

# **Middlesbrough Draft Local Plan**

Report of Consultation

December 2024

## 1 Introduction

In February 2024, the Council published a Draft Local Plan as the second stage in the preparation of a new Local Plan. The purpose of the document was to gather views from the public and stakeholders on the Council's draft policies. The document was intended to be a discussion document. Views from stakeholders and the public were sought from 1<sup>st</sup> February 2024 to 15<sup>th</sup> March 2024.

This report provides a summary of the consultation undertaken on the Middlesbrough Draft Local Plan. It sets out how the consultation was carried out, including details of how it was promoted and the materials which were made available, and identifies the issues that were raised and the Council's response to these. In doing so, this report demonstrates how this consultation and the comments received have informed the development of the publication version of the Local Plan.

The consultation was carried out in line with the agreed Consultation Plan, and also in accordance with the Council's Local Plan Statement of Community Involvement which was adopted in March 2020. Although it wasn't a statutory consultation, the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 have also been taken into account in the undertaking of the consultation and this associated report.

## 2 Background

The commencement of work on a new Local Plan was formally agreed by the Council in September 2022. The first stage was the production of a Scoping Report (Regulation 18), on which a consultation was undertaken in December 2022 to January 2023. The representations received during this consultation helped inform the development of a Draft Local Plan document. A period of public consultation was undertaken on the Draft Local Plan between February and March 2024.

## 3 Details of Consultation

The Draft Local Plan consultation ran for a period of six weeks between 9am on 1<sup>st</sup> February 2024 and 5pm on 15<sup>th</sup> March 2024.

The following documents were made available on the Council's website and at Middlesbrough House:

- the Draft Local Plan (January 2024);
- the Draft Local Plan Policies Map and its associated Town Centre inset Map; and
- the Draft Local Plan Sustainability Appraisal.

The Draft Local Plan and the Draft Local Plan Policies Map and its associated Town Centre inset Map, were also made available in all Libraries and community hubs.

## 4 Who was invited to make comments?

A total of 2940 letters and emails were sent out directly to the statutory consultees, individuals and organisations on the Council's Local Plan consultee database inviting them to comment on the Draft Local Plan. Consultees included statutory consultees, such as National Highways, Historic England, the Environment Agency and Natural England, parish and community councils, community groups, interested local residents and land owners, developers and other with an interest in land. Letters

were also sent to residents adjoining housing allocations to inform them of the consultation. (A copy of the letter can be viewed in Appendix 2).

## 5 How the consultation was publicised

The consultation was publicised on the Council's website (See website text in Appendix 3), and the Draft Local Plan document was made available to view at Middlesbrough House and at all libraries and community hubs in Middlesbrough. Notices were also placed on nearby lamp-posts and/or fencing on or close to the boundary of all proposed housing development sites identified in the Draft Local Plan document (See Appendix 4 for example site notice). The site notice contained a QR code which could be scanned and linked directly to the consultation on the Council's website.

A press release (See Appendix 5) was issued by the Council, and this resulted in articles in the Evening Gazette and on the BBC news website (See Appendix 6). In addition, the consultation was publicised on the Council's social media channels including Facebook and Twitter (See attached in Appendix 7). The Council webpage also included a series of Frequently Asked Questions (FAQs) in Appendix 8 to assist with understanding the Draft Local Plan and how to respond to the consultation.

## 6 Drop in events

A number of drop-in events were hosted across the borough, the details of which can be seen below.

<b>Middlesbrough Draft Local Plan Consultation – Drop-in Events</b>		
<b>Venue</b>	<b>Date</b>	<b>Time</b>
<b>Langdon Square Community Centre</b> , Langdon Square, Coulby Newham TS8 0TF	12/02/2024	3:00 pm – 6:00 pm
<b>Old Fire Station</b> , Town Hall, Albert Rd, Middlesbrough TS1 2QJ	12/02/2024	4:00 pm – 7:00 pm
<b>Acklam Green Community Centre</b> , Stainsby Road, Acklam TS5 4JS	13/02/2024	3:00 pm – 6:00 pm
<b>North Ormesby Community Hub and Library</b> , Derwent Street, North Ormesby, TS3 6JB	14/02/2024	2:00 pm – 5:00 pm
<b>Thorntree Community Hub and Library</b> , Birkhall Road, Thorntree TS3 9JW	14/02/2024	2:00 pm – 5:00 pm
<b>Easterside Community Hub and Library</b> , Broughton Avenue, Easterside TS4 3PZ	15/02/2024	2:00 pm – 5:00 pm
<b>Hemlington Community Hub and Library</b> , Crosscliff, Hemlington TS8 9JJ	15/02/2024	2:00 pm – 5:00 pm
<b>Stainton and Thornton Memorial Hall</b> , Strait Lane, Stainton TS8 9BB	16/02/2024	3:00 pm – 6:00 pm
<b>Acklam Community Hub and Library</b> , Acklam Road TS5 7AB	19/02/2024	2:00 pm – 5:00 pm
<b>St Margaret's Church</b> , The Oval, Brookfield TS5 8ET	20/02/2024	3:00 pm – 6:00 pm
<b>Grove Hill Community Hub and Library</b> , Bishopton Road, Grove Hill TS4 2RP	21/02/2024	2:00 pm – 5:00 pm
<b>Neptune Centre</b> , Ormesby Rd, Berwick Hills TS3 7RP	21/02/2024	2:00 pm – 5:00 pm

<b>Marton Community Hub and Library</b> , The Willows, Marton TS7 8BL	22/02/2024	2:00 pm – 5:00 pm
<b>Newport Community Hub and Library</b> , St Paul's Road, Middlesbrough TS1 5NQ	22/02/2024	2:00 pm – 5:00 pm
<b>Nunthorpe Methodist Church</b> , Connaught Rd, Nunthorpe TS7 0BP	23/02/2024	3:00 pm – 6:00 pm
<b>Linthorpe Community Centre</b> , Linthorpe Road, Middlesbrough TS5 6JG	26/02/2024	3:00 pm – 6:00 pm
<b>Marton Community Centre</b> , Cypress Road, Marton TS7 8PZ	27/02/2024	4:00 pm – 7:00 pm

The drop-in sessions provided an opportunity for members of the public to find out more about the Draft Local Plan and the consultation. The events were attended by Council officers, the Executive Member for Regeneration and the Executive Member for Environment. Physical copies of the Draft Local Plan and Policies Map were available to view, as well as a series of display boards which summarised the Draft Local Plan and provided details on how to submit any comments. These display board are included in Appendix 9. During the drop-in events officers were available to provide any further information and answer any questions or queries. These events were well attended by residents and local businesses.

## 7 Member Briefings

A briefing for all Members of the Council was held before the consultation commenced and the Executive Member for Regeneration offered to meet with all Members individually, or as groups of members on a ward by ward basis to discuss their issues/concerns in relation to the Draft Local Plan and what local issues they wanted to see addressed by the Local Plan. A series of meetings were held for most wards, typically involving the Executive Member for Regeneration, Council officers and the relevant ward members.

## 8 Methods of Response

Comments could be submitted via an online form on the Council's website. A downloadable version of this form was also made available. Comments could also be submitted via email or post.

## 9 Summary of Representations Received

During the consultation, 4122 comments were received from a total of 2136 respondents. They included responses from statutory consultees including Historic England, the Environment Agency, Natural England and National Highways. In addition, four petition style responses were received.

## 10 Summary of Issues Raised

All comments received have been considered by officers. A summary of the issues raised in relation to each chapter/policy has been included in Appendix 1, this also includes Council's response to the responses. This summary has been restricted to matters that are material planning considerations all comments have been anonymised. The summary includes whether the response has been made by a statutory or general consultee, the Council's response to the matters raised and if this has led to any changes in the Publication Local Plan.

Comments were also received on the Sustainability Appraisal which accompanied the Draft Local Plan. These comments have been taken account of during the preparation of the Sustainability Appraisal of the Publication Local Plan.

## 11 Summary of changes to the Publication Local Plan

As a result of the consultation, policy changes and updates to the local plan evidence base, a number of changes have been made to the Publication Local Plan. The significant changes include:

- Revisions to the Local Plan Vision
- Amendments to the strategic objectives, in particular to include reference to climate change
- Introduction of a new Policy ST2 Spatial Strategy
- Further detail in Policy ST3 Middlesbrough Development Corporation
- Removal of Cargo Fleet (EC2.5) from EC2 employment locations
- Inclusion of detailed policy EC5, for the regeneration of Gresham
- Inclusion of new housing allocation HO4r Wood Street
- Removal of Teessaurus Park as a site for Gypsy and Traveller accommodation
- Inclusion of a new site at Cannon Park for Gypsy and Traveller accommodation
- Inclusion of new policy on the approach to Biodiversity Net Gain and Climate Change
- Inclusion of new policies in the Historic Environment on archaeology HI4 and Stockton and Darlington Railway HI5.

## 12 Duty to cooperate and joint working arrangements

In 2011 the Localism Act introduced the duty to cooperate in relation to planning of sustainable development. The duty to cooperate places a legal duty on local planning authorities, and other public bodies to engage on strategic cross-boundary matters in a meaningful way.

The Council has taken this duty on board and works closely with other local authorities within the Tees Valley, and other duty to cooperate bodies such as the Historic England, Natural England and National Highways.

In preparing the Draft Local Plan document, officers had regular meetings with the rest of the Tees Valley Local Planning Authorities, both as a group and on an individual basis. In addition, as part of the consultation on the Draft Local Plan, meetings were held with a number of Duty to Cooperate bodies. Further details of these discussions are contained within the separate Duty to Cooperate Statement.

## 13 What happens next?

The next stage in the process involves preparing the Publication Local Plan. The Publication stage forms part of the formal plan-making, where the draft planning policies should be fully formed. As part of the formal plan-making process the Publication Local Plan - will be subject to a further six-week public consultation process, where formal representations will be sought on matters concerning legal compliance and soundness. Following conclusion of the publication period, the Plan will be submitted to the Secretary of State for Independent Examination.

## **Appendix 1 Summary of Issues Raised**

## Chapter 1 – Introduction

Summary of issues raised	Statutory or general consultee	Response
There is no evident identification of the transport evidence base that has been used to inform the development of the Plan and define policy and infrastructure requirements.	Statutory	There is a list of all the evidence base documents that have been used to inform the development of the Local Plan on the website and the Publication Local Plan has been updated to include reference the key evidence documents.
Clarification is required regarding the geographic extent of Local Plan. It's relationship to the town centre and Middlehaven, where the MDC are the decision-making authority, should be clarified.	Statutory	Text amended to clarify that Local Plan covers all of the Middlesbrough Local Authority area, including the area of the town centre and Middlehaven where the MDC are the local planning authority for decision-making.
To accommodate any potential delays in the adoption of the Local Plan, and also assist in the effective long-term planning of larger scale developments, the plan period should be reviewed and amended to comfortably cover the minimum 15-year period required.	General	Consider plan period to 2041 is sufficient to ensure 15 year period following adoption of the Local Plan.
It is stated that 'the issues being faced now were significantly different to those the Local Plan has previously been seeking to address' however these are not identified and explained.	General	Text amended.
<p>A number of responses were received in relation to the evidence base:</p> <p>The evidence base is not clearly identified.</p> <p>Documents in the evidence base are not up to date. In particular, comments stated that evidence on housing and the historic</p>	General	<p>There is a list of all the evidence base documents that have been used to inform the development of the Local Plan on the website and the Publication Local Plan has been updated to include reference the key evidence documents.</p> <p>The evidence base is subject to ongoing update and review. There is a list of all the evidence base</p>

<p>environment were not up to date.</p> <p>A complete, up-to-date evidence base needs to be made available at earliest opportunity.</p>		<p>documents that have been used to inform the development of the Local Plan on the website and the Publication Local Plan has been updated to include reference the key evidence documents.</p>
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## Chapter 2 – Strategic Objectives and Vision

Summary of issues raised	Statutory or general consultee	Response
The protection and enhancement of the natural environment could be strengthened within some of the strategic objectives. Indeed, as part of an objective, it was recommended that a specific reference should be to protecting and enhancing the natural environment.	Statutory	Objectives have been amended to reflect response.
To better align with the ambitions of Biodiversity Net Gain and the 25 Year Environment Plan, the creation of Green and Blue Infrastructure could be included in Objective E.	Statutory	Objectives have been amended to reflect response.
The importance of contributing towards climate change mitigation, and the protection of the natural environment and designated Green and Blue Infrastructure sites, could be included in the vision.	Statutory	The Local Plan Vision has been amended to reflect the response.
Middlesbrough's role in assisting the North East Housing crisis should be included within the vision	General	Middlesbrough's role in addressing housing issues is considered to be adequately referenced throughout the plan including in the Vision.
The vision should explicitly identify the alleviation of deprivation and poverty as a goal. In addition, particular areas of deprivation and poverty should be identified and monitored over the medium to long term.	General	Local Plan Vision has been amended to include reference to the alleviation of deprivation and poverty.
The role of development in facilitating community safety should be highlighted.	General	Not considered appropriate to amend the Vision. This matter is dealt with in the Creating Quality Places chapter of the Local Plan.
The relationship between Middlesbrough Council and the MDC, and how this will facilitate the realisation of the plan, should be included in the vision and strategic objectives.	General	The supporting text to policy ST3 addresses the relationship between the Council and the MDC.
The evidence base is not up to date.	General	The evidence base is subject to ongoing update and review. There is a list of all the evidence base documents that have been used to

		inform the development of the Local Plan on the website and the Publication Local Plan has been updated to include reference the key evidence documents.
The vision does not take into account the climate crisis	General	Vision has been amended to reference climate change.
It is not clear which strategic objective would cover the protection and enhancement of valued landscapes. This should be expressly included in the appropriate objectives.	General	The strategic objectives have been reviewed and updated, landscape is covered by Objective E and it is unnecessary to reference every issue in these objectives. This is also addressed through updates to Chapter 6 Natural Environment, in particular policy GR1.

## Policy ST1 – Development Strategy

Summary of issues raised	Statutory or general consultee	Response
A point should be added to the policy to ensure that development is directed away from areas of increased flood risk (Flood Zone 2 and 3).	Statutory	Policy has been amended to reflect response.
For point e., specific references to the ‘water environment’ and the benefits to biodiversity and/or wildlife would provide clarity and strengthen the policy.	Statutory	Policy has been amended to reflect response.
Climate change is strongly tied to the biodiversity crisis and point i. should therefore be amended to acknowledge this.	Statutory	Policy has been amended to reflect response.
Point a. could be worded more positively, aiming to not only minimise the impact on the environment, but also, wherever possible, to result in an enhancement.	Statutory	Policy has been amended to reflect response.
One respondent stated that, in conformity with paragraphs 123 and 124 of the National Planning Policy Framework, recognition should be given to the Government’s commitment to	General	A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council’s approach to selecting and prioritising sites for development.

<p>redevelop brownfield and vacant sites.</p> <p>Similarly, numerous other responses suggested that priority should be given to the use of brownfield sites over greenfield. In particular, the prioritisation of house building on brownfield sites, such as the town centre, was raised.</p>		
<p>The focus on urban living should require that housing development on brownfield sites is located close to existing amenities.</p>	<p>General</p>	<p>Point j. of Policy CR2 will require development to be served by adequate infrastructure, services, and community facilities, either existing, improved, or new.</p>
<p>Emphasis should be placed on the provision of social housing rather than private housing.</p>	<p>General</p>	<p>Policy HO5 sets out the Council's approach to affordable housing.</p>
<p>A number of responses stated that existing green and blue spaces, including trees and woodland, should be protected from development.</p> <p>Additionally, a respondent suggested that recognition and protection should be given to the vital habitats that green and blue spaces provide.</p>	<p>General</p>	<p>Policy GR1 gives protection to existing green and blue infrastructure. Policies GR2, GR3, GR4, GR5 and GR6 protect different types of open space and this protected open space is shown on the Local Plan Policies Map.</p> <p>Biodiversity net gain is addressed through a new Policy GR7.</p>
<p>There is no specific reference to habitat or biodiversity protection and enhancement for its own sake.</p> <p>In addition, another response specifically identified that a criterion should be added to the policy regarding the protection and enhancement of valued landscapes, sites of biodiversity or geological value, and soils.</p>	<p>General</p>	<p>Policy has been amended to reflect response. It not considered appropriate to refer to landscape and soils within this policy.</p>
<p>Figures on the cost of development and expenditure to implement them are not included</p>	<p>General</p>	<p>It is not appropriate to provide this level of detail in a Local Plan. A Viability Assessment and Infrastructure Delivery Plan have been produced to accompany the Publication Local Plan.</p>

		Policy CR4 will require developer contributions to fund necessary infrastructure and other community benefits that are required as a result of proposed developments.
The policy is written as a statement of ambitions and is not effective or justified. It should be re-written to be clear and evident how a decision maker should react to development proposals, avoiding unnecessary duplication.	General	It is not considered necessary to amend the policy.
In the absence of a Middlesbrough Design Code, the 'Building for a Healthy Life' design toolkit should be signposted.	General	Design matters are dealt with in the Creating quality Places chapter.  Middlesbrough Council is committed to good quality design and we have a Design SPD along with a series of site specific masterplans and design guidance. We will consider preparation of a borough wide design code following the adoption of the Local Plan.
Economic growth needs to be accompanied with housing growth. This needs to be recognised and clearly identified in the policy.	General	Economic and housing growth are considered to be adequately reflected in this policy and throughout the Local Plan.
It was suggested that there may be a greater need to deliver family housing, which would support economic growth by helping retain economically active sections of the community, and that this should be recognised.  On the other hand, a different response suggested that residents of Middlesbrough need bungalows, flats, and smaller houses.	General	Detailed housing requirements are dealt with in the Housing Development Chapter which is supported by our evidence base. It is not considered appropriate to include details within this policy.

