

# **Redcar & Cleveland Borough Council**

## **Local Plan Scoping Report**

### **Report of Consultation**

**October 2015**

#### **Introduction**

In July 2015 the Council published a Scoping Report as the first stage in the preparation of the new Local Plan. The Scoping Report set out the key issues the Council believes should be addressed in the new Local Plan, as well as setting out, to a limited extent, proposals to deal with these issues.

The Scoping Report was used as the basis for stimulating debate with key stakeholders and other interested parties on issues including the economy, sustainability, design, housing, environment, community facilities, heritage assets and transport and how to address these through the local planning system.

This report sets out a summary of the consultation undertaken by Redcar & Cleveland Borough Council for the Local Plan Scoping Report. The report sets how the consultation was undertaken and provides a summary of the issues raised.

The consultation was also carried out in accordance with the Council's Local Plan Statement of Community Involvement which was adopted in July 2014.

#### **Bodies Consulted**

Comments on the Scoping Report were sought during a 6 week period from July 2015 to August 2015. Over 2,500 letters and emails were sent out to the statutory consultees, individuals and organisations on the Council's Local Plan consultee database inviting them to comment on the Scoping Report.

Consultees ranged from statutory consultees, such as English Heritage, the Environment Agency and Natural England, to town and parish councils, community groups and interested local residents.

A Scoping Report for the Sustainability Appraisal was also prepared and was subject to consultation. Consideration of the comments received has been carried out separately as part of the concurrent sustainability appraisal process.

## Publicity

Emails and letters advertising the consultation on the Scoping Report were circulated to those on the planning consultee database.

A press release was issued publicising the opportunity to make comments. The consultation was also publicised on the Council's website, and the document was made available to view at Redcar & Cleveland House and at each library in the Borough.

## Responses Received

A total of 52 responses were received to the consultation providing 248 comments.

All of the comments received have been considered and taken into account in developing the Draft Local Plan.

## Summary of the issues raised in the consultation

The consultation responses highlighted a number of key issues, which have been taken into account when developing the Draft Local Plan. All the comments received can be viewed on our consultation portal at [www.redcar-cleveland.gov.uk/localplan](http://www.redcar-cleveland.gov.uk/localplan). Table 1 sets out the number of comments made on each chapter of the Local Plan Scoping Report.

**Table 1 Number of Comments Received by Section**

<b>Local Plan Scoping Report Section</b>	<b>Number of Issues Raised</b>
Introduction	29
Key Principles	18
Vision, Objectives and Themes	6
Sustainability and Design	42
Local Spatial Strategies	21
Regeneration	6
Economic Development	29
Housing	48
Natural Environment	28
Historic Environment	12
Transport and Accessibility	8

The following provides a summary of the issues raised in each chapter of the Local Plan Scoping Report:

### Chapter 1 Introduction

- It was suggested that greater emphasis on improving health should be incorporated into the Local Plan.
- It was proposed that a process is agreed to embed screening for health impact on all the policies and strategies that support the delivery of the plan. This could be aligned to the current arrangement for equality impact assessment in order to avoid duplication of efforts.
- The Infrastructure Delivery Plan (IDP) should, where necessary, identify green infrastructure required to mitigate the adverse impacts of development upon.
- The IDP should deliver the strategy for environmental protection and enhancement.
- Natural England welcomed the reference to identifying opportunities to work with 'the Tees Valley Local Nature Partnership to strengthen planning for biodiversity and identify potential 'Nature Improvement Areas'.
- Natural England noted they have published the North York Moors and Cleveland Hills National Character Area (NCA) Profile and Tees Lowlands NCA Profile. These documents should assist in determining landscape capacity and the distribution of development within the Borough.
- Skelton Farming Limited support the Council's general approach towards the regeneration priorities in Skelton.
- Taylor Wimpy advised that the duty to cooperate and addressing cross boundary issues should be at the heart of the plan making process and, as such, details of how the Council has engaged with neighbouring authorities and relevant bodies in the formation of the Draft Local Plan must be provided at an early stage.

## **Chapter 2 Key Principles**

- The Health Improvement Commissioning Lead recommended including a statement about both improving health (overall) and reducing health inequalities.
- Natural England recommended that the objectives within the Biodiversity Action Plan, Local Nature Partnership, National Character Areas, Rights of Way Improvement Plan and Green Infrastructure Strategy should be taken into consideration.
- Persimmon Homes suggested the Council could make a bold statement by including a principle about delivering the necessary levels of housing to meet the current and future housing requirements of its residents.
- In terms of spatial differentiation, the RSPB advised that reference should be made to the natural environment, particularly designated and protected sites and ecological networks.

## **Chapter 3 Vision, Objectives and Themes**

- A number of comments expressed support of the proposed vision and approach, and key outcomes and priorities including Northumbrian Water Ltd. and Natural England.
- The New Marske Residents Association advised that some primary school children are already having to be bussed in and out of Schools away from their home areas and think that increased development will acerbate this problem.
- A number of health colleagues advised that Health and wellbeing should be a cross cutting theme.
- Historic England wishes to see the protection of the borough's historic environment reflected in the Vision and Objectives for the Plan.

