buildings off Whitby Road has bats which are protected species. Proposed access road will pass behind houses on Whitby Avenue so they will have a road on both sides. Other objections we have are there are too many houses being built in Guisborough. We used to be a lovely market town, but will all the new houses and infrastructure it is failing to cope. It is difficult to make doctor appointments and there are not enough facilities. There are too many estate agents and fast food outlets which cause a huge amount of litter and not enough facilities and quality shops to encourage people to visit the town.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough****DRAFTLP_198****Full Name:** John Leggott**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Wish to object on the following grounds: 1. Loss of flood relief. Undeveloped areas are vital to provide soak-away and run-off for high rainfall, preventing flooding to surrounding properties. 2. Loss of wildlife habitat. These are ancient fields, undisturbed for hundreds of years and have become a vital habitat for birds, pollinating insects, flora and fauna. They could be classed as sites of scientific interest, once they are bulldozed they are gone forever. 3. Guisborough has suffered more than enough development in recent years. We need green spaces for young people to exercise. 4. Green areas within the town give it a 'small town feel' with ancient historic and rural links. This makes the town attractive to visitors and residents. Without them it soon becomes another featureless urban sprawl. Ironically, these desirable features are what attracts people and allows builders to sell their houses at a premium. 4. There are plenty of existing unsold properties in Guisborough for people wanting to live in the town, and there are plenty of houses for sale in Middlesbrough for people who don't mind living in featureless urban sprawl. If the profit motive of landowners and developers always prevails over environmental/historic and 'quality of life' concerns, where do we draw the line. Lets hope we realise what we've got before its gone.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_90**Full Name:** Susan Hogan**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Belmangate Field is conservation land and one of the last pieces left in Guisborough. It also houses endangered species in the stables (bats). Building on this land would increase flood risk. To remove the Scouts and Cubs, Sea Cadets is unfair to the kids out of school activities.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_482**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform 'Appropriate Assessment'.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough**

DRAFTLP_431

Full Name: Louise Tait
Organisation: Environment Agency
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The Local Planning Authority should apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property and manage any residual risk, taking account the impacts of climate change. We would expect a sequential test to be undertaken for the allocation and development of any sites in flood zones 2 and 3. This would include Belmangate Field (proposed housing allocation), which is detailed in the council's Sustainability Appraisal as containing a small area of land in Flood Zones 2 and 3 associated with the watercourse on the northern edge of site.

Officer response:

Only the land in Flood Zone 1 will be developed. Land in Flood Zone 2 and 3 will only be used for open space and will not be developed. Therefore, a sequential test is not required.

DRAFTLP_364

Full Name: Mr Jack Paines
Organisation:
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

Objects to Belmangate Field for following reasons: Increase in flood risk from Chapel Beck Loss of agricultural land Loss of relics of medieval strip farming Adverse affect on character of historic area Impact on privacy, peace and quiet of neighbours and impact from street lighting Devaluation of property.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

DRAFTLP_650

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Belmangate Field site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.24****Belmangate Field, Guisborough**

DRAFTLP_326**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

A number of allocated sites are close to designated heritage assets (for example H3.13, 3.19 and 3.24), or are within (in the case of H3.26. Having a positive strategy for the historic environment (as demonstrated by the plan) can avoid harming the significance of both designated and undesignated assets, including effects on their setting. At the same time, the allocation of sites for development may better reveal their significance (as suggested by Policy H3.26 and paragraph 6.169). However, at present the plan is not clear on how the sites have been selected, and how the impacts on the historic environment have been assessed, and will be incorporated into the layout and design going forwards. For information, Historic England has produced guidance on the Historic Environment and Site Allocations in Local Plans. This is available from

Officer response:

Having further considered the potential impact the development of the site would have on Guisborough Conservation Area, the Council has concluded that it no longer wishes to include the site within the Local Plan as a housing allocation.

Section/Policy**Policy H 3.25****Land at Galley Hill, Guisborough**

DRAFTLP_91	Comment summary:	Officer response:
Full Name: Susan Hogan	A small development allocated for 50 dwellings contributing to more flooding because there is nowhere for the rain to drain off.	The policy requires the provision of a flood risk assessment, and that development avoids areas that are at risk of surface water flooding. Under national policy requirements, new development cannot make flooding worse; it has to be the same or better than before.
Organisation:		
Agent Name:		
Agent Organisation:		
Submission type: Letter		
Agree with section?: No		
DRAFTLP_549	Comment summary:	Officer response:
Full Name: Jordan Gresham	TW fully support the proposed allocation of Land at Galley Hill, Guisborough, for housing development, under Draft Policy H 3.25 (Land at Galley Hill, Guisborough) of the Local Plan. Notwithstanding TW's full support for the allocation, they would raise the following detailed comments on the policy criteria and request that the suggested amendments are made to wording of the policy. As these representations and those previously submitted demonstrate there are no technical matters that cannot be overcome through detailed design and mitigation. TW would therefore question the need for criteria C as the masterplan submitted with these representations takes full account of the sites constraints including topography (a full topographical survey has been undertaken) and confirms that the site is capable of accommodating around 50 dwellings. In terms of the phasing of development, TW would suggest that the site could come forward prior to the existing Galley Hill development (Phase 1) being completed and would therefore ask the Council for greater flexibility in the wording of the policy to ensure this to happen. TW would also advise that, in addition to the access through Galley Hill, there is a potential for a vehicular access/egress from Middlesbrough Road albeit with no right turn from the site onto Middlesbrough Road. We would therefore request that the policy is amended to make reference to this and provide greater flexibility.	It is logical to assume that development would follow on from Galley Hill Phase 1, but in recognising the importance of maintaining a continuous supply of housing it is proposed to amend the wording at criterion d; to, 'prior commencement of housing units in the final construction phase at the current Galley Hill development'. The Council does not support the provision of a second access from Middlesbrough Road on the basis that this would create an unacceptable levels of traffic from the wider Galley Hill development and could have a detrimental impact on the proposed green space and green link between the indicative housing area and the Middlesbrough Road entrance.
Organisation: Taylor Wimpey (Uk) Ltd		
Agent Name: Mr Steven Longstaff		
Agent Organisation: England Lyle Good		
Submission type: E-Mail		
Agree with section?: In Part		
DRAFTLP_651	Comment summary:	Officer response:
Full Name: Mr Chris Bell	At this stage Highways England is not able to provide specific comment on the development proposed at the Galley Hill site, but welcome the requirements in criteria e.' for a transport assessment and criteria k.' which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.	Comment noted.
Organisation: Highways England		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: In Part		

Section/Policy**Policy H 3.25****Land at Galley Hill, Guisborough**

DRAFTLP_136**Full Name:** A W Armstrong**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The Galley site is swampy and noisy. Access will be difficult.

Officer response:

The policy requires the provision of a flood risk assessment, and that development avoids areas that are at risk of surface water flooding. Under national policy requirements, new development cannot make flooding worse; it has to be the same or better than before. The development would be subject to a transport assessment which would include achieving a suitable access from the Galley Hill development site.

DRAFTLP_483**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, policy will be amended as appropriate.

Section/Policy**Policy H 3.26****Home Farm, Skelton****DRAFTLP_325****Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

A number of allocated sites are close to designated heritage assets (for example H3.13, 3.19 and 3.24), or are within (in the case of H3.26. Having a positive strategy for the historic environment (as demonstrated by the plan) can avoid harming the significance of both designated and undesignated assets, including effects on their setting. At the same time, the allocation of sites for development may better reveal their significance (as suggested by Policy H3.26 and paragraph 6.169). However, at present the plan is not clear on how the sites have been selected, and how the impacts on the historic environment have been assessed, and will be incorporated into the layout and design going forwards. For information, Historic England has produced guidance on the Historic Environment and Site Allocations in Local Plans. This is available from

Officer response:

The site was included as planning permission for development had already been granted, meaning that the impact upon the conservation area and heritage assets had already been assessed.

DRAFTLP_652**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

At this stage Highways England is not able to provide specific comment on the development proposed at the Home Farm site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.27****Stanghow Road, Skelton**

DRAFTLP_653

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Stanghow Road site, however given the scale of development proposed it is unlikely on its own to be of particular concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

DRAFTLP_484

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, policy wording will be amended as necessary.

Section/Policy**Policy H 3.28****Kilton Lane, Brotton****DRAFTLP_654**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Kilton Lane site, but welcome the requirements in criteria e.' for a transport assessment and criteria f.' which includes a requirement for the implementation of a travel plan to encourage more sustainable travel modes. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

DRAFTLP_550

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

TW fully support the proposed allocation of Land at Kilton Lane, Brotton, for housing development, under Policy H 3.28 (Kilton Lane, Brotton) of the Local Plan. The land represents a suitable and sustainable urban extension to Brotton with good links to the existing settlement and local facilities. TW has no comments on the policy requirements, other than to suggest criteria g and h do not need to be included as specific policy requirements. This is on the basis an outline planning application (R/2011/0301/OOM) related to the eastern part of the site was refused for a mixed use development on principle only, as the site was not allocated for development in the Council's Local Development Framework (LDF); all of the relevant technical matters were resolved however, and as such it has been clearly demonstrated there are no technical constraints that would prevent the site in coming forward for development in the short term. Moreover, the previous planning application also included an area of land to the east of the site for sustainable urban drainage and landscape planting. This land is also available and should be incorporated in the draft allocation as shown on the plan (in blue). TW would also request that the draft allocation is extended into the area shown in yellow as this was included within the previous outline planning application which was only refused on the basis that the site was not, at the time, included within the LDF for development. All technical matters were addressed and it was therefore demonstrated that the site (inc. the yellow and blue area) was suitable for development.

Officer response:

In the Council's opinion, the proposed allocation which aligns with the established building line to the north would result in a more logical extension to the built-up area to the east of Kilton Lane compared to the previous application site. Moreover, the proposed allocation, unlike the former application site, also incorporates land to the west of Kilton Lane and no additional land would be required in order to meet housing requirements in the plan. Although the proposed development boundary is different to the former application site it is acknowledged nonetheless that in addressing drainage issues it may be appropriate to utilise the sloping farmland to the east of site. However, as this would be considered essential infrastructure it would meet exceptions criteria. under Policy SD3, so there would be no requirement to further adjust the development boundary accordingly to achieve this. Previous studies undertaken as part of the previous application may be relevant in addressing the policy requirements, including in relation to archaeological issues, however as the site and proposals are different, fully relevant supporting studies will be required.

DRAFTLP_485

Full Name: Andrew Whitehead
Organisation: Natural England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

The policy will be amended accordingly.

Section/Policy**Policy H 3.28****Kilton Lane, Brotton**

DRAFTLP_126

Full Name: Julie Wright
Organisation: Skelton & Brotton Parish Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Skelton & Brotton Parish Members feel there should be some kind of community facility built in the Brotton area to serve the increased number of residents, as a result of the increased housing stock. They feel the most appropriate type of facility would be a community centre/hall where local groups/residents could meet, as there is a lack of such venues in the area. Members wondered if this type of facility could be provided using monies gained from Section 106.

Officer response:

Request for community facility noted. Developer contributions will be subject to viability and also the three legal tests set out in regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010 as amended. The priority for developer contributions in the Local Plan is to provide affordable housing in the first instance. Other contributions will be negotiated with the developer when development proposals come forward.

Section/Policy**Policy H 3.29****Newbury Road, Brotton****DRAFTLP_130**

Full Name: Julie Wright
Organisation: Skelton & Brotton Parish Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Skelton & Brotton Parish Members feel there should be some kind of community facility built in the Brotton area to serve the increased number of residents, as a result of the increased housing stock. They feel the most appropriate type of facility would be a community centre/hall where local groups/residents could meet, as there is a lack of such venues in the area. Members wondered if this type of facility could be provided using monies gained from Section 106.

Officer response:

This site has a detailed planning permission in place to provide affordable housing. Therefore, assuming that consent is implemented, there is no scope to secure further community contributions linked to the development of this particular site.

DRAFTLP_655

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Newbury Road site. However, given the scale and type of development proposed this is unlikely to be of concern. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 3.30****Former Rosecroft School, Loftus****DRAFTLP_223**

Full Name: Eileen Found
Organisation: Mars. Estate Residents Group

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: Yes

Comment summary:

Houses built in time for the new Whitby Potash Mine. Ideal place for new workers and executive people who require housing. Scarborough and Whitby now overcrowded and prices high.

Officer response:

Support noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

DRAFTLP_656

Full Name: Mr Chris Bell
Organisation: Highways England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Former Rosecroft School site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

DRAFTLP_347

Full Name: Margaret Darcey
Organisation:

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

The land at Rosecroft, should be offered at a low sum to sale to a private housing company, 3/4/5 bedroom private housing, and bring new families into the area, possibly from York Potash (due to start work September 16).

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

Section/Policy**Policy H 3.30****Former Rosecroft School, Loftus****DRAFTLP_486****Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We note and welcome the recognition within the policy wording for housing developments within a 16km buffer to carry out a screening exercise to determine the need for Appropriate Assessment under the Habitats Regulations. Research elsewhere has shown that approximately 75% of visitors to coastal sites come from within a 6km radius of the site, and so within other Local Planning Authority areas we have recommended a 6km buffer is used for determining whether housing developments have the potential to have a likely significant effect upon a Natura 2000 site. We note a 6km buffer has been used within the accompanying Statement to inform Appropriate Assessment'.

Officer response:

Comments noted, wording will be amended to refer to 6km buffer.

DRAFTLP_230**Full Name:** Mrs K Sanderson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Brownfield site for sale. More attractive to potential buyers if the adjacent former playing field was included.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

DRAFTLP_231**Full Name:** Mr B Sanderson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

A prospective sale would surely be helped if at least one of the adjacent former playing fields was included in the plan as well as the original brownfield site.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

Section/Policy**Policy H 3.30****Former Rosecroft School, Loftus**

DRAFTLP_232**Full Name:** Mr G.T Lyon**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Add one level of the former playing fields to the plan to make it more attractive to potential buyers.

Officer response:

Consideration will be given to the physical, policy and market implications of extending the allocation into the former school playing fields area. Based on similar representations, this would potentially involve extending development limits to incorporate the immediate (lower level) of the playing field area within the allocation site. The two higher levels would be retained as open land.

DRAFTLP_166**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The former Rosecroft School site is shown as a Housing Allocation of 50 dwellings, but not projected to start development until 2021/22. Members have heard that there may be covenants restricting the size of the development to the footprint of the former school, but are of the opinion that investigations should be made into whether more of the site could be developed, and before 2021.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability. Restrictive covenants previously did exist on this site, but were settled some years ago and no longer present a development constraint.

DRAFTLP_7**Full Name:** mr wayne davies**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Loftus rosecroft site should extended by 1 field, to increase housing number, ensuring a quality residential development. While also increasing leisure facilities on the top 2 fields, a turning circle and parking for the nearby school.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

Section/Policy**Policy H 3.30****Former Rosecroft School, Loftus**

DRAFTLP_229**Full Name:** Mr Steve Sanderson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

To make the area more attractive to potential quality developers, I think at least one of the former playing fields should be included as well as the brownfield school site.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

DRAFTLP_18**Full Name:** Mr Paul Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

The Council does not have a great record at assessing strategic demand, what does this mean? Loftus needs houses that would work for young families as second purchases for people to move up to.

Officer response:

Comment noted. We are proposing to include the adjacent field within the allocation, and exploring public sector funding options, in order to support development viability.

Section/Policy**Policy H 3.31****Low Cragg Hall Farm, Carlin How****DRAFTLP_47**

Full Name: Mr Michael Bulmer
Organisation:
Agent Name: Mr Rod Hepplewhite
BSc (Hons) MRTPI
Agent Organisation: Prism Planning
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

Fully support the allocation of client's site for residential development and specifically policy H3.31, including the proposed quantum of development which reflects the outline planning permission. Submit that the site is in a sustainable location with access to facilities and transport options. Residential development would fulfill the three dimensions of sustainability identified in paragraph 7 of NPPF, economic, social and environmental. We have previously demonstrated that the development can be accommodated on the site in a way which respects and responds to the landform. With regard to the planning applications, no technical objections were raised to the development. It has been demonstrated that the site can be accessed safely and water run-off captured and controlled.

Officer response:

Support noted.

DRAFTLP_657

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

At this stage Highways England is not able to provide specific comment on the development proposed at the Low Cragg Hall Farm site. As already identified, further consideration is required to fully understand the implications of the Plans spatial development aspirations on the operation of the SRN both from an individual perspective and any potential cumulative impacts. The accompanying technical note provides further detail in this respect.

Officer response:

Comment noted.

Section/Policy**Policy H 4****Affordable Housing****DRAFTLP_546**

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (UK) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: Yes

Comment summary:

TW do not raise any objections to policy H4 and welcome the provision within the policy which allows for a reduced level of affordable housing (subject to a detailed viability assessment) to be provided should viability be an issue on a particular site. This approach is pragmatic and accords with national guidance.

Officer response:

Comments noted.

DRAFTLP_664

Full Name: Ms Fiona Coleman
Organisation: Broadacres
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: No

Comment summary:

Due to the changes in funding of affordable schemes, especially around rented units, RPs are needing to be more inventive in how schemes are funded. This is mainly done through cross subsidy from forms of ownership particularly the private open market sale. Most of the local authorities in North Yorkshire, including the National Parks, have or are looking to change their policies to either include open market sale on exception sites or to allow a small number of open market properties on sites adjacent to development limits of settlements. For example in Hambleton they have the Rural exception policy which requires 100% affordable but they also have an Interim Planning Guidance policy which allows up to 5 open market on sites adjacent to development limits. Richmondshire have a policy (CP4) which has no development limits and will allow proposals which are in keeping with the existing settlement. Both of these allow us to develop affordable housing for rent using a cross subsidy generated from private sale units. The sale units can either be on site or from an independent site elsewhere. The local plan as currently proposed potentially would not allow us to be as flexible in the provision of affordable housing and I would request that this is reconsidered during the redrafting stage you are currently in.

Officer response:

Policy H4 will be amended to clarify the situation in respect of rural exceptions sites.

Affordable Housing

DRAFTLP_572**Full Name:** Mr Ben Stephenson**Organisation:** Persimmon Homes
Teesside Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Whilst Persimmon Homes support the approach of addressing the affordable housing need through the plan, we have the following concerns. The 2013 Viability Assessment identifies significant viability issues across much of the are with a 15% requirement and nominal £500 section 106/276. Viability issues increase significantly when a higher amount of £2,800 is factored in. Given the list of infrastructure in SD5, section 106 contributions are likely to be greater than £500 per unit and as such the Council should reconsider affordable housing contributions on the basis of its own viability evidence. On sites below 15 units, the policy requires a commuted sum. This is contrary to national policy and the recent appeal decision. The Council will, therefore need to amend the thresholds to take account of this judgment and amendment to the PPG. It is also noted that the policy identifies a target of 15% on sites of 15 or more despite the SHMA identifying an annual net imbalance of just 20 units. This represents 8.5% of the proposed annual housing target and therefore while it is recognised that not every site will provide affordable housing, due to size and viability, it would suggest that a more appropriate target would be closer to 10%. We also consider the policy to be unjustified as it stipulated that where affordable housing requirement is less than 10 units, all affordable housing is to be delivered on a social or affordable rented bases. This approach does not align with supporting evidence in the 2016 SHMA which identifies an appropriate tenure split of 72% affordable (social) rented and 28% intermediate. We therefore recommend that the second, third and fourth paragraph are deleted and replaces with: 'The affordable provision and tenure and mix will be negotiated on a site-by-site basis, having regard to the economic viability of the development and the most up-to-date evidence of housing need, aspiration and the local housing market. We believe such an amendment essential given the current state of the 'affordable' rental market following the rent controls announced by Government. The difficult in identifying willing Registered Providers to acquire rented units is evidenced in our recent application to enact a conversion notice within s.106 (R/2015/0736/PO). Finally neither the policy or plan take account of the impending introduction of Starter Homes as a form of affordable housing. Reference should therefore be made within the policy and plan to ensure conformity with NPPF.

Officer response:

The viability assessment will be updated as appropriate. The affordable housing target is considered appropriate in order to deliver the level of affordable housing required in the borough, and to take account of sites below the threshold. Starter Homes are not classed as affordable housing within Annex 2 of the NPPF and the Council has no evidence of an unmet need for them in the borough. Policy H4 will be amended to take account of recent court judgments.

Section/Policy**Policy H 4****Affordable Housing****DRAFTLP_563**

Full Name: Mr Nick McLellan
Organisation: Story Homes
Agent Name: Samantha Ludlow
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: No

Comment summary:

With regard to Policy H4, Story Homes notes the proposed application of a 15% affordable housing target on sites of 15 units or more, with commuted sums sought below this threshold. While Story Homes recognises the need to provide affordable housing, paragraph 173 of the NPPF is key where it sets out the need to ensure viability and deliverability. In line with this, the Council's own 2013 Whole Plan Viability Assessment does identify significant viability issues across much of the Plan area, with viability concerns increasing when a higher Section 106/Section 278 contribution is applied. At paragraph 1.59 the Draft Local Plan confirms that the Whole Plan Viability Assessment report is to be updated later in 2016. Story Homes considers that is of paramount importance that this work takes account of the likely level of Section 106 contributions as well as factoring in the impact of all plan policies and obligations. In addition, the SHMA at Part 1 identifies a net imbalance of only 20 units and Story Homes considers that the net annual need would be nearer to 10% than 15%. As a result, the adoption of a 15% target could lead to an over-supply of affordable housing. As regards to the 15 dwellings threshold for on-site affordable housing delivery, the Plan states that commuted sums are required below this threshold. However, the thresholds in the Draft Local Plan fail to take account of the recent High Court ruling of 11 May 2016 (Case No: C1/2015/2559) that allowed the Secretary of State's appeal on the provision of affordable housing on small sites of fewer than 10 Units, as well as the vacant building credit, both of which were set out in a Written Ministerial Statement of November 2014 but subsequently quashed in July 2015. As such, Story Homes considers that Policy H4 should be amended in order to ensure consistency with the latest national guidance. Story Homes therefore wishes to reserve its position in respect of this policy until the Council has reviewed its evidence base.

Officer response:

The viability assessment will be updated as appropriate. The affordable housing target is considered appropriate in order to deliver the level of affordable housing required in the borough, and to take account of sites below the threshold. Policy H4 will be amended to take account of recent court judgments.

DRAFTLP_511

Full Name: Mr Mark Gabriele
Organisation: Bellway Homes (NE Division)
Agent Name: Shaun Cuggy
Agent Organisation: Barton Willmore
Submission type: E-Mail
Agree with section?: No

Comment summary:

Our Client fully supports the representations prepared by the HBF and in particular the comments they have made in relation to Policy H4 Affordable Housing.

Officer response:

Comments noted.

DRAFTLP_502

Full Name: Mr Phill Bamford
Organisation: Gladman
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

Any policy requirements related to the provision of affordable housing need to be tested through the Whole Plan Viability Study to ensure that it is Framework compliant and that the cumulative impacts on development in their area of all existing and proposed local standards and policies do not put the implementation of the Plan at serious risk. Gladman would suggest a split of 60% Social Rented and 40% intermediate would be appropriate as it would improve the viability of sites and would seek to address the Government's agenda of turning the country from generation rent' to generation buy'.

Officer response:

The viability assessment will be updated as appropriate. The affordable housing target is considered appropriate in order to meet the affordable housing needs of the borough.

Affordable Housing

DRAFTLP_452**Full Name:** Cleveland Housing Trust**Organisation:****Agent Name:** Mr David Stovell**Agent Organisation:** David Stovell & Millwater**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Cleveland Housing Trust are seeking any definition of affordable housing to reflect the type of housing provided rather than the provider. Registered Housing Associations have previously been the base definition of affordable housing. Cleveland Housing Trust provides the same product but it is not covered by the definition of affordable housing for new development, because they are not a registered provider. There will be other housing charities in a similar position. It would seem to be in everybody's interest to make the definition as broad as possible to cover all organisations wishing to provide affordable housing either to rent or equity share within the Borough. Cleveland Housing Trust like other similar charities are in a position to build affordable housing to supplement that provided by the council and registered providers. It seems to us that this should be encouraged.

Officer response:

The definition does include the possibility for housing provided by organisations similar in nature to registered providers to be classed as affordable housing, where agreement has been made with the Council. However, as tenants of registered providers have significantly greater rights and regulatory protections than tenants of other landlords, the Council would ordinarily expect affordable housing to be provided by registered providers, and would only consider alternatives in exceptional circumstances.