<p>There should be a stronger presumption in favour of development.</p>	<p>General</p>	<p>The NPPF establishes a presumption in favour of sustainable development. The Council believes that the Plan accords with the NPPF and the provisions it sets out for applying a presumption in favour of sustainable development in plan-making.</p>
<p>Concerns were raised that new development, particularly housing, will lack appropriate infrastructure such as schools, doctors, and shops.</p>	<p>General</p>	<p>The Publication Local Plan is supported by an Infrastructure Delivery Plan (IDP). The IDP will help ensure that new development is supported by appropriate infrastructure.</p> <p>Point g. of Policy ST1 aims to deliver appropriate infrastructure to support development. This is supported by other policies in the Plan, including GR1 and those in chapter 7. Housing allocation policies also identify the provision of infrastructure such as schools and local centres, where appropriate.</p> <p>It should also be noted that Policy CR4 will require contributions from developers. These will fund necessary infrastructure and other community benefits required as a consequence of development.</p>
<p>Priority should be given to large, green open spaces that can be utilised by the residents for recreation.</p>	<p>General</p>	<p>Point f. of the policy seeks to ensure that the provision and protection of high quality, integrated and connected green and blue spaces. This is supported by other policies in the Plan including those in the Natural Environment Chapter. Policy GR3 seeks to protect existing open space. Policy GR4 outlines that, where possible, new development should provide new open space. Requirements to provide open space are also identified in policies relating to specific housing allocations in chapter 5 Housing Development.</p>

## Policy ST2 – Middlesbrough Development Corporation Area

Summary of issues raised	Statutory or general consultees	Response
The policy should ensure that development is located away from areas at high risk of flooding (Flood Zones 2 and 3). In addition, where development is located near watercourses or flood zones it should be resilient to climate change.	Statutory	Flood risk is covered in the Natural Environment Chapter in Policy NE10. It is not considered necessary to include a reference to flood risk in this policy given its strategic nature, however Policy EC4 Middlehaven has been updated in relation to flood risk.
To ensure that development does not increase flood risk elsewhere, there should be an aim to ensure that flood risk is reduced overall.	Statutory	Given the strategic nature of the policy it is not considered necessary to address flood risk within the Policy. Policy NE10 on flood risk and water management is considered to adequately address this issue.
The policy does not set out any criteria regarding the protection and enhancement of biodiversity and geodiversity.	Statutory	Given the high level and strategic nature of the policy it is not considered necessary to address biodiversity and geodiversity within the Policy. Biodiversity and Geodiversity are address in the Natural Environment Chapter including in Policies NE1, NE5, NE6 and NE7.
As the MDC is not the plan-making authority, the MDC Design Code would have limited weight as a material consideration.	Statutory	Policy has been amended.
The policy should provide an overarching objective for the management of the historic environment and reference its 'conservation and enhancement'.  Moreover, there should be detailed guidance on the conservation and enhancement of the historic environment in the MDC area.	Statutory	Given the high level and strategic nature of the policy it is not considered necessary to address management of the historic environment within the Policy. Management of the historic environment is covered in Chapter 8 of the Local Plan and within specific policies for the Middlesbrough Development Corporation (MDC) are including EC4 Middlehaven and the Town Centre policies.
There is a lack of site-specific allocations for the 1,500 new homes proposed, with a significant proportion of the housing supply	General	The Policy has been amended to include details of site allocations and additional Policies EC5 Gresham and HO4r Wood Street

<p>reliant upon unallocated windfall sites.</p> <p>The contribution of windfall sites should not be relied upon and included in housing supply. Inclusion in the supply would require an evidence base that demonstrates there is sufficient available and deliverable land for the 563 windfall dwellings.</p>		<p>have also been included within the Publication Local Plan. Unallocated windfalls only make up a small number (96) of the 1500 new homes proposed in the MDC area.</p>
<p>Concerns were raised by multiple respondents that the development of homes in the MDC area may be challenging.</p> <p>It is suggested that the area has characteristics (i.e. brownfield, town centre and regeneration sites, an existing housing market that is weak) which may present challenges in terms of viability and technical constraints. Evidence is therefore required to demonstrate that the delivery of homes in the MDC area is achievable and deliverable over the plan period.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024). This assessment has considered the viability of sites within the Local Plan. Policy ST3 has been amended to provide further detail on sites in the MDC area.</p>
<p>To be considered sustainable, and thereby conform with the NPPF, the natural environment should be referenced in the policy.</p>	<p>General</p>	<p>Given the high level and strategic nature of the policy it is not considered necessary to address the natural environment within the Policy. The natural environment is covered by a dedicated Chapter in the Publication Local Plan.</p>
<p>The policy does not refer to the overall Local Plan policies, including housing policies HO1 and HO2. The interrelationship between Policy ST2 and the Local Plan as a whole needs clarification.</p>	<p>General</p>	<p>The Policy has been amended to make clear that the Policies of the Local Plan apply in the MDC area.</p>
<p>The number of homes identified for the Gresham/Union Village has been significantly underestimated. It is suggested that the figures in ST2, and the overall housing supply, are updated to reflect the higher numbers required to secure viable development of the site.</p>	<p>General</p>	<p>Policy ST3 has been amended to reflect these comments, in addition new policy EC5 Gresham has been added to the Publication Local Plan.</p>

<p>Alternately, it is suggested that the policy incorporates greater flexibility to ensure redevelopment of the site is not compromised.</p>		
<p>The policy should identify, that in addition to housing, a mixture of complimentary uses would be considered appropriate.</p>	<p>General</p>	<p>Policy ST3 has been amended to reflect these comments.</p>
<p>The delivery of 1,500 homes in the urban area, and the use of brownfield sites, should be a priority over development of green spaces south of the town centre.</p>	<p>General</p>	<p>A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council's approach to selecting and prioritising sites for development.</p>



## Chapter 3 – Creating Quality Places

### Policy CR1 – Creating Quality Places

Summary of issues raised	Statutory or general consultees	Response
It is not clear how the aspirations to support and promote sustainable and active transport, as outlined in paragraph 3.3, have been used to shape the Plan in an evidenced manner.	Statutory	Active travel is considered throughout the Local Plan and in particular within the infrastructure Chapter which is been developed taking into account the Council's Integrated Transport Strategy.
There is no information provided to justify the selection of sites within the Plan.	Statutory	A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council's approach to selecting and prioritising sites for development.
It would be appropriate for water efficiency measures to be incorporated into policies, such as CR1, that support the creation of new development and places.	Statutory	Policy CR3 has been amended to reflect this comment, it is not considered necessary to amend this policy too.
Masterplans must acknowledge the requirement to minimise the likely impacts of climate change.	General	The Local Plan considers climate change throughout and a new policy on climate change has been introduced. Masterplans would need to take account of the Local Plan when they are prepared.
<p>With regard to paragraph 35 of the NPPF, point e. is not considered sound.</p> <p>Multiple respondents suggested that the Council does not set local standards for development which stray from those set nationally. In particular, one response requested the removal of the reference to 'zero carbon buildings'.</p> <p>Some comments specifically highlighted the December 2023 Written Ministerial Statement on Local Energy Efficiency</p>	General	Criteria h of the policy has been amended to reflect the responses received.

<p>Standards. In summary, the statement sets out that plan-makers are not expected to ‘set local energy efficiency standards for buildings that go beyond current or planned buildings regulations’. Should any planning policies ‘propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation [they] should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’.</p> <p>While some responses therefore suggested that such matters do not need specific policies in the plan, other responses recommended that the policy should reference the ‘latest national guidance’ / Future Homes Standard and Building Regulations as the appropriate standards for development.</p> <p>In addition, some comments suggested that, should an additional planning requirement be set to explore opportunities regarding the delivery of zero carbon homes and/or providing renewable/low carbon energy generation, it must be done on a flexible basis.</p>		
<p>In terms of urban design, the Building for a Healthy Life design toolkit be signposted.</p>	<p>General</p>	<p>Middlesbrough Council is committed to good quality design and we have a Design SPD along with a series of site specific masterplans and design guidance.</p>
<p>With respect to the health and wellbeing of residents, it was suggested that a reference to active travel would strengthen the policy.</p>	<p>General</p>	<p>The Policy has been amended to include reference to sustainable transport modes including active travel.</p>
<p>Well designed buildings and places should incorporate provision for local food growing.</p>	<p>General</p>	<p>Provision for local food growing is made with Housing allocation Policies. Policy CR3 has been amended to include reference to</p>

<p>As a guide, it was suggested that residential on-site food growing should provide 0.9 square meters of space per person.</p>		<p>the GBI checklist which refers to community growing space.</p>
<p>To ensure compliance with paragraph 35b of the NPPF, it was suggested that the policy should be amended to recognise that site specific constraints influence and guide the design of proposals.</p>	<p>General</p>	<p>It is considered that the Local Plan is in conformity with the NPPF, it is not considered necessary to amend the policy.</p>
<p>To ensure the policy is positively prepared and effective, it should set out what scale of development would require a development framework or design code.</p> <p>However, in the same vein, it was recommended that the policy be amended to remove the need to prepare design codes and development frameworks. It was stated that the preparation of design codes and development frameworks would delay new development, significantly impacting the delivery of housing allocations and the Council's five-year housing land supply. Rather than creating numerous design codes and development frameworks, it was suggested that the Local Plan's policies should set out the expected design standards, with new development being required to uphold the standards and principles set out in the National Design Guide, National Model Design Code, and NPPF.</p>	<p>General</p>	<p>The preparation of masterplans, development frameworks and design code are considered appropriate to achieve good design. It is not considered appropriate to identify what scale of development would require a development framework or design code within the Policy as it will differ on a site by site basis.</p>
<p>The policy would be strengthened by a separate criterion requiring development to achieve a minimum of 10% biodiversity net gain. Although it was suggested that the Council should set 'a much more progressive' target, for example 20% on larger sites.</p>	<p>General</p>	<p>Biodiversity Net Gain addressed in the Natural Environment Chapter in Policy NE1 and new Policy NE7 on Biodiversity Net Gain.</p>

<p>The policy is overly restrictive and economic growth should be prioritised by a presumption in favour of development.</p>	<p>General</p>	<p>In line with the NPPF, the Draft Local Plan applies a presumption in favour of sustainable development. In order to achieve sustainable development, paragraph 8 of the NPPF identifies that the planning system has three overarching objectives, economic, social, and environmental. The criteria set out in the policy are deemed necessary in the achievement of these objectives and the delivery of sustainable development.</p>
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## Policy CR2 – General Development Principles

Summary of issues raised	Statutory or general consultee	Response
<p>The rationale for the policy given in paragraph 3.5 could be improved by referencing that development should not result in unacceptable impacts to the environment.</p>	<p>Statutory</p>	<p>The supporting text has been amended to reflect this comment.</p>
<p>With reference to the provisions of the Environment Act 2021 and statutory Biodiversity Net Gain, it was suggested that the removal of ‘wherever appropriate’ from point d. would place greater emphasis on the importance of incorporating ecology and biodiversity features into proposals.</p>	<p>Statutory</p>	<p>Point d of the Policy has been amended to take account this comment.</p>
<p>Point m. should be strengthened to ‘prevent’ noise, air, water and/or land pollution, and include a reference to both groundwater and surface water.</p>	<p>Statutory</p>	<p>Point m of the Policy has been amended to take account this comment.</p>
<p>It is not clear how the aspiration to support and promote sustainable and active transport (e.g. point l.) has been used to shape the Plan in an evidenced</p>	<p>Statutory</p>	<p>A new Policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council’s approach to selecting</p>

<p>manner, with no information provided to just how allocated sites have been selected for development.</p>		<p>and prioritising sites for development.</p>
<p>The policy should include a requirement to minimise impacts from light pollution on the natural environment.</p>	<p>Statutory</p>	<p>The Policy has been amended to include reference to light pollution.</p>
<p>It would be appropriate for water efficiency measures to be incorporated into policies, such as CR2, that support the creation of new development and places.</p>	<p>Statutory</p>	<p>Policy CR3 has been amended to take account of this response, it is not considered necessary to amend this policy too.</p>
<p>To support sustainable development the policy identifies that ‘proposals should demonstrate how they maximise economic benefits, contribution to social inclusion, and minimise detrimental environmental effects’. However, on individual proposals there will be times where one of these ‘strands’ will be the greatest priority. The policy should therefore support proposals that ‘achieve balance in seeking to optimise’ these strands.</p> <p>What’s more, the policy should also seek positive gains to the environment, rather than only avoiding negative effects.</p>	<p>Statutory</p>	<p>The Policy has been amended in response to this comment.</p>
<p>The requirement to accord with the policies of the Plan (point a.) is not necessary and need not be stated within Policy CR2. As drafted, point a. could be considered contrary to planning law, which requires applications to be determined in accordance with the development plan, unless material considerations indicate otherwise.</p>	<p>General</p>	<p>It is considered that the Local Plan is in conformity with the NPPF, it is not considered necessary to amend the policy.</p>
<p>The policy could be developed further, with regard to the requirements of the GBI Strategy and Action Plan.</p>	<p>General</p>	<p>It is considered that the Local Plan adequately addresses the Green and Blue Infrastructure Strategy throughout, it is not necessary to reference it within this policy.</p>

<p>It was suggested that point c. could include allotments and community gardens. The inclusion of a requirement for all major housing and mixed-use developments (incorporating housing) to provide suitable food growing space on-site was also suggested.</p>		<p>Policy CR2 established principles that all development would be expected to adhere to it is not considered appropriate to list all of the different types of protected open space.</p>
<p>The wording of some criteria is overly negative and does not allow for mitigation to offset any potential impacts. It was therefore stated that the policy is not positively prepared, justified, or consistent with national policy.</p> <p>As such, a range of specific amendments to the wording of points b., c., g., and h. was suggested.</p>	<p>General</p>	<p>It is considered that the Policy is in conformity with the NPPF, it is not considered necessary to amend the policy.</p>
<p>The policy's inclusion of the statement 'the existence of poor quality design as a result of previous development will not be accepted as a reason for lowering design expectations in new proposals' was questioned by multiple respondents.</p> <p>Responses stated that development should be permitted to take into account the local context, and that it would be unreasonable to disregard the local context when considering the design expectation of new proposals.</p> <p>It was therefore requested that the statement be removed from the policy in its entirety or, as a minimum, the reference to previous development design quality should be removed.</p>	<p>General</p>	<p>The Council is committed to the promotion of good design. The existence of poor quality design is not a justification for continuing with poor quality development in the future. No amendments are required to the policy.</p>
<p>The policy is not considered to be sound in accordance with paragraph 35 of the NPPF as its wording significantly overlaps</p>	<p>General</p>	<p>The Council is committed to addresses the impacts of climate change, therefore criterion p is considered appropriate to assist</p>

<p>with matters covered by national Building Regulations. It was requested that the wording of the policy is therefore reviewed.</p> <p>Similarly, in relation to point o., another response requested clarity on what the minimum requirements would be. A different respondent suggested that point o. should only require proposals to incorporate energy efficiency measures in line with national policy and building regulations.</p>		<p>with this. It is considered that the Policy is in conformity with the NPPF, it is not considered necessary to amend the policy.</p>
<p>A majority of the requirements set out in the policy are covered by national legislation, national policy requirements, or other policies in the draft Plan. The overlap between point d. and the requirements covered by the Environment Act 2021 was highlighted as an example.</p> <p>It was therefore suggested that the need for the policy be reconsidered and, as a minimum, the requirements covered by national legislation or policy be removed to avoid any unnecessary repetition.</p>	<p>General</p>	<p>It is considered that the Policy is in conformity with the NPPF, it is not considered necessary to amend the policy.</p>
<p>Social Impact Assessments should not be sought for all developments. If they are introduced, they should only be focussed on large urban extensions.</p>	<p>General</p>	<p>Social impact assessments are not a requirement of the Policy. The Policy has been reworded to take account of this response</p>
<p>The Council should ensure that previously developed land is deliverable through viability testing and that a suitable number of greenfield sites are provided.</p> <p>Multiple other respondents suggested that previously developed land/brownfield sites should always be utilised first/in preference to any green space.</p>	<p>General</p>	<p>A range of sites, including both previously developed land and greenfield sites, are allocated in the Plan. In line with the NPPF, the Plan encourages the development of previously developed land. A new Policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council's approach to selecting and prioritising sites for development.</p>

		A Viability Assessment has been prepared to support the Publication Local Plan.
The principles set out in the policy are overly restrictive. There should be an ‘overriding and prioritising’ principle in favour of economic growth and development.	General	In line with the NPPF, the Draft Local Plan applies a presumption in favour of sustainable development. In order to achieve sustainable development, paragraph 8 of the NPPF identifies that the planning system has three overarching objectives, economic, social, and environmental. The criteria set out in the policy are deemed necessary in the achievement of these objectives and the delivery of sustainable development.
The general principles set out in the policy should be more specific around net zero and decarbonisation targets at a local and national level.	General	The Council is committed to addresses the impacts of climate change and has introduced a new Policy on Climate Change.
The Plan is not supported with evidence regarding existing traffic flow and projections on the impact that proposed development would have upon this.	General	The Publication Local Plan has also been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.
A range of specific amendments to existing criteria, or requests for additional criteria, were suggested:  Criterion i. should be expanded to identify that development must not increase flood risk on the site or elsewhere.  Criterion d. should require that, on all greenfield housing allocations, biodiversity net gain is delivered within the extent of	General	The Policy has been amended inline with this response.  New Policy NE7 Biodiversity Net Gain (BNG) sets out the Council’s approach to the delivery of BNG.