- Cllr David Walsh request that the strategic initiative from the NHS and Public Health England, which seeks to bring the issue of health and wellbeing into the land use planning framework, be taken into account and suggest that the issues of health, well-being and the need to tailor our existing and new communities to meet the demographic challenges of the increasing number of elderly people should be included as a priority.

## **Chapter 4 Sustainability and Design**

- It was recommended that the Council adopt a CIL.
- A number of developers expressed concern on the adoption of a Community Infrastructure Levy, which may place unjustified and significant burdens upon development and prevent the delivery of new homes.
- The Environment Agency advised that the plan should ensure that groundwater is protected and where necessary improved during regeneration and development. The plan should also reflect contaminated land matters.
- The Environment Agency advised that in order to reduce surface run-off, the plan should include references to the Tees Valley Authorities Local Standards for Sustainable Drainage document
- The Environment Agency advised that the plan should plan for flooding and coastal erosion.
- The plan should include a policy/section in relation to flood risk. This should seek to ensure that development is located away from areas at risk of flooding and flood management measures are included with the development to ensure flood risk in the surround areas is not increased.
- Environment Agency recommends that the Strategic Flood Risk Assessment is used to determine the baseline conditions for the Sustainability Appraisal. The Catchment Flood Management Plan and Surface Water Management Plan should also form part of the evidence base.
- The Environment Agency advises that the impacts of climate change should be taken into account. In particular, it should identify where climate change is expected to increase flood risk. Would also welcome the inclusion of policies which promote the use of SuDS and de-culverting.
- A number of local respondents thought that onshore wind turbines should only be allowed on designated brownfield sites, well away from homes.
- Natural England recommended including criteria for selecting development sites with the least environmental value.
- Natural England advised that design policies should include criteria which encourage the incorporation of natural greenspace within development sites, especially within identified wildlife/GI corridors. Habitats created should be determined through the relevant Biodiversity Action Plan.
- A number of developers recognised that whilst the requirement for “good design” is a key component of sustainable development, it is important to set realistic and not overly prescriptive requirements. They also supported the Council’s approach to removing any policy requiring additional energy savings on top of Building Regulation requirements.
- A number of developers advised that the Council must review Development Limits.
- Developers advised that the Council must put in place a flexible criteria based policy mechanism 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 short of meeting the Borough’s objectively assessed housing requirements.

- The Mobile Operators Association considered it important that there is a specific telecommunications policy within the emerging Local Plan.
- The RSPB suggested that specific reference is made to protected sites and ecological networks and due regard to them is embedded appropriately within relevant policies in order to maximise nature conservation benefit.
- Cllr Ann Higgins disagreed with the categorisation of areas i.e. Lazenby as a conurbation area. It should be within the Villages category.
- Cllr Ann Higgins advised that to create sustainable communities, the Council needs to be inward looking and regenerate existing communities, centres and town centres
- The Highways Agency supported maintaining a policy that establishes a strategic approach to the location of development and directs growth to the most sustainable locations.
- The NFU believes farming can play a key role in meeting the Government's renewable energy targets.
- Cllr Steve Kay would like to see a policy to direct wind turbine developments to brownfield sites.

### **Chapter 5 Local Spatial Strategies**

- A number of respondents thought that the spatial strategies need to be retained while a number of people thought they should be reviewed.
- A number of respondents thought that the "green-wedge" between Saltburn and Marske must be protected.
- Taylor Wimpey does not consider that spatial strategies are necessary and do not achieve anything unless the Council are specifically allocating land for future development in these areas.
- A number of respondents felt that the plan should ensure Marske's separate identity,
- Knight Frank would like to see a spatial strategy created for Marske or emphasis on the area within the Redcar Spatial Strategy.

### **Chapter 6 Regeneration**

- The Woodland Trust would like to see the Local Plan encourage planting of trees and woods in other areas of the borough as a key part of regeneration.
- York Potash Ltd would like to the plan make specific reference to the York Potash project and recognise the benefits to the local economy.

### **Chapter 7 Economic Development**

- The Strategic Retail, Leisure and Office Study is out of date and needs updating.
- Guisborough Town Council thought that the number of food outlets and takeaways in town centres should be restricted.
- The hot food policy needs to remain. However it could be amended to restrict additional takeaways further.
- A number of developers are pleased that the Council intends to merge as many of the existing policies related to Economic Development as possible.
- The delivery of new housing within the borough should be viewed positively in terms of economic development and included as a priority within the Plan.
- Guisborough Town Council recommended that the provision of more tourist accommodation to be encouraged.

- The RSBP noted that much of the Tees Estuary supports internationally and nationally important populations of waterbirds and, as such, the plan must ensure that the integrity of this network of sites is protected and, ideally, enhanced.
- The Theatre's Trust advised that to reflect the NPPF, the replacement policy to Policy CS19 needs to clarify what is meant by the term 'community facilities' to ensure it includes cultural uses, as they are not provided for within the text of the current policy. The policy will also need to be strengthened to safeguard existing community facilities.
- Gladman is supportive of the Council seeking to deliver an aspirational level of sustainable economic growth to help deliver regeneration in the borough. This growth should reflect the aspirations of the Local Enterprise Partnership as well as the Council's Regeneration Masterplan.
- The NFU supports the proposal to support the expansion of existing rural businesses.