Affordable Housing

DRAFTLP_294**Full Name:** Matthew Good**Organisation:** Home Builders Federation Ltd**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

The HBF does not dispute the need for affordable housing it is, however, concerned with the viability implications of the policy as well as its consistency with national policy. Target The 2013 Whole Plan Viability Assessment identifies significant viability issues across much of the plan area with a 15% requirement and a nominal section 106 / 278 requirements of £500 (table 8.4). The viability issues increase significantly when a higher Section 106 / 278 amount of £2,800 is factored in (table 8.5). Given the list of infrastructure identified in Policy SD5, section 106 contributions are likely to be greater than £500 per unit and as such the Council should reconsider the affordable housing contributions on the basis of its own viability evidence. The Council is undertaking further viability work prior to the next stage of consultation. It is important that this information takes account of the likely level of section 106 costs and the impact of all plan policies and obligations. The HBF strongly recommend engagement with the industry during the production of the study to ensure that it is grounded upon realistic assumptions. It is notable that the 2016 SHMA (part 1) identifies a net imbalance of just 20 units. Whilst it is recognised that not every site will provide affordable housing, due to size and viability considerations, the net annual need would suggest a more appropriate target would be closer to 10%. The 15% target may lead to an over-supply of affordable housing. Threshold The policy identifies a 15 dwelling threshold for on-site affordable housing delivery, below this commuted sums are required. This is contrary to national policy. On 13th May 2016 the Court of Appeal (West Berkshire District Council and Reading Borough Council v. Secretary of State for Communities and Local Government Case No: C1/2015/2559) allowed the Secretary of State's appeal on the provision of affordable housing on small sites of fewer than 10 units, and the vacant building credit, both of which were set out in a Written Ministerial Statement of 28th November 2014. The PPG was subsequently amended to reflect the appeal decision (ID 23b-013). This decision effectively means that contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm. Within designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less, this should be via a commuted sum. The Council will, therefore, need to amend the thresholds to take account of this judgement and subsequent amendment to the PPG. Type of Affordable Housing The second and third paragraphs of the policy do not take account of the impending introduction of Starter Homes'. This will need to be reflected within the policy. Rural Exceptions The final paragraph of the policy is essentially a rural exceptions policy. The current wording restricts development to sites of 10 and does not allow any market housing. The justification for a cap of 10 dwellings is unknown and in our opinion is rather arbitrary. It is recommended that the reference to 10 units be removed. Given the viability issues, it is unlikely that many schemes will be brought forward for 100% affordable housing. It is therefore recommended that market housing should be allowed on such sites, where justified, to enable the delivery of the affordable housing. This approach is common in many local plan policies and will provide greater opportunity to meet the needs of the Service Villages and Villages. The following amendments are recommended; Small scale housing schemes [delete: of less than 10 dwellings] that are located outside, but adjacent to, Development Limits of the Service Villages and Villages will be supported where 100% affordable housing is to be provided and maintained in perpetuity, in order to meet a verifiable and identified local need and where the local need cannot be met on sites within settlements. In exceptional cases, due to viability issues, a proportion of market housing can be provided.

Officer response:

The viability assessment will be updated as appropriate. The affordable housing target is considered appropriate in order to deliver the level of affordable housing required in the borough, and to take account of sites below the threshold. Starter Homes are not classed as affordable housing within Annex 2 of the NPPF and the Council has no evidence of an unmet need for them in the borough. Policy H4 will be amended to take account of recent court judgments. Policy H4 will be amended to clarify the situation in respect of rural exceptions sites.

Section/Policy**Policy H 4****Affordable Housing**

DRAFTLP_553

Full Name: Mr Chris Munro
Organisation: Homes and Communities Agency
Agent Name: Mr Phil Brock
Agent Organisation: WYG
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Support the provisions within Policy H4 for applicants to demonstrate viability to provide a lower percentage of affordable homes. This will provide flexibility should market conditions change. Policy H4 would need to consider the May 2016 Court of Appeal decision upon thresholds for affordable housing and the impending requirement for Starter Homes'.

Officer response:

Comments noted. Policy H4 will be amended to take account of recent court judgments.

DRAFTLP_422

Full Name: mr stuart white
Organisation: CPRE
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We feel that there is a case for a 20% minimum but, in principal, support the intention of providing a minimum of 15% on all developments of 15 houses or more.

Officer response:

Comments noted.

Section/Policy**Policy H 5****Sub-division and conversion of buildings to residential uses****DRAFTLP_423****Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We support the Council's proposals.

Officer response:

Comment noted.

DRAFTLP_33**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

Just a comment that some of our most interesting buildings in the Loftus parish - namely the old chapels - in Liverton Mines, Carlin How and Loftus, have all been left to deteriorate, or been turned into storage sheds. What role has RCBC planning department in preventing this downgrading of available property?

Officer response:

Comment noted. The Council has a very limited role if the property is in private ownership, and would only get involved if its condition deteriorates so much that it adversely affects the amenity of the neighbourhood. We will, however, work with any property owners to find a suitable use should they wish to do so.

DRAFTLP_602**Full Name:****Organisation:** RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Please see our comments regarding screening for LSE within the HRA in relation to these policies.

Officer response:

Comments noted.

Section/Policy**Policy H 6****Houses in Multiple Occupation**

DRAFTLP_603**Comment summary:****Officer response:****Full Name:**

Please see our comments regarding screening for LSE within the HRA in relation to these policies. Comments noted.

Organisation: RSPB**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part

Section/Policy**Policy H 7****Gypsy, Traveller and Travelling Showpeople Accommodation**

DRAFTLP_58**Full Name:** Mr Andy Stephenson**Organisation:** National Farmers
Union**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Policy does not make reference to any provision of space or consideration for any associated livestock (horses, etc.) that the community may have. Welcome details on how the authority would treat such livestock within the plan to avoid any adverse issues (e.g. highways, trespass, etc.).

Officer response:

The existing site at The Haven operates successfully without the provision of space for livestock and it is not anticipated that the allocated extension will include this provision. Policy H7 does not prevent the provision of grazing land with any proposals for travelling community sites should there be a demand for this arrangement from the community. Incidents of trespass or fly grazing within the Borough will be dealt with under other appropriate legislation.

NATURAL ENVIRONMENT

DRAFTLP_327**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We welcome reference to historic parks and gardens in para. 7.3. However, they do not appear to be referenced or given protection in the policies that follow. There is also no reference to the work on Historic Landscape Characterisation, which was mentioned in the council's Landscape Character SPD (2010). Similarly, there is little mention of the contribution made by heritage to the other designations (National Park, Heritage Coast, etc). This section would benefit from far more cross-referencing, along with specific policy wording for parks and gardens.

Officer response:

Comments noted. The section will be amended to include greater reference to heritage, including parks and gardens. Reference to Historic Landscape Characterisation will also be added.

Section/Policy**Policy N 1****Landscape****DRAFTLP_186**

Full Name: Northumbrian Water
Organisation: Northumbrian Water Ltd

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: Yes

Comment summary:

We fully support the aims set out within the policies to protect and enhance the natural environment where possible. We particularly support the comments made regarding the Council's intentions to safeguard watercourses and to maintain, enhance and seek new opportunities to improve the water environment. We also fully support the use of wet woodlands to mitigate flood risk, improve water quality and enhance biodiversity within the region.

Officer response:

Support noted.

DRAFTLP_487

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Natural England welcomes the recognition within the policy of the landscape value of the North York Moors National Park and the Cleveland Heritage Coast, and the commitment within the policy to ensuring development does not harm the landscape setting, scenic beauty and special qualities of these designations. We also welcome the inclusion of the Natural England Character Areas, and the commitment to considering opportunities for landscape enhancement identified within these documents.

Officer response:

Support noted.

DRAFTLP_10

Full Name: Mr John Gaffney
Organisation:

Agent Name:

Agent Organisation:

Submission type: Web

Agree with section?: No

Comment summary:

Further residential development on Eston Hills south of the A174 should be specifically prohibited. Current wording for Sensitive Landscape Areas and Eston Hills gives the green light for future development applications and developers by complying with items a. to c. will say that they have met the requirements of the Local Plan. It is in direct contradiction to Section 3.2 of Policy LS1. The Eston Hills needs protected status with Policy LS3 point q and 7.9. The area south of the A174 should be declared a SPA or SAC to reflect the wishes of the local community who oppose development.

Officer response:

The SPA and SAC designations are a European designation and cannot be allocated through the Local Plan. Where the Tees Valley Local Sites Partnership has considered that parts of the Eston Hills area meet the criteria for Local Sites designation, such as the Eston Moor Local Wildlife Site, these have been identified on the Policies Map and protected through Policy N4.

Section/Policy**Policy N 1****Landscape**

DRAFTLP_148

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Policy N1 - this recognises that high importance will be given to protecting the landscape setting, scenic beauty and special qualities of the North York Moors National Park. The policy has also been amended following earlier comments to remove reference to the National Park being on the fringe of the Borough and reference is now made to special qualities rather than protection from 'inappropriate development' and 'significant impact'. This policy is supported. However, a reference to the duty on Redcar and Cleveland Borough Council to 'have regard' to National Park Purposes (as set out in the 1949 National Parks and Countryside Act (as amended by the 1995 Environment Act) and Paragraph 3 of the landscape section of National Planning Practice Guidance within paragraph 7.4 would be welcome, as would a reference to the 2012 North York Moors Management Plan to identify the special qualities' of the National Park.

Officer response:

Support noted. The policy will be updated in accordance with comments.

DRAFTLP_295

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Can areas which are classified as Sensitive Landscape, be re-classified as Local Green Spaces, to give a higher protection from enabling future developments ever taking place?

Officer response:

The Sensitive Landscape Areas been identified as a result of a Landscape Character Assessment and are identified in order to provide protection for landscape character of areas identified as sensitive to change. Local Green Spaces perform a different role and the designation cannot apply to all sensitive landscapes. Local Green Spaces can only be designated where the green space is in reasonably close proximity to the community it serves, holds a particular local significance and is not an extensive tract of land. Local Green Spaces also need to be identified by local communities.

DRAFTLP_424

Full Name: mr stuart white
Organisation: CPRE
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

It is important that we protect all aspects of our natural environment, not just those of national importance, if we are to promote the area for tourism. Inappropriate housing development and renewable energy provision will not enhance the Borough. If tourism is to be promoted then we need to provide suitable tourist resources and accompanying infrastructure. We support the focus on improving and reinstating poor quality landscapes.

Officer response:

Comments of support are noted. Policy N1 provides support for locally important landscapes by requiring development to be carefully designed, to retain important landscape features and to screen or integrate the development into the landscape. Housing and renewable energy developments will be required to meet these criteria and have the potential to be designed to not cause significant harm to designated landscapes. The development of tourist resources in the East Cleveland area is supported through Policy LS3 and the Local Plan supports the delivery of accompanying infrastructure.

Section/Policy**Policy N 1****Landscape****DRAFTLP_436****Full Name:** Louise Tait**Organisation:** Environment Agency**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

We recommend that Local Plan Policy N1: Landscape should include reference to rivers and watercourses, particularly, in relation to protecting biodiversity habitats. In Section 7.12, we welcome the comment that sensitive landscapes will include wooded beck valleys'.

Officer response:

Support noted. The biodiversity of habitats such as rivers and watercourses is protected through Policy N4. Policy N1 offers protection for all features of importance to the character of the landscape, including watercourses.

DRAFTLP_503**Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125. Para 109 sets out that the planning system should contribute to and enhance valued landscapes with advice in Para 113 stating that Local Planning Authorities should set criteria based policies against which proposals for any development on or affecting such sites should be judged. In addition, Para 113 highlights that distinctions should be made between the hierarchy of international, national and locally designated sites so that their protections is commensurate with their status. It is important to note that this advice does not suggest a ban on all development in or adjacent to these designated areas and that the weight that can be attached to any conflict with such designations should be aligned with their importance based on the hierarchy detailed above.

Officer response:

Comments noted. It is considered that Policy N1 is inline with the NPPF and allows development within the identified landscapes where identified criteria are met.

Section/Policy**Policy N 2****Green Infrastructure****DRAFTLP_191****Full Name:** Heather Hodges**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

Redcar, Marske, New Marske and Saltburn should remain separate identities. They were never intended to join up, creating an urban sprawl. The plan, as it stands, takes account of this, and I fully endorse it. It need not, and should not, be changed in any way.

Officer response:

Support noted.

DRAFTLP_488**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the inclusion of this policy, and we support the aims and objectives identified within it.

Officer response:

Support noted.

DRAFTLP_250**Full Name:** Cllr Bill Clarke**Organisation:** Redcar & Cleveland Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Guisborough has an abundance of this particularly being so close to the National Park of the North Yorkshire Moors. We also have the Guisborough walkway and various other footpaths surrounding the town leading to areas of natural beauty. A lot of the footpaths are maintained poorly and the maintenance plan needs to be improved especially along the walkway leading from Enfield Chase and up along Butt lane right up to the edge of the moors. Chapel beck is in need of cleaning in certain parts of he town. The Environment Agency - who have initiated £1.5m worth of improvements towards flood risk - must get to work with the local authority to help clean and maintain their responsibility regularly.

Officer response:

Comments noted. Comments made in relation to the maintenance of footpaths will be referred to the relevant Council section.

Section/Policy**Policy N 2****Green Infrastructure**

DRAFTLP_95**Full Name:** Rosemary Nicholls**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** Yes**Comment summary:**

I'm happy with the plan to keep the strategic gap between Saltburn and Marske.

Officer response:

Support noted.

DRAFTLP_85**Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Support policy.

Officer response:

Support noted.

DRAFTLP_76**Full Name:** Geoff Watkins**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

Happy to the countryside around Saltburn and Marske identified as a protected area.

Officer response:

Support noted.

Section/Policy**Policy N 2****Green Infrastructure**

DRAFTLP_547

Full Name: Jordan Gresham
Organisation: Taylor Wimpey (Uk) Ltd
Agent Name: Mr Steven Longstaff
Agent Organisation: England Lyle Good
Submission type: E-Mail
Agree with section?: No

Comment summary:

TW object to policy N2 and in particular the extent of proposed Green Wedge between Redcar and Marske and the Strategic Gap between Saltburn and Marske. TW do welcome that the Council has undertaken a review of the Green Wedge and Strategic Gap to inform the preparation of the Draft Local Plan. Notwithstanding, TW object to its conclusions. TW object to the extent of the Green Wedge between Redcar and Marske and particularly its northern extent. It is clearly acknowledged by the Council that development could be achieved in the northern extent of the Green Wedge without coalescence of the built up area. TW fully support this conclusion and would suggest that the Council must reconsider the Green Wedge boundaries in this location and remove land which is not required to fulfil the Green Wedge objectives listed at paragraph 7.22 of the draft Local Plan which states, green wedges are open areas within the urban and coastal area which provide buffers between different uses and delineate distinct communities. A Landscape and Visual Appraisal prepared for Land at Grundales found that a landscape-led masterplan framed around the objectives set out in the Redcar and Cleveland Landscape Character SPD would actually improve the edges of Redcar and Marske; enhance pedestrian and cycle connectivity between them; open up new views; and provide new recreational opportunities. These could be achieved without compromising the Green Wedge objectives and would also provide benefits in terms recreational improvements and of restoring the landscape in the adjacent area. TW object to the extent of the strategic gap between Saltburn and Marske. The Council's assessment acknowledges that limited development could be possible without undermining the openness of the strategic gap. TW support these conclusions and consider that Land to North of Marske Road for the reasons set out in the accompanying site specific representations presents a suitable location for future housing development in Saltburn. Residential development on the Land to the North of Saltburn. could be achieved without conflicting with the aims and objectives of the strategic gap to maintain separate identities, and to ensure settlements do not coalesce. Notwithstanding the above, TW would question why the Council's assessment only considers Land South of Marske Road (now benefiting from outline planning approval) and not Land to the North of Marske Road as this land has also been promoted by TW. On this basis, TW would request that the Council undertake a more detailed review of the strategic gap taking into consideration Land North of Marske Road and only include land that required for the strategic gap to meet its objectives.

Officer response:

In addition to separating and delineating the distinct communities of Redcar and Marske, an important role of the green wedge is its value for local amenity, recreation and wildlife as recognised in paragraph 7.22. Therefore, it is considered appropriate to maintain the extent of the designation in this area as it is currently fulfilling its intended policy purpose as a green wedge. Strategic gap boundaries were defined based on local character areas and topographical features. Land North of Marske Road was considered in the review alongside the permitted site as land west of Saltburn. The Council has assessed all sites that have been submitted for inclusion in the plan and has selected what it considers to be the most sustainable, appropriate and deliverable package of sites to meet the housing requirement and the Locational Policy (SD2).

DRAFTLP_193

Full Name:
Organisation: Enterprise Inns Ltd
Agent Name: Mr David Marjoram
Agent Organisation: England Lyle Good
Submission type: Letter
Agree with section?: No

Comment summary:

Object to allocation of site as green wedge under policy N2. Assert that it is inappropriate to include client's site as the land is brownfield and therefore materially different in terms of function and value to green wedge and open space. Surrounding uses, aside from ancillary buildings, are entirely green and of clear value to the local community and area. In contrast client's site is self-contained private land that is largely developed and currently occupied by Parklands Public House, associated access road and hardstanding used for car parking. Residual grassed area to the rear shows evidence of previous development. Questionable the value it adds and essentially been included as 'broad brush' allocation. It does not fulfil functions of wedge. As a result, we consider its protection unjustified and inappropriate, particularly as the re-use of brownfield land beyond development limits provided it is not high environmental value, is supported by draft policies SD2 and SD3 and NPPF. We therefore recommend our client's site be excluded from green wedge allocation. Not only would this better reflect its true function, previously developed land, it could help avoid potential policy conflicts in the future.

Officer response:

Comments noted. The policies map will be updated to remove the site from the green wedge designation.

Section/Policy**Policy N 2****Green Infrastructure****DRAFTLP_359**

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

More mention that they're going to protect the green corridors and strategic gaps good to see.

Officer response:

Support noted.

DRAFTLP_521

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The Strategic Gaps are not delineated and nowhere else in the document are the definitive boundaries spelt out.

Officer response:

Comments noted. The Strategic Gaps have been shown in detail on the Local Plan Policies Map and are also indicated within the Key Diagram. Para. 7.22 explains that strategic gaps are to maintain the separate identities of settlements and to ensure they do not coalesce. The term will also be included within the Glossary.

DRAFTLP_432

Full Name: Louise Tait
Organisation: Environment Agency

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We are in support of Policy N2: Green Infrastructure to the Tees Valley Green Infrastructure Strategy and it's identification of green infrastructure networks. We recommend that the Local Plan includes specific reference to the upcoming Tees Estuary Habitat Masterplan within Policy N2: Green Infrastructure, which focuses on supporting the protection and enhancement of the green infrastructure network. The second paragraph of Policy N2: Green Infrastructure mentions that opportunities should be sought to improve the water environment. We suggest that deculverting should be referenced at this point in the policy, as this is a potential water environment and it is often overlooked by developers. The addition of criterion g. in Policy N2 which identifies beck valleys and other watercourses as specific locations for protecting, enhancing, creating and managing the borough's green infrastructure network is welcomed. We are in support of section 7.18, which references that green infrastructure can facilitate water management. However, we recommend that deculverting is mentioned within this section.

Officer response:

Comments of support welcomed. Reference to the development of a strategic framework in the Tees Estuary will be included in the Local Plan and amendments made to Policy N2 to include reference to deculverting.

Section/Policy**Policy N 2****Green Infrastructure****DRAFTLP_241**

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Where there is a loss of green infrastructure resource and principle of net gain' should apply where possible. Should this be a principle?

Officer response:

Sentence to be amended in line with comments.

DRAFTLP_361

Full Name: Mrs T Meadows
Organisation: Saltburn, Marske and
New Marske Parish
Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Not sure what the minor amendments are but glad to see the strategic gaps are being protected.

Officer response:

Support noted. Green wedge boundaries were reviewed as part of the Local Plan preparation, with some minor amendments to accommodate housing need and to better relate to existing features, this is detailed in the Green Wedge and Strategic Gap Review Paper (2016).

DRAFTLP_72

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Although there is reference to Strategic Gaps in the Draft, there is no clear definition. It was suggested by the representatives that the Strategic Gaps are shown in a map. If this is the case, the detailed and prescriptive maps should be incorporated in the Local Plan together with a definitive description of boundaries.

Officer response:

Comments noted. The Strategic Gaps have been shown in detail on the Local Plan Policies Map and are also indicated within the Key Diagram. Para. 7.22 explains that strategic gaps are to maintain the separate identities of settlements and to ensure they do not coalesce. The term will also be included within the Glossary.

Green Infrastructure

DRAFTLP_338**Full Name:**

Organisation: West Midlands
Metropolitan Authority
Pension Fund

Agent Name: David Staniland

Agent Organisation: Knight Frank LLP

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Our client's site is identified within the Draft Local Plan as falling within the strategic gap between Marske and New Marske. Given the Publication version of the previous Local Plan (July 2014) was abandoned, principally because of our client's site's proposed allocation for residential development (Policy H 3.1 Marske Inn Farm Strategic Site), this is not surprising but is still disappointing nonetheless. Draft Local Plan Policy N2 (Green Infrastructure) states that the Council will aim to protect and enhance the green infrastructure network and will support the protection, enhancement, creation and management of the green infrastructure network, to improve its quality, value, multi-functionality and accessibility, in the strategic gaps between Marske and New Marske and Marske and Saltburn and in the green wedge between Marske and Redcar. It isn't made clear anywhere within the Draft Local Plan what the difference between a strategic gap and a green wedge is. Paragraph 7.22 advises that the strategic gap and green wedge designations were reviewed in the preparation of the Local Plan. In preparing these representations, we have reviewed the Redcar and Cleveland Green Wedge and Strategic Gap Review, May 2016 document and are still not clear what the difference between strategic gap and green wedge is. Green wedges are described in paragraph 1.1 of the Review document as, open areas within the main Teesside built-up area that provide buffers between different uses and delineate distinct communities'. Strategic gaps are described in paragraph 1.3 of the Review document as locations around the Teesside main built-up area to ensure that it does not coalesce with surrounding settlements, and to protect each settlement's distinct identity'. These descriptions do not provide any clarify on the difference between the two, which is reflected in the Draft Local Plan. The Review document goes on to describe a number of sites in the strategic gap and green wedge. At paragraph 3.21 the document describes our client's site (identified as Marske Inn Farm, Marske) as a major site' comprising a vast area of gently sloping farmland to the south of Marske between the Darlington-Saltburn railway and the A174. The site is outside development limits.' Paragraph 3.22 continues that, the site is currently at appeal for non-determination for outline permission for up to 1,000 dwellings and supporting community facilities and commercial uses including a hotel and retailing. The site is bordered to the east by the A1085 (which becomes Marske High Street) and by Longbeck Road to the west.' This is not correct. The site is currently at appeal following the Council's refusal of the planning application. The Review document does not provide a review of our client's site's contribution to the strategic gap. It includes a description of the site (above) then a very basic review of the strategic gap between Marske and New Marske as a whole, which actually concludes that limited development could be possible without undermining the openness of the strategic gap' and without harming the identity of the strategic gap in providing physical separation between Marske and New Marske, provided it is well integrated into the landscape and well related to existing settlements.' Whilst the Review document includes a plan illustrating the extent of the green wedge between Marske and Redcar, and the other green wedges, it does not include plans illustrating the extent of the strategic gaps. Given the above, we question the robustness of the Review document, from which the strategic gaps and green wedge around Marske is based in the Draft Local Plan. Given the lack of detail within the Review document, this raises questions on its credibility and, as a consequence, on the soundness of the Local Plan. Paragraph 7.22 of the Draft Local Plan describes both a strategic gap and green wedge as a location which performs an important role that should remain protected. Strategic gaps and green wedges are described as areas which help to maintain the separate identities of Marske, New Marske and Saltburn and ensure that they do not coalesce. Whilst both the role of a strategic gap and a green wedge are described, the difference between them is not. Paragraph 7.22 continues by describing a green wedge as an open area within the urban and coastal area of value for local amenity, recreation and wildlife, which provides a buffer between different uses and delineates distinct communities. This description of a green wedge could just as easily be a description of a strategic gap, however. There doesn't appear to be any distinction in the Draft Local Plan between the two. It isn't clear, therefore, whether one designation holds more value or a greater degree of protection than the other. The difference, if any, between a strategic gap and a green wedge needs to be made distinctly clear in the next

Officer response:

Definition of strategic gaps and green wedges will be added to the glossary, and the supporting text updated to clarify their role. Strategic gap boundaries were defined based on local character areas and topographical features, further detail will be included in an updated Green Wedge and Strategic Gap Review.

Green Infrastructure

version of the Local Plan. The Draft Local Plan Policies Map (May 2016) identifies the areas within both the strategic gap and the green wedge. This is an update from the abandoned version of the Local Plan Policies Map (September 2013) in that, the previous version did not identify the areas within the strategic gap. This is the first time, therefore, it has been possible to see the extent of the area the Council considers the strategic gap covers. Strategic gaps and green wedges are described as areas which provide a buffer between different distinct communities. We would, therefore, question why the Draft Local Plan Policies Map shows a strategic gap to the south of Marske which, whilst providing a buffer between New Marske and Saltburn, also ends abruptly to the south, in open countryside and land identified as open space? Clearly a gap between the settlement and the open countryside / open space does not meet the purpose of a strategic gap. We consider that the extent of the area currently identified as falling within the strategic gap needs to be amended to ensure the land shown within it fulfils the purpose of a strategic gap. The strategic gap should only include the land directly between Marske, New Marske and Saltburn. It should not include land between the settlements and the open countryside / open space.

DRAFTLP_328

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

It is worth noting that Green Infrastructure (GI) can both include, as well as enhance, a significant number of heritage assets. Historic landscapes, parks, gardens and cemeteries can all be designated heritage assets in their own right. In addition, the setting of a heritage asset can contribute to its significance and this setting can often include elements which could be defined as GI. It might be helpful to include reference to the importance of GI to the historic environment in this section.

Officer response:

Comments noted. Reference to the importance of green infrastructure to the historic environment will be included in N2.

DRAFTLP_290

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Have these been precisely defined in the Borough? Has the SHLAA been adjusted to remove any greenfield sites within these defined areas. What is the definition of a strategic gap and green wedge and what protection does this give to the wards or communities? Can the land to the north of New Marske down to the A174 be protected from future development such as housing, (we believe is was once identified for possible wind farm developments) with the introduction of a strategic gap between Longbeck Lane in NM and Mickledales and the lngs developments? Until the development plan is approved we are still vulnerable to speculative builders. The new Taylor Wimpey development South of Marske Road (H.3.20) on completion will from nearest corner to nearest corner leave only a 550 metre separation between Saltburn & Marske. There is a technicality to resolve as at the moment the new development is in St. Germain's ward in Marske, so currently there is only a zero strategic gap between both of these communities.

Officer response:

The strategic gaps and green wedge areas are identified on the Local Plan Policies Map and will be clearly defined within the Glossary. The Council will seek to resist developments in the strategic gap that would lead to a coalescence of settlements and within the green wedge that would impact on the ability of the wedge to provide a buffer between different uses and communities or provide a valuable resource for amenity, recreation and wildlife. The boundaries of these areas have been reviewed in preparation of the Local Plan and to consider potential development areas.