<p>the housing allocation and development limits.</p> <p>A criterion should be added requiring development to provide adequate electric vehicle (EV) charge points.</p> <p>A criterion should be added to require all greenfield housing allocation to deliver nutrient neutrality within the extent of the housing allocation and development limits.</p>		<p>Policy IN3 addresses the issue of EV charging points.</p> <p>Policy NE8 sets out the approach to Nutrient Neutrality.</p>
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### Policy CR3 – Sustainable and High Quality Design

Summary of issues raised	Statutory or general consultee	Response
<p>To be consistent with national policy, Policy CR3 should include a criterion which ensures the design of development respects existing site constraints, including utilities infrastructure.</p>	<p>Statutory</p>	<p>It is considered that this issue is addressed by criterion a. &amp; criterion c. No policy amendments required.</p>
<p>It would be appropriate for water efficiency measures to be incorporated into policies, such as CR3, that support the creation of new development and places.</p>	<p>Statutory</p>	<p>The Policy has been amended to take account this response.</p>
<p>There is an opportunity for the policy to reference a district-wide Design Code.</p>	<p>Statutory</p>	<p>Middlesbrough Council is committed to good quality design and we have a Design SPD along with a series of site specific masterplans and design guidance. We will consider preparation of a borough wide design code following the adoption of the Local Plan.</p>
<p>The policy should require development to have regard to the requirements of the Green and Blue Infrastructure Strategy Action Plan, including the identified priority opportunities</p>	<p>General</p>	<p>The requirement for development to have regard to the GBI Strategy Action Plan, including the identified priority opportunities and the GBI checklist for development, is established in criterion i. of Policy NE1 of the Plan. In addition, the</p>

<p>and the GBI checklist for development.</p>		<p>Policy has been amended to refer to the GBI checklist in criterion e.</p>
<p>It was suggested that point b. should be given additional flexibility with the added stipulation of 'where possible and subject to other potential constraint'.</p> <p>One respondent also highlighted the use of the word 'reinforces'. As the term is not defined, and no catchment guidance is provided, they suggest that it is unclear how a development proposal would meet the requirement.</p>	<p>General</p>	<p>It is not considered appropriate to amend the Policy.</p>
<p>The acceptability of a variety of parking arrangements should be instilled into criterion h.</p>		<p>It is considered that policy h. is sufficiently flexible to allow for the provision of a variety of different parking arrangements.</p>
<p>No clear definition is provided with regards to 'sufficient parking' and as such the policy does not accord with paragraph 35c of the NPPF.</p> <p>It should be confirmed whether the parking standards set out in the Tees Valley Design Guide and Specification Document will be taken forward with the new Local Plan, or if alternate parking standards would be adopted.</p> <p>One respondent also suggested that residential development lacked parking, and that greater emphasis should therefore be placed on the provision of adequate parking.</p>	<p>General</p>	<p>Not possible to define sufficient car parking as will be dependent on type of development and its location along with any other local circumstances. No amendments are required to the Plan.</p>
<p>Concerns were raised that elements of the policy overlap with Building Regulations and other national-level guidance. In particular, it was stated that the</p>	<p>General</p>	<p>The Policy is not considered to contrary to building regulations, however a minor has been made to the Policy to provide clarification.</p>

achievement of passive solar energy gains under point l. conflicts with Part S of the Building Regulations.		
Clarity was requested on what is meant by 'sustainable design' in point m. It was suggested the current wording is vague and does not provide sufficient guidance for accordance or monitoring of policy compliance.	General	It is not considered necessary to amend the Policy.
To ensure consistency with national policy, point d. should clarify that a biodiversity net gain of 10% is required.  However, another response highlighted that there should not be unnecessary repetition of national legislation, noting that biodiversity net gain is covered by the Environment Act 2021.	General	New Policy NE7 sets out the Council's approach to Biodiversity Net Gain, no amendments are required to this policy.
With respect to the requirements to submit a Design and Access Statement, the policy is not fully consistent with PPG and should be amended accordingly.	General	It is not considered necessary to amend the Policy is it considered to be in conformity with the PPG.
The requirements set out in policy must be clear and well evidenced. To this point, it was suggested that the Council reconsider the individual requirements of Policy CR3 to ensure they are all clearly defined and in line with PPG.	General	It is not considered necessary to amend the Policy is it considered to be in conformity with the PPG.
In line with paragraph 136 of the NPPF, it was suggested that the policy could be strengthened by a reference to tree-lined streets.  Similarly, it was also suggested that consideration could be given to the creation of soft boundaries (evergreen hedges instead of walls/fences).	General	It is not considered necessary to amend the Policy, Policy NE1 addresses Green infrastructure.
The policy is too restrictive and should be removed.	General	The NPPF established the importance of well-designed buildings and places, identifying it as a key aspect of sustainable

		development. Paragraph 132 of the NPPF identifies that Plans should set out a clear design vision and expectations. The policy will play an integral role in establishing the Councils design vision and expectations, supported by Middlesbrough’s existing Urban Design SPD. As such, the inclusion of Policy CR3 is deemed necessary.
It was suggested that where possible, existing trees should be retained. Additionally, when replacement trees are planted they should be adequately maintained, with a period of at least 10 years suggested.	General	No Policy amendments required.
With reference to the Green and Blue Infrastructure Checklist (Appendix 9 of the Draft Local Plan) and Part 2 of the National Model Design Code, it was suggested that the policy include a requirement that ‘swift bricks should be installed in all new-build developments including extensions’	General	This is considered to be too detailed for this policy the purpose of which is to set out high level design criteria. No policy amendments required.
To be consistent with national policy, Policy CR3 should include a criterion which ensures the design of development respects existing site constraints, including utilities infrastructure.	General	It is considered this representation is addressed by criteria a. and c. of the Policy, no amendments to the policy are required.

## Policy CR4 – Developer Contributions

Summary of issues raised	Statutory or general consultee	Response
While the policy sets out the approach for securing funding necessary for infrastructure, it was queried how the Council intended to identify transport measures at the Plan-making stage and provide certainty over its funding and deliverability.	Statutory	The Publication Local Plan is supported by an Infrastructure Delivery Plan (IDP). By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure

		<p>that new development is supported by appropriate infrastructure.</p> <p>In addition, the Publication Local Plan has also been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>Health infrastructure should be clearly identified as essential. There should be an expectation that, where necessary, proposals will meet the cost of providing health infrastructure made necessary by the development.</p> <p>As well as securing contributions for health and care services required to mitigate the direct impact of demand in areas of significant housing growth, it was stated that the Plan must consider the need to mitigate the cumulative impact of smaller housing growth.</p> <p>It was also stated that the Council must work with the NHS and other partners to forecast the health infrastructure and related costs required to support the planned levels of growth and development. In addition, it was recommended that the Local Plan and supporting evidence base (IDP) should set out the process for determining the appropriate form of contribution towards health infrastructure.</p>	<p>Statutory</p>	<p>The Policy has been amended to reference health infrastructure.</p> <p>The Publication Local Plan is supported by an Infrastructure Delivery Plan (IDP). The IDP will help ensure that new development is supported by appropriate infrastructure. The Council has consulted with the NHS and other related partners to help establish what health infrastructure may be required to support the proposed levels of housing growth.</p>
<p>Multiple responses raised the point that development can only be required to mitigate its own impact. It was stated that</p>	<p>General</p>	<p>The Publication Local Plan is supported by an Infrastructure Delivery Plan (IDP). The IDP will help ensure that new</p>

<p>developers/development schemes cannot be held accountable for addressing pre-existing infrastructure deficiencies and should not be expected to take a disproportionate level of financial responsibility over other sources of potential funding.</p> <p>It was therefore recommended that the updated Infrastructure Delivery Plan (IDP) should clearly identify the existing and known deficiencies in current infrastructure. It should also set out how the cumulative effects of new development would be addressed and/or identify the level of contribution that would be required from new developments.</p> <p>It was also suggested that the policy’s supporting text should be updated to reference the updated IDP and confirm that new development would only be required to mitigate its own impact and not existing deficiencies.</p>		<p>development is supported by appropriate infrastructure. This document will set out existing and known deficiencies in current infrastructure and set out the approach for addressing the cumulative effects of new development of new development.</p>
<p>The Plan is not supported by an up to date Viability Assessment.</p> <p>The policy does not account for potential viability issues associated with development schemes and should be amended to provide flexibility with regards to contributions. It should provide an opportunity for developers and landowners to negotiate contributions where site-specific circumstances present viability risks to the delivery of development.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024). No Policy amendments required.</p>
<p>The policy should include the need for developers to support the aspirations of the Green and Blue Infrastructure Strategy, particularly the provision of communal and individual food growing infrastructure such as allotment space, orchards, landscaping and hedgerows that include plants and</p>	<p>General</p>	<p>The supporting text and Policy CR4 sets out examples of typical matters for which developer contributions will be sought. This list is not intended to be exhaustive, however the policy has been amended to include reference to green and blue infrastructure. As is outlined in the NPPF and PPG, plans should</p>

<p>trees which produce fruit, nuts, or seeds.</p> <p>Similarly, a different response questioned why the policy does not specifically reference a requirement to provide parks, football areas, tennis courts or swimming baths.</p>		<p>be as focused and concise as possible. Subsequently, it is not considered appropriate to reference, for instance, all the specific forms of open space, play, sport, and recreation that the Council may seek development contributions towards.</p>
<p>No guidance is provided on how developer contributions will be calculated, assessed, and kept up to date.</p>	<p>General</p>	<p>Not appropriate to set this out in policy therefore no policy amendments are required.</p>
<p>Some of the requirements set out in the list of example matters for which contributions will be sought would not satisfy the statutory tests set out in regulation 122 and 123 of the Community Infrastructure Levy Regulations 2010 (as amended) and are not considered sound in line with paragraph 35(b) of the NPPF. Specifically, the list's inclusion of contributions for rail improvements and artwork was questioned.</p>	<p>General</p>	<p>The list of examples are considered appropriate and the policy states that this list is not exhaustive. No policy amendments required.</p>
<p>The policy should be worded to allow for the submission of a viability assessment in support of a planning application, if required, which the Council would review and consider when determining what the necessary contribution should be. This would be consistent with paragraph 58 of the NPPF.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>Criterion j. should specifically reference nutrient neutrality.</p>	<p>General</p>	<p>Policy NE8 sets out how any mitigation for Nutrient Neutrality must be provided.</p>
<p>Affordable housing is not welcome.</p>	<p>General</p>	<p>Middlesbrough's Local Housing Needs Assessment identifies an affordable housing need of 4,432 households. Consequently, where necessary, it is considered appropriate to secure developer contributions towards affordable housing.</p>

## Policy CR5 – Development Limits

Summary of issues raised	Statutory or general consultee	Response
To support and strengthen the policy, the inclusion of some specified text into paragraph 3.13 was recommended. This regarded the appropriate assessment and remediation of brownfield land.	Statutory	Supporting text has been amended to reflect this response.
The policy should differentiate between different types/forms of land outside the limit to development. For instance, it should differentiate between land that is beyond the limit to development, but is well related/adjacent to existing settlements, and land that is in isolated locations.	General	It is not considered necessary to amend the Policy.
<p>Neither Policy CR5 nor HO2 confirms whether windfall sites apply to land with development limits only, or whether sustainable sites adjacent to development limits could be considered.</p> <p>It was therefore suggested that both Policy CR5 and HO2 be amended to provide clarity on this matter.</p>	General	Windfall development will be accommodated in accordance with the policies within the Local Plan. Any proposals for sites outside of the limit to development will be considered against the requirements of Policy CR5. No Policy amendments required.
<p>The Council should adopt a more permissive approach to development that is well related/immediately adjacent to the existing urban area, even if it lies beyond the limit to development. It was stated that this would create flexibility in the supply of new homes.</p> <p>One respondent suggested that the Council should consider allowing sustainable development adjacent to defined development limits.</p> <p>Other responses suggested that the policy could include a contingency position where, if</p>	General	The Council is happy with the approach to development limits set out in Policy CR5.



<p>housing delivery consistently falls below the requirement, landowners/developers could submit sites to the Council and/or a review of the development limits would be considered.</p>		
<p>The limit to development should be maintained as is currently identified in the adopted Local Plan and should not be amended to further housebuilding.</p> <p>The Council has not provided any justification to amend the limit and it would add to urban sprawl. In particular, new housing developments in Stainton and Thornton would have a significant impact on its character.</p>	<p>General</p>	<p>The Plan’s housing requirement has been informed by the informed by a Local Housing Needs Assessment (2020). It has been set to accommodate the Council’s aspiration to achieve economic and job growth over the Plan period.</p> <p>A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council’s approach to selecting and prioritising sites for development. To meet the identified housing requirement, it is acknowledged that some development of greenfield sites will be required, including some which lie beyond the current limit to development. There is an insufficient amount of available and suitable brownfield sites to meet all of Middlesbrough’s housing requirement. The proposed adjustment of the limit of development will release areas of land that are well linked/lie adjacent to the existing urban area. It is therefore considered that this would help facilitate the delivery of sustainably located development.</p>
<p>Multiple responses suggested that the development of existing brownfield sites should be prioritised.</p> <p>In particular, one respondent stated that there should be no greenfield development at all, with all efforts focussed on affordable housing development in the town centre.</p>	<p>General</p>	<p>A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council’s approach to selecting and prioritising sites for development.</p> <p>The purpose of Policy CR5 is to focus development within the urban area. In locations beyond the development limit, the policy</p>

		<p>supports the re-use of existing buildings and the redevelopment of previously developed land.</p> <p>However, with regards to housing development, Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required. Proposed amendments to the development limit have made allowances for new housing allocations, which includes greenfield land. These sites are well linked/lie adjacent to the existing urban area.</p>
The policy is unnecessary and should be removed.	General	The Council considers that the policy is required to focus development within the urban area. Defined development limits will contain future development and create a clear distinction between Middlesbrough's urban area and the countryside. This approach will assist in the achievement of sustainable development, as is prioritised by the NPPF.

## Policy CR6 – Tall and Large Buildings

Summary of issues raised	Statutory or general consultee	Response
In order to safeguard aquifers, the policy should contain points regarding pile design and ensuring pathways to underlying aquifers are not created.	Statutory	Policy has been amended to reflect this response.
With regard to point b., clarification should be provided on what would be considered a 'distinctive profile'.	Statutory	The Policy has been amended to remove reference to 'distinctive profile'.
It was suggested that point k. may not be required, as the requirement for a transport assessment may be necessary for many other developments.	Statutory	It is considered that the requirement of a transport assessment is appropriate for tall buildings. The inclusion of this criterion in the policy does not

		prevent such an assessment being sought for other forms of development. Indeed, paragraph 117 of the NPPF identifies that all developments that generate significant amounts of movement should be supported by a transport assessment.
Point g. should be amended to recognise that tall building proposals may affect the fabric of a heritage asset, not only its setting.	Statutory	The Policy has been amended to reflect this response.
It was recommended that Public Health England's resource on the prevention of suicides in public places be added to the supporting text.	General	It is not considered appropriate to amend the supporting text.
Greater clarity should be provided regarding what constitutes a 'tall and large building'.	General	The supporting text includes reference to what tall buildings are considered to be.
The policy is worded in a way which assumes tall and large buildings result in negative effects that need to be controlled and managed.  In order to be positively prepared, the policy should be re-written to recognise the potential positive contribution that tall and large buildings can have.	General	The policy is intended to set out the Council's approach to dealing with tall buildings and is considered to be sufficiently positive, no amendments to the Policy are required.
Point l. of the policy overlaps with national-level Building regulations/other national-level guidance. It is suggested that the policy be amended to encourage development to be in line with the latest national guidance.	General	No amendments to the Policy are required.
Most of the policy criteria are not related to size. They should therefore be reduced and made more specific, with a principle that tall and large buildings are welcome.	General	It is considered that many of the policy criteria are considerations that are specific to tall and large buildings. While some of the policy criteria may also be considerations that are applicable to other forms of development, they are considered to be of relevance in

		the determination of proposals for tall and large buildings and their inclusion in the policy is therefore considered appropriate.
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## Policy CR7 – Shopfront Design

Summary of issues raised	Statutory or general consultee	Response
The policy should be altered to consider the impact of new or altered shopfront designs on all types of heritage assets, including those which are not designated.	Statutory	Policy has been amended to reflect this response.
All shopfronts should be designed to be accessible for Disabled people.	General	It is considered that this would be covered by legislation and no changes are required to the Policy.
The policy is unnecessary. Ugly shopfronts would put off customers.	General	The Council considers high quality shopfronts to be part of what makes successful town centres lively and interesting places that people want to visit. Therefore, to ensure that shopfronts are well designed and positively contribute to the streetscape, this policy is considered necessary.

## Policy CR8 – Advertisements and Signage

Summary of issues raised	Statutory or general consultee	Response
Illuminated signs must meet industry guidance regarding epileptogenic and migraine inducing frequencies.	General	It is not considered necessary to amend the Policy.
Advertisements and signage are not welcome in a residential setting.	General	No policy amendments required.