## **Chapter 8 Housing**

- Several developers advised that the only way to improve affordability is to provide housing. If the evidence base suggests that a certain level of affordable housing is required and the Council are not seeking to address this through the Plan then the affordability gap will only get worse. Local Plan housing requirements should, therefore, reflect the full need for affordable housing provision as required by paragraph 47 of the Framework if addressing affordability is to be achieved.
- Young people aged 25yrs to 35yrs are leaving the villages to seek employment but also because affordable 1 to 2 bedroomed homes are limited and they are forced to leave their villages.
- A clear policy on using brownfield sites for further housing development before considering further greenfield build should be included.
- A policy on returning unoccupied properties in High Streets to residential use needs to be in place.
- The housing supply needs to reflect the ageing population too and consider 'Homes for Life' housing.
- A number of respondents expressed concern about building more large scale housing developments in Redcar, Guisborough or Marske.
- A number of local residents thought that house building should be kept at an absolute minimum.
- St Hilda's Church site - virtually all of the previous green spaces in this part of Redcar has now been built upon; this should be retained as open space.
- More bungalows and retirement homes for those who want to downsize are required.
- A number of developers would like to make clear that as part of any review of Development Limits, so to should there be a review of the existing 'Green Wedge' designations.
- Developers recommended that following years of persistent under delivery it is important that the Council removes all obstacles to the delivery of new housing within the borough over the plan period.
- The Home Builders Federation (HBF) agree that a district wide 'one size fits all' density target is neither appropriate nor desirable due to the variations in character and circumstances between sites and locations.
- How Planning disagree with the suggestion that the NPPF continues to place priority on the development of previously developed land. The NPPF simply

supports the development of sustainable sites regardless of their previously developed status.

- The HBF recommends including additional sites to provide a 20% supply buffer.
- The HBF does not support phasing of development as this is considered contrary to the NPPF and to the successful delivery of housing.
- The HBF advises that it is important that any housing mix policies retain sufficient flexibility to enable developers to respond not only to the specific characteristics of individual sites and their setting but also prevailing market conditions.
- The Council must obtain an understanding of its full OAN before establishing a housing requirement.

## **Chapter 9 Natural Environment**

- To promote tourism throughout our rural area it is essential to maintain Green Wedges between the villages of East Cleveland and the larger towns. Guisborough in particular has now increased in size to the extent that it is losing much of its previous rural charm.
- The Environment Agency advised that policies which promote appropriate green infrastructure in new development, particularly in Redcar, should be included.
- The Local Plan should contain a specific policy which protects European designations (notably the Teesmouth Cleveland Coast SPA and North York Moors SPA/SAC).
- Natural England would expect the Local Plan to demonstrate how public access and enjoyment of the coast will be improved and support creation (or evolution) of the England Coastal Path and manage coastal change.
- Taylor Wimpey would not support a policy which is restrictive and affords unnecessary levels of protection to all landscapes as this would be contrary to the NPPF.
- Guisborough Town Council want to see the open spaces, playing fields and sports grounds in the town protected.
- The RSPB is concerned about the apparent lack of positive planning in relation to landscape scale conservation and ecological networks and their importance for nature conservation.
- Cllr Ann Higgins highlighted the need to keep the Eston Recreation Ground as an open space facility.
- Cllr Ann Higgins recommended doing more to protect the Eston Hills.
- The Woodlands Trust would like to see separate policy on trees and woodland within the Natural Environment Section.
- A number of developers advised that it is not appropriate to include development limits in the plan.

## **Chapter 10 Historic Environment**

- The positive strategy for the historic environment should be derived from a clear understanding of the issues specific to the borough.
- The plan should set out the approach the Council intends to follow to address heritage at risk.
- Cllr Ann Higgins recommended including further protection of the Eston Hills.
- North East Archaeological Research Ltd advised that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

## Chapter 11 Transport and Accessibility

- It was advised that to reduce traffic chaos on the major routes, it is essential that public transport adequately serves the public, particularly in the smaller villages and on estate roads.
- Natural England expect a specific policy to support the creation and maintenance of the current and future route of the National Trail around the coast. They would also encourage the Council to secure a coastal access route on the seaward side of development so that it affords sea views.
- North Yorkshire County Council requested to see that cross boundary traffic movement has been addressed.
- Cllr Ann Higgins advised that public transport cannot currently accommodate new development. Public Transport across the borough needs to be a priority.
- There are significant differences between different communities in Redcar and Cleveland in terms of ability to access public transport and main A roads.
- Redcar, Marske and Saltburn have good access to the A66 via the A174. There is also a rail link.
- Guisborough and East Cleveland have no rail link and Guisborough has very poor access to A66, A174 and A19.
- Access by road to Middlesbrough from the south is affected by developments in Nunthorpe and Marton and Great Ayton which are neighbouring Local Authority areas. Any further development in any of these areas should be limited until road infrastructure is addressed.