Section/Policy**Policy N 2****Green Infrastructure****DRAFTLP_39**

Full Name: Cllr Steve Kay
Organisation: Redcar & Cleveland
Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Green 'wedges' identified to preserve our towns and villages as clearly defined entities.

Officer response:

Green wedges are defined on the Policies Map within the main built-up area of the Borough. These areas are important for amenity, recreation and wildlife and provide buffers between different uses and delineate distinct communities within the main built-up area. Outside of this area strategic gaps separate the main built-up area from Saltburn and New Marske, and development limits help to prevent uncontrolled urban sprawl.

DRAFTLP_129

Full Name: Julie Wright
Organisation: Skelton & Brotton
Parish Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Skelton & Brotton Parish Council Members were disheartened to note the demise of the buffer zone' to reduce noise to local householders from the bypass.

Officer response:

Noted. Policy H3.28 for the allocation of residential development land at Kilton Lane, Brotton, and Policy REG3 for a mixed-use development at Skelton both include a requirement for a substantial planting buffer between the development and the A174 Skelton and Brotton bypass.

DRAFTLP_425

Full Name: mr stuart white
Organisation: CPRE

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

In general we support this policy but note that the strategic gap/green wedge between Marske--New Marske, Marske"Saltburn, Marske"Redcar has been reduced to a bare minimum and opposed by those communities. The real sense of community has been eroded by the Council's development programme.

Officer response:

Comment of support noted. There have been limited alterations to green wedges in the Local Plan to reflect planning permissions and allocations required to meet housing need, while ensuring the purpose of the designation is maintained. This is detailed in the Green Wedge and Strategic Gap Review. Strategic gaps have now been defined on the policies map. Green wedges and strategic gaps will be protected through policy N2.

Section/Policy**Policy N 3****Provision of Open Space and Recreation Facilities**

DRAFTLP_489**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We welcome the inclusion of this policy, and support the aims within it. The provision of open space and recreational facilities has the potential to improve public health and wellbeing, and also has the potential to mitigate some of the pressures of recreational impacts upon designated sites.

Officer response:

Support noted.

DRAFTLP_426**Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

In principal we support this policy.

Officer response:

Support noted.

DRAFTLP_84**Full Name:** Mr Dave McGuire**Organisation:** Sport England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

This policy is broadly supported.

Officer response:

Support noted.

Section/Policy**Policy N 3****Provision of Open Space and Recreation Facilities****DRAFTLP_405****Full Name:** Eric George Allinson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** No**Comment summary:**

Encourage provision - don't agree. Instead encourage the use of existing open space (see other comments) also utilise open spaces created by the demolition of any surplus buildings. Investigate using out of hours school facilities for sporting facilities. See attached

Officer response:

The policy seeks open space provision to be made on-site as part of high quality residential development with the exception of specific criteria including where the development would be better served by improvements to existing provision.

DRAFTLP_194**Full Name:** Enterprise Inns Ltd**Organisation:** Enterprise Inns Ltd**Agent Name:** Mr David Marjoram**Agent Organisation:** England Lyle Good**Submission type:** Letter**Agree with section?:** No**Comment summary:**

Object to allocation of site as open space under policy N3. Assert that it is inappropriate to include client's site as the land is brownfield and therefore materially different in terms of function and value to open space. Surrounding uses, aside from ancillary buildings, are entirely green and of clear value to the local community and area. In contrast client's site is self-contained private land that is largely developed and currently occupied by Parklands Public House, associated access road and hardstanding used for car parking. Residual grassed area to the rear shows evidence of previous development. Questionable the value it adds and essentially been included as 'broad brush' allocation. It does not meet definition of types of open space. As a result, we consider its protection unjustified and inappropriate, particularly as the re-use of brownfield land beyond development limits provided it is not high environmental value, is supported by draft policies SD2 and SD3 and NPPF. We therefore recommend our client's site be excluded from the open space allocation. Not only would this better reflect its true function, previously developed land, it could help avoid potential policy conflicts in the future.

Officer response:

Comments noted. Amendments will be made to remove the site from the open space allocation.

DRAFTLP_397**Full Name:** F and L Collings**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

The Church Hill development has not progressed. Does the Council have the power to enforce promises made by developers after permission is granted? As previously expressed, the Church Hill site ought to be developed in its entirety.

Officer response:

The Church Hill development was approved in 2012 as a residential development of 262 dwellings. While the Council does not have powers to require the completion of a commenced development within a set timescale, development on the site is progressing at a reasonable rate and is expected to be completed in 2025. The planning approval for the site did not include the provision of a school or leisure facility.

Section/Policy**Policy N 3****Provision of Open Space and Recreation Facilities**

DRAFTLP_5		Comment summary:	Officer response:
Full Name:	Mrs Joyce Charlesworth	Put more effort into parks, especially those with play areas and give more support to the volunteers who 'work' in the parks and open spaces	Comments noted. Through Policy N3, the Local Plan requires contributions to towards open space and recreation for new developments and seeks to protect open space from redevelopment. The Council is not able to provide support for volunteers through the Local Plan.
Organisation:			
Agent Name:			
Agent Organisation:			
Submission type:	Web		
Agree with section?:	In Part		
<hr/>			
DRAFTLP_306		Comment summary:	Officer response:
Full Name:	Mr Bob Moodie	As the Redcar & Cleveland Borough Council Leisure Provision Strategy was prepared in 2011 will this suffice inclusion when Plan goes to Inspector for final approval? Similarly will the Inspector accept Leisure Needs Assessment for Redcar & Cleveland Borough Council carried out in 2007, or is this something that will be updated prior to Plan submission?	Comments noted. The Local Plan is based upon the most up to date evidence base that the Council has available.
Organisation:	East Cleveland Community Organisation		
Agent Name:			
Agent Organisation:			
Submission type:	E-Mail		
Agree with section?:	In Part		
<hr/>			
DRAFTLP_353		Comment summary:	Officer response:
Full Name:	Mr Steve Donlan	Guisborough Cricket Club supports the protection to existing open space. However, the club does not believe that protection should only be afforded to publically used facilities. We do not believe the key sports grounds in Guisborough have adequate protection and are concerned with the current plan assessment of "no allocations". Via whatever mechanism, the plan needs to reflect the key role sports clubs play in the community. Facilities need to be protected from development. If "green open space" is reserved for publically aimed facilities, then some other categorisation must be used to safeguard the status of sports grounds. What other measures can be put in place to ensure sports facilities are not simply sold for housing.	Facilities linked to sports clubs have been included within the Playing Pitch Strategy 2015, which forms part of the evidence base for Policy N3. Amendments will be made to the Policies Map to include secondary open spaces, such as private sports clubs.
Organisation:	Guisborough Cricket Club		
Agent Name:			
Agent Organisation:			
Submission type:	Letter		
Agree with section?:	In Part		

Section/Policy**Policy N 4****Biodiversity and Geological Conservation****DRAFTLP_153****Comment summary:****Officer response:**

Full Name: Mr Paul Fellows
Organisation: North York Moors National Park

Paragraph 7.48 The Authority supports the opportunity to improve habitat connections with the National Park.

Support noted.

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

DRAFTLP_437**Comment summary:****Officer response:**

Full Name: Louise Tait
Organisation: Environment Agency

We are happy to see reference in Policy N4: Biodiversity and Geological Conservation criterion e. to providing mitigation and, where necessary, compensation for any impact upon certain biodiversity or geological designations. We also welcome the inclusion of the statement opportunities to deculvert watercourses will be encouraged' in Policy N4 and the mention of green and blue infrastructure and wildlife corridors within section 7.47. In Chapter 7, we are very pleased to see the inclusion of paragraph 7.56 which promotes opportunities to deculvert watercourses as part of development or redevelopment and acknowledges the contribution of deculverting towards improving the status of waterbodies in the borough as part of the Water Framework Directive.

Support noted.

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

DRAFTLP_427**Comment summary:****Officer response:**

Full Name: mr stuart white
Organisation: CPRE

In principal we support this policy.

Support noted.

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Section/Policy**Policy N 4****Biodiversity and Geological Conservation****DRAFTLP_435**

Full Name: Louise Tait
Organisation: Environment Agency

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We suggest that Bathing Water quality is considered within the Local Plan, particularly, in Section 7: Natural Environment.

Officer response:

Water quality is addressed in Policy SD7.

DRAFTLP_604

Full Name:
Organisation: RSPB

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

There are many aspects of this policy which are supported by the RSPB and the positive intentions with regard to the protection and enhancement of the borough's biodiversity assets are noted. We also note and welcome that many of our suggestions regarding additions/amendments have been applied to the wording in this policy. However, we would still like to see the following amendments: In respect of SSSIs c. the benefits clearly outweigh any adverse impact on the site the following wording should be added to this sentence: and any broader impacts on the network of SSSI's 7.36 We also welcome consideration within the policy wording of the proposed extension to the Teesmouth and Cleveland Coast SPA, and particularly that the Council will continue to work with partners to agree a collective vision for ongoing management of the interest of wildlife and industry in the Tees Estuary master plan. Further that any proposals within, or impacting on, the SPA should be informed by the master plan. A collaborative and strategic approach on the Tees Estuary is important to secure positive outcomes for the nature interests of the estuary and may be particularly important in securing strategic mitigation sites. 7.41 We will continue to attach a significant importance to protecting these sites. In line with our previous comments we would like to see more ambition in the wording of this policy with regards to nationally important sites.

Officer response:

Comments noted. The policy will be amended to reflect the comments.

DRAFTLP_490

Full Name: Andrew Whitehead
Organisation: Natural England

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

We fully support the inclusion of this policy, and the safeguards and protection that it provides to designated sites. To ensure the policy follows the Habitats Regulations process, where the purpose of an Appropriate Assessment is to determine the potential for a proposal to have an adverse effect on the integrity of a site, we advise that the wording of the third paragraph is amended to read: Priority will be given to protecting our internationally important sites, including the Teesmouth and Cleveland Coast SPA/ Ramsar and European Marine Site, and the North York Moors SPA and Special Area of Conservation. Development that is not directly related to the management of the site, but is likely to have [delete 'an adverse' insert] 'a significant' effect on any internationally designated site'.

Officer response:

Comments noted. Policy will be updated in accordance with recommended wording.

Section/Policy**Policy HE 1****Conservation Areas**

DRAFTLP_504**Full Name:** Mr Phill Bamford**Organisation:** Gladman**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. The policies in the RCLP therefore need to make such a distinction so as to ensure they are consistent with the Framework. The Framework states that if the harm to a heritage asset is deemed to be substantial, then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the RCLP should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the RCLP need to reflect this guidance. In addition, in light of the judgement in FODC v. SSCLG and Gladman Developments Ltd. [2016] EWHC 421 Admin, Gladman consider it is necessary for the RCLP to carry out an assessment of the potential impact of proposed development on heritage assets, as set out in paragraph 129 of the Framework. The Judgement concerns the interaction between paragraph 14 and paragraph 134 of the Framework, and the issues of the balancing exercise to be undertaken to assess the harm of any proposals against the benefits of the identified proposed development in accordance with paragraphs 133, 134 and 135 of the Framework. Gladman consider that the implications of the Judgement apply equally to both the decision making process and the plan making process. Paragraph 134 is clear in talking about development proposals', a phrase which can apply equally to planning applications and proposed allocations. Furthermore, footnote 29 of the Framework clearly states that The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking.. It is therefore essential that the implications of the above Judgment are fully considered in the context of both decision-taking and plan-making.

Officer response:

We note the point being made but statements of significance for each heritage asset are required to inform the policy, i.e. the significance of the asset is required before making a decision based on the policy. So, whilst the policy could include such a requirement it would not be possible to actually make that decision without the significance already being assessed. The point about non-designated heritage assets mentioned in para 135 of the NPPF is, I think, irrelevant as Policy HE2 relates only to designated heritage assets.

DRAFTLP_19**Full Name:** Mr Paul Wilson**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Dont make me laugh, I live in a conservation area on North Road in Loftus and you obviously don't give a toss

Officer response:

Due to a lack of effective control parts of Loftus Conservation Area have suffered from inappropriate alterations. A Conservation Area Management Plan, to give greater weight to conservation issues when determining planning applications along with consultation on the introduction of an Article 4 direction to restrict permitted development rights, will help to improve the situation.

Section/Policy**Policy HE 1****Conservation Areas****DRAFTLP_329**

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The chapter on the historic environment is extremely thorough and comprehensive, and we congratulate the council on its positive and proactive approach. There is a clear strategy throughout the document for integrating heritage considerations, although there needs to be greater clarity over the evidence base supporting the plan. We particularly welcome the references to: the role that heritage plays in the economy (para. 8.2); the commitment to collaborative working (para. 8.4); the intention to minimise heritage at risk (para. 8.5); the on-going review of Conservation Areas and conservation led regeneration (paras. 8.6 and 8.9). While all the policies provide strong protection for the historic environment, there may need to be some clarification with regards the wording on hard and soft landscaping. While these can be an integral part of the historic environment, and form a key part of the significance or contribute to the setting of a heritage asset, there may be some instances where they can also be a negative factor and require management or removal. For example, many Scheduled Ancient Monuments are at risk due to vegetation encroachment, and designed landscapes may require the opening up of key views and vistas to better reveal their significance. Although Parks and Gardens are mentioned in para. 8.1, they do not appear to be reflected within the policy wording or supporting text. Given that they also do not have a strong policy in Section 7, we would like to see greater protection given to these heritage assets.

Officer response:

The ongoing production of the Conservation Area Management Plan for Saltburn, which is intended to be first in the production of CAMP's for each of the Borough's CA's, includes a heritage audit which will provide an empirical record to form the evidence base showing the current status of Conservation Areas. With regard to concerns over soft landscaping, there must be an acknowledgement that all vegetation is not necessarily to be considered soft landscaping. In many cases it is a lack of vegetation management that should be addressed. I believe Historic England has previously raised this issue in regard to Saltburn Valley Gardens and there is an obvious lack of vegetation management at Kirleatham.

DRAFTLP_308

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Are there any guide lines for constraints on building alterations within Conservation Areas? Is each Conservation Area listed and specified?

Officer response:

There are little extra controls over most Conservation Areas apart from restrictions on applying render, matching materials to be used in extensions and control over demolition. Article 4 directions can also be used, in certain circumstances, to offer further protection to CA's. Conservation Areas are listed on the website and described in the Conservation Area Appraisals.

DRAFTLP_257

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

We have a lot of friends of groups who look after some of our historic areas and need better partnership and encouragement from the local authority. More regular meetings on what the local authority can do for these helping hands including funding ideas needs to be encouraged.

Officer response:

We note that the Council has previously assisted in providing funding for new projects. However, it is recognised that an ongoing issue is the cost of maintenance of heritage assets which can be more difficult to find funding for. The Council will continue to work with community groups, subject to resource availability.

Section/Policy**Policy HE 1****Conservation Areas****DRAFTLP_167**

Full Name: Mrs A Atkinson
Organisation: Loftus Town Council
Agent Name:
Agent Organisation:
Submission type: Letter
Agree with section?: In Part

Comment summary:

Loftus Town Council appreciates the heritage importance of retaining old and listed buildings, and of the streetscape as a whole. However, its members are also aware of the difficulties which can be caused by living in such properties, which can lead to properties being abandoned and further deteriorating. Loftus Town Council therefore is of the opinion that Planning Policies should not be too restrictive - sympathetic consideration should be given to permitting owners to bring properties up to modern living standards, or for change of use. Help, advice and direction to possible funding sources should be provided via Development or Regeneration officers, in order to preserve the essential qualities and retain the buildings in good repair, promoting their long-term sustainability. The Council is supportive of retaining the need to submit full (not outline) application for new development within Conservation Areas.

Officer response:

Funding for the maintenance of GII listed buildings is lacking; a situation that is not expected to change in the near future. With regard to modern living standards, historically sensitive narrow profile double glazed timber windows are now widely available and have been approved for use in listed buildings elsewhere. Another issue in historic buildings gaining a reputation as being unsuitable for modern living is a reputation for damp, which is a situation created since the latter half of the 20th Century and still ongoing where numerous interventions using inappropriate materials has impacted upon the ability of the building to sustain acceptable living conditions.

DRAFTLP_80

Full Name: Sarah Moulder
Organisation:
Agent Name:
Agent Organisation:
Submission type: Web
Agree with section?: In Part

Comment summary:

Please review policy H3.24 (Belmangate Field) in light of the aims of this policy

Officer response:

Whilst Policy 3.24 sets out criteria for development of the site in a sensitive manner, Policy HE1 must also be complied with. As open space, the historic significance of the site will have to be assessed.

DRAFTLP_71

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

It is important to list the Conservation Areas in the Borough. The principle of Conservative should be made clearer and how the Assessment system works and how Conservation Area Management Plans are to be prepared and used to support the Conservation Area policy.

Officer response:

Whilst the Borough's Conservation Areas are listed on the website, the Council agrees that it should publicise the aims of the Conservation Area designations in an attempt to better engage residents and developers and make them aware of the mutual benefits of Conservation Area status, and will take action to do so.

Section/Policy**Policy HE 2****Heritage Assets**

DRAFTLP_505

Full Name: Mr Phill Bamford
Organisation: Gladman
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: No

Comment summary:

Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. The policies in the RCLP therefore need to make such a distinction so as to ensure they are consistent with the Framework. The Framework states that if the harm to a heritage asset is deemed to be substantial, then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the RCLP should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the RCLP need to reflect this guidance. In addition, in light of the judgement in FODC v. SSCLG and Gladman Developments Ltd. [2016] EWHC 421 Admin, Gladman consider it is necessary for the RCLP to carry out an assessment of the potential impact of proposed development on heritage assets, as set out in paragraph 129 of the Framework. The Judgement concerns the interaction between paragraph 14 and paragraph 134 of the Framework, and the issues of the balancing exercise to be undertaken to assess the harm of any proposals against the benefits of the identified proposed development in accordance with paragraphs 133, 134 and 135 of the Framework. Gladman consider that the implications of the Judgement apply equally to both the decision making process and the plan making process. Paragraph 134 is clear in talking about development proposals', a phrase which can apply equally to planning applications and proposed allocations. Furthermore, footnote 29 of the Framework clearly states that The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking.. It is therefore essential that the implications of the above Judgment are fully considered in the context of both decision-taking and plan-making.

Officer response:

We note the point being made but statements of significance for each heritage asset are required to inform the policy, i.e. the significance of the asset is required before making a decision based on the policy. So, whilst the policy could include such a requirement it would not be possible to actually make that decision without the significance already being assessed. The point about non-designated heritage assets mentioned in para 135 of the NPPF is, I think, irrelevant as Policy HE2 relates only to designated heritage assets.

DRAFTLP_330

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

The chapter on the historic environment is extremely thorough and comprehensive, and we congratulate the council on its positive and proactive approach. There is a clear strategy throughout the document for integrating heritage considerations, although there needs to be greater clarity over the evidence base supporting the plan. We particularly welcome the references to: the role that heritage plays in the economy (para. 8.2); the commitment to collaborative working (para. 8.4); the intention to minimise heritage at risk (para. 8.5); the on-going review of Conservation Areas and conservation led regeneration (para. 8.6); and the encouragement of the continued active use of heritage assets (para. 8.16). While all the policies provide strong protection for the historic environment, there may need to be some clarification with regards the wording on hard and soft landscaping. While these can be an integral part of the historic environment, and form a key part of the significance or contribute to the setting of a heritage asset, there may be some instances where they can also be a negative factor and require management or removal. For example, many Scheduled Ancient Monuments are at risk due to vegetation encroachment, and designed landscapes may require the opening up of key views and vistas to better reveal their significance. Although Parks and Gardens are mentioned in para. 8.1, they do not appear to be reflected within the policy wording or supporting text. Given that they also do not have a strong policy in Section 7, we would like to see greater protection given to these heritage assets.

Officer response:

With regard to the comment on Parks & Gardens not being specifically mentioned in the policy, these are considered to be covered by the term "Heritage Assets". However, whilst it is important to consider the maintenance of heritage assets, including vegetation management as illustrated by HE's concern about Saltburn Valley Gardens, we do not consider it appropriate to include these matters in the Local Plan. I suspect HE's concerns about Parks & Gardens originate from the condition of Saltburn Valley Gdns but this is a Council Area Mgmt issue rather than one for the LDF.

Section/Policy**Policy HE 2****Heritage Assets**

DRAFTLP_251

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

Guisborough is steeped in history with its ancient Priory ruins, churches and cobbled Main Street. A lot of these buildings rely on Friends of to support them and help maintain them. I know the local authority will work in partnership with these organisations but they need to know this. There needs to be more partnership and assistance meetings to push forward ideas groups have to move these to fruition. Regular meetings between these groups and the local authority to speed up advice sessions are a necessity to achieve these groups' goals.

Officer response:

Comments noted, the Council will continue to work with community groups, subject to resource availability.

Section/Policy**Policy TA 1****Demand Management Measures****DRAFTLP_658**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: Yes

Comment summary:

Highways England is supportive of this policy and the focus on the delivery of demand management measures as opposed to physical infrastructure improvements. We consider demand management measures such as those proposed provide an essential mechanism for encouraging a modal shift to more sustainable means of transport and reducing the dependency on the private car.

Officer response:

Support noted.

DRAFTLP_64

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: No

Comment summary:

Bullet point f: Workplace parking levies are no more than indirect taxation against working people. I would oppose any measure to introduce such a tax'.

Officer response:

This is a longer term initiative if it becomes necessary.

DRAFTLP_331

Full Name: Barbara Hooper
Organisation: Historic England
Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

All types of transport schemes and measures can have a potential impact on the historic environment, whether directly or indirectly. This can range from the direct impact of land take associated with major new road schemes and improvements to the existing road network, to the introduction of traffic management measures and their impact on the character and appearance of historic townscapes and landscapes. There may also be opportunities to re-use heritage assets, for example historic routes or bridges. More advice is available on website, including assessing the impact of road schemes, advice on street design, and design and management of streetscapes and public open spaces.

Officer response:

Any proposed roadworks will take proper regard to the historic nature of their surroundings where appropriate.

Section/Policy**Policy TA 1****Demand Management Measures****DRAFTLP_428****Full Name:** mr stuart white**Organisation:** CPRE**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

9.5 If the Council is serious about tackling climate change then it needs to stop developments that require car journeys to reach every required facility eg shops, schools, or incorporate day to day needs within such developments. Local resources are so stretched that it is not always possible to attend the nearest school or see the nearest doctor. Good shopping facilities are sometimes 1 or 2 miles away. However, in the great scheme of things, there is little the Council can do about climate change. The best it can do is to improve local air quality. 9.7 If these objectives are to be achieved then there is a need to improve the frequency and reliability of public transport, to develop more safe designated cycle lanes and to introduce policies to encourage walking to school eg supervised crocodiles' of children walking to school from the same neighbourhood.

Officer response:

The Council needs to be aware that people readily use their cars so must allow these to be accommodated whilst actively promoting the sue of alternatives such as walking, cycling and public transport.

DRAFTLP_168**Full Name:** Mrs A Atkinson**Organisation:** Loftus Town Council**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Loftus Town Council agrees that there is a need to make public transport a more attractive option, both for residents endeavouring to get to work, medical appointments or leisure, and for visitors in order to encourage economic activity. Members consider that buses need to run later, more frequently, and linkages between buses and trains need to be better co-ordinated. Information about public transport needs to be available at bus stops and kept updated. However, members were also disappointed that there appears to be no reference to improve access roads or to introduce additional parking in Loftus. Members consider that there are potential visitors who do not stop in Loftus as there is little parking, thus inhibiting economic regeneration.

Officer response:

The Council works with bus operators and provides the local link bus services to provide as extensive a network that funding allows. There are few opportunities for road or car park improvements that would not involve or impact on properties that are outside council ownership.

DRAFTLP_36**Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Agrees with relatively uncontested road network and that internet work from home must be encouraged in this area. Carparking in Loftus - the main car park is not sign posted. As more cars come into town, the main car park is increasingly parked up. The plan makes no provision for any more. It is still remarkable difficult to travel from Loftus to Redcar or Whitby by public transport.

Officer response:

North Road car park is signposted in both directions from A174. There are few opportunities for car park improvements without impacting on properties that are not in Council ownership. Bus services operate from Brotton and Loftus to Whitby half hourly from 06:00 to 18:30 Monday to Saturday. Return journeys from Whitby operate from 06:00 to 19:00. There is a similar frequency and duration of services to Redcar on bus service X4.

Section/Policy**Policy TA 1****Demand Management Measures****DRAFTLP_35****Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** In Part**Comment summary:**

Agrees with relatively uncontested road network and that internet work from home must be encouraged in this area. Carparking in Loftus - the main car park is not sign posted. As more cars come into town, the main car park is increasingly parked up. The plan makes no provision for any more. A lot of young people go from East Cleveland to work in Whitby. This is not at all easy to manage on public transport. Nor is shift work on Teesside. It is still remarkable difficult to travel from Loftus to Redcar by public transport.

Officer response:

North Road car park is signposted in both directions from A174. There are few opportunities for car park improvements without impacting on properties that are not in Council ownership. Bus services operate from Brotton and Loftus to Whitby half hourly from 06:00 to 18:30 Monday to Saturday. Return journeys from Whitby operate from 06:00 to 19:00. There is a similar frequency and duration of services to Redcar on bus service X4. We trailed a shift time bus service from Loftus to Teesport in summer 2015. This was unsuccessful as existing employees with standing travel arrangements were not interested in transferring to early morning or late night bus services.

DRAFTLP_243**Full Name:** Scott Lloyd**Organisation:** Redcar & Cleveland
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Amend the wording The focus will be on encouraging greater use of the public transport network supported by demand management measures and making best use of existing infrastructure. To The focus will be on encouraging greater levels of walking and cycling and use of the public transport network supported by demand management measures and making best use of existing infrastructure. How this is implemented and connection - planners have to understand cycle routes (for example) will be critical for this to make any difference.