## Chapter 4 – Economic Growth

### Policy E1 Economic Strategy

Summary of issues raised	Statutory or general consultee	Response
<p>The strategy establishes a focus on the town centre and revitalisation of existing employment areas in the urban area and adjacent to the River Tees. Over the longer term, without additional measures the effect of the strategy could result in a broadly negative effect upon this objective.</p> <p>Ensure delivery of the strategy is implemented alongside other elements of local plan policy that would protect and enhance green infrastructure.</p>	Statutory	<p>The Publication Local Plan will not implement policies in isolation from each other. Chapter 6 Natural Environment sets out an updated approach to green infrastructure.</p>
<p>Given the proposal under criteria b. to convert 25% of floorspace from retail to other uses, there may be a need for more detailed planning guidance on this matter. Some of these buildings may be of historic interest and any conversion would need to be sympathetic to the building's significance. Consider potential for planning guidance once the plan is adopted for design considerations conversion for the change of use away from retail.</p>	Statutory	<p>Policy CR3 requires a Heritage Impact Assessment for development affecting heritage assets.</p> <p>The Historic Environment Chapter also provides further detailed policies on development affecting heritage assets.</p>
<p>The protection and support of existing local sustainable food businesses and support for new local sustainable food businesses that support the local food economy is an important aspect of Middlesbrough's Food Action Plan (<a href="https://www.goodfoodmbro.org.uk/middlesbrough-food-action-plan/">https://www.goodfoodmbro.org.uk/middlesbrough-food-action-plan/</a>), this should be included within this policy.</p>	General	<p>It is not necessary to amend this policy for the Local Plan to support sustainable food businesses. These will be dealt with in accordance with the NPPF and legislation relating to commercial use classes.</p>
<p>An update the evidence base so that the economic growth and net additional jobs are updated so that potential growth aligns with the Draft Local Plan period 2022-2041. The LHNA (2021) evidence does not run alongside the Draft Local Plan period, this could mean that the economic growth figures are disproportionately affected and underestimated,</p>	General	<p>The Draft Local Plan has been informed by our evidence base. The Council's ambition to create at least 350 jobs is based upon growth associated with the Town Investment</p>

<p>and therefore a missed opportunity to factor in additional jobs growth.                  Multiple comments that the housing supply may be insufficient to achieve Middlesbrough’s full economic potential.                  Policy EC1, points a) and b) are not valid as a result of the out-of-date information associated with 350 jobs per annum.                  The Council needs to refresh its evidence base in relation to its retail study and employment land review.</p>		<p>Plan and the Tees Valley Strategic Economic Plan. LHNA (2021) identifies additional jobs over the period 2019-2037, and is a reflection of the Council’s aspiration.                  The Council considers it unnecessary to update its evidence in relation to retail or employment land, with existing studies providing a sound evidence base.</p>
<p>Policy HO6 conflicts with Objective C To strengthen our local economy by supporting existing businesses and attracting new employers</p>	<p>General</p>	<p>HO6 has been updated. Whilst some previously identified employment land will be lost to this use, it is not considered this will lead to a shortfall in the provision of employment land, nor will it undermine the broader approach to strengthening the local economy.</p>
<p>Recommend Policy EC1 is amended to include a greater recognition of the interrelationship to the supply of new sustainable homes. Alternatively, the Council could introduce a cross reference to Policy HO1 (b) which seeks to ensure that there are sufficient houses to support the economic aspirations of the Borough.</p>	<p>General</p>	<p>Policy EC1 has been amended to include point j. regarding the provision of new dwellings to support economic growth.</p>
<p>Further details on how these actions will be achieved need to be made a part of the strategy.</p>	<p>General</p>	<p>As per the Strategy and Vision it is anticipated that actions throughout the Local Plan will be achieved in conjunction with other plans and strategies, and the operation of the private sector. Middlesbrough Council is committed to delivering a range of strategies and plans, in partnership with other organisations.</p>

## Policy EC2 Employment Locations

Summary of issues raised	Statutory or general consultee	Response
<p>A section in this policy that addresses Health and Wellbeing factors associated with the development of these employment locations, would be welcomed. For instance, active travel infrastructure, associated cycle parking, and the provision of end of journey facilities. Policy EC17 Retail Development on Industrial Estates and Business Parks does refer to such requirements.</p>	<p>General</p>	<p>Publication Local Plan Policy EC2 is primarily concerned with recognising existing employment areas. Development within these areas would need to accord with other policies in the plan, including Policy IN2 Integrated Transport Strategy.</p> <p>The rest of Policy EC2 relates to new development in non-allocated employment areas, and includes point e. that requires access to sustainable transport and active travel.</p>
<p>Policy HO6 conflicts with the Riverside Park allocation as an employment area.</p>	<p>General</p>	<p>Policy HO6 has been amended to identify a site elsewhere. The evidence base has identified that it is appropriate to locate such uses near to certain employment areas.</p>
<p>The Council should review existing employment allocations to determine whether this is the most effective use and whether certain sites may be more suited to deliver housing.</p>	<p>General</p>	<p>The Middlesbrough Employment Land Review (ELR) (2021) assessed a range of sites suitable for employment. Middlesbrough's employment locations are safeguarded to meet identified need and allow growth and diversity. Policy EC3 Alternative use of employment land and buildings identifies criteria where proposals for alternative uses will be considered acceptable. The SHLAA has assessed all land put forward for consideration as potential housing land.</p>
<p>There must be foresight given to potential expansion of employment locations, particularly along the river frontage. The Local Plan must not place undue constraint on expansion or on industrial activity where it is a key driver of job creation.</p>	<p>General</p>	<p>Policy EC1 sub paragraph <i>Employment proposal on non-allocated sites</i> identifies criteria where employment proposals on non-allocated sites will be permitted.</p>

<p>Not enough weight has been given in the plan for expansion of Advanced Manufacturing employment land given the Tees Valley's ambitions to grow the sector.</p>		<p>TeesAmp is identified as a key site for advance manufacturing, whilst Policy EC2 identifies Site EC.1 Riverside Park (inc TeesAMP) as an employment location.</p>
<p>Employment allocations are too far from proposed housing in the south of the town.</p>	<p>General</p>	<p>The ELR (2021) identified an oversupply of employment land over the plan period. As such, it is considered appropriate to safeguard existing employment allocations.</p> <p>Chapter 7. Physical, Social and Environmental Infrastructure places a strong emphasis upon actively managing the available network more effectively. Policy IN2 Integrated Transport Strategy, specifically identifies the need for a sustainable transport network, linking employment within Middlesbrough to provide access for all.</p>

### Policy EC3 Alternative Use of Employment Land and Buildings

Summary of issues raised	Statutory or general consultee	Response
<p>Typo - Reference at para 4.28 to "Policy EC2" (rather than EC3)</p>	<p>general</p>	<p>Reference amended.</p>
<p>Buildings not in use should be repurposed for identified needs i.e. educational.</p>	<p>General</p>	<p>Policy EC3 identifies criteria where proposals for alternative uses will be considered acceptable.</p>
<p>The policy is deemed unnecessarily restrictive and should be removed.</p>	<p>General</p>	<p>To achieve sustainable economic growth there is a requirement to identify land required to support development. Policy EC2 identifies and safeguards employment land that supports Middlesbrough's economic growth. Policy EC3 seeks to ensure flexibility in the use and redevelopment of land that is no longer required to meet the employment needs and identifies</p>



		the suitable criteria to achieve this.
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## Policy EC4 Middlehaven

Summary of issues raised	Statutory or general consultee	Response
<p>The area contains a number of designated heritage assets but also a significant number of non-designated heritage assets including those on the local list. It is therefore important to ascertain where allocations are to be made within this large area so that an understanding of what impacts on the historic environment can be determined and whether design measures are required to reduce harm. This should be achieved through a Heritage Impact Assessment.</p>	Statutory	<p>The Policy includes criteria that requires proposals to sustain and enhance the area's historic significance and also for listed buildings. This has been broadened to include reference to heritage assets and to include reference to a Heritage Impact Assessment.</p> <p>Policy CR3 (a) requires a proposal to integrate with its surroundings in terms of respecting its design, scale, form, density, massing, existing buildings (particularly historic buildings) and land uses around the site; in addition, a Heritage Impact Assessment is required for development affecting heritage assets. Policies in the Historic Environment Chapter will also apply to any proposals affecting heritage assets.</p>
<p>In terms of out area of interest we recommend that criteria k. is amended as it only refers to listed buildings. Whilst it is listed buildings that comprise the designated heritage assets within Middlehaven, the policy should also seek to protect non-designated heritage assets.</p>	Statutory	Policy amended to refer to heritage assets.
<p>Consideration should also be given in this policy to the Transporter Bridge a Grade II* listed building. The Transporter Bridge is one of the town's key defining heritage assets and whilst adjoining rather than within the Middlehaven</p>	Statutory	Policy amended to include reference to the Transporter Bridge.

<p>allocation area, the policy area provides important setting to the asset and should continue to do so. Therefore we would suggest the asset is specifically mentioned and that development proposals are where necessary required to demonstrate they will safeguard its future.</p>		
<p>The policy could be more specific around the inclusion of affordable workspace, health, cultural and community facilities.</p> <p>Consideration should be given to include provisions for a new health facility.</p>	<p>General</p>	<p>Policy IN4 Community Facilities sub paragraph <i>New facilities</i>, states proposal for new community facilities will be supported provided there is a demonstrable local need.</p> <p>Consultations with the NHS have not identified a need for a new health facility in this area.</p>
<p>This should focus on the Council supporting businesses rather than providing a list of restrictions. The aims are laudable but it is too restrictive.</p>	<p>General</p>	<p>NPPF Paragraph 132 states plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The GBI Strategy identifies Middlehaven as a significant priority opportunity for Middlesbrough, which includes a framework of green and blue infrastructure that guides redevelopment of the area. Building upon the success of existing development and investment, the policy is not considered overly restrictive or prescriptive in its aims to transform the Middlehaven area as a mixed-use development.</p>
<p>As a part of the Green &amp; Blue Infrastructure Strategy master plan for this area, the inclusion of orchards, and landscaping and hedgerows that includes plants and trees that produce fruit, nuts or seeds would support the bold blue/ green concept and</p>	<p>General</p>	<p>It is not considered appropriate to amend the policy as suggested.</p>

<p>enhance the high-quality public realm.</p> <p>Would also like to see the provision of markets and temporary sustainable food retail and provision for affordable healthy food choices included as a part of this development.</p>		
<p>The levels of dwellings at 500 seems a high number given the ambition to expand the digital sector. There is also due to be a significant expansion in educational use on the Middlehaven site which may constrain further development.</p>	<p>General</p>	<p>The MDC have prepared a masterplan and Draft design code for their area, to include Middlehaven, with the key developments identified in Policy ST3. The MDC have confirmed that Middlehaven has the capacity to deliver 600 dwellings, 500 of which can be expected to be delivered within the plan period.</p>

## Policy EC5 University Campus

Summary of issues raised	Statutory or general consultee	Response
<p>There is no mention of provision for biodiversity enhancement. Include enhancement of biodiversity on and surrounding the University campus.</p>	<p>Statutory</p>	<p>Policy EC6 h has been amended to reference improving biodiversity.</p> <p>Achievement of Biodiversity Net Gain is set out in Policy GR1, with requirements regarding biodiversity also set out in other policies such as GR5, GR7, CR2, and CR3.</p>
<p>Parking solutions should include enhanced numbers for cycle parking and the campus' connectivity to the town should be achieved by investing in appropriate walking and cycling infrastructure to better support active travel.</p>	<p>General</p>	<p>A strong emphasis upon managing the available network more effectively, including measure to achieve modal shift and connectivity runs throughout the Local Plan. Specifically in connection with the University Campus Publication Local Plan Policy EC6 (c), in addition to Policies CR2, CR3, and IN3 which specify</p>

<p>The University campus must not be artificially cut off from the Town Centre by poor building design. It is vitally important that the University is part of the town centre with clear access routes and links to the railway station.</p>		<p>parking and connectivity requirements.</p> <p>Criteria d and e of the policy place emphasis upon the integration of the campus with the surrounding area, and improving connectivity to the Town Centre.</p>
<p>Consideration should be given to this immediate area in the months when the university is closed.</p>	<p>General</p>	<p>Criterion d places emphasis upon the need to integrate the campus with the surrounding area.</p>

## Policy EC6 Culture

Summary of issues raised	Statutory or general consultee	Response
<p>At present there is a degree of uncertainty within this policy that cannot be supported without suitable caveats to protect the historic environment. It is unclear whether Historic England's aims and objectives to conserve and enhance the historic environment would not be in conflict with the aims and objectives of Middlesbrough's Cultural Partnership, particularly given that the objectives given may change over the lifetime of the plan.</p>	<p>Statutory</p>	<p>The Policy has been amended to reflect this response. Any Culture development proposals set out in this policy would need to be considered in the context of the whole plan, including the Historic Environment Chapter and other policies that help sustain and enhance heritage assets.</p>
<p>Would like to see increased opportunities for the provision of markets, as well as scope for temporary sustainable food retail (such as pop-up social supermarkets e.g. Eco Shops) within cultural events and activities to support the social and economic character of the town and area and showcase and support the growth of the area's rich and diverse local food heritage.</p>	<p>General</p>	<p>It is not considered appropriate to reference markets and sustainable food retail in this policy.</p>

<p>Museums and theatres - improvements are mentioned for Dormans Museum &amp; Albert Park but no mention is made to Stewart Park. This should be included in the plan for maintenance and improvements.</p>	<p>General</p>	<p>Publication Local Plan Policy EC7, subheading Museums and Theatres (n) identifies <i>improvements to the visitor experience of Dorman Museum and make greater connections to Albert Park.</i> Stewart Park is protected under policies in the Natural Environment chapter, however the policy has been amended to include reference to the Captain Cook Birthplace Museum with Stewart Park</p>
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## Policy EC7 Town, District and Local Centres

Summary of issues raised	Statutory or general consultee	Response
<p>There is no requirement for a Local centre at Land north of Low Lane as this is currently allocated as green wedge and should remain as such. There is no requirement for a Local centre at Newham Hall Farm. Strong objection to the new proposed areas as development sites, particularly that to the north of Low Lane due to serious concerns regarding access, safety, and need.</p>	<p>General</p>	<p>The Middlesbrough Town Centre and Retail Leisure Study (MLRS) (2020) states where new housing developments in the south are proposed, it will be important to consider the extent to which more basic, day to day needs of the new residents will be met by existing provision and whether there is any outstanding need for new, local-level, facilities. Policy HO4b (b) identifies the provision of an appropriately scaled local centre, with other community facilities at Lingfield Farm. Policy HO4o (f) proposals should establish a new local centre around the Sporting Lodge, including retail facilities to serve the new and existing residents of Stainton. Policy IN4 sub paragraph 'new community facilities' identifies criteria that will be required to support new facilities, to include, but not limited too, i. a demonstrable local need and ii.</p>

		<p>accessible to the community it is intended to serve.</p> <p>In addition to meeting local shopping needs, local centres will be a critical aspect of placemaking in new communities.</p>
<p>This seems excessively arbitrary, restrictive and unnecessary. It is a carte blanche to refuse development and should be cut.</p>	<p>General</p>	<p>NPPF 'Ensuring the vitality of town centres' requires planning policies to define a network and hierarchy and the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.</p> <p>The policy is considered in accordance with the NPPF, and is not considered overly restrictive or prescriptive in its aims to promote the long term vitality and viability of Middlesbrough's centres.</p>

## Policy EC8 Middlesbrough Town Centre

Summary of issues raised	Statutory or general consultee	Response
<p>Minor amendments are required to ensure criteria d. accurately reflects national policy for the historic environment.</p>	<p>Statutory</p>	<p>Policy has been amended.</p>
<p>It is considered that a reference to the need for low/zero carbon development would bring an extra benefit to the success and maintenance of the Middlesbrough Town Centre. Perhaps this should be a cross cutting theme or a separate criterion.</p>	<p>General</p>	<p>It is not considered appropriate to amend this policy. Publication Local Plan Policy NE11, supports renewable and low carbon energy developments; in addition, Policy CR1 Creating Quality Places, criterion e requires development to have regard to <i>adapting to and minimising the likely impacts of climate change, by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation.</i></p>
<p>The aims of this policy are laudable but should again focus</p>	<p>General</p>	<p>The policy is considered in accordance with the NPPF,</p>

on support rather than restriction. There shouldn't be too much fixed restrictions on different businesses operating in the different areas; it should be relatively free-flowing, and the Council should focus on supporting businesses and opening up the whole town centre.		Chapter 7, and is not considered overly restrictive or prescriptive in its aims to promote the long term vitality and viability of Middlesbrough's centres.
An increase in urban housing in the immediate area will provide a demand for town centre uses.	General	1500 dwellings are expected to be delivered on sites within the MDC area. Publication Local Plan Policy ST3 identifies sites at Middlehaven, Gresham, Wood Street, Church House and Union Village for housing development in the Town Centre.
Given the Council's recent adoption of the Healthy Weight Declaration (HWD), all applications will be viewed through the lens of promoting a food environment that provides a healthy range of options.	General	No policy amendments required.

## Policy EC9 Civic, Commercial and Cultural Heart

Summary of issues raised	Statutory or general consultee	Response
<p>Section j provision of car parking to support the development, is in conflict with design aspirations of (CR3), and a drive towards modal shift (IN2).</p> <p>Suggest including a section on the provision of cycle parking and emphasise the established integrated active travel and public transport routes into the town centre in this policy?</p>	General	Amend criterion j to say 'be accessible by a range of sustainable transport modes including active travel'
There remains a significant supply of poor stock and the local plan should reflect this and be flexible in terms of use and demolition. Recognise the ambition to bring more	General	Publication Local Plan Chapter 3 Creating quality places and, Policies ST3, EC4, EC5, HO3, HO4, HO7, HO8, HO9 aim to improve the amount of housing and quality of the built environment and

<p>residential stock into the town centre but question whether the plan places enough emphasis on the quality of the stock. If further town centre residential is to be developed through building conversion or new build, it must be of high quality and a mix of sizes to encourage a diverse range of residents including families.</p>		<p>requiring high quality design, and living standards, which are a cutting theme throughout the plan.</p>
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### Policy EC10 Retail Quarter

Summary of issues raised	Statutory or general consultee	Response
<p>Note that that data that the retail quarter seems to be based on is a Litchfields report from 2020 – given the significant changes in the industry and the town during the last 4-5 years, it would seem essential that this is revisited.</p> <p>Retail quarter size and context needs to be seriously reconsidered in light of fresh data.</p>	<p>General</p>	<p>Paragraph 9.52 of the MRLS Stage Two Middlesbrough Town centres states <i>'The recommendations and projections within the study should assist the Council in reviewing development plan policies over the coming years and to assist development control decisions during this period. The study provides a broad overview of the potential need for further retail development up to 2037. Projections are, however, subject to uncertainty and forecasts may need to be amended to reflect emerging changes as and when new information becomes available, in particular longer-term projections should be treated with caution.'</i></p> <p>Text within the Publication Local Plan and the supporting Policies Map identify a significantly reduced Town Centre boundary, to develop a more compact centre with appropriate uses focused on core areas.</p>



<p>This is not unreasonable but flexibility should be prioritised given changing consumer habits about town centre retail.</p>	<p>General</p>	<p>In accordance with NPPF Chapter 7 'Ensuring the vitality of Town Centres' the policy is not considered overly restrictive or prescriptive in its aims to transform the area as a mixed-use development.</p>
<p>Reduce shopping units, &amp; build leisure &amp; housing.</p>	<p>General</p>	<p>The need to renew and revitalise the Town Centre is recognised, with the strategy based upon attracting diverse commercial and leisure uses into central Middlesbrough.</p> <p>Text within the Publication Local Plan and the supporting Policies Map identify a significantly reduced Town Centre boundary, to develop a more compact centre with appropriate uses focused on core areas.</p> <p>Policy ST3 reflects the aim to provide 1500 new homes in the MDC area containing the town centre.</p>
<p>Numerous comments that retail offer needs to be re-established and improved.</p>	<p>General</p>	<p>Retail will continue to play an important role in Middlesbrough's Town Centre, with the Retail Quarter and the Primary shopping Area (PSA) identified as core retail areas. Policies EC7 and EC10 specifically aim to retain and enhance a strong retail core by applying the sequential test to proposed retail uses outside of the PSA.</p>

## Policy EC11 Leisure Quarter

Summary of issues raised	Statutory or general consultee	Response
<p>There should be more leisure centres like swimming, pools, exercising equipment, socialising, restaurants, tennis</p>	<p>General</p>	<p>The need to renew and revitalise the Town Centre is recognised, with the strategy based upon attracting diverse commercial</p>

courts, and playing corners for little children		and leisure uses into central Middlesbrough.
Again, good aims but too strong a restriction on given areas will hold back development; flexibility should be encouraged.	General	The policy states other complementary uses will be considered appropriate where they meet the identified criteria.  The policy is not considered overly restrictive or prescriptive in its aims to transform the area.

### Policy EC12 Independent Quarter

Summary of issues raised	Statutory or general consultee	Response
The whole of the town centre should be facilitating small businesses. Flexibility should be key with the aim of developing the whole town centre.	General	The need to renew and revitalise the Town Centre is recognised, with the strategy based upon attracting diverse commercial and leisure uses into central Middlesbrough. Policies EC13 Independent Quarter, and EC15 Linthorpe Road Secondary Shopping area recognise the importance of niche shopping offers encouraged by small scale enterprise, and their contribution to the surrounding communities.

### Policy EC13 Railway Station and Historic Quarter

Summary of issues raised	Statutory or general consultee	Response
The opening sentence does raise concern 'Redevelopment of the Railway Station to provide a high quality public transport hub that supports direct services to London, alongside regional and local services, will be supported.' Whilst we do not object to future improvements to the railway station harm to the historic	Statutory	Policy wording amended.

significance of the station should be avoided and where this is not possible there would need to be a clear and convincing justification, with any harm being exceptional and outweighed by public benefits.		
A rail link directly outside the Riverside Football Stadium would reduce the pedestrian issues to and from the ground. The current access is congested and not fit for purpose and poses a risk to safety.	General	There are currently no proposals to provide a rail link to the Riverside Stadium, therefore this is not addressed in the Publication Local Plan.

### Policy EC14 Linthorpe Road South Secondary Shopping Area

Summary of issues raised	Statutory or general consultee	Response
This seems too restrictive. Businesses should be given the opportunity to access spaces here freely without too much restriction.	general	The policy states other complementary uses will be considered appropriate where they meet the identified criteria.  The policy is not considered overly restrictive or prescriptive in its aims to transform the area
Multiple comments regards the cycle lane and its negative contribution to the area.	General	The cycle lane is not an issue that is addressed by this policy. The Council will consider this matter through its Integrated Transport Strategy.

### Policy EC15 District and Local Centres

Summary of issues raised	Statutory or general consultee	Response
Local centre shopping areas do not have enough diversity. There need to be incentive for local businesses to use these units providing substantive shopping options not just convenience or takeaway.	general	Criterion (a) of the policy encourages a diversity of uses to facilitate the current and future functions of Middlesbrough Local Centres. Policy EC17 Hot food takeaways, aims to support an appropriate balance of uses within a centre, and recognises the negative

		impact a high proportion of this particular use can have on a centre.
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## Policy EC16 Hot Food Takeaways

Summary of issues raised	Statutory or general consultee	Response
<p>The Council should strengthen this policy still further. The Council should adopt the same successful strategy as Gateshead. Specifically</p> <ol style="list-style-type: none"> <li>Locations where children and young people congregate: Planning permission will not be granted for A5 (hot food takeaways [sui generis]) use within a 400m radius of entry points to secondary schools, youth centres, leisure centres and parks*. *Parks are categorised as playing areas, Area parks over 5 hectares in size and Neighbourhood Open Spaces over 2 hectares in size.</li> <li>Locations where there are high levels of obesity: Planning permission will not be granted for A5 (hot food takeaways [sui generis]) use in wards where there is more than 10% of the year 6 pupils classified as obese.</li> <li>Over proliferation: Planning permission will not be granted for A5 (hot food takeaways [sui generis]) use where the number of approved A5 establishments, within the ward, equals or exceeds the UK national average, per 1000 population.</li> </ol>	General	The Policy has been amended to reflect the evidence available for Middlesbrough.
Further, A respondent proposed an additional appendix to the Local Plan with maps illustrating the exclusion zones around sensitive receptors identified in the first of the planning considerations; following an approach adopted in South Tyneside (Local Plan Supplementary Planning Document 22: Hot Food Takeaways & Health [November 2017]).	General	It is considered inappropriate to amend the policy as suggested.
Would also like to see childhood obesity rates used as material consideration to limit the over proliferation of hot food takeaways with a limit of 10% of children living with overweight or obesity per ward.	General	It is considered inappropriate to amend the policy as suggested.

<p>Would like to see the distance between hot food takeaway uses and existing and proposed school entry points increased, and all schools included in this, not just secondary schools. This request is based on research that found exposure to takeaway food outlets was positively associated with consumption of takeaway food (<a href="https://www.bmj.com/content/348/bmj.g1464">https://www.bmj.com/content/348/bmj.g1464</a>).</p> <p>Would also like for the inclusion of ‘anywhere where children are likely to congregate, including parks, leisure centres, nurseries’ in the wording of point d.</p>		
<p>Multiple comments pertain generally to too many existing takeaways.</p> <p>More specifically comments ask how the local plan will deal with existing proliferation and/or lower the number of existing HFTs.</p>	<p>General</p>	<p>Publication Local Plan Policy EC17 Hot food takeaways, aims to support an appropriate balance of uses within a centre, and recognises the negative impact a high proportion of this particular use can have on a centre.</p> <p>Once established the use class of a building remains so in perpetuity (provided the conditions of the existing decision issued are met), until a different use is applied for. In which case the planning process cannot reduce the number of existing HFTs. Publication Local Plan Policy EC16 aims to manage the proposal for new applications for HFTs where thresholds are expected too, or have already been exceeded in a local centre.</p>
<p>This policy should be cut entirely. It is restrictive and unnecessary.</p>	<p>general</p>	<p>Policy EC17 Hot food takeaways, aims to support an appropriate balance of uses within a centre, and recognises the negative impact a high proportion of this particular use can have on a centre.</p>

		The policy requirements are not considered to be overly restrictive or prescriptive, and would aid in the management of proposed HFT applications.
<p>The following policy objections to draft Policy EC16:</p> <p>A. The 400m exclusion zone is inconsistent with national planning policy</p> <p>B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.</p>	General	The policy requirements are not considered to be overly restrictive or prescriptive, and would aid in the management of proposed HFT applications.

### Policy EC17 Retail Development on Industrial Estates and Business Parks

Summary of issues raised	Statutory or general consultee	Response
This policy should be cut entirely. It is restrictive and unnecessary.	General	Policy EC18 recognises the need for some small-scale retail and food operators to meet the needs of workers during their shifts and provides for flexibility for retail of this type outwith the Town Centre and Local Centres. It is important that the scale of such development does not overly impact on our centres. The policy is not considered overly restrictive or prescriptive in its aims to achieve this.

## Chapter 5 – Housing Development

### Policy HO1 – Housing Strategy

Summary of issues raised	Statutory or general consultee	Response
The policy does not incorporate any specific reference to the role and relationship between biodiversity and housing development. The inclusion of appropriate policy that will secure the protection and enhancement of biodiversity and geodiversity was therefore recommended.	Statutory	The Policy has been amended to take account of this response.
The housing strategy and projected housing numbers are based on the Council's financial requirements, rather than meeting housing needs.	Statutory	The Plan's housing strategy and requirements have been based upon the housing needs identified through its evidence base.
Out of date data, based on the 2020 LHNA, has been used. In addition, no reference to the progress achieved in meeting the housing needs identified in the adopted 2014 Housing Local Plan has been made.	Statutory	The LHNA is considered by the Council to be up to date.
<p>As of April 2023, the Council has at least seven years housing supply and is achieving a 257% Housing Delivery Test measurement. Therefore, more homes are being built per annum than the housing need identified in the adopted Local Plan.</p> <p>Following on from the above, one respondent therefore suggested that the Holme Farm (HO4p) and Land North of Low Lane (HO4o) sites should be removed. These sites are both within the Stainton and Thornton Neighbourhood Plan area and proposals for development should have regard to the requirement of the Neighbourhood Plan.</p>	Statutory	The allocations of Holme Farm (Policy HO4p) and Land North of Low Lane (Policy HO4o) are required to meet the housing required in identified in Policy HO2, no policy amendments are required.
The housing strategy is solely based on the Council's financial	General	The Plan's housing strategy and requirements have been based

<p>requirements, as opposed to sustainable development to meet local housing needs. One respondent specifically identified the Newham Hall Farm and Nunthorpe Grange housing allocations as examples of this.</p>		<p>upon the housing needs identified through its evidence base.</p>
<p>Multiple respondents raised issues with infrastructure supporting new housing developments. It was stated that traffic infrastructure should be considered when planning new developments. In addition, until infrastructure issues are addressed, it was stated the south of Middlesbrough cannot sustain any more housebuilding. One response specifically commented that roads around Marton, Nunthorpe, Coulby Newham, and Acklam must be improved before any further new builds are considered. Finally, with respect to point k., it was recommended there should be a commitment towards revenue support for bus services from section 106 agreements.</p>	<p>General</p>	<p>The Publication Local Plan is supported by an Infrastructure Delivery Plan (IDP). The IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>Responses were received regarding the development of greenfield land and the prioritisation of previously developed land. Many respondents supported brownfield site development, particularly with respect to the Town Centre and Middlehaven areas. However, it was suggested that housing development should only be on brownfield sites. Moreover, it was said that brownfield sites should be developed before any greenfield sites.</p> <p>Similarly, it was suggested that the regeneration/rebuilding of housing should be considered, not only building more homes.</p>	<p>General</p>	<p>A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council's approach to selecting and prioritising sites for development.</p> <p>The housing strategy policy seeks to maximise and prioritise the re-use of previously developed land, while minimising further development of new housing in greenfield suburban locations beyond those identified in Policy HO4 or in a neighbourhood plan. This approach is in line with the NPPF.</p>
<p>Point c. should specify a minimum percentage of housing development on previously</p>	<p>General</p>	<p>It is not considered appropriate to specify a percentage within the Policy.</p>



<p>developed land. This is required to measure whether the Plan is achieving this policy requirement, as well as point j..</p>		
<p>The economic growth aspirations of 350 new jobs per annum, stated in paragraph 5.2, are totally unrealistic.</p>	<p>General</p>	<p>These aspirations are considered to be appropriate and have been based upon growth associated with the Town Investment Plan, the Tees Valley Strategic Economic Plan and the Middlesbrough Development Corporation Masterplan.</p>
<p>It was stated that the Council has prioritised its own development land for housing allocations compared to alternative sources of housing land supply (e.g. brownfield sites, land of lower environmental and amenity value.) and that evidence should be provided to demonstrate that an objective assessment of alternative housing locations has been undertaken.</p>	<p>General</p>	<p>A new policy ST2 Spatial Strategy has been included in the Publication Local Plan to set out the Council's approach to selecting and prioritising sites for development.</p>
<p>Points i. and j. are unnecessarily restrictive and will contribute to unaffordable housing through a lack of supply.</p>	<p>General</p>	<p>The NPPF requires plans to provide a framework for meeting housing needs. As such, it is important that the Local Plan will deliver a range of housing that meets the towns identified need. Point i., has been slightly reworded but is therefore considered appropriate and not unnecessarily restrictive.</p> <p>Likewise, minimising further development of new housing in greenfield suburban locations, beyond those identified in Policy HO4 or in a neighbourhood plan, is intended to steer housing development towards brownfield land, as well as greenfield sites that have been allocated and considered appropriate/suitable for housing development.</p>
<p>It was suggested that the wording of Policy HO1 be amended. As drafted it was stated that HO1 is not effective and is more of a statement of intent than a policy</p>	<p>General</p>	<p>The purpose of the Policy is to set out the Council approach to the delivery of housing.</p>

<p>that sets out how housing development will be achieved. In addition, it was highlighted that many elements within HO1 are repeated within other policies in the Plan.</p>		
<p>The housing strategy requires appropriate evidence to demonstrate that it is deliverable and developable over the plan period, meeting the varied housing need of the town and not leading to a shortage in housing delivery. Specifically, multiple responses highlighted the need for evidence to demonstrate that the delivery of housing on previously developed land/in and around the Town Centre, which is prioritised in the strategy, is deliverable and developable.</p> <p>To this point, concerns were raised with the robustness of the Local Plan Viability Assessment (2018). It was highlighted that this document was published six years ago and pre-dates recent market and legislative changes (e.g. build-cost inflation, new Building Regulation requirements, Biodiversity Net Gain, and Nutrient Neutrality).</p>	<p>General</p>	<p>The housing strategy has been informed by a suite of evidence, including a LHNA, SHLAA, and viability assessment.</p>
<p>In alignment with the G&amp;BI Action Plan, a number of specific requirements for new housing developments were suggested. These included the protection of existing allotments and community gardens for food growing and the encouragement of orchards, hedgerows, and other landscaping that includes plants and trees that produce fruit, nuts, or seeds.</p>	<p>General</p>	<p>These points are too specific to be included within the Strategy.</p>
<p>Further clarity was sought on a number of matters:</p> <ul style="list-style-type: none"> <li>• Clarity was requested on the meaning of 'sustainable housing' in point h. and the Council's expectations with regard to it.</li> </ul>	<p>General</p>	<p>Policy has been amended to take account of this response.</p>

<ul style="list-style-type: none"> <li>• Further detail was sought on what would constitute aspirational in terms of the 'balanced portfolio of housing'.</li> <li>• Greater clarification regarding the interrelationship between the aspirations of this policy and those of the MDC was sought.</li> </ul>		
<p>The Draft Local Plan states that approximately 341 dwellings will be delivered on windfall sites over the plan period, forming part of the identified housing supply. However, point j. of Policy HO1 seeks to minimise further development of new housing in greenfield suburban locations beyond those identified in Policy HO4 and neighbourhood plans. Concerns were therefore raised that criteria j. would restrict windfall development to brownfield sites and that the plan does not clearly identify where these 341 dwellings would be delivered or whether there is sufficient deliverable land. In objection to point j., one respondent stated that this approach is entirely inconsistent with the NPPF.</p>	<p>General</p>	<p>Point J. would not restrict windfall sites to brownfield land but rather to sites within the urban area (within the limit to development). Windfall development will be accommodated in accordance with the policies within the Local Plan. Any proposals for sites outside of the limit to development will be considered against the requirements of Policy CR5.</p>
<p>The policy sets out that all new housing development will be required to contribute to the creation of balanced and sustainable communities. However, due to the lack of allocated sites for care homes/extra care housing, for which there is an identifiable need, it is considered that the policy is not positively prepared and therefore fails to comply with paragraph 35 of the NPPF.</p>	<p>General</p>	<p>Policy HO3 addresses this issue and individual housing allocation policies allocate land for such use. No changes are required to this policy.</p>
<p>The proposed housing supply is insufficient to meet the identified target and the economic aspirations of Middlesbrough. However, recognising the true development potential of sites like</p>	<p>General</p>	<p>The proposed housing supply is considered appropriate to meet the housing requirement and address economic growth aspirations. Changes have been made to the Publication Local</p>

<p>Gresham will assist in the achievement of the Councils wider economic aspirations. For these reasons, it was stated that the housing strategy is not considered positively prepared, justified or effective and is therefore unsound in the context of NPPF paragraph 35.</p>		<p>Plan to include further detail on Gresham.</p>
<p>It was suggested that the identified housing strategy is not positively prepared, justified, or effective and is therefore unsound in the context of NPPF paragraph 35 as:</p> <ul style="list-style-type: none"> <li>• there is not clear evidence to support some of the identified sites as deliverable;</li> <li>• the housing requirement of 400 net additional dwellings per annum is ‘a conservative and low estimate’;</li> <li>• the proposed buffer of 11.7% is not sufficient;</li> <li>• the timescales identified in the delivery trajectory are likely optimistic;</li> <li>• and when set against the housing requirement, rather than the minimum housing need of the standard method, the Plan is unable to demonstrate a five-year supply of housing land.</li> </ul>	<p>General</p>	<p>A Viability Assessment has been prepared to support the Publication Local Plan and will be available as part of the evidence base.</p> <p>The housing requirement is considered appropriate and takes account of the Council’s economic growth aspirations. The buffer is considered sufficient to ensure flexibility and to ensure a five year deliverable housing supply can be maintained over the plan period.</p>
<p>To ensure housing land supply is maintained, the policy could highlight that developments in accordance with Policy HO4 will be approved in a timely and efficient manner.</p>	<p>General</p>	<p>No amendments required to the Policy.</p>
<p>It was recommended that sites for executive housing continue to be allocated to ensure future population growth and associated economic and social growth.</p>	<p>General</p>	<p>No specific need for executive housing has been identified therefore no changes to the policy is considered necessary. Executive housing could come forward as part of the housing mix on individual housing allocation.</p>

## Policy HO2 – Housing Requirement

Summary of issues raised	Statutory or general consultee	Response
The housing strategy and projected housing numbers are based on the Council's financial requirements, rather than meeting housing needs.	Statutory	The Plan's housing strategy and requirements have been based upon the housing needs identified through its evidence base. The housing requirement has also been considered against the transitional arrangements set out in the NPPF (2024).
The 2020 LHNA makes no reference to the progress achieved to meet the housing needs in the adopted 2014 Housing Local Plan.	Statutory	No policy amendments required.
As of April 2023, the Council has at least seven years housing supply and is achieving a 257% Housing Delivery Test measurement. Therefore more homes are being built per annum than the housing need stated in the adopted Local Plan.	Statutory	No policy amendments required.
Parish Council's should be consulted at the pre planning stage on Planning applications submitted by developers requesting amendment/increase in dwelling numbers to already approved applications.	Statutory	This is not something that is possible to addressed through the Local Plan.
<p>Many responses stated that the Local Housing Needs Assessment (LHNA) prepared in 2020, and used to inform Policy HO2, is:</p> <ul style="list-style-type: none"> <li>• out of date;</li> <li>• does not reference progress achieved to meet housing need against the 2014 Housing Local Plan;</li> <li>• does not recognise new requirements set out in the latest NPPF;</li> <li>• does not reference up to date current and future demographic trends, including census data;</li> </ul>	General	The evidence base that supports the Local Plan is kept under review, the LHNA is considered to be up to date. The housing requirement has also been considered against the transitional arrangements set out in the NPPF (2024).