Officer response:

Accept revised wording.

Section/Policy**Policy TA 2****Travel Plans**

DRAFTLP_278**Full Name:** Rachael Wigginton**Organisation:****Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

We have no issues to raise with Redcar. TA2 and 3 are welcomed and in particular the reflection of the cross boundary issues and the need to liaise with other authorities.

Officer response:

Support noted.

DRAFTLP_659**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** Yes**Comment summary:**

As identified in response to the site specific policies, Highways England is supportive of utilising Travel Plans as a mechanism to encouraging a modal shift to more sustainable means of transport and reducing the dependency on the private car.

Officer response:

Support noted.

Improving Accessibility within and beyond the Borough

DRAFTLP_258

Full Name: Cllr Bill Clarke
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Transport links between Guisborough and the two minor hospitals Redcar and Brotton need to be improved and advertised much smarter. This also includes links from Guisborough to JCUH. The large Arriva buses must be stopped from routing on what I class as minor roads such as New Road and Rectory Lane. Other safer and more efficient routes must be researched and implemented. The HGV route in to and out of the town needs to be enforced if it can be legally via the by-pass. Large HGV's are taking shortcuts to access their destinations and this has resulted in New Road having to be included in the highways programme for 2016/17 for rebuilding and not just resurfacing. They are also, at times, coming down the actual Westgate Road which Sunnyfield House and other older houses are on. This needs to be also investigated and enforce re-routing where necessary.

Officer response:

Bus services and journey planning information is available on the internet - www.connectteesvalley.co and can be made available to individuals on request. There are limited options for introducing services in this current financial climate. Relocating bus routes would leave areas of south Guisborough un-served - this is not supported. There are limited options for enforcing lorry routes, particularly when the majority of HGVs are likely to be legitimately using the routes to access premises. Westgate Road is the main link from Westgate to Reed Terrace that has several business premises. This therefore is legitimate for occasional HGVs.

DRAFTLP_66

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Opening statement and bullet point b: Following highway works, over a period of years, by R&CBC and MBC that has resulted in a significant dual carriageway being reduced to a single carriageway heading west from the A1032 roundabout to Middlesbrough Longlands is this not a contradiction in terms? The intersections of the A1085 along this route are constantly congested hot spots' and in the case of the intersection at Normanby RD/A1085 are positively unsafe.

Officer response:

A1085 has predominately been affected by the A66. Sections of carriageway have been reallocated while junctions have been improved to better accommodate local turning movements.

Section/Policy**Policy TA 3****Improving Accessibility within and beyond the Borough****DRAFTLP_660**

Full Name: Mr Chris Bell
Organisation: Highways England
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

Highways England is generally supportive of this policy and the identification of transport schemes that are required to support the delivery of the Plans development aspirations and the delivery of sustainable economic growth and sustainable communities within the borough. Overall we are supportive of schemes which seek to improve or expand public transport services and facilities, along with improvements to sustainable transport provisions, particularly where such improvements would encourage or enable journeys to be made without utilising the SRN. With regards to the specific schemes referred to in relation to the SRN, including in criteria d. the A66, A1053 and A174, particularly Greystones roundabout, and criteria k. the A66 and A174 road links to the A19 and beyond to the A1/A1(M), providing appropriate access to the strategic highway network from South Tees, to reduce bottlenecks and maintain highway capacity, whilst we welcome the reference to working in collaboration with Highways England, and appreciate that such improvements are required to facilitate development and support existing and expanding industries, as referred to in paragraph 9.26, there is a need to better understand the current Plan's spatial development aspirations and the consequences for the SRN and the specific schemes referred to. Reference is made in both the Plan and the Infrastructure Delivery Plan to the Tees Valley Area Action Plan, which was intended to examine the development proposals likely to come forward in the Tees Valley area and the corresponding transport measures required to facilitate economic growth and mitigate potential detrimental impacts on the SRN. However, the last update of this Plan was in 2011 and is therefore outdated and does not reflect the latest development aspirations and transport infrastructure needs within the Tees Valley area. However, we understand that the AAP is, currently undergoing further development work and the results of this are expected summer/autumn 2016. Therefore, we should be able to provide more detailed comment on these schemes and any other measures that may be required, once the latest version of the AAP has been published.

Officer response:

Comment noted.

DRAFTLP_535

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council
Agent Name:
Agent Organisation:
Submission type: E-Mail
Agree with section?: In Part

Comment summary:

I cannot find any detailed planning to improve roads. Does this exist and can it be spelt out? LTP3 does not address this and will be well through its life span by August 2017.

Officer response:

There are few detailed plans for major road improvements. Some options are indicated at para 9.25 but these have not been developed to a detailed stage.

Section/Policy**Policy TA 3****Improving Accessibility within and beyond the Borough****DRAFTLP_665**

Full Name: Mr Darren Edmends
Organisation: Redcar & Cleveland Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Here are some reworked comments for the 2nd bullet point in section 9.25: "A proposed east to west extension to Dockside Road, through the South Bank Wharf Enterprise Zone that will provide access to the riverside and give an additional access point into Tees port. A further connection from Eston Road to the east west extension will allow access the adjacent Prairies Enterprise Zone;

Officer response:

The bullet point for Dockside Road will be amended.

DRAFTLP_522

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

The Railway halt at Steel House, whilst not currently in use, is a strategic opportunity for redevelopment of the SSI site. Should this not be considered for inclusion at some relevant point. The IDP may a place for this. When and how will the updating of the IDP be taking place and by whom?

Officer response:

This is a private station over which the Council has no control. We will seek to use our influence to ensure that it remains available until the future of the steel works is resolved.

DRAFTLP_332

Full Name: Barbara Hooper
Organisation: Historic England

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

All types of transport schemes and measures can have a potential impact on the historic environment, whether directly or indirectly. This can range from the direct impact of land take associated with major new road schemes and improvements to the existing road network, to the introduction of traffic management measures and their impact on the character and appearance of historic townscapes and landscapes. There may also be opportunities to re-use heritage assets, for example historic routes or bridges. More advice is available on website, including assessing the impact of road schemes, advice on street design, and design and management of streetscapes and public open spaces.

Officer response:

Any proposed roadworks will take proper regard to the historic nature of their surroundings where appropriate.

Section/Policy**Policy TA 3****Improving Accessibility within and beyond the Borough****DRAFTLP_284**

Full Name: Mr Bob Moodie
Organisation: East Cleveland Community Organisation

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Are any major road networks and or by-passes being identified to give improved access to EC villages? This will be welcome if done sensitively, without detracting from the rural tranquillity. HGV road transport currently use some unsuitable local rural roads to access industrial customers locations across EC. Are any plans in place to address this issue and make the EC road network safer for general road users and HGV drivers?

Officer response:

No major road improvements are currently proposed in East Cleveland. There are insufficient traffic levels to justify any major works.

DRAFTLP_277

Full Name: Rachael Wigginton
Organisation:

Agent Name:
Agent Organisation:

Submission type: Letter

Agree with section?: In Part

Comment summary:

We have no issues to raise with Redcar. TA2 and 3 are welcomed and in particular the reflection of the cross boundary issues and the need to liaise with other authorities.

Officer response:

Support noted.

DRAFTLP_211

Full Name: mrs christine moulder
Organisation:

Agent Name:
Agent Organisation:

Submission type: Web

Agree with section?: In Part

Comment summary:

Transport more important to retaining working age population than new housing. Transport links are key to encouraging a) employers to locate here and b) people to reside here. The SHMA highlights that most commuter journeys out of RCBC involve travel to Middlesbrough and Stockton. Access by road to these employment areas, particularly from Guisborough and Nunthorpe, is a limiting factor. With extensive housing development in both areas this will only worsen. Guisborough has no access to rail services. Last time I checked it was not even possible to tie in a bus trip to Nunthorpe with the train from Nunthorpe to Middlesbrough. Add to that the lack of a good airport and a 45 minute drive to Darlington station for main line trains and it becomes obvious why working people relocate.

Officer response:

Those catching buses westward from Guisborough would stay on board to travel to Middlesbrough rather than changing to rail at Nunthorpe. Bus service 28 provides an hourly connection to Nunthorpe if people want to catch a train further afield.

Section/Policy**Policy TA 3****Improving Accessibility within and beyond the Borough****DRAFTLP_177****Full Name:** Mr J D Wiggins**Organisation:** Manless Green Farm**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

Consideration should be given to converting bus routes in East Cleveland to electric operation/trolley buses. Low bridges at North Skelton and Brotton should not be a great problem due to new technology.

Officer response:

This may be a longer term option for the future but would need to be taken on board by commercial bus operators.

DRAFTLP_176**Full Name:** Mr J D Wiggins**Organisation:** Manless Green Farm**Agent Name:****Agent Organisation:****Submission type:** Letter**Agree with section?:** In Part**Comment summary:**

There is no mention of the Tees Valley Metro.

Officer response:

This scheme is no longer being pursued.

DRAFTLP_127**Full Name:** Julie Wright**Organisation:** Skelton & Brotton Parish Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Skelton & Brotton Parish Members felt that the local transport infrastructure requires improvement, for example footpaths and cycle routes, both around the villages, but particularly to link the villages of Skelton and Brotton and to facilitate access to the retail development soon to be built on the outskirts of Skelton.

Officer response:

Few options exist for improvements at present due to a lack of existing routes that could be upgraded. Options will be kept under review into the future.

Section/Policy**Policy TA 3****Improving Accessibility within and beyond the Borough**

DRAFTLP_67	Comment summary:	Officer response:
Full Name: Cllr Bob Norton	Para 9.30: What will we do for Steel Halt railway station that effectively delivers people right in to the SSI site? This needs to be retained and maintained pending future development of the site.	This is a private station over which the Council has no control. We will seek to use our influence to ensure that it remains available until the future of the steel works is resolved.
Organisation: Redcar & Cleveland Borough Council		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: In Part		
DRAFTLP_65	Comment summary:	Officer response:
Full Name: Cllr Bob Norton	Should we be making some reference to the Combined Authority in this section?	Reference will be made in policy TA3 to Tees Valley Combined Authority.
Organisation: Redcar & Cleveland Borough Council		
Agent Name:		
Agent Organisation:		
Submission type: E-Mail		
Agree with section?: In Part		
DRAFTLP_253	Comment summary:	Officer response:
Full Name: Cllr Bill Clarke	We are whether society likes it or not in the age of the car and private transport. It is acknowledged that some people do not have this facility and some of the bus links are inadequate, poorly advertised and badly routed. We have the situation in Guisborough whereby if you have to take public transport to the two minor hospitals in the borough; that is Redcar and Brotton to visit elderly residents or to receive minor treatment the Redcar bus is two buses and the Brotton bus is one and then a lengthy walk. This is not acceptable and is costly. The bus link to JCUH is also inadequate and poorly advertised. These need to be resolved urgently with assistance from the NHS and bus companies. We also have the large Arriva buses driving through the town on what I class as minor roads and these should be investigated and re-routed. Two examples of these roads are Rectory Lane and New Road. New Road is in the highways programme 2016/17 to be re-built after it has been virtually destroyed by constant uses of these buses and HGV's accessing a short cut to other parts of the town. This brings me on to the fact that we only have a courtesy route for HGV's coming in and out of the town. Companies are ignoring this and we should have this route enforced. Once the Cleveland Gate project is fully underway with what I should think will be the approval for another 135 dwellings on Springwood Road, Rectory Lane must be investigated for a better road safety/strategy management and increased demand. The junctions on Rectory Lane which include the Cleveland Gate complex, Morgan Drive, Enfield Chase, Rectory Avenue/Close, Dorset Road and Hutton Lane must be investigated with a view to better access and traffic management.	Bus services and journey planning information is available on the internet - www.connectteesvalley.co and can be made available to individuals on request. There are limited options for introducing services in this current financial climate. Relocating bus routes would leave areas of south Guisborough un-served - this is not supported. There are limited options for enforcing lorry routes, particularly when the majority of HGVs are likely to be legitimately using the routes to access premises. The junctions on Rectory Lane currently operate satisfactory and are predicted to do so in the future.
Organisation: Redcar & Cleveland Borough Council		
Agent Name:		
Agent Organisation:		
Submission type: Letter		
Agree with section?: In Part		

DRAFTLP_68

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Para 9.37: Is it now correct to quote high levels of freight relating to steel movements?

Officer response:

There are several steal rolling mills in the borough so this is still relevant.

Section/Policy**Policy TA 4****Sustainable Transport Networks****DRAFTLP_34****Full Name:** Cllr Liz Westhead**Organisation:****Agent Name:****Agent Organisation:****Submission type:** Web**Agree with section?:** Yes**Comment summary:**

Pleased that you plan to encourage walking cycling and horse riding in Cleveland.

Officer response:

Support noted.

DRAFTLP_661**Full Name:** Mr Chris Bell**Organisation:** Highways England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

Highways England is supportive of this policy and the focus on the delivery of sustainable transport networks, to maintain and enhance access to walking and cycling provisions, which can help to encourage a modal shift to more sustainable means of transport and reduce the dependency on the private car.

Officer response:

Support noted.

DRAFTLP_333**Full Name:** Barbara Hooper**Organisation:** Historic England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

All types of transport schemes and measures can have a potential impact on the historic environment, whether directly or indirectly. This can range from the direct impact of land take associated with major new road schemes and improvements to the existing road network, to the introduction of traffic management measures and their impact on the character and appearance of historic townscapes and landscapes. There may also be opportunities to re-use heritage assets, for example historic routes or bridges. More advice is available on website, including assessing the impact of road schemes, advice on street design, and design and management of streetscapes and public open spaces.

Officer response:

Any proposed roadworks will take proper regard to the historic nature of their surroundings where appropriate.

DRAFTLP_491**Full Name:** Andrew Whitehead**Organisation:** Natural England**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

While we welcome the inclusion of this policy as a means of improving public access, including to sites at the coast and the North York Moors it does have the potential to increase recreational pressures on these sites.

Officer response:

The concern regarding increasing pressure on sensitive sites is noted. The proposed works will have regard to the sensitive nature of their surroundings where appropriate.

Section/Policy**Appendix 1:
Implementation Plan and Monitoring Framework****DRAFTLP_293**

Full Name: Matthew Good
Organisation: Home Builders Federation Ltd

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: No

Comment summary:

It is recommended that reference also be made to potential triggers for a plan review, if it fails to deliver against the housing requirement. These triggers should also be included within the Implementation Plan / Monitoring Framework in appendix 1.

Officer response:

Comments noted. The Monitoring Framework includes a target of 234 dwellings to be completed per year through the plan period. Should there be a failure to meet this target, the Council will carryout the remedial action identified in Appendix 1. It is not considered that failure to meet the target should immediately trigger a review of the plan, as there may be other more suitable interventions. A review of the plan will be carried out if the action plan considers it necessary or other measures are not successful. Reference to remedial action will be included within the relevant policy.

DRAFTLP_69

Full Name: Cllr Bob Norton
Organisation: Redcar & Cleveland Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Opening statement, final sentence: Should carryout' not read carry out'?

Officer response:

Agreed. The correction has been made.

DRAFTLP_244

Full Name: Scott Lloyd
Organisation: Redcar & Cleveland Borough Council

Agent Name:
Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Specific reference to the Purple Flag scheme, needs more detail: Who is paying for the assessment (not for inclusion but needs to be worked out) Where is this to be applied to (the Purple Flag assessment) just Redcar? Redcar and Guisborough? How measured? Crime and ASB rates?

Officer response:

Comment noted. Reference to the Purple Flag Scheme is to be removed from Policy ED1 and Appendix 1 as the Council no longer intends to pursue an application.

Section/Policy**Appendix 1:
Implementation Plan and Monitoring Framework**

DRAFTLP_534

Full Name: Cllr Philip Thomson
Organisation: Redcar & Cleveland
Borough Council

Agent Name:

Agent Organisation:

Submission type: E-Mail

Agree with section?: In Part

Comment summary:

Appendices 225 to 248 Presumably these were tried in Portrait? I would find it easier to handle. Also, I found the bullet points in the columns unconnected. Should there be any alignment or matching up?

Officer response:

Comments noted. Format improvements will be considered, however landscape was considered to be the most effective to display the information, due to the numbers of columns required. The bullet points do not fully align as there is often more than one indicator for each policy outcome or vice versa.

Section/Policy**Appendix 7:****Key Diagram**

DRAFTLP_339**Full Name:****Organisation:** West Midlands
Metropolitan Authority
Pension Fund**Agent Name:** David Staniland**Agent Organisation:** Knight Frank LLP**Submission type:** E-Mail**Agree with section?:** No**Comment summary:**

Appendix 7 of the Draft Local Plan includes a Key Diagram. This diagram is very similar to that which is included at the end of the adopted Core Strategy (July 2007) document and that which was included at Appendix 5 (Key Diagram) of the Publication version of the abandoned Local Plan (July 2014). Only fairly minor changes are proposed on the Key Diagram in the Draft Local Plan, when compared against that in the Core Strategy. For example, the grey arrows which previously identified the broad location of the strategic gaps between Marske and New Marske and Marske and Saltburn are now shown as green stars. Rather confusingly, the green wedges are still shown as green stars, albeit a slightly different design, so it isn't particularly easy to distinguish between the two. What is significant is the fact that our client's site is identified on the Key Diagram in the Draft Local Plan as falling within the Urban / Coastal Area' (coloured in violet). This area has been renamed and was previously identified on the Key Diagram in the Core Strategy as the 'Conurbation' (coloured in violet). There is no question whether our client's site is included or not because the A174, which runs to the south of our client's site, is the southern boundary of this Urban / Coastal Area. What is also significant is that, whilst the Council have amended the area within the Urban / Coastal Area to the east of our client's site, between Marske and Saltburn, our client's site remains within it. This would indicate that the Council, in revising the area within the Urban / Coastal Area, have chosen to retain our client's site within it.

Officer response:

The use of green stars will be reviewed see if the distinction between the green wedges and strategic gaps can be made any clearer. Other comments are noted.

DRAFTLP_520**Full Name:** Cllr Philip Thomson**Organisation:** Redcar & Cleveland
Borough Council**Agent Name:****Agent Organisation:****Submission type:** E-Mail**Agree with section?:** In Part**Comment summary:**

The Key Diagram at the rear of the draft has some merit but does not present any impact. This is useful in its diagrammatic form but not as a definitive document.

Officer response:

The Key Diagram is a requirement to indicate broad locations for strategic development. The detailed land-use designations are shown on the Policies Map.

Appendix 2: Changes to Local Plan Following Consultation

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Foreword

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike , new text in <u>underline</u>)	Reason for Change
3	Foreword	Amend text	It is vitally important that we get an up-to-date Local Plan in place as quickly as possible, so that we can continue to have a positive influence over the development that takes place in Redcar and Cleveland. With this in mind, we have involved all parts of the Council in preparing this Draft Local Plan, working in collaboration across the political spectrum to set out our preferred approach to planning for development. We have also <u>undertaken a comprehensive public consultation exercise on our Draft Local Plan, and taken into consideration the views expressed as part of previous plan</u> in making activities, and made significant changes to our proposals.	For clarity
3	Foreword	Delete text	The Draft Local Plan will now be made available to the public for consultation and I would like to invite everyone who lives, works and visits Redcar and Cleveland to provide us with your views about the proposed strategy and policies that it contains. A series of public consultation events will be held over a six-week period, with Councillors and officers available to discuss the document throughout this consultation period. I look forward to hearing your views. <u>Finally,</u>	For clarity
3	Foreword	Add text	<u>The Publication Local Plan is the result of this work. It is the version of the Local Plan that the Council wishes to adopt and we are publishing the document so that formal representations can be made to it. Once all the representations have been made, the Council will submit</u>	For clarity

Foreword

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			the Local Plan to the Secretary of State for its Independent Examination.	
3	Foreword	Amend text	I would like to thank everyone who has been involved in preparing this Draft Local Plan, in particular the Councillors who have worked alongside me in getting to this stage. I hope that we can continue to work together to achieve sustainable economic growth for years to come.	For clarity

1 Introduction

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
6	Para 1.8	Amend text	The NPPF re-emphasises the importance of having a planned system and that local plans play an underpinning role in delivering sustainable development and supporting economic growth. This <u>It</u> underlines the importance of having a well-justified and an up-to-date local plan and its vital role in shaping the future of our local area.	For clarity
6	Para 1.9	Amend text	Whilst we have prepared this Publication Local Plan using a lot of work has been done comprehensive evidence base, in order to make sure our approach in can be justified. We have also taken into account the comments made during the consultation on the Draft Local Plan can be justified, it is important, which took place between June and August 2016, making changes to underline that they are not a final set of proposals. our approach where appropriate. The Council is, therefore, keen to hear the views of all interested parties to help us finalise our Local Plan.	For clarity
7	Para 1.10	Amend text	The Council has also prepared an Infrastructure Delivery Plan (IDP) to sit alongside the Draft <u>Publication</u> Local Plan. The IDP outlines some of the infrastructure (such as transport, schools, health services and open space) that is needed to help new communities prosper. We will continue to update the IDP alongside the preparation of the Local Plan.	For clarity
7	Para 1.11	Delete text	Following the consideration of the Draft Local Plan by Cabinet in May 2016, it will be subject to a six week period of public consultation, commencing in June 2016. During this period, the Council will invite comments from all sections of the community. We will publicise the consultation through information in the local press and on	For clarity

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			our website, and by writing to various consultees. We will hold drop in sessions throughout the borough, with Council officers on hand to explain the contents of the Draft Local Plan and answer any questions that people may have.	
		New text	<u>The Publication Local Plan is being made available for formal representations in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Full details of the representations procedure can be obtained from the Council and by visiting www.redcar-cleveland.gov.uk/localplan.</u>	For clarity
7	Para 1.12	Amend text	<u>Following the publication period, the Local Plan will be submitted to the Secretary of State for Independent Examination. The timetable for the preparation and the adoption of the Local Plan is set out below:</u>	For clarity
7	Table 1	Amend text	[Caption] add: <u>(dates with * subject to confirmation by the Planning Inspectorate)</u> [delete 1 st row]: Approval of Draft Local Plan by Cabinet – May 2016	For clarity
7	Para 1.14	Amend text	A Duty to Co-operate Statement will be <u>has been</u> prepared to accompany the publication version of the <u>this</u> <u>Publication</u> Local Plan.	For clarity
8	Para 1.16	Amend text	<u>In preparing the</u> Draft Local Plan, we have ensured that our strategy and policies are compliant with the Marine and Coastal Access Act 2009, the Marine Policy Statement and Marine Licensing. We have co-operated, and will continue to liaise, with the MMO to ensure that the Local Plan and its implementation are consistent with the marine planning	For clarity

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			process and will support the UK vision for clean, safe, productive and biologically diverse oceans and seas.	
9	Para 1.21	Amend text	The traditional employment base of Redcar and Cleveland has been manufacturing based on steel, chemicals and heavy engineering. However, over recent yearsdecades, there has been a decline in these industries which has impacted upon many communities in the borough and the north east, resulting in areas of urban deprivation and a declining population. The chemical industry, mainly based at Wilton International, is a vitally important part of the local, regional and national economy. Despite the cessation of steel making at SSI in Redcar, the steel sector continues to be an important part of the local economy, and great efforts are being made to secure its future in the borough. The borough is also well known for <u>Teesport, which is one of the largest freight ports in the UK, a major employer in the borough and a key economic asset for the Tees Valley. The port forms part of a wider logistics sector which has expanded in recent years and has the potential for further growth.</u>	For clarity
10	1.25	Amend text	The borough includes two passenger rail links, one linking Saltburn, Marske and Redcar to Middlesbrough, and another linking Nunthorpe to Middlesbrough and Whitby along the Esk Valley line. The A174 and the A66 provide the main road links in the urban areas of the borough. Both roads eventually link through to the A19(T) to the west. Guisborough is linked by the A171, which is the main road	For clarity

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			connecting Whitby to Middlesbrough. A network of minor roads connects the small villages. Bus services provide a good <u>reasonable</u> public transport network throughout <u>around</u> the borough and into neighbouring areas .	
12	1.35	Amend text	Future growth may be less dependent on the retail sector and financial services. It is likely to be driven far more by low carbon technologies and manufacturing, increased social enterprise, <u>tourism</u> , adapting to increased flood risk, energy and food security, a rapid shift in consumption patterns and by efficient use of natural resources. We do know that the future is very uncertain, with the likelihood of rapid technological and social changes, which themselves could drive growth. We need increasingly to look outwards to the rest of the UK, but also Europe and globally for opportunities and solutions.	Consultation response
12	1.36	Amend text	We have our Regeneration Masterplan, the delivery of which is being reinforced through a new Economic Growth Strategy for the borough. We have prepared this Draft Local Plan in order to provide a clear spatial direction on how we intend to support the delivery of this strategy and create a more adaptable and resilient Redcar and Cleveland.	For clarity
14	1.45	Amend text	T TVU published the Strategic Economic Plan (SEP) in 2014, setting out its proposals to generate growth through to 2025. The overarching aim of the SEP is to work collaboratively to build on competitive advantages and	For clarity

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			<p>remove barriers to growth, thus facilitating the creation of 25,000 new jobs and £1billion extra into the economy over the next decade. Following the creation of the Tees Valley Combined Authority, a refreshedthe SEP will be published in July 2016<u>refreshed</u>.</p>	
16	1.52	Amend text	<p>The key pieces of evidence used in preparing the Local Plan include:</p> <ul style="list-style-type: none"> • <u>Redcar & Cleveland Strategic Housing Market Assessment</u> (2016); <u>Volumes 1 & 2, and Volume 2 Update (2016)</u>; • <u>Redcar & Cleveland Draft Local Plan: Housing Land Supply and Allocations Background Evidence Paper (2016)</u>; • <u>Redcar & Cleveland Strategic Housing Land Availability Assessment</u> (2014, to be updated 2016); • <u>Redcar & Cleveland Five Year Housing Land Supply Assessment</u> (2015)2016//17-2020/21 (2016); • Whole Plan Viability Testing - Redcar & Cleveland Local Plan (2013); Emerging, <u>updated 2016</u>); • <u>Redcar & Cleveland Economic Growth Strategy</u> (to be published 2016); • <u>Redcar & Cleveland Regeneration Masterplan</u> (2010); • Redcar & Cleveland Regeneration Masterplan Delivery Plan 2012 - 2017; 	For clarity and to include updated documents