<ul style="list-style-type: none"> <li>• uses arguments from an earlier version of the LHNA document, produced in 2016, to justify a level of housing requirement that is unnecessary to meet housing need;</li> <li>• and is no longer regarded as a valid means of assessing housing need, in accordance with paragraph 61 of the NPPF.</li> </ul>		
<p>It was stated that the housing requirement is unrealistically/unnecessarily high. In relation to this, various concerns were made. It was stated that the proposed requirement; is based upon significant economic growth that is unlikely to occur; has resulted in the unnecessary allocation of greenfield sites; is not justified as there are not enough people moving into Middlesbrough; and fails to respect previous policies associated with the protection of green space. Finally, it was suggested that, rather than prioritising sustainable development to meet local housing need, the Council has prioritised its financial requirements.</p> <p>In particular, many responses suggested that the proposed requirement of 400 dwellings per annum is not justified as the Council has overachieved against the housing need identified in the adopted Housing Local Plan 2014. Having raised this point, some responses subsequently stated that Middlesbrough’s housing requirement should be kept in line with the figure identified by the standard method. One response specifically stated that the minimum net additional dwellings</p>	<p>General</p>	<p>The proposed housing requirement has been established in accordance with the NPPF and associated PPG. To determine the minimum number of homes needed, the Draft Local Plan’s strategic policies have been informed by a local housing needs assessment conducted using the standard method (the Middlesbrough LHNA 2021). The housing requirement takes in the Council’s economic growth ambitions. No policy amendments required. It has also been considered against the transitional arrangements set out in the NPPF (2024).</p>

<p>between 2022 and 2041 should be 4,301 and proposed a set of housing supply sources that would meet this figure and also provide a 20% buffer.</p>		
<p>It was questioned how the LHNA established a housing requirement of 400 net additional dwellings to support economic growth of approximately 350 addition jobs per annum. Even if all those taking the additional jobs needed new houses, that would only account for 350 homes, not 400.</p>	<p>General</p>	<p>No Policy amendments required.</p>
<p>With reference to existing vacant properties, multiple responses questioned the levels of house building being set in the housing requirement. Some responses suggested that existing vacant properties should be redeveloped.  It was also suggested that new phases of new build housing should not be undertaken until the previous phase is occupied.</p>	<p>General</p>	<p>The housing requirement established in this policy takes account of the Council's economic growth aspirations. No policy amendments required.</p>
<p>It is anticipated that Gresham will deliver the equivalent of approximately 730 dwellings. Policy HO2 should include sufficient flexibility to ensure that the development potential of Gresham is not compromised and part i. should therefore be updated to reflect this delivery.</p>	<p>General</p>	<p>Policy HO2 and ST3 have been amended to take account of these comments and reflect more up to date information in relation to the proposals for Gresham. In addition, a new Policy EC5 Gresham has been introduced.</p>
<p>Multiple respondents questioned whether the proposed housing requirement of 400 dwellings per annum is sufficiently ambitious. Concerns were raised as to whether this requirement is sufficient to ensure a good, varied supply of housing that is affordable and accessible. Moreover, Middlesbrough's aspirations regarding economic and jobs growth, as well as previous levels of housing delivery, were suggested as reasons why</p>	<p>General</p>	<p>The proposed housing requirement is considered to be sufficiently ambitious to take account of the Council's economic growth ambitions including proposed jobs growth of 350 dwellings per annum.</p>

<p>the Council should consider increasing the housing requirement. One respondent specifically stated that a requirement in excess of 400 dwellings per annum (dpa), and in the range of up to 500dpa, should be considered.</p>		
<p>Multiple responses suggested that the proposed buffer of 11.7% is insufficient and should be increased. This derived from concerns related to the Plan’s housing delivery trajectory, particularly the delivery of urban brownfield sites in the MDC area. It was stated that an additional buffer is required to account for fluctuation in delivery/the risk of some non-delivery of sites and would help in the maintenance of a clear and demonstratable housing land supply in the long-term. Additionally, to addressing the historic under delivery of affordable housing, it was suggested that increasing the housing buffer further would provide greater certainty over the delivery of sufficient affordable housing in a timely manner.</p> <p>One respondent specifically stated that a rolling five-year housing supply with an additional buffer of 20% would provide a realistic prospect of achieving the planned supply. Another recommended that a minimum buffer of 20-25% against the overall plan period requirement of 7,600 dwellings.</p>	<p>General</p>	<p>The over allocation/buffer that is identified in Local Plan is considered sufficient to ensure flexibility and to ensure a five year deliverable housing supply can be maintained over the plan period.</p>
<p>For the MDC area, it was stated that the Plan is reliant on the delivery of a number of urban brownfield sites that have delivered little development in the previous twenty years, despite having been allocated and subject to various masterplans. In addition, it was stated that housing supply in the MDC area</p>	<p>General</p>	<p>In the MDC area, more detail has been included in Policy ST3 and in other policies within the Local Plan in relation to the sites where housing delivery is expected to take place. The windfall allowance with the MDC has been significantly reduced in the Publication Local Plan to 46 dwellings.</p>



<p>includes a windfall allowance that is not justified.</p> <p>Consequently, to ensure the plan is deliverable, it was recommended that this should sit outside of the deliverable/developable supply to form part of a wider justified windfall allowance. Moreover, with this in mind, it was strongly advised that 'at least a 20% flexibility buffer' be included in the Plan's whole housing requirement to safeguard against sites not coming forward as expected and thereby ensure the requirement is met. It was also suggested that the Plan include triggers for a full review should it fail to deliver against the housing requirement for a specified period of time, an approach that would be in accordance with the NPPF.</p>		
<p>An appropriate level of flexibility should be provided within the housing supply to ensure the Plan is robust and resilient to change, including circumstances where allocations fail to come forward.</p> <p>It was suggested supply should allow for additional sites to come forward, and also provide flexibility on the types of sites coming forward. In addition, one respondent specifically stated that a lapse rate of 10% should be used for sites with extant planning permission. With respect to the supply from windfall sites, they also recommended that a lapse rate be used and 'small' sites removed.</p> <p>One respondent suggested that a fresh examination of each of the existing local plan allocations without planning permission is needed, stating that up-to-date evidence is required as to whether each of these allocations should</p>	<p>General</p>	<p>The over allocation/buffer that is identified in Local Plan is considered sufficient to ensure flexibility and to ensure a five year deliverable housing supply can be maintained over the plan period. No amendments to policy wording required.</p> <p>A viability assessment has been prepared to inform the Publication Local Plan.</p>

<p>be brought forward and allocated in the new Local Plan.</p>		
<p>The housing delivery trajectory is not sufficiently robust, with no clear evidence to support some of the identified sites as deliverable.</p> <p>A number of housing sites were said to have delivery timescales that appear optimistic, with more realistic lead-in times, delivery rates, and capacity assumptions suggesting that fewer homes may be delivered within the plan period than indicated. In addition, concerns were raised that the MDC includes an ‘exceptionally large windfall element’ of 563 homes on unidentified sites without evidence of how this has been identified and would be delivered.</p>	<p>General</p>	<p>The housing trajectory has been updated in the Publication Local Plan and is considered to be sufficient robust. A viability assessment has been prepared to inform the Publication Local Plan.</p>
<p>When set against the housing requirement, rather than the minimum housing need of the standard method, the Plan is unable to demonstrate a five-year supply of housing land. It was stated that the best way to address this, and ensure the plan can adapt to changing circumstances and meet the minimum housing requirement, is to introduce additional flexibility to the supply. In particular, it was recommended that additional land and sources of supply be identified in the Local Plan, with a minimum buffer of 20-25% against the overall plan period requirement of 7,600 dwellings.</p>	<p>General</p>	<p>It is considered that a five year housing supply is able to be demonstrated and no changes to the Local Plan are required.</p>
<p>It was suggested that the evidence base used to identify the housing requirement is updated, ensuring full consideration is given to all of the elements that may suggest a higher housing figure is appropriate.</p> <p>Similarly, having noted that the LHNA 2021 derives some of the</p>		<p>The evidence base to support the Local Plan is considered to be up-to-date and robust.</p>

<p>evidence base from the 2016 and 2018 SHMA, some responses recommended that an addendum update is provided to clarify that the evidence base is up to date and supported.</p>		
<p>Paragraph 5.12 of the Draft Local Plan states that the identified housing requirement would support 350 additional jobs per annum and, while this is lower than the aspiration to deliver 500 additional jobs per annum, this target is considered appropriate because the economic impact of the COVID-19 pandemic is likely to result in lower initial jobs growth early in the plan period.</p> <p>It was stated that the evidence base does not seem to clarify or provide justification for exactly how much the pandemic has impacted jobs growth and therefore appears to be an assumption.</p> <p>Questioning the decision to adopt the lower jobs growth aspiration for the housing requirement, it was recommended the assumptions on Middlesbrough’s economic aspirations are reviewed, including the impact that they could have on the additional requirement for additional new homes above the standard method and originally estimated uplift.</p>	<p>General</p>	<p>The Council considers the evidence base prepared to support the Local Plan to be up to date the supporting text has been amended to remove any confusion.</p>
<p>With regards to windfall housing, clarity should be provided on whether this only relates to windfall sites within development limits, or if sustainable sites adjacent to development limits would also be considered.</p>	<p>General</p>	<p>Windfall development will be accommodated in accordance with the policies within the Local Plan. Any proposals for sites outside of the limit to development will be considered against the requirements of Policy CR5.</p>
<p>Clarification was requested regarding the housing provision for the designated Neighbourhood Areas and how this relates to the</p>		<p>Appendix 7 of the Local Plan provides a breakdown of the housing sites within each Neighbourhood Area.</p>

<p>proposed allocations in Policy HO4.</p> <p>One respondent suggested that the total number of net additional dwellings for Neighbourhood Areas set out in the policy should include the post 2041 figures. They also stated that the LPA need to set out what discussions have been held with the local community in relation to the figures for the Coulby Newham.</p>		
<p>In relation to the housing requirements, the policy does not reference the consideration of matters such as new planning legislation, updated NPPF requirements, the impact of nutrient neutrality issues associated with the Teesmouth and Cleveland SPA, biodiversity net gain requirements, and viability studies of major housing sites.</p>		<p>The issues raised in response are dealt with elsewhere in the Local Plan, for example the approach to nutrient neutrality is set out in Policy NE8, Biodiversity Net Gain is addressed in new Policy NE7. In addition. a Viability assessment has been prepared to support the Local Plan.</p>

### Policy HO3 – Housing Mix and Type

Summary of issues raised	Statutory or general consultee	Response
<p>Criteria c. and e. are not appropriate or viable on town centre development sites. Sites within the MDC area should therefore be excluded from these requirements.</p>	<p>Statutory</p>	<p>Policy has been amended to take account of this comment.</p>
<p>The requirement regarding housing designed for older people and those with special housing needs should be separate from the Housing mix policy. The need to reflect the size, type and tenure of housing needs for different groups in the community, including older people, was strengthened in</p>	<p>General</p>	<p>It is considered that the Policy adequately addresses the housing needs of older people, no changes to the Policy are considered to be necessary.</p>

<p>paragraph 63 of the recently amended NPPF.</p>		
<p>Paragraph 5.25 identifies demand for 'spare' bedrooms and the need for additional rooms, however this is not reflected in the housing mix set out in Table B. It was recommended that the supporting text should clarify the range of mixes that may be appropriate and set out that these will be determined on a case-by-case basis depending on identified local need.</p>	<p>General</p>	<p>No amendments to the Policy are considered necessary.</p>
<p>The LHNA does not reflect the population or household projection based on national 2014 statistics. Therefore, the projected minimum dwelling size requirements set out in Table B need to be re-assessed using ONS national population projections.</p>	<p>General</p>	<p>The LHNA is considered to be up-to date and robust, no changes are required to the evidence base or to the Local Plan.</p>
<p>In relation to point a., should the size requirements set in Table B be applied on a site-by-site basis in the determination of applications, this would be unduly constraining and not necessarily be appropriate to site specific characteristics or local context. For the avoidance of doubt, it was therefore recommended that the policy or its supporting text should be amended to clarify that the size requirements in Table B will not be strictly applied on a site-by-site basis.</p> <p>Similarly, other respondents stated that this part of the policy needs to be flexible. It was suggested that individual sites issues, market demands, and other changing circumstances be accounted for and that housing mix should be assessed and delivered on a site-by-site basis.</p>	<p>General</p>	<p>The requirements in Table B will not be applied on a site by site basis, no changes are need to the Policy or the supporting text.</p>

<p>It was therefore recommended that point a. be expanded to specify that housing mix can also be informed by 'other evidence', including market intelligence from housebuilders.</p>		
<p>With regards to the requirement to provide at least 10% of dwellings as bungalows (point c.), multiple respondents were concerned that there is a lack of evidence for this need. It was suggested that this requirement is not positively prepared, justified, or effective and should be removed.</p> <p>As proposed, there were concerns about the potential impact this requirement would have on site viability and deliverability.</p> <p>Specifically, multiple responses suggested that there are a number of instances where the requirement could not physically be met, for example constrained or city centre/urban sites, and specific locations where bungalows may not be considered appropriate based upon the local housing need. They therefore recommended that the policy be re-worded to encourage bungalows where they are feasible and deliverable, and where there is an identified need and demand in line with the wording of part a. or the final paragraph of HO3.</p> <p>One respondent questioned the evidence to support the 10% bungalow requirement, suggesting that the 2% provision of M4(3) dwellings (point d.) would effectively deliver bungalows on new developments in a</p>	<p>General</p>	<p>The requirement for 10% dwellings as bungalows is considered appropriate to address the housing needs of an ageing population. A Viability Assessment has been prepared to support the Publication Local Plan which has considered the requirement for 10% bungalows. The Policy has been amended to make clear the 10% requirement will not apply on 100% flatted or conversion schemes.</p>

<p>proportionate manner that is in line with the evidence.</p> <p>Another respondent stated that 10% of bungalows plus 2% M4(3) homes is a repetition of the same effect and that the requirement for 2% of M4(3) should be included within the 10% bungalow provision.</p> <p>Conversely, multiple responses were received stating that, given the aging population, more bungalows should be provided. One respondent specifically suggested bungalow only sites should be considered.</p>		
<p>With reference to evidential requirements set out in PPG multiple respondents questioned whether the evidence used by the Council supports the proposed level of M4(2) and M4(3) housing provision.</p> <p>Should such a requirement be justified using appropriate evidence, it was recommended that an appropriate transition period is specified within the policy. In line with PPG, it was also suggested that any policy requirements regarding M4(2) and M4(3) housing provision are flexible, giving consideration for site specific factors. It was noted that this is not just in relation to the ability to provide step-free access. One respondent specifically suggested that the policy should be re-worded to allow sufficient flexibility for M4(3) dwellings to be delivered where they are most appropriate.</p> <p>Respondents also highlighted the proposal to mandate the current M4(2) requirement in</p>		<p>The Council considers that this will meet identified housing needs and no changes are required to the Plan.</p>

<p>Building Regulations as a minimum standard for all new homes, as stated in the Government’s response to the ‘Raising accessibility standards for new homes’ consultation. M4(3) would continue to apply as existing where local planning policy is in place and where a need has been identified and evidenced. However, it was suggested the Council should consider the most appropriate way to deliver homes that will meet its needs, as this may not always be in the form of M4(3) homes.</p>		
<p>The Council does not have robust evidence to support the requirement for residential developments of 200 dwellings or more to make at least 1% of the dwellings available as self-build or custom build plots (point e.). Responses suggested that this requirement, which forms part of Policy HO3 and HO11, is not positively prepared or justified and therefore conflicts with paragraph 35 of the NPPF.</p> <p>Multiple respondents suggested that the policy requirement could impact the viability and deliverability of sites and that it should be removed.</p> <p>It was highlighted that PPG (ID: 57-025-20210508) sets out methods that local authorities can use to increase the number of planning permissions which are suitable for self and custom build housing. While one respondent stated that a policy intervention was not required, a number of other responses suggested that alternative policy mechanisms could be used to ensure a reliable and sufficient</p>	<p>General</p>	<p>The Council considers that this will meet identified housing needs and no changes are required to the Plan. In addition, The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024).</p>