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			<ul style="list-style-type: none"> • Redcar & Cleveland Gypsy and Traveller Accommodation Assessment (2015); • Redcar & Cleveland Strategic Retail, Leisure and Office Town Centre Study Update (2011)(2016); • <u>Redcar & Cleveland Visitor Destination Plan (2014);</u> • <u>Renewable and Low Carbon Study for the Borough of Redcar and Cleveland (2015);</u> • Redcar & Cleveland Employment Land Review (2016); • Redcar & Cleveland Borough Council Strategic Flood Risk Assessment (2016); • <u>North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation (2010);</u> • Redcar & Cleveland Open Space Assessment (2016); • <u>Redcar & Cleveland Borough Council Leisure Provision Strategy (2011);</u> • Leisure Needs Assessment for Redcar & Cleveland Borough Council (2007); • Redcar & Cleveland Borough Council Playing Pitch Strategy (2015); • Redcar and Cleveland Local Wildlife and Geological Sites (2015); • <u>Tees Valley Geodiversity Action Plan (2011);</u> • <u>Redcar & Cleveland Countryside Strategy (2015-2020);</u> and 	

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			<ul style="list-style-type: none"> Guidelines for the Selection of Local Wildlife Sites in the Tees Valley (2010). 	
17	1.54	Amend text	The Local Plan must be subject to ongoing Sustainability Appraisal (SA) throughout its preparation, including specific consideration of environmental, health, equalities and rural impacts. This seeks to identify the likely impacts and how they might be addressed to ensure the effectiveness of this document in achieving economic, social and environmental goals. The SA has been used in a proactive way to help shape emerging themes, objectives and actions. The <u>SA</u> report will be published alongside the Draft Local Plan, and its recommendations will be addressed in finalising the <u>Publication</u> Local Plan.	For clarity
17	1.55	Amend text	Alongside the SA, we have prepared a Habitats Regulations Assessment (HRA). The purpose of HRA is to identify whether the proposed policies set out within the Local Plan, either alone or in combination with other plans and projects, are likely to have an adverse effect on the integrity of any Natura 2000 Sites. The requirement to carry out this assessment is set out within the Conservation of Habitats and Species Regulations. Like the SA, the recommendations of the HRA will be used in finalising the Draft Local Plan. the HRA report will be published alongside the <u>Publication Local Plan.</u>	For clarity
18	1.56	Amend text	The Draft <u>Publication</u> Local Plan has been developed in close consultation and collaboration with a range of organisations and individuals from the public, private and voluntary sectors. A significant amount of engagement	For clarity

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			took place as part of the previous version of the Local Plan, prior to work on this being halted in July 2014.	
18	1.57	Amend text	The first main consultation exercise on the new Local Plan was during the summer of 2015 on the Local Plan Scoping Report. This was used to help identify the issues we needed to address through the Local Plan and led to agreement on the outcomes to be achieved, the underpinning values, and the thematic and spatial priorities. There has been <u>was</u> a strong and positive response to the process to date and we have taken the results into account in developing this document.	For clarity
		New text	<u>We undertook further consultation on the Draft Local Plan over 6 weeks between 27th June and 8th August 2016. We received a good response to the consultation, with over 650 comments being submitted from 185 individuals and organisations. We also received two petitions with nearly 300 signatures regarding two of the policies. All of the comments received and issues raised have been taken into account in preparing the Publication Local Plan.</u> <u>Full details of the consultation on the Draft Local Plan, including a summary of each comment received, our response to each comment, and the changes made in preparing the Publication Local Plan, can be found in the associated Report of Consultation.</u>	For clarity
18	1.59	Amend text	We have previously used independent consultants to advise us on the viability of the policies in the previous iteration of the <u>Publication</u> Local Plan, through the	For clarity

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			preparation of a "Whole Plan Viability Testing" report in 2013 (available at www.redcar-cleveland.gov.uk/localplan); We intend to update this work as we finalise the Local Plan later in 2016 following the consultation on the Draft Local Plan.	
19	1.63	Amend text	The Council is has also preparing prepared an Economic Growth Strategy which seeks to reinforce the delivery of the Regeneration Masterplan. The strategy seeks to accelerate diversification and growth of local economic activity through a clear focus on economic development priorities and outcomes. This economic growth focus complements and reinforces the broader set of outcomes encapsulated in the Regeneration Masterplan. It provides a framework for prioritising future public and private sector resources to target economic growth, and the alignment of expertise and capacity to maximise benefits for Redcar & Cleveland and the Tees Valley	For clarity
20	1.66	Amend text	In 2016, the Redcar & Cleveland Employment Land Review was updated, assessing . <u>It assesses</u> the supply and demand for employment land within the borough and makes recommendations on the amount of employment land which should be brought forward for development through the Local Plan to meet our aspirations. The recommendations of this study have been used to inform the economic development policies in this Local Plan to help support economic growth.	For clarity
		New text	<u>Redcar and Cleveland has</u> substantial areas <u>of contaminated land. The Local Plan will support the reclamation of contaminated land to enable the</u>	Consultation response

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			<u>redevelopment of brownfield sites and help shift the perception of South Tees, presenting a cleaner, greener image of industry</u>	
22	1.76	Amend text	In August 2011, the updated The Redcar & Cleveland Town Centre Study was published in 2016. This updates the Strategic Retail, Leisure and Office Study was published. This (2011) and has been used to inform the retail policies contained within the plan. The Town Centre Study has assessed the relative health of the borough's centres and identifies identified the need for additional retail, and leisure and office development over the plan period. The recommendations of this study have been used inform the retail policies contained within this plan.	For clarity – and to reflect new evidence
22	1.77	Amend text	The study indicates that the existing retail hierarchy set out within, which has been retained from the LDF Core Strategy, is still appropriate and therefore this has been rolled forward into the Local Plan. The Council will, therefore, continue to direct all new retail and leisure development towards existing centres. Where out of centre development is proposed, the sequential assessment approach must be followed for all proposals of 200m2 or more. Depending on the type of office development proposed, this will be directed towards existing centres, or the designated industrial estates and business parks.	For clarity – and to reflect new evidence
22	1.78	Amend text	The study indicates that there is no identified need to provide any significant level of additional convenience floorspace within any of the borough's centres over the	For clarity – and to reflect new evidence

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			plan period. However, the potential for a new large food store, although some qualitative improvement in East Cleveland was identified through the study to meet the main food shopping needs <u>Redcar town centre could be supported. The development of local residents. A new Asda superstore has since opened in Skelton which now meets this</u> has met previously identified demand for convenience retail in the East Cleveland area.	
22	1.79	Amend text	With regards to non-bulky comparison goods, the study identifies that there is expected to be a small level of demand for additional floorspace within several of the borough's centres. <u>borough.</u> However, the level of anticipated demand is so small at a level that it could be accommodated within the existing centre boundaries.	For clarity – and to reflect new evidence
22	1.81	Amend text	With regards to bulky goods comparison retail, the study also indicates that there is unlikely to be any unmet demand for additional floorspace within the borough's centres over the plan period. Whilst bulky goods comparison retail will also continue to be prioritised in existing centres, it is recognised that it is often difficult to find a suitable building within existing centres for such uses. <u>that it is often difficult to find a suitable building within existing centres for such uses.</u> Therefore, bulky goods retail will also be supported at Cleveland Retail Park and on safeguarded employment land if there are no suitable premises or sites available within centres.	For clarity – and to reflect new evidence
23	1.82	Amend text	As the Strategic Retail, Leisure and Office <u>Town Centre</u> Study indicates that the majority of the borough's centres are currently undertrading, the impact out-of-centre	For clarity – and to reflect new evidence

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			development on the vitality and viability of existing centres is likely to be much greater than it otherwise would be. Therefore, a range of local thresholds have been set for when an impact assessment will be required to support a development proposal, which are significantly lower than the default threshold contained in the NPPF.	
25	1.96	Amend text	The net and gross annual affordable housing requirements for Redcar and Cleveland, by both property size and designation, are shown in the table below: (NB - due to rounding, row totals may not sum precisely):	Consultation response
26	1.99	Amend text	The Local Plan will ensure that opportunities are taken to protect promote and develop <u>enhance</u> our unique assets, to make Redcar and Cleveland an attractive place to live, work and visit.	Consultation response
28		Amend sub-heading	Critical infrastructure <u>Infrastructure provision</u>	For clarity
29	1.112	Amend text	The preparation of the Draft Local Plan has involved liaison meetings and discussions with infrastructure and service providers to ensure there is a coordinated approach to infrastructure planning and delivery to support the Local Plan. The Council and its development partners have also undertaken a number of infrastructure studies to provide a detailed analysis for certain types of infrastructure where there could be capacity problems. The detailed work carried out has meant that we now have a better understanding of the critical infrastructure that needs to be delivered <u>or improved</u> to support the proposed site allocations set out in the Local Plan. <u>new development.</u> The	For clarity

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			Infrastructure Delivery Plan sets out in detail what assesses <u>the current level of</u> infrastructure <u>provision in Redcar and Cleveland and identifies improvements that</u> will be required and how and when it will be provided to give confidence that infrastructure can be delivered <u>support the delivery of the Local Plan.</u>	
29	1.114	Amend text	Tees Valley Unlimited (TVU) has partnered up with the key infrastructure providers and the five Tees Valley local planning authorities to develop the Tees Valley <u>Strategic Infrastructure Plan</u> . This plan sets <u>out</u> what <u>are the current barriers to growth and what are the priorities for improving</u> infrastructure projects will be delivered across the Tees Valley.	For clarity
29	1.114	Create new paragraph and amend text	There are plans to deliver improvements to rail and road infrastructure in particular but to also ensure that utilities such as gas, water and electricity infrastructure is upgraded to meet anticipated requirements, and that pipeline and other infrastructure networks can be provided and upgraded to support growth. These strategic projects will be delivered through national funding schemes, such as the Local Growth Fund.	For clarity
29	1.115	Amend text	A number of strategic infrastructure projects, in particular transport projects, that link into national infrastructure are being promoted by the Northern Power House <u>Powerhouse</u> Project. This is a project jointly lead by the Government, northern city regions and Local Enterprise Partnerships, working together with Highways England, Network Rail and HS2 Ltd as the Transport for the North Partnership Board.	For clarity
30		Amend sub-heading	Flood Risk	For clarity

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			<u>Water resources and flood risk</u>	
30	1.117	Amend text	As part of the site assessment process for the Local Plan, the Council has worked closely with the Environment Agency and Northumbrian Water to ensure new development is located in areas which are at least risk of flooding. The Strategic Flood Risk Assessment (SFRA) has been updated April 2016 to assess flood risk from all potential sources. This assessment identified a small number of areas along our coast which are prone to flooding from the sea and also a number of areas which are prone to flooding from surface water during periods of high rainfall. This assessment has been used to ensure new development is located on sites which are at low risk of flooding where possible , and to also develop policies to ensure the borough, its residents and businesses are not at risk from rising sea levels and increased rainfall resulting from climate change.	For clarity
30	1.119	Amend text	To assess the current capacity of water supply and waste water and collection infrastructure, the Council, in conjunction with the other Tees Valley local planning authorities, commissioned consultants to undertake a Water Cycle Study (WCS). This study was completed in December 2012. As part of this study, a high level assessment of the existing wastewater carrying network has been undertaken to determine whether there is likely to be sufficient capacity in the system to transmit additional wastewater flows from the new development proposed in the Local Plan. The WCS concluded that	For clarity

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			network capacity is limited in several locations where development is proposed. However, Northumbrian Water has confirmed that waste water drainage infrastructure is not a constraint on growth and will be, or can be, upgraded when required. However, Northumbrian Water has confirmed that drainage infrastructure in the in the areas where development is proposed either has enough capacity or capacity can be increased when development comes forward.	
31		Amend sub-heading	Broadband connectivity <u>Telecommunications</u>	For clarity
31	1.122	Amend text	In a global, internationally-competitive and low carbon economy and society, where connectivity is often via the internet, we need to ensure companies, communities and people are not 'remote' from markets, work or learning opportunities. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services. High-speed digital connectivity increasingly offers opportunities for all to achieve this, particularly those in remote rural areas. Improved coverage will help to support increased productivity, higher skill levels, science and innovation, employment opportunities, and more cohesive, empowered and active communities. Research suggests that, within 15 years, fibre broadband could bolster the economy of a typical town by £143 million and create 225 new jobs, 140 new start-up businesses and 1,000 more homeworkers	For clarity
32	1.124	Delete text	The Council secured Broadband Delivery UK (BDUK) funds	For clarity

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			to meet the national goal of bringing access to fibre broadband (24–30Mb/s) to over 90% of premises in the borough and at least 2MB/s to others by the end of 2016. Additional funds, available on a competitive basis, for more isolated, rural premises were secured in March 2014. It is anticipated that together this will provide access to fibre broadband for 93.8% of the borough’s premises and a minimum of 2MB/s for the remainder. Broadband Delivery UK (BDUK) has allocated additional public funding through the Superfast Extension Programme (SEP) to extend fibre broadband coverage to at least 95% of UK premises. Funding will need to be matched by local authorities and an additional contribution made by the successful contractor.	
32	1.127	Delete text	The Council has used a number of existing strategies and background studies, as well as commissioning new studies, to determine the impact of the development proposed in the Local Plan, as well as defining what infrastructure should be delivered during the plan period to ensure that development is sustainable.	For clarity
32	1.129	Amend text	The Council will also work with its delivery partners to support the implementation of transport schemes that will improve linkages across the sub-region. As public transport and the road network crosses boundaries with other local authorities, a great deal of transport planning is undertaken at a sub-regional level. In the Tees Valley, this is undertaken by Tees Valley Unlimited (TVU), which also fulfils the role of the Tees Valley Local Enterprise	For clarity

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			Partnership. The 'Tees Valley Economic & Regeneration Statement of Ambition', prepared by TVU, sets out the current actions needed to tackle transport issues at the strategic level. Priority areas which have been highlighted include: tackling capacity pinch points on the strategic highway network where new development is being delayed or prevented; improving reliability of the highway network through the Network Management Strategy; and delivery of the Tees Valley Bus Network Improvement Programme. The Local Plan will help to deliver these priorities.	
33	1.130	Amend text	Transport consultants were commissioned by both Redcar & Cleveland Borough Council and Middlesbrough Borough Council to evaluate the impact of future development sites on the transport network within Redcar and Cleveland and Middlesbrough and to test mitigation measures. This work <u>assessment</u> (5) has provided an insight into how well the future highway network would cope with the development traffic and provides recommendations on where infrastructure improvements may be required to increase capacity. The outputs from this study, as well as other studies, have been taken into account during the preparation of the Local Plan.	For clarity
33	1.131	Amend text	Tees Valley Unlimited has <u>Forecasting has been</u> carried out forecasting to assess if there will be <u>the capacity of schools in the borough to ensure they have</u> enough capacity in our schools to cater for the increase in the number of pupils as a result of <u>during</u> the new development proposed in the Local Plan <u>plan period</u> . Over recent years there has been a	For clarity

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			<p>fall in birth rates across the borough. This is predicted to continue for the foreseeable future, even when taking into account the development proposed in the Local Plan, and will consequently lead to a reduction in pupil numbers in the majority of our schools. The fall in birth rates, and the recent re-organisation of schools across the borough, means that the majority of housing sites can be delivered without a requirement to increase the capacity of local schools. <u>However, if there is a lack of capacity in a primary school which serves a new development, the Council will work to increase capacity of existing schools and seek developer contributions, if required, to help fund the school.</u></p>	

2 Sustainability and Design

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
37	Policy SD2	Amend text	<u>Wherever possible</u> , priority will be given to the development of previously developed land and the reuse of existing buildings, and limiting development in the countryside. In selecting site allocations, and in considering development proposals, the following sequential approach will be applied:	Consultation response
39	New Paragraph	Add text	<u>In seeking to prioritise the re-use of previously developed land, the Council will continue to work with delivery partners including private developers, the Homes and Communities Agency and the Tees Valley Combined Authority which is, among other things, overseeing the preparation of a Brownfield and Surplus Public Sector Land Register, in line with government policy.</u>	Consultation response
40	Paragraph 2.15	Add text	The development limits have been determined through retaining the existing boundaries, and making allowances for new site allocations identified in the Local Plan. In a small number of instances, some minor amendments have been made to correct any anomalies and to provide a consistent approach. It should be noted that certain small rural settlements are not defined by development limits and, as such, are located outside development limits. <u>These include Liverton, Moorsholm, Newton-under-Roseberry and Upleatham where a continuing policy of allowing further development including infilling, would</u>	For clarity

2 Sustainability and Design

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			erode the special character of the settlement. Further details can be found in the 'Review of Development Limit Boundaries' background evidence paper.	
	Policy SD4	New criterion	<u>will not increase flood risk either on site or downstream of the development;</u>	Consultation response
42	Policy SD4 g.	Amend text	will not result in an adverse impac effect on <u>the integrity of</u> a Natura 2000 site, either alone or in combination with other plans or projects.	Consultation response
42	Policy SD4 j.	Add text	be sustainable in design and construction, incorporating best practice in resource management, <u>energy efficiency</u> and climate change adaptation;	Consultation response
42	Policy SD4 k.	Add text	create a healthy, <u>active,</u> safe and secure environment;	Consultation response
42	Policy SD4 l.	Add text	reduce pollution, including light and noise and vibration levels to meet or exceed acceptable limits	Consultation response
	Policy SD4	New criterion	<u>consider water conservation and recycling as an integral element of new development;</u>	For clarity
	Policy SD4	New criterion	<u>a comprehensive Flood Risk Assessment and Sustainable Drainage Scheme will be required for all major development or where new development has the potential to impact on existing flood risk;</u>	For clarity

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	Policy SD4	New criterion	<u>a Land Stability Risk Assessment will be required where development is proposed in areas where there is a potential for ground instability due to previous mineral activity;</u>	Consultation response
43	Policy SD4 u.	Amend text	a Local Employment Agreement (LEA) will <u>may</u> be required for all strategic and significant development proposals and, where the value of a development exceeds £5 million, the LEA should <u>may also</u> include a Local Procurement Plan.	Consultation response
43	Paragraph 2.19	Amend text	In locating new development, important environmental, built and historic assets will be protected including trees, ancient woodland, important habitats, archaeological sites, conservation areas, listed buildings and scheduled monuments. The level of protection offered will reflect the status <u>significance</u> of the site and its importance within the local environment.	For clarity
43	Paragraph 2.21	Add text	The Council will ensure that new development will not result in unacceptable impacts on those living or working nearby, particularly by way of loss of privacy and the effects of light, noise, odours, pollution or other disturbances. Sites should be avoided where they would put human health and safety at an unacceptable risk (e.g. sites close to hazardous installations, sites that would impact upon road safety). Where necessary, the Council	Consultation response

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			will seek the advice of the appropriate regulatory organisations, including the Environment Agency, Health and Safety Executive and Civil Aviation Authority, on proposals falling within defined consultation zones(7). <u>Where development is to be located in the vicinity of sewerage treatment works, the Code of Practice on Odour Nuisance from Sewerage Treatment Works by DEFRA 2006 should be adhered to.</u>	
44	Paragraph 2.22	Amend text	Applicants proposing development on or near potentially contaminated or unstable land will be required to evidence that risks associated with contamination will be successfully addressed through remediation without undue environmental impact during and following the development in accordance with The the Model Procedures for the Management of Land Contamination (CLR 11), which have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.	For clarity
44	New Paragraph After 2.24	Add text	<u>The design and layout of where we live and work plays a vital role in keeping us healthy and active. Making sure that the environment where people work, live and play helps to get more people moving is crucial if we are to tackle this issue. Guidance on how to create healthy and active developments is contained in the Sport England's</u>	Consultation response

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			<u>Active Design guidelines.</u>	
45	Paragraph 2.28	Delete text	The Council will request an applicant to produce a Travel Plan alongside their planning application where the proposal is strategic and likely to have significant transport implications, particularly those attracting large numbers of visitors or users, or which will employ a large number of people. Their purpose is to help reduce car usage, improve road safety and to incorporate more environmentally friendly delivery and freight movements.	Included in Policy TA2
45	Paragraph 2.29	Amend text	A Health Impact Assessment (HIA) should be used to assess development proposals where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on health and wellbeing, as well as assessing the indirect implications for the wider community. Any adverse impact(s) should <u>will</u> be addressed through a planning condition or section 106 agreement	For clarity
45	Paragraph 2.30	Amend text	<u>The Council will encourage developers to provide opportunities for employment and training for the local labour market through the construction phase of a development</u> and for the end use of non-residential development. The mechanism <u>One of the main mechanisms</u> by which a developer and the Council will	Consultation Response

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			work together to maximise access to employment opportunities for local labour will be specified in a Local Employment Agreement- (LEA) . Where the value of a development exceeds 5 million, the Local Employment Agreement <u>LEA</u> should include a Local Procurement Plan with an aim to ensure at least 20% of the qualifying supplies and services used as part of the development to be provided from companies and organisations based or operating in the borough. <u>Further guidance is contained in the Developer Contributions SPD.</u>	
46	Policy SD5	Amend text	f. road and highway <u>and rail</u> improvements;	Consultation Response
46	Policy SD5	Amend text	i. improvements to landscape, water environments, biodiversity and heritage assets, <u>(including habitat creation and management) and heritage assets (including</u> repair or restoration of historic buildings and structures); <u>);</u>	Consultation Response
47	Paragraph 2.34	Add text	The provision of affordable housing is one of the most common types of provision secured through section 106 planning obligations. Further information on the requirements for affordable housing is set out in <u>Policy H4 and</u> the Affordable Housing SPD.	For clarity

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47	New Paragraph (after 2.34)	Add text	<u>The Council are working with partners, including industry and other regulatory authorities, to agree a collective vision for ongoing management of the interests of wildlife and industry in the Tees estuary as part of a 'Tees Estuary strategic framework'. The Council is also committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site. Any proposals within, or impacting on, the SPA should be informed by the framework. Developments identified, through an appropriate assessment, as leading to recreational disturbance of the SPA and Ramsar site may also be required to contribute to any appropriate mitigation identified through the management plan.</u>	Consultation Response
48	Policy SD6	New criterion	<u>impact on the North York Moors National Park and its setting;</u>	Consultation Response
48	Policy SD6	Add text	<u>Sites being brought forward for wind turbine deployment should be subject to survey to assess their use by the bird species that are qualifying interests of the North York Moors SPA and the Teesmouth and Cleveland SPA and Ramsar Site. Where the presence of the relevant species is confirmed, an assessment of the impacts of the development on the relevant bird species, including assessment of the risk of mortality from turbine blade</u>	Consultation Response

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			<u>strikes, shall be undertaken.</u>	
49	Option SD6a	Delete text	<p>Option SD6a</p> <p>Renewable and Low Carbon Energy</p> <p>Rejected option</p> <p>Defining potentially suitable areas for wind and solar energy as areas of low sensitivity only.</p>	For clarity
49	Option SD6b	Delete text	<p>Option SD6b</p> <p>Renewable and Low Carbon Energy</p> <p>Rejected option</p> <p>Defining potentially suitable areas for wind and solar energy as areas of high/moderate sensitivity and below.</p>	For clarity
49	Option SD6c	Delete text	<p>Option SD6c</p> <p>Renewable and Low Carbon Energy</p> <p>Rejected option</p> <p>Allocating sites for renewable and low carbon energy development.</p>	For clarity

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51	Paragraph 2.46	Amend text	The siting and design of proposals are particularly important. Design considerations include scale, layout and simplicity to create a proposal which does not conflict with landscape character, focal points and indicators of scale. Significant effects on views from important viewpoints should be avoided where possible or minimised through careful siting. This will include views in registered historic parks, and views from popular tourist locations, scenic routes, and settlements. Proposals should consider sites where areas of existing vegetation and/or the landform help to minimise visibility and screen views. Cumulative impacts, where there is more than one renewable energy development located close by in a landscape or view, should also be assessed. It should also be considered whether the impacts are temporary or could be capable of being reversed <u>and the landscape restored</u> within a reasonable timescale. All components of wind farm development will be considered including turbines, associated infrastructure and construction and decommissioning. <u>Renewable energy projects and their associated infrastructure should be reversible where possible.</u>	Consultation response
52	Paragraph 2.50	Delete text	Other options considered included defining areas as potentially suitable for renewable and low carbon	For clarity

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			technology on the proposals map based on alternative thresholds of landscape sensitivity. It was however considered that limiting identified areas to those of low sensitivity only would be overly restrictive as this would exclude the majority of the plan area and could prevent development which could be successfully accommodated through appropriate design. Conversely it was considered that identifying areas of higher sensitivity on the proposals map would include landscapes which are unlikely to be suitable for these types of development.	
52	Paragraph 2.51	Delete text	It was also considered whether sites should be specifically allocated for renewable energy development within the Local Plan. However, despite the production of the Renewable and Low Carbon Study, there is insufficient evidence to support this approach and it may be difficult to secure the agreement of landowners to allocate sites. Further alternative options such as the use of separation distances, local development orders and reliance on criteria only policies were discounted at an earlier stage as they were not considered compliant with national policy and guidance.	For clarity
52	New Paragraph	Add text	<u>Small scale wind development is considered to include one or more turbines, less than 50m to tip. The number of turbines would also be an important factor in determining</u>	For clarity

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			<u>the suitability of development and would be considered on a case by case basis. Small scale solar development is considered to include developments less than 5ha in area, and medium scale between 5 and 10ha.</u>	
54	Policy SD7	Add text	For greenfield sites, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1-in-1 year rainfall event and the <u>1-in-100 year rainfall event, must not exceed the peak greenfield runoff rate from the site same event. <u>Where the drainage system discharges to a surface water body that can accommodate uncontrolled surface water discharges without any impact on flood risk from that surface water body (e.g. the sea or River Tees) the peak flow control standards and volume control standards need not apply.</u></u>	For clarity
55	Paragraph 2.53	Amend text	Before deciding on the scope of a site-specific Flood Risk Assessment, the Strategic Flood Risk Assessment should be consulted along with the Local Planning Authority, Lead Local Flood Authority and , the Environment Agency <u>and Northumbrian Water</u> . The completed Flood Risk Assessment should be submitted to the Local Planning Authority for approval.	Consultation response

3 Local Spatial Strategies

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike , new text in <u>underline</u>)	Reason for Change
59	Policy LS1 w.	Amend text	safeguard and enhance <u>the significance of</u> buildings, sites, settings and areas of heritage and cultural importance;	Consultation response
60	Policy LS2p.	Delete criterion	Develop a renewable energy visitor centre;	Consultation response
	Policy LS2	New criterion	<u>protect bathing water quality;</u>	Consultation response
61	Policy LS2 ac.	Amend text	safeguard and enhance <u>the significance of</u> all buildings, sites and areas of heritage and cultural importance;	Consultation response
65	Policy LS3 o.	Amend text	safeguard and enhance <u>the significance of</u> buildings, sites, settings and areas of heritage and cultural importance;	Consultation response
65	Paragraph 3.20	Amend text	The coastal village of Skinningrove nestles in a narrow valley and in an area that has become the focus for steel processing and heavy industry.	Consultation response
68	Policy LS4 z.	Amend text	safeguard and enhance <u>the significance of</u> buildings, sites, settings and areas of heritage and cultural importance including the 'Dorman Long' tower at South Bank Coke Ovens supporting its adaptation to enable alternative uses;	Consultation response
69	3.27	Amend text	<u>The Planning permission has been granted for the</u> York Potash project, <u>which</u> proposes to transport mined ore from a new mine in the North York Moors National Park via a tunnel conveyor to a new minerals handling facility at Wilton International. Following treatment the product will then be transported to new harbour facilities on the River Tees for export. Planning approval has been granted for the minerals handling facility and an application for the harbour facilities Development Consent Order has been submitted to the Planning Inspectorate, to be considered on behalf of the Secretary of State for Transport, with a decision expected in summer 2016.	Updated

4 Regeneration

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
71	4.2	Amend text	<p>Most of the projects can be delivered through the thematic policies set out in the Local Plan. However, there are three specific locations in the borough that have been identified as 'Regeneration' allocations, each with their own unique aims and objectives:</p> <ul style="list-style-type: none"> • <u>Coatham</u> - a mixed use scheme, focusing on leisure, tourism and visitor uses; • Kirkleatham - conservation-led development that helps to protect and enhance the historic assets at Kirkleatham Village, including listed buildings at risk; and • Skelton - to provide modern business accommodation, alongside commercial development opportunities arising from the development of the Asda supermarket and a long-term strategic housing option; <u>and</u> • <u>Loftus - to support the regeneration of the town and to encourage additional development to support its long-term sustainability.</u> 	To reflect the inclusion of a new policy
72	Policy REG1	Amend text	<p>Coatham</p> <p>Land at Coatham (8.7 ha) is allocated for a mixed use development comprising of leisure, tourism and, visitor <u>and retail</u> uses.</p> <p>It is expected that the proposals will achieve the following:</p> <p>1. <u>•</u> <u>Aa</u> high quality mixed use development comprising of</p>	For clarity and to allow for additional development types

4 Regeneration

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			<p>a range of leisure and tourism uses, including appropriate ancillary uses;</p> <p>2.<u>2.</u> Ground<u>ground</u> investigation and prior completion of any necessary remediation work;</p> <p>3.<u>3.</u> Contributions<u>contributions</u>, as necessary at the time of application, towards any other services and community infrastructure enhancements;</p> <p>4.<u>4.</u> Good<u>good</u> accessibility by sustainable transport, including walking and cycling; and</p> <p>5.<u>5.</u> Where<u>where</u> development is proposed in flood zones 2 and 3, proposals should meet the sequential and exceptions tests and be supported by a Flood Risk Assessment, <u>which will inform site layout and design.</u></p> <p>Any proposal will be required to carry out a screening exercise to determine the need for Appropriate Assessment.</p>	
72	4.5	Amend text	<p>Whilst the site is allocated specifically<u>primarily</u> for leisure, tourism and visitor uses, some <u>retail and</u> other ancillary uses will be supported whereas they would<u>could</u> improve the leisure and tourism offer of the site. Such complementary uses would include<u>Retail and other main town centre uses, such as</u> restaurants and cafés, which could<u>may</u> be used as part of a linked trip and increase the length of stay. Whilst other main town centre uses (other than leisure and tourism use) may be supported on the site, they will still be expected to follow the sequential assessment approach set out in Policy ED1 and be</p>	For clarity and to allow for additional development types

4 Regeneration

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			supported by an impact assessment, where necessary.	
73	4.8	Amend text	The site is located in close proximity to the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site. Any proposal will be required to carry out a screening exercise to determine the need for Appropriate Assessment, to ensure that there will be no adverse impacts upon effects on the SPA. <u>A recreation management plan will be developed that will set out measures to ensure that increased recreational pressure arising from the development will not have an adverse effect on the SPA.</u>	To reflect Habitats Regulations Assessment
75	4.11	Amend text	The Kirkleatham Estate comprises a concentration of buildings and landscape features, <u>including</u> surviving remnants of the designed gardens of Kirkleatham Hall, a large early seventeenth century country house demolished in the mid 1950s. The hall and its grounds and parkland grew within, and later absorbed and re-ordered large parts of, the village of Kirkleatham and its hinterland. The estate subsequently expanded and later declined, and is now the subject of conservation endeavours.	For clarity
75	4.14	Amend text	Kirkleatham is in the southern half of the Tees Lowlands countryside character area, a broad low-lying plain of gently undulating farmland and sparse woodland contrasting with extensive river bank conurbation and industry, punctuated by the historic planned parkland of the estate. There are wide views south to the wooded escarpment edge of the Cleveland Hills, and a distinctive industrial skyline. The natural environment of Kirkleatham Estate will be protected, managed and, where possible,	Consultation response

4 Regeneration

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			enhanced. Development proposals should ensure that they do not impact detrimentally on biodiversity, including protected species. Opportunities should be sought to restore landscape features, such as local watercourses, by de-culverting- (subject to flooding considerations).	
76	4.16	Amend text	The Council has completed a series of assessments, including a Conservation Plan (plus two addendums), a use testing study, and a development options study for the estate. We have liaised proactively with English Heritage <u>Historic England</u> throughout and continue, <u>continuing</u> to do so in looking at ways at evolving the estate and ensuring its future is sustainable. To support the Council's ambitions, in August 2015 we undertook an Enquiry By Design event at Kirkleatham, in partnership with the Prince's Foundation for The Built Environment. This brought together a range of specialists, service providers and community representatives to analyse the estate; consider and shape ideas for its future and create a masterplan setting out the events conclusions; and establishing a basis for the future development of Kirkleatham Estate.	For clarity
79	REG3	New criterion	<u>a screening exercise to determine the need for an Appropriate Assessment;</u>	To reflect Habitats Regulations Assessment
80	4.26	Amend text	The emerging Redcar & Cleveland Employment Land Review (ELR)(2016) indicates that whilst Skelton Industrial Estate should continue to be safeguarded for general industrial and business use, there is no quantitative need to retain the extension land for industrial uses. However, the ELR does identify that there are qualitative deficiencies	For clarity

4 Regeneration

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			with the existing industrial estate as many of the buildings are outdated and far too large for potential users. This has resulted in a number of vacancies.	
		New Policy REG4 & supporting text	[New policy included on Loftus]	Consultation

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through , new text in <u>underline</u>)	Reason for Change
84	Policy ED1	Amend text	Development proposals for main town centre uses(11)will be focused in town and district centres. The scale and type of development will reflect its capacity for new development. Any proposal which would increase the floorspace of a centre by 10% or more must be supported by a retail impact assessment.	To better reflect the NPPF
84	Policy ED1	Amend text	Any proposal for a main town centre use will be expected to follow the sequential assessment approach set out within the NPPF, favouring locations within existing centres, followed by edge of centre locations. Development outside existing centres should be well related to existing centres and easily accessible by a range of transport methods, including public transport. The sequential assessment will not apply to site allocations for main town centre uses, or small-scale proposals for main town centre uses (less than 200m2 gross), except where the site is safeguarded/allocated for another form of development.	To better reflect the NPPF
85	Policy ED1 ci	Delete text	theatres, concert halls, casinos and ice rinks: 2,500m2;	To reflect updated evidence base
85	Policy ED1 cii	Amend text	bingo halls, cinemas, and <u>health and fitness clubs, tenpin bowling, casinos, nightclubs and bingo halls: 1,500m2000m2;</u> and	To reflect updated evidence base
85	Policy ED1 ciii	Amend text	caféscafes, restaurants, pubs, and bars, health clubs, gyms, swimming pools, leisure centres, museums and libraries: 1,000m2.: 500m2	To reflect updated evidence base
85	Policy ED1 g	Delete text	improving the late afternoon/night time economy of Redcar Town Centre in order to help achieve Purple Flag status(12);	Consultation response

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
85	Footnote	Delete text	12 — Purple Flag is the accreditation scheme run by the Association of Town Centre Management that recognises excellence in the management of town and city centres at night	Consultation response
86	Paragraph 5.7	Amend text	The NPPF requires local planning authorities to set their own local thresholds for the circumstances under which retail impact assessments are required for out-of-centre retail developments. The Redcar & Cleveland Strategic Retail, Leisure and Office <u>Town Centre Study (2011)2016</u> indicates that all of the borough's centres are currently trading below capacity, and there is no significant demand for additional retail floorspace in any of these centres over the plan period. The borough's centres are, therefore, more susceptible to adverse impacts from out-of-centre developments than would otherwise be the case and the Council is proposing lower thresholds than the default NPPF threshold to take account of this. A range of <u>higher</u> thresholds have been set for various types of leisure development. All local thresholds are consistent with the recommendations of the Redcar & Cleveland Strategic Retail, Leisure and Office Study (2011).	To reflect updated evidence base
86	New Paragraph	Add text	<u>Proposals for development over these local thresholds should be accompanied by a proportionate impact assessment that reflects their scale and nature. All local thresholds are consistent with the recommendations of the Redcar & Cleveland Town Centre Study 2016.</u>	To reflect updated evidence base
87	Paragraph 5.10	Amended text	3 There are a number of district centres within the borough, which provide a range of shops and services to meet the needs of local communities. The largest of these centres is	Correction

5 Economic Development

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			Guisborough District Centre which serves the town and the surrounding villages. Due to the size and status of the centre as a market town destination at the gateway to the North York Moors National Park, a PSA has been identified to ensure that the retail character and function of Guisborough district centre <u>District Centre</u> is protected along the main shopping frontages of Westgate. At least 55% of the units in the Guisborough PSA should be retained in A1 use, which is broadly consistent with the existing number of A1 units in the PSA. The Local Plan also identifies the boundaries of Low Grange Farm District Centre for the first time, which has been developed to serve the communities in the northern part of Greater Eston.	
88	Paragraph 5.14	Amended text	The retail park was originally developed as a location for bulky goods retail. However, over recent years, several planning permissions have been granted, to widen the range of goods which can be sold from some of the units, to non-bulky goods -comparison <u>goods</u> retail and convenience retail.	Consultation response
88	Paragraph 5.15	Amended text	In order to protect the designated centres within the both <u>the</u> borough and Middlesbrough, further permissions for non-bulky goods retail will not be permitted at Cleveland Retail Park, unless it can be clearly justified through a sequential assessment and retail impact assessment.	Consultation response
89	Paragraph 5.17	Add text	There has been an increase in the number of hot food takeaways in many centres in the borough over recent years, many of which are only open during the evenings to serve the late night economy. This has led to an increase in	Updated

5 Economic Development

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			closed and shuttered units during the day time. <u>To prevent an over proliferation of hot food takeaways and a reduction in day time visitors, the Council will restrict the number and concentration of these uses in the borough's centres.</u>	
89	Paragraph 5.18	Delete text	In July 2008, Redcar & Cleveland Borough Council adopted an interim policy on hot food takeaways, to restrict the number and concentration of hot food takeaways in the borough's centres until a policy could be adopted as part of the development plan.	Updated
89	Paragraph 5.19	Delete text	The interim hot food takeaway policy has been successful at preventing an over-proliferation of hot food takeaways in the borough's centres and it is, therefore, proposed to incorporate these restrictions into the Local Plan. This is consistent with the recommendations of the Redcar & Cleveland Strategic Retail, Leisure and Office Study (2011).	Updated
	New Paragraph	Add text	<u>There is a recognised link between takeaway food and obesity and rates of obesity in both children and adults are higher in Redcar and Cleveland than the national average. In order to improve health and wellbeing in the borough and encourage healthier eating, applicants for takeaway uses are recommended to seek the advice of the Council's public health team on how to provide healthier choices.</u>	Consultation Response
90	Policy ED4	Amend text	a. proposals for the sale of bulky goods which cannot be accommodated in existing town or district centres, or on the edge of such centres, where it is demonstrated that there are no suitable or available sequentially preferable sites and where there will not be an adverse impact upon the	Consultation response and to better reflect the NPPF

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			<u>supply of employment land</u> ; or	
90	Policy ED4	Add text	c. small scale retail and food uses (A1, A3 and A5) providing a local service to those working in an industrial area- where there is a deficiency in that service . Total gross floorspace in any one unit should not exceed 200m2.	Consultation response
90	Paragraph 5.21	Add text	Bulky goods retailers require large buildings for the display of their goods, and are often serviced by large heavy goods vehicles. This makes it difficult, in many cases, to find suitable premises or land available within or on the edge of existing centres. In those circumstances where <u>it is demonstrated that</u> there are no suitable or viable locations within or on the edge of existing centres, it may be more appropriate for these uses to be accommodated on existing industrial or business parks, which are characterised by units of a similar scale.	Clarification
90	Paragraph 5.23	Add text	The Council recognises that industrial estates and business parks are major employment areas and, as a result, there will be a need to provide the opportunity for some small scale retail and food operators to meet the needs of workers during their shifts, particularly at lunchtime. In sustainability terms, it is preferable for these operators to be located as close as possible to their customers and, therefore, some small scale retail and food uses will be permitted in industrial estates and business parks- that are not already served by existing retail and food businesses . However, these should be less than 200m2 to ensure that they are primarily to meet the needs of workers.	Consultation response
92	Policy ED6	Amend/add text	Some of the above general employment sites lie adjacent	Clarity, to ensure

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			<p>to, or are within, the proximity of, protected landscapes and nature conservations sites. Where appropriate, proposals will need to demonstrate that there will be no adverse impacts effect on the integrity of the Teesmouth and Cleveland Coast SPA and Ramsar site, or other European designated nature conservation sites either alone or in combination with other plans and programmes.</p> <p><u>Any proposals for development within the Warrenby Industrial Estate adjacent to Coatham Marsh should include a buffer of undeveloped land and a suitable boundary treatment during both construction and operation, such that direct effects on land within and immediately adjacent to the proposed extension to the Teesmouth and Cleveland Coast SPA are avoided.</u> Any necessary mitigation measures must be secured in advance of the development in order to meet the requirements of the Habitat Regulations.</p>	<p>consistency with Habitats Regulations wording and Habitats Regulations Assessment recommendation.</p>
93	Paragraph 5.26	Add text	<p>There is a need to ensure that there is a continuous supply of employment land within the borough to provide a choice of sites in terms of size, quality and location. <u>The Redcar & Cleveland Employment Land Review update (2016) (ELR) identified a need of up to 163ha of employment land for specialist uses over the plan period, however given the unique and critically important role these special use sites play in driving the economic growth of Redcar and Cleveland, it concluded that the majority of land previously protected for steel, chemical and port-related industries should continue to be protected in the Local Plan. The area of land safeguarded for general</u></p>	<p>Consultation response</p>

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			<p><u>industrial uses through the policy is higher than the projected need of up to 26ha of over the plan period, as identified in the ELR. However, it is considered that following de-allocation of a number of sites, justification exists for protecting the remaining sites in order to meet local needs.</u></p>	
94	Paragraph 5.35	Amend text	<p>The quality and success of general industrial areas does vary and it is recognised that environmental, access and security improvements are needed in order to retain and to attract new businesses. Some improvement work has already been undertaken in areas such as the South Tees business parks, but further improvements are needed. There has been suggestion of a deficiency of quality employment land in the South Tees area. Should further evidence emerge this will be addressed in <u>a future iterationsreview</u> of the emerging Local Plan. The Council will continue to work with landowners and businesses to improve the quality and image of existing industrial estates and business parks.</p>	Clarification
95	Paragraph 5.37	Amend text	<p>The River Tees and its estuary contain a wildlife site of European importance, protected by the Habitats Regulations. This site is known as the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar site and consists of several different but supporting habitats, many of which are located close to industry. Where appropriate, proposals will need to demonstrate that there will be no significant adverse impacts<u>effects</u> on the integrity of protected sites, alone or in combination with other development, plans or projects.</p>	Consultation Response

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
96	Policy ED7	Amend text	Land at Cleveland Gate, Guisborough (2.4ha) will be brought forward for mixed use commercial development of retail (A1 use); ancillary café/restaurant (A3 use); and business development (B2 and B8 uses). The development of the site will be expected to achieve the following: <ol style="list-style-type: none"> a. a well designed mixed-use scheme providing retail units (up to 4310m2); ancillary cafe/restaurant (up to 233m2) and business units; 	To reflect resubmitted planning application
96	Paragraph 5.39	Amend text	The emerging Redcar & Cleveland Employment Land Review update (2016) has identified that there is a quantitative oversupply of general employment land in the Guisborough and East Cleveland area . The proposed development seeks to move away from historic employment uses and promote employment units which can be used by starter companies/entrepreneurs and smaller local businesses, for which there is local demand. This employment development will be supported by the retail and café/restaurant element of the scheme which is in a sequentially preferable location with links to Guisborough District Centre.	For clarity and to reflect new evidence
96	Paragraph 5.40	Amend text	In accordance with the permitted <u>resubmitted</u> scheme, R/2016/ 0021/FFM0485/RSM , it is anticipated that the retail park element will be located in the northern part of the site, off Rectory Lane, and will comprise 4, 310m2 <u>2740m2</u> of retail space; together with two smaller units at the site frontage for café/restaurant use.	To reflect resubmitted planning application
99	Policy ED9	Amend text	<ol style="list-style-type: none"> a. new tourist accommodation throughout the borough to meet future needs; including new hotel accommodation in Redcar and Saltburn; 	For clarity

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
99	Policy ED9	Add text	<u>Development for main town centre uses will be expected to follow the sequential assessment approach set out within Policy ED1 and should be supported by an impact assessment where they exceed the locally set thresholds.</u>	For clarity
99	Policy ED9	Amend text	Development proposals for leisure and tourism uses will be expected to follow the sequential approach set out in Policy SD2. Any proposals located within 16km <u>6km</u> of a Natura 2000 site will be required to carry out a screening exercise to determine the need for an Appropriate Assessment.	To reflect Habitats Regulations Assessment
101	Paragraph 5.53	Amend text	The section of the England Coast Path which passes through the borough is also due to be opened in July 2016. Upon the opening of this <u>The</u> section of the England Coast Path, <u>at</u> Saltburn will become <u>is</u> one of only a handful of locations in the country to be at the junction of two National Trail routes, which offers the opportunity for significant tourism benefits. Watercourses also offer the opportunity to connect inland and coastal tourism in a sustainable way and will be supported.	Updated
101	Paragraph 5.54	Amend text	It is recognised that some Natura 2000 sites, such as the Teesmouth and Cleveland Coast Special Protection Area, are already impacted by recreation and, given the potential for leisure and tourism development coming forward near these sites, some degree of cumulative impact is possible. <u>The Council is committed to the development of a management plan to address the impact of recreational disturbance on the SPA and Ramsar site.</u> Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of a Natura	Consultation response and to reflect Habitats Regulations Assessment

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			2000 site, either alone or in combination. It is likely that a Recreation Management Plan will be required that sets out the measures that will be adopted to ensure that increased recreational pressure arising from the proposed development will not have an adverse effect on a Natura 2000 site. Where any adverse effects cannot be mitigated, tourism or leisure development would be unlikely to pass the test of imperative reasons of overriding public interest (IROPI), without European Commission involvement.	
101	Paragraph 5.55	Amend text	The Council will support leisure and tourism developments within the borough to help deliver the projects set out within the Council's Regeneration Masterplan and to support the aims of Tees Valley Unlimited's Strategic Economic Plan <u>priorities of the Council's Growth Strategy.</u>	To reflect updated evidence base
	New Paragraph	Add text	<u>Proposals should be accompanied by a suitable environmental assessment, and necessary mitigation where required. Proposals should protect, and where possible enhance, Normanby Beck.</u>	Recommendation of Sustainability Appraisal
103	Policy ED11	Amend text	c. is satisfactorily accessed from the road network; and <u>and provides safe pedestrian access points;</u>	For clarity
103	Policy ED11	Add text	d. would not have an adverse impact upon designated biodiversity or geological sites, unless appropriate mitigation can be provided in accordance with Policy N4; and	For clarity
103	Policy ED11	Add text	e. <u>does not result in cumulative harm from a concentration of such development.</u>	Recommendation of Sustainability Appraisal
103	Policy ED11	Amend text	Any proposals located within 16km <u>6km</u> of a Natura 2000 site will be required to carry out a screening exercise to determine the need for an Appropriate Assessment.	Recommendation of Habitat Regulations Assessment

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
103	Paragraph 5.60	Amend text	The Regeneration Masterplan supports and the Growth Strategy support the growth of the leisure and tourism economy throughout the borough capitalising on the area's natural assets. Providing a range of accommodation to encourage tourists to stay in the borough is an important part of the Council's strategy.	Updated evidence base
104	Paragraph 5.63	Add text	Where <u>development is to be</u> located within a woodland setting, the Council may require the applicant to agree appropriate management arrangements for the retention of the woodland or forest for visual and biodiversity reasons. Management arrangements may also include measures to minimise or remove the potential effect on sites of biodiversity importance, including any nearby sites of European importance.	For clarity
104	New Paragraph after 5.64	Add text	<u>Consideration will be given to any cumulative effects of proposals to prevent detrimental impacts on the surrounding area, including on landscape, biodiversity and local amenity.</u>	To reflect Sustainability Appraisal
104	Paragraph 5.67	Amend text	<u>The Council is committed to the development of a management plan to address the impact of recreational disturbance on the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site.</u> Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of a Natura 2000 site, either alone or in combination. It is likely that a Recreation Management Plan will be required that sets out the measures that will be adopted to ensure that increased recreational pressure arising from the proposed development will not have a adverse effect on a Natura	Consultation response

5 Economic Development

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			2000 site.	
105	Policy ED12	Amend text	Proposals for new hotel accommodation will be required to follow the sequential approach to site selection set out in Policy ED1, with proposals for new hotel accommodation being particularly directed to sites within Redcar and Saltburn. <u>Any proposals located within 6km of a Natura 2000 site will be required to carry out a screening exercise to determine the need for an Appropriate Assessment</u>	Consultation responses
105	Paragraph 5.68	Amend text	Hotels and guest houses are an important part of our tourism accommodation offer within the borough and the Council will continue to support these uses, particularly in the traditional seaside resorts of Redcar and Saltburn.	Consultation response
	New Paragraph after 5.72	Add text	<u>Equestrian development can contribute to recreational disturbance affecting the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site. The Council is developing a management plan to address recreational impacts on the site.</u>	Consultation response and Habitats Regulations Assessment

6 Housing

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike , new text in <u>underline</u>)	Reason for Change																		
109	6.7	Amend text	The SHMA concluded that the OAN for housing in the borough is slightly above official household projections, at an average of 132 dwellings per annum. <u>This number is based on the CLG 2012-based household projections plus a 10% uplift to reflect a potential past constraint on land supply</u> , primarily due to historical constraints on the availability of viable housing land. Despite those constraints, over the last 20 or so years, we have delivered new housing at an average rate of 186 <u>185</u> dwellings per annum (net).	For clarity																		
109	6.8	Delete text	In determining a housing requirement, the Council has considered a number of options, ranging from meeting our OAN in full to highly ambitious, policy-led options involving exceptional population growth strategies. Each option, including the OAN, would involve a level of population retention/growth which is higher than that implied by the ONS projections. A summary of these options is included in Table 3 below:	Superfluous text																		
109	Table 3 Summary of Housing Options	Delete text	<table border="1"> <thead> <tr> <th>Option</th> <th>Annual Population Growth (above ONS)</th> <th>Annual Housing Requirement</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>25</td> <td>12</td> </tr> <tr> <td>2</td> <td>14</td> <td>18</td> </tr> <tr> <td>3</td> <td>25</td> <td>22</td> </tr> <tr> <td>4</td> <td>27</td> <td>20</td> </tr> <tr> <td>5</td> <td>50</td> <td>24</td> </tr> </tbody> </table>	Option	Annual Population Growth (above ONS)	Annual Housing Requirement	1	25	12	2	14	18	3	25	22	4	27	20	5	50	24	Superfluous text
Option	Annual Population Growth (above ONS)	Annual Housing Requirement																				
1	25	12																				
2	14	18																				
3	25	22																				
4	27	20																				
5	50	24																				