<p>provision of self and custom build opportunities, such as the allocation of small and medium scale sites specifically for self and custom build housing and permitting self and custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p>		
<p>The Council should work collaboratively with providers in identifying appropriate sites for the allocation of homes suitable to meet the needs of older people and Disabled people. This would provide the Council more certainty that these needs are fully met.</p> <p>In addition, the difference between homes suitable for older people and specialist housing for older people, and the difference in need and demand for these types of homes, should be identified.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>In the final paragraph of the policy it is stated that 'The provision of dwelling types to meet the needs of older people, such as bungalows and low rise apartments, will be encouraged as part of the housing mix on all suitable development sites.'</p> <p>It was noted that the flexibility of this statement is juxtaposed with the prescribed 10% bungalow requirement in point c., and that no definition is given regarding 'suitable development sites' and how this would be applied. Consequently, it was suggested that the statement is ambiguous and reference to bungalow provision on suitable development sites should be removed from the final paragraph.</p>	<p>General</p>	<p>No policy amendments required.</p>

<p>No sites are allocated for health, care homes, retirement living, extra care or assisted living development. It was suggested that the Local Plan should allocate land to the north of Acklam Hall (ACK3) for such uses.</p>	<p>General</p>	<p>It is not considered appropriate to allocate the land north of Acklam Hall in the Local Plan for such uses, this land is identified as Green Wedge in the Publication Local Plan. No changes to the Local Plan are proposed.</p>
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## Policy HO4 – Housing Allocations

Summary of issues raised	Statutory or General consultee	Response
<p>Clarity was requested on the site selection process that has been undertaken in the allocation of housing sites.</p> <p>Specifically, information on how sites have been selected, including the criteria used to do so and the weight given to site sustainability was requested.</p>	<p>Statutory</p>	<p>Sites have been selected in accordance with the criteria in Publication Local Plan Policy ST2.</p>
<p>Site allocations HO4o (Land North of Low Lane) and HO4p (Holme Farm) should be removed from the plan.</p> <p>Both sites are within the Stainton and Thornton Neighbourhood Plan and proposals should have regard to the requirements of the Neighbourhood Plan. Moreover, both sites are outside the current limit of development.</p> <p>The land north of Low Lane is currently designated as green wedge and classed as undeliverable in the SHLAA and Five Year Housing Land Supply Assessment (dated 1<sup>st</sup> April 2023).</p>	<p>Statutory</p>	<p>Sites have been selected in accordance with the criteria in Publication Local Plan Policy ST2. The sites referenced are required to meet the housing required, no changes to the Policy are necessary.</p>
<p>Objections were raised against all the proposed allocations, with a particularly significant number comments submitted in objection to HO4a Stainsby and HO4b Newham Hall Farm.</p>	<p>General</p>	<p>Sites in the Local Plan have been selected in accordance with the criteria in Publication Local Plan Policy ST2. Policy ST2 and Policy HO1 Housing Strategy seeks to maximise and prioritise the re-use of previously developed land, while minimising further development of</p>

<p>The main issues raised in objection to specific site allocation are identified in the respective polices below and a response provided.</p> <p>Many of the comments received in objection to the allocation of specific housing sites were against the development of greenfield land and suggested that housing should be prioritised on brownfield sites/in the Town Centre and Middlehaven area.</p>		<p>new housing in greenfield suburban locations beyond those identified in Policy HO4 or in a neighbourhood plan. This approach is in line with the NPPF.</p> <p>While the plan prioritises the development of brownfield land, in order to achieve the planned levels of economic and housing growth it is acknowledged that development of greenfield land will be necessary.</p>
<p>An updated Local Plan Viability Assessment (LPVA) has not been provided for allocations HO4a, HO4b, and HO4d and each of these sites were regarded as unviable in the 2018 LPVA.</p>	<p>General</p>	<p>A Local Plan Viability Assessment has been prepared to support the Publication Local Plan.</p>
<p>The supporting text fails to demonstrate that any objective assessment of alternative sites identified through the SHLAA or assessed by the Sustainability Appraisal has been undertaken.</p>	<p>General</p>	<p>Sites have been selected in accordance with Policy ST2 and have been subject to the Sustainability Appraisal process. Supporting text to the Policy has been amended to clarify.</p>
<p>In relation of sites in the south of Middlesbrough, it was stated that no consideration has been given to the impact of the failure to deliver existing infrastructure requirements for the 2014 Housing Local Plan (i.e. Stainton Way Western Extension, East Middlesbrough link road, and Nunthorpe Park and Ride). Moreover, it was suggested that no consideration has been given to new planning legislation, updated NPPF requirements, nutrient neutrality issues associated with the Teesmouth and Cleveland SPA, biodiversity net gain requirements, and viability studies of major housing sites in the allocation of housing sites.</p> <p>With respect to changing requirements, such as biodiversity net gain and nutrient</p>	<p>General</p>	<p>Sites have been selected in accordance with Policy ST2 and have been assessed through the SHLAA and sustainability appraisal process.</p> <p>The issues raised in response are dealt with elsewhere in the Local Plan, for example the approach to nutrient neutrality is set out in Policy GR8, Biodiversity Net Gain is addressed in new Policy GR7. In addition, a Viability assessment has been prepared to support the Local Plan.</p>

<p>neutrality, one response specifically stated that fresh examination is required as to whether Newham Hall Farm (HO4b) should be allocated in whole, in part, or at all.</p>		
<p>The Council has failed to give sufficient weight to the assessment of brownfield sites to be prioritised for housing, before allocating green field sites, and has therefore failed to follow the NPPF.</p>	<p>General</p>	<p>Sites have been selected in accordance with Policy ST2 and have been assessed through the SHLAA and sustainability appraisal process.</p>
<p>The scale of greenfield housing allocations will decimate Middlesbrough's greenspace.</p>	<p>General</p>	<p>The Local Plan has been prepared in accordance with national policy and the Council has taken a balanced approach to site selection in accordance with Policy ST2, with the most valuable greenspaces protected.</p>
<p>The allocation of HO4o is not just justified in the context of reasonable alternatives (i.e. site reference STA10). In addition, responses highlighted that HO4a relates to land that is currently identifies as green wedge.</p> <p>In terms of HO4p, the issues was raised that this allocation relates to land that is outside the existing development limits.</p>	<p>General</p>	<p>Sites have been selected in accordance with Policy ST2. Allocated housing sites and alternative sites and have been assessed through the SHLAA and sustainability appraisal process.</p>
<p>Alternative options for housing development should be explored. The use of brownfield sites and smaller-scale developments that prioritise the preservation of green spaces would offer a more sustainable approach.</p>	<p>General</p>	<p>Sites in the Local Plan have been selected in accordance with the criteria in Publication Local Plan Policy ST2. Policy ST2 and Policy HO1 housing strategy seek to prioritise the re-use of previously developed land, while minimising further development of new housing in greenfield suburban locations beyond those identified in Policy HO4 or in a neighbourhood plan. This approach is in line with the NPPF.</p> <p>While the plan priorities the development of brownfield land, in order to achieve the planned levels of economic and housing growth it is acknowledged that some</p>

		development of greenfield land will be necessary.
The road network in Middlesbrough will not cope with the traffic generated from the development of the proposed allocations. Responses referenced roads across Middlesbrough, including the A19 and A174 and those around Coulby Newham, Hemlington, Stainton, and Stainsby.	General	A transport study has been prepared to support the Local Plan and will be available in the evidence base. In addition, an Infrastructure Delivery Plan has been prepared to support the Local Plan. The IDP will help ensure that new development is supported by appropriate infrastructure.
<p>Multiple comments were received promoting the allocation of land for housing sites.</p> <p>Three areas of land were put forward and suggested as possible sites suitable for housing development at Middlesbrough Golf Club (MGC), adjacent to Brass Castle Lane.</p> <p>An area of land north of Acklam Hall (reference ACK3) was put forward as a site where there is an opportunity to build on the existing health facilities at Acklam Hall and deliver further health, care, assisted living and retirement/older living uses. In a statement promoting the allocation of this land, it was stated that the site is deliverable.</p> <p>Finally, land at Grange Farm (site reference STA10), which lies south of Stainton Way, was put forward as a site suitable for housing development. In a statement promoting the allocation of this land, issues were raised with respect to the plan's proposed housing allocations and supply. It was stated that the land at Grange Farm needs to be allocated to ensure the housing requirement is deliverable in both the short</p>	General	Sites have been selected in accordance with Policy ST2. Allocated housing sites and alternative sites and have been assessed through the SHLAA and sustainability appraisal process. The sites referenced are not required to meet the housing requirement.

<p>term and over the whole plan period.</p>		
<p>In accordance with the NPPF, it was stated that the plan should provide a wide mix of sites, identifying at least 10% of the housing requirement on sites no larger than one hectare. If this is not achieved, strong reasons must be provided.</p>	<p>General</p>	<p>The Local Plan identifies over 10% of delivery on sites of hectare or less than a hectare or on windfalls which are sites that are likely to be less than a hectare.</p>
<p>Clarity is required regarding how the Council has arrived at the indicative yields for each site. With respect to this, further consideration must be given to the impact of biodiversity net gain to ensure that the plan is deliverable, with enough land allocated to meet the housing requirement and provide an appropriate buffer.</p>	<p>General</p>	<p>The SHLAA has formed the basis for the yields in the Local Plan which is based on Officers assessment of the likely developable area of a site.</p>
<p>The figures and the overall way in which housing supply is identified and described is not clear. Between the Plan, its Appendices and the SHLAA, the sites are categorised, labelled and counted in a number of different ways. The full methodology and figures set out in the Plan are not clear and easily understandable and it is therefore not possible to fully confirm and assess the soundness of the plan as a whole. It was therefore suggested that a thorough review of the housing supply figures be undertaken as a matter of urgency.</p> <p>In particular, one response stated that figures for the Hemlington Grange sites have been miss-counted and that the indicative figure of 608 dwellings for allocation HO4f is significantly more than the site can accommodate.</p>	<p>General</p>	<p>The figure for Hemlington Grange has been revised in this Policy and in Policy HO4f.</p>
<p>The policy was not considered sound. It was stated that HO4 is not positively prepared, effective, or consistent with the NPPF.</p>	<p>General</p>	<p>The Council considers the Policy to be sound, the housing allocations are only one element that deliver the housing requirement. The</p>

<p>The plan's housing requirement is 7,650, however Policy HO4 suggests a supply of 5,058 dwellings. With regard to the provisions of the NPPF, the plan's housing requirement should be viewed as a minimum and sufficient development opportunities should be provided to meet the housing requirement. Consequently, to ensure that the requirement is delivered, it was recommended that additional land be allocated for housing. The additional allocation of land should ensure that an appropriate buffer is provided within the housing land supply.</p> <p>In addition, concerns over the deliverability of sites over the plan period were expressed. It was suggested that sites with outline planning permission should not be included in the five year land supply, unless there is clear evidence to demonstrate that houses will be delivered from those sites. Further recommendations included the removal of windfalls from the housing supply and the application of a 10% lapse rate.</p>		<p>housing requirement will be delivered through a combination of:</p> <ul style="list-style-type: none"> <li>i. housing allocations set out in Policy HO4;</li> <li>ii. regeneration sites in the MDC area (see Policy EC4 and EC5);</li> <li>iii. completions since 1<sup>st</sup> April 2022;</li> <li>iv. other sites with planning permission; and</li> <li>v. small windfall sites.</li> </ul> <p>A Viability Assessment has been produced to support the Publication Local Plan.</p>
<p>It was highlighted that the plan's housing land supply should include a short and long-term supply of sites to ensure continuous delivery of housing across the plan period.</p> <p>Furthermore, it was stated that the plan should allow for the phased deliver of larger allocations and permitting parts of the wider housing allocations to come forward at different points over the plan period, as opposed to enforcing the whole allocation to be brought forward</p>	<p>General</p>	<p>No policy amendments required.</p>

<p>at one time. It was recommended that the wording of HO4 be amended to reference such flexibility.</p>		
<p>A respondent suggested that for a number of housing allocations they would welcome a commitment to include the provision of suitable space for on-site food growing (both allotments for individual and communal allotment/ growing sites) by residents. As a guide we would like to see the provision of approximately 0.9sqm per person. Would also like to see a commitment to planting of orchards and landscaping and hedgerows that includes plants and trees that produce fruit, nuts or seeds.</p>	<p>General</p>	<p>Policies have been updated to include reference to the GBI checklist. No further policy amendments required.</p>

## HO4a Stainsby

Summary of issues raised	Statutory or general consultees	Response
<p>Scheduled Monument Stainsby medieval village and open field system, List Entry Number: 1016352 lies adjacent to the site. A Heritage Impact Assessment is required as part of the evidence base.</p>	<p>Statutory</p>	<p>A HIA will form part of the evidence base for the Publication version of the Local Plan and the Policy has been amended to take account of the HIA.</p>
<p>Strong objection to SWWE through the site for the following reasons:</p> <ul style="list-style-type: none"> <li>• Increase in traffic related noise and air pollution</li> <li>• Concern about the suitability of clay soil located around the meadow.</li> <li>• The masterplan states that a further connection will be created through an enhanced roundabout entrance at Mandale Road – passing over Blue Bell Beck; which provides a haven for wildlife and biodiversity.</li> <li>• Phased works will disturb habitat</li> </ul>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>



<ul style="list-style-type: none"> <li>• The spine road would negatively impact existing flora, fauna, becks, ponds, trees etc.</li> <li>• Negative impact upon mental and physical health</li> </ul>		<p>The Publication Local Plan has also been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p> <p>The Stainsby Country and Masterplan Design code, adopted by the Council June 2022, and in addition to specific criteria identified in Policy HO4a, will be used to guide development proposals.</p> <p>A suite of detailed supporting assessments will be required to support a planning application.</p> <p>Where required mitigation measures will be provided.</p>
<p>Objection to housing in general for the following reasons; and in addition to the above:</p> <ul style="list-style-type: none"> <li>• Loss of greenfield site</li> <li>• Nature reserve that should be conserved</li> <li>• New housing would be too close to the A19, and would be subject to air and noise pollution</li> <li>• Additional housing will further exacerbate existing traffic, air pollution and noise problems</li> <li>• Will destroy the biodiversity of the historic green belt area of the beautiful Mandale meadow</li> <li>• Unnecessary loss of green space contributes to climate change.</li> </ul>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p> <p>The Publication Local Plan has also been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This</p>

<ul style="list-style-type: none"> <li>• No local amenities to accommodate existing or new residents</li> <li>• Lack of infrastructure i.e. GPs, schools, dentists etc.</li> <li>• Existing flooding issues due to the beck</li> <li>• The cost of maintenance for the country park is unsustainable, and will result in more council tax costs to Middlesbrough’s residents</li> <li>• Negative impact upon mental and physical health</li> </ul>		<p>evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p> <p>The Stainsby Country and Masterplan Design code, adopted by the Council June 2022, and in addition to specific criteria identified in Policy HO4a, will be used to guide development proposals.</p> <p>A suite of detailed supporting assessments will be required to support a planning application.</p> <p>Where required mitigation measures will be provided.</p>
<p>The development should incorporate social housing</p>	<p>General</p>	<p>Policy HO5 Affordable Housing, require residential developments of 10 or more homes, within the wards of Acklam, Coulby Newham, Hemlington, Kader, Ladgate, Marton East, Marton West, Nunthorpe, Stainton &amp; Thornton, and Trimdon, a minimum of 15% of the homes will be required to be affordable.</p>
<p>The local plan shows that you finally intend to link the new north side residential housing footpath via the existing flat track to the north, point C &amp; onto the east of our property at point D.</p> <p>1) Is it your intention to request official use of the tarmac track from point A to D therefore altering the existing ABC prow to A to D to C.</p> <p>2) or, Do you intend to fence off point D not allowing access to the same.</p>	<p>General</p>	<p>The matters raised are too detailed for the Local Plan, and will be addressed through future planning application(s).</p>

<p>3) It is clearly of benefit to all concerned to adopt option 1) from which we have no objection to, for some of the following reasons:-</p> <p>a) As already mentioned, the five styles &amp; steep steps.</p> <p>b) Access for wheelchair, pushchair &amp; mobility scooters.</p> <p>c) No danger from the horses in the paddocks.</p> <p>d) The ongoing council mtc &amp; cost of existing prowl ie strimming (£££).</p>		
<p>Multiple duplicate comments</p> <p>The Council has failed to follow the NPPF with regard to assessing housing allocations. Council has failed to give sufficient weight to the assessments of brownfield sites to be prioritised for housing, before allocating green field sites(Policy HO4)</p> <p>The housing numbers required for future housing will be satisfied by building in the town centre, Middlehaven and on brownfield sites. Council tax income will not be sufficient to maintain the man-made country park and the costs would be a burden to Middlesbrough residents.</p> <p>Development of 1300 houses as the development is not required due to Middlesbrough Council already exceeding their quota of new builds across Middlesbrough. The housing numbers required for future housing will be satisfied by building in the town centre, Middlehaven and on brownfield sites.</p> <p>Council has not provided updated local viability assessments in respect of the Stainsby, (HO4a). Newham Hall (HO4b) and Nunthorpe (HO4d) housing allocations. Each of these sites are regarded as unviable based on the 2018 Local Plan Viability Assessment contained in the Council's evidence base.</p>	<p>General</p>	<p>In line with the NPPF, the Plan encourages the development of previously developed/brownfield land and give substantial weight to the value of using them for homes and other identified needs. Specifically, Policy CR2 of the Plan identifies that re-use of previously developed land will be encouraged. Publication Local Plan Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p> <p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024).</p>
<p>The published Masterplan foregrounds the centrality of community allotments/growing spaces, there is nothing in the policy to that affect. More broadly, we feel that the approach</p>	<p>General</p>	<p>Policy wording amended.</p>