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			6.	62	40	
			Exceptional	5	4	
109	6.9	Delete text	<p>The NPPF requires local planning authorities to significantly boost the supply of housing. Neither options 1 or 2 would achieve this, as they would involve setting a housing requirement at, or below, the historical average delivery rate for the borough. As such, both options have been rejected on that basis.</p>			Superfluous text
110	6.10	Delete text	<p>Following such a prolonged period of population loss, with the ONS projecting further losses to the working age population of the borough, options 5 and 6 are felt to be unrealistic. Each of these options would involve, by the end of the plan period, returning the borough's overall population to levels not experienced for 40 years, with a rate of population growth not seen since the 1960s. For these reasons, both of those options have been rejected.</p>			Superfluous text
110	6.11	Delete text	<p>Whilst option 4 is more realistic than those higher options, it would still involve a significant rate of population growth in the borough, which was last achieved during the period of planned growth in the steel and petrochemical industries in the 1970s. By the end of the plan period, the overall population of</p>			Superfluous text

6 Housing

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			the borough would need to return to that experienced in the late 1990s. This is not felt to be realistic in the current economic climate and, for that reason, option 4 has been rejected.	
110	6.12	Amend text	The Council’s corporate plan, Our Plan 2015 – 2017, recognises the need to retain the borough’s working age population, in order to assist with our objectives to increase employment, stimulate economic growth, reduce dependency ratios and rebalance the population profile. However, having experienced more than three decades of such losses, it is recognised <u>recognises</u> that it would be unrealistic to reverse this trend completely	For clarity
110	6.13	Amend text	As such, Our Plan sets a corporate objective to grow our population by approximately 250 people per annum more than the official population projections, with a particular focus on working age households and families. This represents approximately half of projected losses to our working age population, and is consistent with option 3 above.	For clarity
110	6.14	Amend text	The <u>This</u> population growth strategy for option 3 would, <u>by the end of the plan period</u> , return the borough’s overall population to that recorded at the 2001 Census. The rate of population growth required would be ambitious, but realistic and achievable. The provision of suitable housing is considered to be	For clarity

6 Housing

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			critical in helping to deliver this growth.	
110	6.15	Amend text	The housing requirement associated with this option <u>strategy has been calculated at 234 net additional dwellings per annum, which</u> is significantly above the borough's OAN and its historical average delivery rate. This would, therefore, meet the NPPF requirement to significantly boost the supply of housing in the borough.	For clarity
110	6.16	Amend text	For these reasons, option 3 is selected, with a <u>Therefore, the</u> housing requirement for the borough of <u>is determined as</u> 234 net additional dwellings per annum.	For clarity
110	6.17	Amend text	Housing will be delivered through a combination of existing housing commitments and site allocations included at Policy H3 and REG3. There is no restrictive phasing of these sites, although an indicative delivery schedule has been included at Appendix 4. This, which demonstrates that there is a range of sites that are capable of meeting the overall need identified and ensuring a continuous five-year supply of deliverable housing land throughout the plan period.	For clarity
115	Policy H3	Amend text	Proposals for housing development located within 16km <u>6km</u> of a Natura 2000 site will be required to carry out a screening exercise to determine the need	Consultation response and Habitats Regulations Assessment

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			for an Appropriate Assessment.	
115-116	Policy H3 – Housing Site Allocations Table	Amend text	[Consequential updates as a result of other changes elsewhere]	To reflect changes to allocations policy and development status
117	6.34	Amend text	Of the 3430 sites shown above, 4513 have a planning permission in place and from the remaining 4617 sites, 6 are greenfield allocations outside current development limits which account for less than 15% of the projected supply over the plan period.	To reflect changes to allocations policy and development status
117	6.35	Amend text	All <u>Some</u> housing allocations are located within 16km <u>6km</u> of a Natura 2000 site and as such <u>where this applies</u> developers will be required to carry out a screening exercise to determine the need for an Appropriate Assessment.	Consultation response and Habitats Regulations Assessment
117	6.36	Amend text	The preferred allocations are identified in addition to the supply from ongoing major residential developments as shown in Table 43 below:	Changes elsewhere in document
117-118	Table 4	Amend text	[renumber to Table 3] [Consequential updates as a result of development activity in the borough]	Changes elsewhere in document To reflect changes to allocations policy and development status
		New text	<u>In 2015/16, the first year of the plan period, there were 213 net additional dwellings completed in the plan area, which is a shortfall of 21 against the</u>	For clarity

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			<u>minimum annual net requirement of 234, as set out at Policy H1.</u>	
118	6.38	Amend text	The <u>above</u> figures do not allow for <u>development on</u> unidentified 'small windfall' windfall sites (schemes providing fewer than 10 additional dwellings), or <u>conversely</u> stock losses and demolitions which are not part of a housing redevelopment programme or a conversion scheme. Windfall completions - on large as well as small sites - can fluctuate and are difficult to predict over the long term, but they are an additional and important source of supply which annually tend to match or exceed stock losses and they will continue to come forward over the plan period. <u>to predict over the long term, but they are an additional and important source of supply. Annual records show that completions on small sites of fewer than 10 dwellings and conversion schemes tend to exceed corresponding stock losses, and this trend can be expected to continue over the plan period.</u>	For clarity
119	6.40	Amend text	§ There is currently no obligation to provide affordable housing, as the Redcar & Cleveland Strategic Housing Market Assessment has indicated an oversupply of affordable dwellings in the north of Greater Eston <u>and evidence regarding development viability suggests that sites in this part of the borough have insufficient</u>	For clarity

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			<u>viability to support affordable housing contributions.</u>	
121-122	Policy H3.2	Amend text	[Policy and supporting text updated throughout to reflect the scheme that was granted planning permission]	Planning consent has since been granted
123	Policy H3.3	Amend text	Gypsy Lane, Nunthorpe Land at Gypsy Lane, Nunthorpe (0. 43ha <u>79ha.</u>) is allocated for the development of approximately 10 dwellings, to be completed within the plan period.	To reflect the revised planning application subsequently submitted
123	Policy H3.3 b.	Amend text	on site affordable housing provision, if necessary, in accordance with the requirements of Policy H4;	To reflect changes to affordable housing regulations
123	Policy H3.3 e.	Amend text	ensuring the development <u>housing</u> footprint does not extend further than the boundary line established by the adjacent residential properties;	To reflect the revised planning application
123	Policy H3.3	New criterion	<u>resolution of surface water drainage issues;</u>	To reflect the revised planning application
123	6.52	Amend text	The site is located in an established residential area and a highly sustainable location adjacent to the Gypsy Lane rail halt providing services into Middlesbrough and <u>it</u> is within 500m of primary schools and local shops at The Avenue and <u>within</u> 1km of Nunthorpe Academy.	For clarity
124	6.53	Amend text	Outline planning consent for 10 dwellings was granted	To reflect the revised

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			in March 2014 (application ref. 2013/0765/OOM). If the detailed proposals result in the provision of 15 dwellings or more, on-site affordable housing should be provided in accordance with Policy H4) on part of this site over 0.5ha. This has been superseded by a further outline application for 10 detached dwellings (application ref. 2016/0489/OOM). The current application site occupies extended area which incorporates drainage infrastructure and a revised highway layout.	planning application subsequently submitted
124	6.54	Amend text	The site provides an opportunity for a small infill scheme, 'rounding-off' the housing along the north side of Gypsy Lane. Although falling within the Conservation Area and the Nunthorpe-Ormesby Green Wedge, residential development <u>as proposed</u> is deemed acceptable in principle because:	For clarity
		New text	<u>If the detailed proposals result in the provision of 11-14 dwellings (inclusive), an off-site financial contribution towards affordable housing would be appropriate, equivalent to 15% on-site provision. If the detailed proposals result in the provision of 15 dwellings or more, on-site affordable housing should be provided in accordance with Policy H4.</u>	To reflect changes to affordable housing regulations
125	Policy H3.4	Amend text	Land at Morton Carr Lane, Nunthorpe (4.3ha <u>3 ha.</u>) is allocated for the limited development of approximately 3230 executive-style dwellings at a net	For clarity

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			density of approximately 15 dwellings per hectare, to be completed within the plan period to 2032.	
	Policy H3.4	New criterion	<u>off-site affordable housing contribution in accordance with Policy H4;</u>	For clarity
125	Policy H3.4 d.	Amend text	preparation of a transport <u>statement</u> to consider the cumulative impact of development on the wider local highway network;	Consultation response
	Policy H3.4	New criterion	<u>a flood risk assessment and drainage strategy;</u>	Consultation response
125	Policy H3.4 e.	Delete text	the preparation and implementation of a travel plan to encourage more sustainable travel modes, having regard to Policy TA2;	Consultation response
125	Policy H3.4 g.	Delete text	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response
		New supporting text	<u>In accordance with national guidance a flood risk assessment and drainage strategy should be undertaken as part of any development proposals.</u>	Consultation response
		New supporting text	<u>Although the quantum of development is relatively modest and falls below national guidelines, a transport statement should be prepared due to the significant level of housebuilding taking place in and planned for the Nunthorpe area.</u>	Consultation response
126	6.63	Delete text	Although the indicative level of development is relatively modest, the proposals will contribute to the	Consultation response

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			significant cumulative level of development in the immediate area and will impact directly on the principal road network at Guisborough Road. Therefore a transport assessment and travel plan are required in accordance with national planning guidance and Policy TA2.	
127	Policy H3.5 j.	Amend text	incorporation of a sustainable urban drainage scheme;	Consultation response
129	Policy H3.6	Amend text	Land at Spencerbeck Farm, Ormesby (2.4 ha) is allocated for the development of <u>up to</u> 82 dwellings (61 net additional properties). The development is expected to complete within the plan period.	In line with planning consents / proposals
129	6.75	Amend text	Detailed planning permission was granted in June 2013 (application reference R/2011/0589/FFM) for 41 dwellings on the front part of the site, which largely comprises farm buildings and residential dwellings. That permission includes <u>included</u> the clearance of the existing 21 residential properties and incorporating affordable housing requirements. <u>That permission expired in June 2016 and has been superseded by an outline application for 41 dwellings, which is awaiting determination (application ref. 2016/0410/OOM).</u>	Planning consent has since expired and a new application submitted
131	Policy H3.7 e.	Amend text	investigation <u>preparation of a flood risk assessment</u> and any appropriate resolution of site drainage issues <u>strategy</u> ;	Consultation response

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131	6.80	Amend text	Normanby Hall is an unused Grade II listed manor house within a mature wooded parkland setting extending over 3.5 hectares. The hall, which has been vacant for over a decade, has fallen into a dilapidated state along with the substantial grounds within which it sits. The listed building is on the English Heritage <u>Historic England</u> 'at risk' register.	Correction
132	6.82	Amend text	The site has been vacant for some years and, if its sustainable future is to be secured, a balance needs to be struck between allowing an acceptable level of new build development to enable the restoration of the hall and its setting and, on the other hand, the limited development potential on the site and <u>the restricted</u> traffic handling capacity of the local road network.	For clarity
133	Policy H3.8 h.	Amend text	a footpath <u>pedestrian</u> link to the east to enable direct pedestrian access to local primary schools and Normanby Road;	For clarity
133	Policy H3.8 i.	Amend text	ground investigation and prior completion of any necessary remediation works;	Consultation response
	Policy H3.8	New criterion	<u>a flood risk assessment and drainage strategy;</u>	Consultation response
134	6.91	Amend text	The site is in a sustainable location within the urban core and has good access <u>is in close proximity</u> to a range of services including a primary school (500m) and a secondary school (800m). Normanby Road	For clarity

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			(600m <u>to the</u> east) contains leisure and further educational facilities and is served by a main bus route into central Middlesbrough. Normanby centre is within 1.3 km to the south-east and contains local shops and business. Larger scale retail facilities, businesses, services and employment areas are located at Cleveland Retail Park / Skippers Lane Industrial Estate and at Low Grange Farm District Centre (1.5 km directly to the north).	
135	Policy H3.9	Delete policy	[Policy deleted]	Development has since commenced on site
137	Policy H3.10 a.	Amend text	achieving access from <u>via</u> the adjacent Former Redcar & Cleveland Town Hall site <u>Fabian Place development</u> , together with any off-site highway requirements as recommended through a transport assessment;	Development has since commenced on adjacent site
137	Policy H3.10 h.	Amend text	flood risk assessment and prior completion of any necessary <u>drainage works</u> strategy ;	Consultation response
	Policy H3.10	New criterion	<u>a screening exercise to determine the need for an Appropriate Assessment</u> ;	Consultation response
138	6.104	Amend text	The site would be suitable for residential development, provided vehicular access could be achieved via the adjoining Former <u>Fabian Place development on the former</u> Redcar & Cleveland Town Hall site, which is currently subject to a planning application for 51 (52) dwellings (reference	Development has since commenced on adjacent site

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			R/2016/0201/FFM). A such, development). <u>Development</u> would <u>therefore</u> be expected to follow <u>on from completion of the town hall site Fabian Place scheme.</u>	
	Policy H3.12	New criterion	<u>completion of a drainage strategy;</u>	
143	Policy H3.13	Delete policy	[Policy deleted]	Development commenced on site
	Policy H3.14 h.	New criterion	<u>completion of a flood risk assessment and drainage strategy;</u>	Consultation response
145	6.123	Amend text	To promote a logical extension to the residential area and to avoid conflict with the established school access arrangements at Redcar Lane, vehicular access should be gained <u>provided</u> from either or both of the existing estate roads off north via Warwick Road (Conway Road and Windsor Road).	Consultation response
148	6.131	Amend text	Outline planning consent for a development comprising 10 dwellings with new vehicular and pedestrian accesses was granted in February 2015 (application ref. 2014/0504/OOM). <u>If the detailed proposals result in the provision of 11-14 dwellings (inclusive) an off-site financial contribution towards affordable housing would be appropriate, equivalent to 15% on-site provision.</u> If the detailed proposals result in the provision of 15 dwellings or more, on-site affordable housing should be provided in accordance	To reflect changes to affordable housing regulations

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			with Policy H4. The planning consent is subject to conditions, including in relation to ground remediation, boundary treatments and drainage.	
149	Policy H3.18	Amend text	Land at Mickle Dales, Redcar (4.3ha) is allocated for the development of up to 100 residential dwellings. The scheme should follow on from <u>potentially provides a later phase to</u> the existing <u>adjoining</u> Rowan Garth development <u>site</u> and <u>should</u> be completed within the plan period to 2032.	Consultation response
149	Policy H3.18 d.	Delete criterion	prior completion of the Rowan Garth development;	Consultation response
	Policy H3.18	New criterion	<u>a flood risk assessment and drainage strategy;</u>	Consultation response
150	6.134	Amend text	The site is in a sustainable location adjacent to <u>adjoining</u> the Redcar built-up area and is broadly within 900m of a main bus route at Redcar Road to the north, 2km of two primary schools and on Redcar Road and Longbeck Railway <u>railway</u> station and 2.2km of shops, businesses and services in Marske District Centre. A pedestrian link into Marske is also provided from the southern site boundary via a footpath to Cat Flat railway crossing.	For clarity Consultation response
	Policy H3.17	New criterion	<u>on-site provision of neighbourhood shopping facilities;</u>	Following further consideration and recommendations of Sustainability Appraisal
152	6.139	Amend text	The development would constitute <u>site is in a</u>	Consistency with new criterion

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			sustainable development <u>location</u> , being within Redcar with good access to the strategic road network, local primary and secondary schools and bus services at Kirkleatham Lane, and the Roseberry Square Local Centre.	
		New text	<u>Bearing in mind the large scale of the prospective development and to support the sustainability credentials of the site, proposals should incorporate small-scale neighbourhood shopping facilities to help meet local day-to-day needs.</u>	Following further consideration and recommendations of Sustainability Appraisal
153	6.143	Amend text	This site is located at the western edge of Saltburn, <u>and is in a sustainable location</u> being adjacent to a main bus route at Marske Road, within 1.2km (10-15 minutes walk) of local schools and Saltburn Leisure Centre, and 1.8km from the town centre and railway station.	For clarity
153	6.144	Delete text	Saltburn has undergone limited residential development over several decades. Despite having a buoyant housing market, the population has stagnated and there is a relative demographic imbalance between a high proportion of older residents (65 years and over), and a low proportion of younger inhabitants. The potential expansion of the town is physically constrained by the coast to the north and steep topography to the east and south. This site provides an opportunity to achieve a major	Superfluous text

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			development to help meet housing needs and aspirations, broaden choice and support community services, without significantly undermining the strategic gap with Marske.	
153	6.145 & 6.146	Amend text, merge paragraphs	In December 2015, outline approval for the development of approximately 130 dwellings, with all issues apart from access to be determined at reserved matters stage (application reference R/2014/0631/OOM). In March in December 2015 and in October 2016, a reserved matters application was submitted <u>approved</u> for 116 dwellings, together with associated garaging, electricity sub-station, public open space, landscaping and ancillary works. This application is awaiting determination (reference R/2016/00154/RRM). (application ref. R/2016/00154/RMM). The approval is subject to a number of conditions, including achieving satisfactory access arrangements, any appropriate ground remediation and ecological measures and the implementation of an agreed drainage strategy and flood risk mitigation.	To reflect subsequent granting of reserved matters consent
154	Policy H3.21 e.	Amend text	provision of <u>a sustainable</u> urban drainage systems <u>scheme</u> .	Consultation response
154	6.149	Amend text	The planning consent is subject to meeting several conditions, including ground investigation and remediation requirements and incorporating a	Correction

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			sustainable urban drainage system within the development.	
155	Policy H3.22	Delete criterion	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response
157	Policy H3.23	Amend text	Land at Cleveland Gate, Guisborough (4.9ha) is allocated for the development of <u>up to</u> 135 dwellings. The scheme should be delivered within the plan period and proposals will be subject to the following:	Consultation response
157	Policy H3.23	Delete criterion	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response
158	6.157	Amend text	Given that the land slopes down from the south, there are drains crossing the site and part of the land is at risk of surface water flooding, proposals should incorporate a sustainable urban drainage scheme to manage existing accumulations and the implications of increased run-off arising from any future development.	Correction
158	6.158	Amend text	The Guisborough Branch Walkway, which borders the southern boundary, provides <u>is</u> a footpath <u>and cycle</u> route crossing the urban area and linking residential areas and green spaces, <u>and provides</u> footpath <u>and cycle</u> connections into the North York Moors National Park. Opening the site up for development provides an opportunity to extend this network and in doing so <u>to</u> improve pedestrian linkages between central	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			Guisborough, including the subject site, with <u>and</u> southern parts of the town and the National Park.	
159	Policy H3.24	Delete policy	[Policy deleted]	Consultation responses and further assessment of potential impact the development could have on the conservation area
161	Policy H3.25	Amend text	Land at Galley Hill, Guisborough (4.6ha) is allocated for the development of approximately 50 dwellings and public open space. The scheme should be delivered within the plan period following completion of <u>and as an extension to</u> the adjacent Galley Hill housing site <u>development</u> .	Consultation response
161	Policy H3.25 d.	Delete criterion	prior completion of the ongoing Galley Hill development to the west;	Consultation response
161	Policy H3.25 e.	Amend text	subject to a transport assessment <u>statement</u> , achieving vehicular access from the <u>existing</u> Galley Hill development <u>housing</u> site;	Consultation response
161	Policy H3.25	New criterion	<u>prior commencement of housing units in the final construction phase at the current Galley Hill development;</u>	Consultation response
161	Policy H3.25	Delete criterion	the preparation and implementation of a travel plan to encourage more sustainable travel modes, having regard to Policy TA2;	Consultation response
161	Policy H3.25	Delete criterion	a screening exercise to determine the need for an	Consultation response

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			Appropriate Assessment;	
161	6.165	Amend text	This linear site is situated between established housing to the south, the ongoing Galley Hill residential development to the west (326 dwellings) and the A171 dual carriageway to the north. It, therefore, presents a logical residential infill opportunity, following on from and linked to the existing development.	Moved to new para
		New text	<u>The site will present a residential infill opportunity, linked to and logically following on from the existing housing site in order to achieve a full co-ordinated development. However, in recognition of the need to maintain a continuous and flexible supply of housing land, and as the site is expected to be served from the same access via an extension to the highway, development will be permitted following commencement of housing construction at the final (fifth) phase of the ongoing development, as illustrated in the most up to date development phasing plan.</u>	Consultation response
164	Policy H3.27 b.	Amend text	affordable housing provision, <u>if necessary</u> , in accordance with the requirements of Policy H4;	To reflect changes to affordable housing regulations
164	Policy H3.27 g.	Delete criterion	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
164	6.172	Amend text	As the indicative housing yield is for fewer than 15 <u>10</u> dwellings, no affordable housing contribution would be required. However, if proposals are for between 11 and 14 dwellings (inclusive) an off-site financial contribution towards affordable housing is <u>would be</u> appropriate, equivalent to 15% on-site provision. However, if proposals are for 15 <u>for 15</u> dwellings or more, the contribution should be provided on-site.	To reflect changes to affordable housing regulations
165	Policy H3.28 d.	Amend text	an appropriate landscaping scheme throughout which respects the locational and topographical characteristics of the site including provision of and incorporates a planting buffer between the A174 Skelton and Brotton bypass and the proposed development;	Consultation response
165	Policy H3.28	New criterion	<u>completion of a flood risk assessment and drainage strategy;</u>	Consultation response
165	Policy H3.28 i.	Delete criterion	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response
166	6.176	Amend text	The site is in a sustainable location being broadly within 300 metres of a primary school, the hospital and a major bus route connecting to Guisborough, Redcar and Middlesbrough at Brotton local centre. <u>As the allocation site is substantial, is located at the edge of the village and extends either side of Kilton Lane, proposals should promote ease of movement through</u>	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			<u>the site for pedestrians and cyclists and opportunities should be sought to improve footpath connectivity between the development and the village centre.</u>	
166	6.177	Amend text	Due to the relatively large size of the site and level of greenspace provision within Brotton, it is expected that proposals will include on-site public open space in accordance with the Council's minimum standards. As part of the landscaping scheme, an adequate <u>effective</u> landscape buffer should also be established towards the boundary with the A174 to screen the development from the bypass and provide noise <u>and visual</u> attenuation.	Consultation response
166	6.179	Amend text	As Northumbrian Water have <u>has</u> identified that the sewerage infrastructure in Brotton is operating at near capacity, proposals will be expected to satisfactorily address water infrastructure requirements.	Consultation response
168	Policy H3.30	Amend text	Land at the former Rosecroft School site, Loftus (1.7ha) <u>3.1ha</u> <u>as shown on the policies map</u> is allocated for approximately 50 <u>the development of up to 100</u> dwellings, to be completed within the plan period.	Consultation response
168	Policy H3.30 e.	Amend text	a <u>transport assessment, achieving</u> satisfactory new vehicular access from Rosecroft Lane;	Consultation response
	Policy H3.30	New criterion	<u>preparation and implementation of a travel plan to</u>	Consultation response

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			<u>encourage more sustainable travel modes, having regard to Policy TA2;</u>	
	Policy H3.30	New criterion	<u>flood risk assessment and drainage strategy;</u>	Consultation response
168	Policy H3.30 h.	Delete criterion	a screening exercise to determine the need for an Appropriate Assessment;	Consultation response
		New text	<u>Although the site has since been marketed for disposal, a replacement housebuilder has not been secured to take this site forward. Therefore, in seeking to make this site more attractive to the market, the land area has been extended to incorporate the lower portion of the former school playing field area.</u>	Consultation response
		New text	<u>As this is a partly greenfield site on sloping ground, it is particularly important that development proposals incorporate a sustainable drainage scheme.</u>	Consultation response
169	6.189	Amend text	<u>As part of</u> the site was previously developed, it will be necessary to undertake ground investigation and any required remediation prior to redevelopment.	Consultation response
		New text	<u>Bearing in mind the large former playing field area beyond the southern boundary, it may be possible to meet open space requirements through off-site contributions.</u>	Consultation response
		New policy	[New policy included – site allocation at Former Handale Primary School, Loftus]	Consultation response
		New policy	[New policy included – site allocation at Abattoir Site]	Consultation response

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			and Adjacent Land, Boosbeck]	
	Policy H4	Amend text	On all appropriate housing developments of 15 or more dwellings (gross), a minimum of 15% of the total number of dwellings on-site shall be provided and maintained as affordable housing, in order to meet needs identified in the Strategic Housing Market Assessment (or other documents which supersede the SHMA). For all housing developments below this threshold, of between 11 and 14 gross dwellings (inclusive), a financial contribution by way of a commuted sum, equivalent to a 15% on-site affordable housing contribution, will be expected.	To reflect changes to affordable housing regulations
	Policy H4	Delete text	Where the affordable housing requirement is fewer than 10 units, all of the affordable housing shall be provided as social rented or affordable rented housing. Where the affordable housing requirement is 10 units or more, a	To reflect changes to affordable housing regulations
	Policy H4	New text	<u>Developments of 10 or fewer dwellings will not generally be required to make an affordable housing contribution, unless they form part of a rural exceptions site.</u>	To reflect changes to affordable housing regulations
	Policy H4	Amend text	<u>A</u> minimum of 70% of the affordable housing requirement shall be provided on-site as social rented	For clarity

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			or affordable rented housing. The remaining proportion may be provided as intermediate housing.	
	Policy H4 a.	Amend text	developments of fewer than 15 <u>between 11 and 14 gross</u> dwellings (gross inclusive);	To reflect changes to affordable housing regulations
	Policy H4	Amend text	Small scale housing schemes of less than 10 <u>or fewer</u> dwellings that are located outside, but adjacent to, Development Limits of the Service Villages and Villages will be supported where 100% affordable housing is to be provided and maintained in perpetuity, in order to meet a verifiable and identified local need and where the local need cannot be met on sites within settlements. <u>In exceptional circumstances, and where supported by a detailed viability assessment, a small proportion of market housing may be provided, if it can be demonstrated as necessary in order to deliver the affordable housing.</u>	Consultation response
	6.194	Amend text	Affordable housing is defined in Policy H2. Dwellings that do not meet the definition of affordable housing, such as low cost market housing, will not be considered as affordable housing for planning purposes. Affordable housing must achieve at least the minimum standards set out in the Homes and Department for Communities Agency's (HCA) Housing and Space Standards, and Local Government's "Technical housing standards - nationally described space standard" (March 2015), or their equivalent if	For clarity

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			the HCA issues revised standards <u>are issued.</u>	
	6.197	Amend text	The spatial evidence for additional affordable housing is at a sub-area level of the borough. As such, there is no evidence of specific unmet needs for additional affordable housing in the Service Villages and Villages of the borough. However, if a future local needs survey carried out by a parish council or a registered provider of social housing demonstrates, to the satisfaction of the Council, a need for additional affordable housing in these areas, the policy makes provision for small sites of fewer than 10 affordable dwellings on the edges of villages. <u>10 or fewer affordable dwellings on the edges of villages. It is recognised that the availability of grant funding to help deliver such affordable housing is much reduced. Therefore, in exceptional circumstances, and where supported by a detailed viability assessment, a small proportion of market housing may be provided, if it can be demonstrated as necessary in order to deliver the affordable housing</u>	Consultation response
	Policy H6	New supporting text	<u>Where relevant consideration should be given to the Sub-division and Conversion Supplementary Planning Document</u>	For clarity and recommendation of Sustainability Appraisal

7 Natural Environment

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike , new text in <u>underline</u>)	Reason for Change
182	Policy N1c.	Delete criterion	located within Development Limits	Correction
182	Policy N1	Amend text	We will aim to protect and enhance the borough's landscapes. Development proposals will be considered within the context of the Landscape Character Assessment and , the Landscape Character Supplementary Planning Document <u>and the Historic Landscape Characterisation</u> . Developments will not be permitted where they would lead to the loss of features important to the character of the landscape, its quality and distinctiveness, unless the benefits of development clearly outweigh landscape considerations. In such cases appropriate mitigation will be required.	Consultation response
184	Paragraph 7.8	Add text	<p>The plan area is also fringed by the North York Moors National Park.</p> <p><u>Redcar and Cleveland Borough Council have a duty to have regard to the National Park Purposes, as set out in the 1949 National Parks and Countryside Act (as amended by the 1995 Environment Act). The special qualities of the National Park are identified in the North York Moors Management Plan (2012) which sets out the vision, strategic policy and outcomes for the future of the Park.</u></p> <p>Development within the plan area should ensure that it does not detrimentally impact on the special qualities of this nationally important area, including landscape setting and scenic beauty.</p>	Consultation response
	New Paragraph after 7.14	Add text	<u>Remnants of past land uses still exist within our landscape. By understanding how landscapes have evolved we can help to manage change and conserve landscape features that give places their unique character and identity.</u>	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			<u>Consideration should be given to the North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation study (2010) which identifies and describes historic components of the contemporary rural and urban landscape.</u>	
186	Policy N2	Amend text	We will <u>protect and</u> support the protection , enhancement, creation and management of our green infrastructure network, to improve its quality, value, multi-functionality and accessibility, particularly in the following locations:	For clarity
186	Policy N2 above e	Add text	<u>heritage assets or green infrastructure which contributes to their setting;</u>	Consultation response
187	Policy N2	Amend text	Where appropriate the Council will seek developer contributions towards the provision and maintenance of green infrastructure. Where there is a loss of green infrastructure resource and a principle of 'net gain' should apply where possible.	Consultation response/clarity
187	Policy N2	Add text	Proposals affecting open space provision will also be assessed against Policy N3, <u>and heritage assets against Policy HE2.</u>	Consultation response
187	Paragraph 7.17	Amend text	...Green infrastructure is also vitally important in providing habitat corridors and a more permeable landscape, helping wildlife to adapt to changing climates. <u>Green infrastructure can also be a heritage asset, such as historic parks and gardens, or can provide an important setting to heritage assets.</u> Community involvement should be encouraged from the onset in the design, implementation and management of green infrastructure.	Consultation response
187	Paragraph 7.18	Add text	...Opportunities should be sought to reduce flood risk by	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			utilising green infrastructure for flood storage; provision of ponds or swales; the maintenance or restoration of riparian zones alongside river courses; and the planting of trees, rain gardens or green roofs to intercept rainfall. <u>Opportunities to improve the water environment through deculverting should also be sought.</u>	
188	Paragraph 7.22	Amend text	...To help maintain their separate identities, and ensure that they <u>the separate settlements</u> do not coalesce <u>with the main built-up area</u> , strategic gaps between Marske and New Marske; and Marske and Saltburn will be protected. Green wedges are open areas within the urban and coastal <u>main built-up</u> area which provide buffers between different uses and delineate distinct communities. These areas are valuable for local amenity, recreation and wildlife and will continue to be protected.	Consultation response
188	Paragraph 7.23	Amend text	Significant <u>Strategic landscape areas, such as significant</u> landscape belts, will also be important in defining settlements and to provide a buffer between housing and employment, particularly in the Greater Eston and South Tees area, <u>and along major transport routes.</u>	For clarity
	New Paragraph after 7.24	Add text	<u>Redcar & Cleveland Borough Council is actively involved in a collaborative process, with industry and other regulatory bodies, to prepare a 'Tees Estuary strategic framework' for development and habitat conservation in the area around the Teesmouth and Cleveland Coast Special Protection Area and Ramsar site. The framework will establish a collective vision for on-going management of interests in the area and will help to identify conservation opportunities in the estuary.</u>	Consultation response

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
190	Paragraph 7.26	Amend text	This policy covers the following types of open spaces as defined in the Open Space Assessment (2016):	Consultation response
	New Paragraph after 7.29	Add text	<u>Proposals affecting heritage assets, including historic parks and gardens, should be assessed against Policy HE2 Heritage Assets.</u>	Consultation response
192	Policy N4	Amend text	Priority will be given to protecting our internationally important sites, including the Teesmouth and Cleveland Coast Special Protection Area/Ramsar and European Marine Site, and the North York Moors Special Protection Area and Special Area of Conservation. Development that is not directly related to the management of the site, but which is likely to have an adverse <u>significant</u> effect on any internationally designated site, irrespective of its location and when considered both alone and in combination with other plans and projects, will be subject to an Appropriate Assessment.	Consultation response
192	Policy N4	Add text	c.the benefits clearly outweigh any adverse impact on the site, <u>and any broader impacts on the network of SSSIs;</u>	Consultation response
194	Paragraph 7.36	Amend text	...Following from the consultation the Council are working with partners, including industry and other regulatory authorities, to agree a collective vision for ongoing management of the interests of wildlife and industry in the Tees estuary as part of a 'masterplan' <u>'Tees Estuary strategic framework'</u> . Any proposals within, or impacting on, the SPA should be informed by the masterplan <u>framework</u> .	Updated
194	Paragraph 7.38	Amend text	Where the requirements of the Habitats Regulations are met, any sites secured as compensation for adverse effects on a Natura 2000 site will be given the same protection as	Correction

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			European sites. Residential development would be unlikely to pass an imperative reasons of public interest (!ROPIROPI) test, as it can be relocated <u>located elsewhere</u> .	
195	Paragraph 7.41	Amend text	We will continue to attach a -significant importance to protecting, <u>and where possible enhancing</u> , these sites.	Consultation response

8 Historic Environment

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
199	8.1	Amend text	The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. It includes archaeological sites, historic landscapes, ruins, standing buildings, parks and gardens, semi-natural environments such as wood, heath and moor, or historic land uses such as industry, farming, defence, communications and even tourism.	For clarity
199	8.2	Amend text	The historic environment is not just about the past, it is also about the present and the future. It can contribute to our quality of life by giving people a sense of place and identity. Redcar and Cleveland's historic environment gives it a unique competitive advantage, attracts people to live and stay; businesses to invest; and tourists to visit - it plays a significant role in driving our growth. We recognise the importance and contribution our historic natural and built environment can make to meeting our local economic growth ambitions and, therefore, recognise the importance for of its successful management.	For clarity
199	8.3	Delete text	A 'heritage asset' is defined by the NPPF as '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). A Designated Heritage Asset is defined by the NPPF as: a World Heritage Site, Scheduled Monument,	Moved elsewhere

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike , new text in <u>underline</u>)	Reason for Change
			Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.	
199	8.4	Amend text	<u>The borough contains some of the finest heritage assets: Gisborough Priory; the Heritage Coast; the iron age hill fort at Eston Nab; remains of the area's mining history within the Eston Hills; surrounding countryside; the planned Victorian resort town of Saltburn; South Gare with its evidence of maritime heritage and wartime defences; Redcar beach and seafront with the petrified forest beneath and the Zetland Lifeboat Museum; Saxon Archeaology near Loftus and Kirkleatham village. These sites (and others) are of value locally, nationally and internationally, and have significant benefits to the borough's economy through tourism and the heritage they portray. Their maintenance, enhancement and management are critically important. This cannot be done single-handedly; they should be approached strategically, holistically and delivered jointly. Therefore, we must take a collaborative approach working with heritage owners and partners, including national agencies, to succeed.</u>	For clarity
200	8.6	Amend text	All <u>Conservation Area Management Plans will be produced for all</u> of our Conservation Areas have up-conservation areas, in order to-date Conservation Area Appraisals which outline opportunities for enhancement. These appraisals and improved preservation. <u>The Conservation Area Management Plans</u> will be kept under review and will be utilised to inform development and enhance conservation	For clarity and from consultation

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			areas and heritage assets. At Kirkleatham we will investigate a strategic masterplan approach for the conservation led regeneration of the historic estate.	
201	Policy HE1	Amend text	<p>Outline applications for Planning Applications</p> <p><u>Development proposals that require</u> planning permission will not be acceptable for development in<u>within</u> conservation areas should normally be subject to a full planning application. <u>Outline applications within conservation areas will only be acceptable where:</u></p> <p>g. <u>the proposal does not involve the demolition or alteration of existing buildings; and</u></p> <p>h. <u>they include sufficient detail to allow a proper assessment of the proposal on any heritage assets affected.</u></p>	For clarity and to align with legislation
201	Policy HE1	Insert text	<p><u>Conservation Areas in Redcar & Cleveland Local Plan Area</u></p> <ul style="list-style-type: none"> • <u>Brotton - Centre of urbanised medieval settlement re-developed and expanded in the 18th and 19th centuries with large, 19th century industrial extension.</u> • <u>Coatham - Urbanised medieval fishing and farming village re-developed in the 18th and 19th centuries with a planned Victorian health resort extension.</u> • <u>Guisborough - Centre of urbanised, medieval, monastic, market town with later extensions. Re-developed and industrialised in the 18th, 19th and 20th centuries.</u> 	For clarity

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Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			<ul style="list-style-type: none"> • <u>Kirkleatham - Group of high status 18th century estate buildings based on a manor house, with earlier archaeology in a parkland setting.</u> • <u>Liverton Village - Medieval green village, surrounding historic field system and detached parish church, re-developed in the 19th century.</u> • <u>Loftus - Urbanised medieval market town gradually re-developed in the 18th and 19th centuries and with a 19th century industrial extension.</u> • <u>Marske - The centre of an urbanised, medieval, farming, fishing and estate village incrementally re-developed in the 18th and 19th centuries, with 19th century industrial additions.</u> • <u>Moorsholm - Medieval moorland green village re-developed and expanded in the 19th century.</u> • <u>Ormesby Hall - Medieval manor house, church, parkland and suburbanised remains of settlement incrementally redeveloped in the 18th and 19th centuries.</u> • <u>Saltburn - Planned Victorian seaside town with remains of a much earlier fishing village.</u> • <u>Skelton - Centre of urbanised medieval market town and stronghold, incrementally re-developed in the 18th and 19th centuries, with industrial 19th century extension.</u> • <u>Skinningrove - Core of remains of medieval farming and fishing village, incrementally redeveloped, expanded and industrialised in the 17th, 18th and 19th centuries.</u> 	

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			<ul style="list-style-type: none"> • <u>Upleatham - Shrunken medieval settlement and surrounding fields, re-planned as an estate village in the late 19th century.</u> • <u>Wilton - Early-mid 19th century planned estate village and country house with a surrounding woodland and parkland setting.</u> • <u>Yearby - Semi-planned 18th century farming settlement on site of medieval village, with surrounding fields.</u> 	
202	8.12	Amend text	<p>Conservation areas represent some of the borough's most significant areas of architectural and historic interest. Development in conservation areas is frequently possible, but because of their special importance, any change will be carefully controlled and appropriate layout, design, materials and detailing will be sought<u>necessary</u>. It will be important to assess the impact of the design and layout of new development on the conservation area so the Council will require developers to submit full design details for applications for development proposed in conservation areas. In many areas special 'Article 4 Directions' have been introduced to give extra protection. This means that in these areas even minor alterations, for example constructing a porch, replacing windows or re-roofing, could require planning permission.</p>	For clarity
205	8.15	Amend text	<p><u>A 'heritage asset' is defined by the NPPF as '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</u></p>	Moved from elsewhere

8 Historic Environment

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			<p><u>assets identified by the local planning authority (including local listing). A Designated Heritage Asset is defined by the NPPF as: 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.</u> Heritage assets, designated and non-designated, are irreplaceable, so any harm or loss will require clear and convincing justification. Heritage policies seek to ensure that the borough's listed buildings, monuments, archaeological sites, landscapes and areas of historic and built heritage significance are preserved and enhanced so that they can continue to make an important contribution to the environment, economy, quality of life and lifelong learning for this and future generations.</p>	
205	8.16	Amend text	<p>The Council wishes to encourage the continued upkeep and active use of designated heritage assets with a general presumption in favour of their conservation based upon their significance. The control of the development of, or around, designated heritage assets is stringent since it is of paramount importance that their special qualities are conserved and where possible contributed to. Development proposals should give due<u>show</u> consideration that protected species may be using the building and any proposal will need to comply with the relevant legislation. The Council will have special regard to the desirability of conserving any designated heritage asset or its setting, or any features of architectural or historical interest which it possesses, which contribute to its</p>	For clarity

8 Historic Environment

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			significance.	

9 Transport and Accessibility

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
211	9.8	Amend text	<p>The borough, and indeed the Tees Valley, has a comparatively un-congested road network, although there are particular congestion hotspots, particularly on the strategic road network at the A19, A174 and A66 and Redcar town centre, where a combination of factors have meant travelling around the town is slow and congested at certain times. Based on current trends, and without interventions, congestion in these areas will increase, impacting on the economy in terms of increased journey times and costs and also on the environment. New infrastructure may be needed to tackle these congested areas but this should be as part of a coordinated approach.</p> <p><u>The focus will be on encouraging greater levels of walking and cycling and</u> use of the public transport network supported by demand management measures and making best use of existing infrastructure. Currently, the cost of private motoring does not discourage use and there is a need to act to make public transport a more attractive option, to encourage a behavioural change to more sustainable travel.</p>	For clarity
212	9.9	Amend text	<p>Demand management and making best use of the existing infrastructure are very much inter-linked. The reallocation of road space, for example, to provide for no-car lanes or bus only lanes is one example of making use of existing infrastructure in a way that is encouraging use of more sustainable modes of travel. Other measures can include:</p> <ul style="list-style-type: none"> not increasing the supply of long stay commuter parking <u>near places of work</u>; 	For clarity

9 Transport and Accessibility

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			<ul style="list-style-type: none"> reducing the supply of long stay commuter parking as car parks are taken up for redevelopment; introducing lower parking charges for multi-occupancy and / or environmentally friendly vehicles; and introducing bus priority at busy intersections. 	
215	Policy TA3	Amend text	<p>The Council will work together with neighbouring authorities, the Tees Valley Combined Authority, Tees Valley Unlimited (the Local Enterprise Partnership), the Government, developers and transport providers to improve accessibility within and beyond the borough, which will support economic, tourism and regeneration objectives for both Redcar and Cleveland and the wider Tees Valley. This will centre on improving:</p>	For clarity
217	9.25	Amend text	<p>3 These objectives are to be delivered through the following projects across the borough:</p> <ul style="list-style-type: none"> to improve linkages between the South Tees Industrial area and the local highway network (particularly the A66 and A1085) which links to the strategic highway network of the A19. This includes junction improvements on the A66 which have recently been completed; a proposed east to west extension to Dockside Road, <u>through the South Bank Wharf Enterprise Zone</u> that will particularly provide better access to the Port / riverside and open the surrounding land <u>give an additional access point into Tees port. A further connection from Eston Road to</u> 	For clarity

9 Transport and Accessibility

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strikethrough , new text in <u>underline</u>)	Reason for Change
			<p>development<u>the east west extension will allow access the adjacent Prairies Enterprise Zone</u>; and</p> <ul style="list-style-type: none"> improvements to Greystones roundabout to improve strategic highway capacity. 	
222	Policy TA4	Amend text	<p>Policy TA 4</p> <p>Sustainable Transport Networks</p> <p>To enhance the borough's tourism, culture and leisure offer and the important contribution to local economic growth, enhanced accessibility and the<u>The</u> development and maintenance of walking, cycling and horse riding routes, will be supported to<u>that</u>:</p> <ol style="list-style-type: none"> improve public access to the coast, countryside, North York Moors National Park, the Cleveland Way, the Teesdale Way, the England Coast Path, the National Cycle Network and other public rights of way and open spaces; <u>provide and improve</u> safe routes to school; and ways of getting to places of improve <u>improve linkages between where people live and recreation, open spaces, the countryside and coast, employment and other local facilities areas and town and district centres</u> so that active travel becomes an attractive option for many shorter journeys; enhance the borough's outstanding range of leisure facilities, nature conservation habitats, country 	For clarity and recommendation of Sustainability Appraisal

9 Transport and Accessibility

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			<p>parks, accessible countryside and green spaces for people to enjoy; and consider changes to parking provisions during peak periods of demand during summer months and events.</p> <p>There will be a presumption in favour of multi-user routes.</p>	
222	9.39	Amend text	<p>Tourism, culture and leisure plays a key role in the regeneration and economic growth of the borough and the ease and quality of access to and between attractions will be a factor in the success of the sector. The countryside of Redcar and Cleveland is well regarded. The public rights of way network offers a vital route into this countryside for our residents and visitors alike. These footpaths<u>The Council wishes to improve walking, cycling and horse riding networks, so that they give better public access to the coast, the North York Moors National Park, wider countryside and to local facilities, such as open spaces, schools, shops and places of work. Footpaths</u>, bridleways and byways are probably best known as a leisure resource, but on a more local scale, they can also offer walking and cycling routes between people’s homes, schools, shops and workplaces. Works undertaken as part of the Local Sustainable Transport Fund programme (2011-2015), have improved the standard of several paths for use by both walkers and cyclists<u>Providing such opportunities will help to provide and promote sustainable transport options. These networks are also important for tourism, culture and leisure and will play a key role in the regeneration and</u></p>	For clarity

9 Transport and Accessibility

Page	Location in Draft Local Plan	Type of Change	Wording Change (deleted text in strike through, new text in <u>underline</u>)	Reason for Change
			<u>economic growth of the borough.</u>	
222	9.40	Amend text, realign paragraphs	It is widely acknowledged that such leisure and travel activities <u>Sustainable transport networks also</u> deliver both physical and mental health benefits and can help to reduce congestion and air pollution. Therefore, we recognise the importance of our public rights of way network as an asset <u>these networks as assets</u> well worth investing in, in addition to the essential elements of the countryside, biodiversity, tranquillity, and aesthetic beauty that they provide. It is also recognised that increased activity in sensitive designated areas such as the Teesmouth and Cleveland Coast SPA or the <u>It is recognised that increased activity in sensitive designated areas such as the Teesmouth and Cleveland Coast SPA or the</u> North York Moors SPA could have an adverse effect on the natural environment. All proposals in sensitive areas will have their environmental impacts assessed in order to ensure that there would be no adverse impacts.	For clarity
223	9.41	Delete text	The Council wishes to improve walking, cycling and horse riding networks in the borough, so that they give better public access to the coast, the North York Moors National Park, wider countryside and to local facilities, such as open spaces, schools, shops and places of work. Providing such opportunities will also help to promote healthier lifestyles and sustainable transport options.	For clarity

Appendices

The following changes have been made to the appendices in response to consultation responses and to reflect changes to policies:

Appendix	Change
Appendix 1 – Implementation Plan and Monitoring Framework	Various amendments to reflect consultation responses and changes to the Draft Local Plan, which have included additional policies.
Appendix 2 – Glossary	Terms added to Glossary in response to the consultation.
Appendix 3 – Proposed Site Allocations	Site maps added, removed or boundaries amended to reflect changes to the Draft Local Plan.
Appendix 4 – Housing Delivery Schedule	The Housing Delivery Schedule has been updated and amended to include new housing sites and remove sites no longer allocated.
Appendix 5 – Proposed Green Space Standards	No changes
Appendix 6 – Policies to be Deleted	No changes
New Appendix added	Relevant Legislation, Policies and other Planning Documents

Policies Map and Document Maps

The following changes have been made to the Policies Map in response to consultation responses and to reflect changes to policies:

Changes to Policies Map		
Grid Reference	Policy	Change
454149 518256 m	N 3 Open Spaces	Parklands removed from Open Space allocation
454149 518256 m	N 2 Green Wedges	Parklands removed from Green Wedge allocation
466382 519705 m	REG 3 Skelton	Residential property, Wharton Cottage, Saltburn Lane removed from allocation
459633 525255 m	REG 1 Coatham	<i>Coatham subject to Policy REG1 is incorrect, being insufficiently large. Amended to the extent of the former Coatham Bowl site being promoted by Estates and on title. This doesn't include any of the Village Green site.</i>
459633 525255 m	N 3 Primary Open Spaces	Open Space 'Coatham Common' clipped around the extension to REG 1
	N 3 Open Spaces	Doorstep spaces (spaces * < ha) removed from map and Policy re named N 3 Primary Open Spaces
	N 3 Secondary Open Spaces	Private pitches added to map as N 3 Secondary Open Spaces
	N 2 Strategic Green Infrastructure Network	Removed from Policies Map and added to the Key Diagram
471289 518817 m	N 3 Primary Open Spaces	Amended around residential property at Deepdale, Loftus
471840 517711 m	H 3 Housing Allocations	Extension to former Rosecroft school site
461732 515777 m	H 3 Housing Allocations	Remove Belmangate Field site
471840 517711 m	SD 3 Development Limits	Extended to include extension to former Rosecroft school site
471840 517711 m	N 1 Restoration	Clipped around extension to former Rosecroft school site

Policies Map and Document Maps

	Landscape Areas	
471840 517711 m	SD 6 Potentially suitable for small scale solar development	Clipped around extension to former Rosecroft school site
471471 518601 m	H 3 Housing Allocations	Added Former Handale School site at Loftus
471725 518231 m	H 3 Housing Allocations	Bran Sands lagoon clipped out (and Tees Dock) to allow for proposed extension to SPA
453177 515692 m	H 3 Housing Allocations	Gypsy Lane Site – amend to new planning boundary app R/2016/0489/OOM
465756 516924 m	H 3 Housing Allocations	Added allocation at Boosbeck abattoir
465756 516924 m	SD 3 Development Limits	Extended around Boosbeck site
465756 516924 m	N 3 Primary Open Spaces	Clipped around Boosbeck site
465756 516924 m	N 1 Restoration Landscape Areas	Clipped around Boosbeck site
454597 519394 m	H 3 Housing Allocations	H 3.9 Town Hall site removed as now a commitment
460778 523016 m	H 3 Housing Allocations	H3.13 Connexions Campus (South) site removed
471725 518231 m	N 1 Restoration Landscape Areas	Gypsy Lane Site – clip to new planning boundary app R/2016/0489/OOM
471725 518231 m	N 2 Green Wedges	Gypsy Lane Site – clip to new planning boundary app R/2016/0489/OOM
471725 518231 m	SD 3 Development Limits	Gypsy Lane Site – extend to new planning boundary app R/2016/0489/OOM
455330 524815 m	ED 6 Protecting Employment Areas	Bran Sands lagoon clipped out (and Dabholm Gut Tees Dock) to allow for proposed extension to SPA
455330 524815 m	SD 3 Development	Deleted from Loftus cemetery and checked for other inappropriate

Policies Map and Document Maps

	Limits	overlaps
473143 518049 m	SD 6 Potentially suitable areas for medium and small scale solar development	Deleted from Loftus cemetery and checked for other inappropriate overlaps
458477 523587 m	N 3 Primary Open Spaces N 3 Secondary Open Spaces	Remove Dormanstown Sports Club from Primary Open Space and move to N 3 Secondary Open Space
467375 516564 m	N 4 Local Wildlife Sites Proposed	Added Lingdale Meadow LWS as proposed
472259 518160 m	ED 1 Protecting and Enhancing the Boroughs Centres	Extension to Loftus District Centre
455632 518709 m	ED 1 Protecting and Enhancing the Boroughs Centres	Extension to Eston District Centre
466433 521297 m	ED 1 Protecting and Enhancing the Boroughs Centres	Extension to Saltburn District Centre
454015 521871 m	TA 3 Extension to Dockside Road	Added allocation of proposed new road to Plan

Policies Map and Document Maps

The following changes have been made to the maps located throughout the document in response to consultation responses and to reflect changes to policies:

Changes to Document Maps	
Policy/Location	Change
Policy H 3 – Housing Allocations (Allocation Maps in Appendix 3)	Update allocations maps to reflect changes to the Policies Map
Policy TA 3 – Improving Accessibility	A4 map added to appendices to show Extension to Dockside Road
Policy N 2 Strategic Green Infrastructure Network	Strategic Green Infrastructure Network annotation added to the Key Diagram
Key Diagram	Easington labelled on diagram; British Steel Redcar station annotated on diagram

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