<p>to the food environment advocated by Bristol City Council (pp. 44 - 48) [ <a href="https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/local-plan/local-plan-review">https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/local-plan/local-plan-review</a> ] would be a welcome addition to our Local Plan; in our view it aligns with many of the aspirations we outline in the Middlesbrough Green and Blue Infrastructure Strategy.</p> <p>In addition to allotments, throughout the site and within housing (rather than on the periphery), more fruit, nut and seed producing trees and shrubs should be within the landscaping scheme. Would like to see more aspects outlined above in Policy HO1 Housing Strategy included in this policy.</p>		<p>No change to policy, this level of detail is not appropriate.</p>
<p>It is considered the allocation, based upon the trajectory for development, would not deliver the full 1,300 homes in the plan period, based on the likely lead-in times, with some of the allocation likely to deliver beyond the Plan period. Each year of delay against the existing trajectory would remove c.90 homes from the plan period delivery.</p>	<p>General</p>	<p>The trajectory will be kept under review and updated prior to publication with the latest information available to the Council.</p>
<p>'De-allocating' the Stainsby Site would allow the Council to still be able to provide a total of 6,300 dwellings over the plan period through land allocations (excluding windfall sites) which would still deliver more than the 256 minimum net additional dwellings per annum (total 4,864) as set out by the standard methodology for calculating housing need – and allow support for the Council's pro-growth agenda via Policy EC1. Further, the agricultural land could be retained for food security, the road would not be needed and therefore disturbance to the local wildlife site and priority species would not be incurred.</p>	<p>General</p>	<p>Stainsby is a key strategic site that is already part of the adopted development plan.</p> <p>Policy HO2 sets out the housing requirements, identifying a minimum of 7980 net additional dwellings for the plan period.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p>
<p>It is argued that the provision of such a large housing allocation on one of the only remaining large green field sites in the district will not help achieve the ambitious targets of the Councils climate emergency 2019, to be carbon neutral by 2029 as an organisation. Agricultural practises should be encouraged to</p>	<p>General</p>	<p>The site allocation, along with other policies in the plan, will help to ensure that sustainable development will be achieved.</p>

<p>tackle climate change to enable nature recovery, provide food needed to sustain the country and provide clean air.</p>		
<p>Whilst it is accepted the delivery of the road could unlock part of the site for development, the delivery of all 1,300 dwellings is questioned and the Plan needs to be realistic about the timing of delivery from this. The allocation of the Grange Farm site would assist in addressing the likelihood of reduced delivery from this site or its delay until later in the plan period and it can be delivered in the short term, which will assist the Council in identifying a rolling five year housing land supply.</p>	<p>General</p>	<p>No policy changes required. The site has been assessed and it is considered that 1300 dwellings can be provided on this site.</p> <p>The trajectory will be kept under review and updated prior to publication with the latest information available to the Council. Additional land may be identified if the Council considers that it would not be able to deliver the housing requirement.</p>
<p>It is against the Paris agreement and does not comply with climate change and the development will contribute to global warming.</p>	<p>General</p>	<p>It is considered that the Publication Local Plan has been prepared to accord with legislation and national planning policy. The policies in the plan will help to ensure that sustainable development will be achieved.</p>
<p>Much of the housing is proposed for an area which is part of natural water management network and which, under the current climate developments, is not something which should be ignored.</p>	<p>General</p>	<p>Criterion (t) and (u) of the policy identify the development should restrict built residential development to the part of the site within Flood Zone 1 only and maintain a buffer to ensure no development takes place within 8 metres of the watercourses within the site; and maximise the use of SuDS, water efficiency measures and landscape buffers as appropriate to protect Saffwood and Blue Bell Beck from urban run-off and sedimentation.</p> <p>In addition, Publication Local Plan Policy GR10 Flood Risk and Water Management, requires proposed development, in areas at risk</p>

		of flooding, to meet specific criteria.
<ul style="list-style-type: none"> <li>• The Stainsby Country Park and Masterplan Design Code (June 2022), is not intended to be prescriptive but provides a framework to guide development and sets out key design objectives and principles that all developments will be expected to embrace, and therefore should not be included as a specific reference in the draft Policy HO4a itself.</li> <li>• Ask the Council to clarify how the figure of 1,300 dwellings for the draft allocation of HO4a has been arrived at, and whether it has been informed by the pending Miller Homes and Avant Homes application for 600 dwellings and central hub facilities. In addition, flexibility should be awarded to the yield.</li> <li>• In the context of the pending planning application, it is not considered that the primary school is essential to be provided as part of that scheme. Within the Stainsby Country Park and Masterplan Design Code (June 2022), the school was envisaged to be delivered as part of the remaining allocation to the north and we agree that is the most optimal location.</li> </ul> <p>In relation to the delivery of the on site facilities a response states that:</p> <ul style="list-style-type: none"> <li>• the primary school delivery cannot be expected to be delivered and open within the early stages of development proposals. It would need a significant level of occupation on the site and the demand to have been reached to deliver an operational school.</li> <li>• Object to the suggested inclusion of bungalows as part of criteria f) of Policy HO4a.</li> <li>• Object to the inclusion of Criteria H in Policy HO4a given that there is a lack of evidence to substantiate this request and as such is therefore not aligned with paragraph 35b of the NPPF.</li> </ul>	General	<p>The Council considers the proposed wording to reflect both the adopted Stainsby Masterplan and the most up to date evidence for the site. It also reflects the Council’s broader commitments to deliver high quality development, that meets a range of needs and aspirations, and enhances the local road network whilst providing active travel opportunities. Further work on viability has been undertaken to inform the Publication Local Plan. Some policy wording has been amended to aid clarity over points raised.</p>

<ul style="list-style-type: none"> <li>• Concerns that criteria i is not in line with NPPF Paragraph 35b as it has not taken viability and deliverability into consideration</li> <li>• Object to this inclusion of off-site secondary school provision, Criteria J, as it was not considered required as part of the adopted Local Plan allocation and there is insufficient evidence provided to justify the requirement in the emerging policy allocation.</li> <li>• Object to the inclusion of Criteria M and the proposed designation of the Local Wildlife Site and Local Green Space as identified on the draft proposals maps, as we consider it is un evidenced and not justified. It further presents a conflict with the Council’s key pieces of infrastructure, the SWWE. As such, we consider that criteria M is not positively prepared, not justified and not effective, conflicting with paragraph 35 of the NPPF.</li> <li>• Concerns that there is a conflict between Policy GR4 and the wording of criteria O. As such, we would recommend that the Council considers whether the wording is consistent and whether Criteria O is required.</li> <li>• Strongly object to the current wording of Criteria P and consider that the current adopted policy H21 Criteria e) wording was more appropriate and would recommend keeping the current adopted wording of Policy H21 Criteria e).</li> <li>• Do not object to providing off site highways contributions necessary for the submitted development proposals, where they are justified and evidenced and meet the three tests of the Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 that the contributions. Would only support this criteria of the policy where it is properly applied in accordance with the NPPF paragraph 115 and Regulation 122 of the CIL</li> </ul>		
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<p>Regulations, and consistent with National Policy.</p> <ul style="list-style-type: none"> <li>• Object to criteria R as it would be impossible to guarantee a “traffic free” route and on that basis consider this criteria to not be effective, in line with NPPF paragraph 35(c). Whilst it is agreed that the development at Stainsby will aim to reduce reliance upon driving as a mode of transport and that the design of the strategic link road through each phase can be such that it reduces the potential for traffic, there is inevitably going to be an element of road traffic particularly at peak times. As such, we consider criteria R should be removed.</li> <li>• Object to criteria T and request that it is deleted, on the basis that it is not consistent with National Policy and the guidance set out in Section 14 of the NPPF and the associated Planning Practice Guidance (Paragraph: 004 Reference ID: 7-004-20220825; and 023 Reference ID: 7-023-20220825) which only seeks to steer new development to areas with the lowest risk of flooding, enforced through the sequential and exceptions tests approaches, rather than a strict requirement to build in flood zone 1 only. If the criteria is retained, it should be re-worded to reflect National Policy.</li> </ul>		
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### HO4b Newham Hall Farm

Summary of issues raised	Statutory or general consultee	Response
<p>Newham Hall, Retaining Wall and Steps, List Entry 1136584. Gate piers And Walls at Entrance to Newham Hall, List entry 1136620. Newham Hall Lodge, List entry 1139867. A Heritage Impact Assessment is required as part of the evidence base.</p> <p>In addition, there is a requirement in the 1990 Act</p>	<p>Statutory</p>	<p>A Heritage Impact Assessment forms part of the evidence base for the Publication Local Plan. Policy HO4b has been amended to make reference to this HIA.</p> <p>Policy HI2 Designated Heritage Assets (a) gives regard to Listed</p>



<p>that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is submitted, even though a site is allocated for development in - the Local Plan, the need to pay special regard to the desirability of preserving a Listed Building or its setting may mean that either, the site cannot actually be developed or the anticipated quantum of development is undeliverable.</p>		<p>Buildings, to sustain and enhance their significance including any contribution made by their setting.</p>
<p>Multiple comments pertain to the breaking point of existing infrastructure, e.g. GPs, dentists, shops, car parks, and road infrastructure are already at full capacity.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p> <p>The Publication Local Plan has also been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>Multiple comments raise strong concern to the loss of wildlife habitat should the site be developed.</p>	<p>General</p>	<p>The policy includes a requirement to enhance the Local Wildlife Sites that lie within the site boundary. All development will also be required to meet Biodiversity Net Gain, as</p>

		set out under Publication Local Plan Policy NE7.
<p>Multiple duplicate comments The Council has failed to follow the NPPF with regard to assessing housing allocations. Council has failed to give sufficient weight to the assessments of brownfield sites to be prioritised for housing, before allocating green field sites(Policy HO4)</p> <p>Council has not provided updated local viability assessments in respect of the Stainsby, (HO4a). Newham Hall (HO4b) and Nunthorpe (HO4d) housing allocations. Each of these sites are regarded as unviable based on the 2018 Local Plan Viability Assessment contained in the Council’s evidence base.</p>	General	<p>In line with the NPPF, the Plan encourages the development of previously developed/brownfield land and give substantial weight to the value of using them for homes and other identified needs. Specifically, Policy CR2 of the Plan identifies that re-use of previously developed land will be encouraged.</p> <p>Publication Local Plan Policy ST2 sets out the approach the Council has taken in selecting sites. Publication Local Plan Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p> <p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024).</p>
<p>A comment from a resident facing the site raises concerns to the access, with increased noise and pollution reducing the value of their properties. Suggested mitigation measures include a one-way route entering the site, re-routing outgoing traffic from the new development to turn left onto Mount Pleasant Way, leading onto Coulby Farm Way, could help distribute the traffic more evenly and prevent Bonnygrove Way from bearing the entire burden of the additional traffic from approximately 1000 houses. With an alternative solution to purchase properties or require the developer to purchase them.</p>	General	<p>The Publication Local Plan sets out policies that will ensure these matters are taken into consideration, and that any impacts from development are acceptable. Future planning applications will be subject to a transport assessment that will fully consider the impact of traffic through the site and on nearby roads. It is not appropriate to determine detailed mitigation (as suggested) at the Local Plan stage.</p>

<p>Multiple duplicate comments Middlesbrough has over performed against its current housing local plan requirements by 25%; it has 7 years housing land supply available; the Middlesbrough Development Corporation is planning for 1500 dwellings over the period of the plan; Council can prioritise the expansion of the existing Hemlington Grange development and brownfield sites for a buffer against its 253 dwellings per annum.</p>	<p>General</p>	<p>In line with the NPPF, the Plan encourages the development of previously developed/brownfield land and give substantial weight to the value of using them for homes and other identified needs. Specifically, Policy CR2 of the Plan identifies that re-use of previously developed land will be encouraged.</p> <p>Publication Local Plan Policy ST2 sets out the approach the Council has taken in selecting sites. Publication Local Plan Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites will be required.</p>
<p>Multiple duplicate comments The proposed housing allocation is likely to have a significant effect on the Teesmouth and Cleveland Coast SPA and RAMSAR site, which is a designated European habitat site, meaning it is offered the highest level of protection under the legislation. The council, in its role as the 'Competent Authority', has a statutory duty to ensure that new development proposals accord with this legislation. Therefore, it must not allow development proposals to proceed if they are likely to have a significant effect on the SPA.</p> <p>Other comments suggest the pollution created from this housing site will negatively impact upon the designation.</p>	<p>General</p>	<p>Work on a Habitats Regulation Assessment has been undertaken forms part of the evidence base for the Publication Local Plan.</p> <p>Publication Local Pan Policy NE6 sets out the approach to considering the impact on protected sites, including designated European habitat sites.</p> <p>Other policies in the plan will ensure there are no unacceptable pollution impacts from new development.</p>
<p>Multiple duplicate comments The Coulby Newham land is assessed as “best and most</p>	<p>General</p>	<p>Newham Hall Farm is a key housing allocation that is being carried forward from the existing</p>

<p>versatile agricultural land, Grade 3A". As a housing allocation, this is contrary to the NPPF para 181.</p> <p>In addition NPPF paragraph 201 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal, (including by development affecting the setting of a heritage asset). No consideration has been given by the Council to the Newham Hall non designated historic landscape.</p>		<p>development plan. The Council does not consider the selection of this site for housing is contrary to the NPPF.</p> <p>A Heritage Impact Assessment forms part of the evidence base for the Publication Local Plan.</p>
<p>Multiple duplicate comments The housing allocation was shown to be unviable in the Councils evidence base in 2018 and continues to be unviable due the increase in inflation on construction costs; increase in interest rates and joint work undertaken by Homes England and the Council in 2022-33.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024). The site is currently in Council ownership and is considered to be developable.</p>
<p>Multiple duplicate comments Middlesbrough Council has failed to implement the necessary infrastructure required to support an increase in housing in South Middlesbrough as required by the 2014 Planning Inspector's report, i.e., Stainton Way Western Extension and the East Middlesbrough link road</p>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>Newham Hall Farm has been allocated for housing since the 2014 Housing Local Plan, and has not progressed substantively since allocation, with no comprehensive planning applications submitted and very few homes delivered in these areas, despite the 10-years plus that has now elapsed.</p>	<p>General</p>	<p>The Council is in the process of bringing the site forward, and a planning application has been submitted for the road. The trajectory has been updated and it is considered that the majority of development will come forward during the plan period.</p>

<p>It is anticipated that continued delays mean this could fail to deliver to the trajectory envisaged.</p> <p>Other comments of the same, the housing site has been allocated for over ten years, is the housing actually needed.</p>		
<p>Concerns about the proximity of the site to the Grade II Listed Newham Hall, Newham Hall Lodge and Newham Hall Gate and its important parkland and setting which is noted as being of Regional Importance by Historic England. Further, it abuts the boundary of the Marton West Neighbourhood Plan so should be considered against relevant policies contained within that document.</p>	<p>General</p>	<p>A Heritage Impact Assessment forms part of the evidence base for the Publication Local Plan.</p>
<p>Concerned about the size of greenfield land allocated in this location and the impact this will have on the surrounding landscape including important views towards Roseberry Topping and the North York Moors National Park.</p>	<p>General</p>	<p>The Council does not agree that the development of this site will have unacceptable impacts on the surrounding landscape and views. Chapter 3 Creating quality Places and more specifically policies CR1, CR2 and CR3; along with Chapter 8 Managing the Historic Environment, recognise the importance of protecting and enhancing important features and characteristics of historic heritage.</p>
<p>When the development has been drafted, immediate neighbours must be kept informed. When planning the road layouts and delivery of the site, consideration must be given to existing and proposed road infrastructure and impacts of construction works.</p>	<p>General</p>	<p>Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made; and in accordance with the Statement of Community Involvement, occupiers of land or properties which are adjacent to and/or have a common boundary with the application site will be notified and given the opportunity to comment.</p>

<p>Objections to the change in figures which has increased to 1100 (from 1000) since the HLP, and how this has been decided.</p>	<p>General</p>	<p>The allocation has been revised to 1000 dwellings.</p>
<p>Given new policy requirements, biodiversity net gain and nutrient neutrality for example, a fresh examination, based upon up to date to-date evidence is required as to whether to allocate the site in whole. The land to the south of Newham Hall should be deleted from the Policies Map. See comments to Policy GR6</p>	<p>General</p>	<p>Achievement of Biodiversity Net Gain is set out in Publication Local Plan Policy NE7, with requirements regarding biodiversity also set out in other policies such as NE1, NE5, CR2, and CR3.</p> <p>The approach to dealing with Nutrient Neutrality in set out in Policy NE8.</p> <p>The Local Plan will be subject Independent Examination before it can be adopted.</p>
<p>In policy H26 of the Housing Local Plan 2014, criterion i) required the provision of improvements to the B1365 to realign the bend in the road at the west of the site. There is a need for a similar criterion in the emerging Plan. The realignment of the road should be shown on the masterplan as it is in the Housing Local Plan 2014.</p>	<p>General</p>	<p>No changes required. The wording in the Policy reflects the most up to date position of the local highway authority.</p>
<p>The loss of open space will have a negative impact upon mental and physical health.</p>	<p>General</p>	<p>The site is not currently open space, but agricultural land. This Policy, along with Policies NE3, NE4 and IN6, recognises the importance of open space, aiming to protect and enhance existing, create new open space, and support development that promotes healthy lifestyles.</p>

### HO4c Grove Hill

No issues raised.

### HO4d Nunthorpe Grange

Summary of issues raised	Statutory or general consultee	Response
<p>The Council is building more houses per annum than stated in the adopted Local, therefore Policy HO4d Nunthorpe Grange should have no requirement to exceed the proposed 250 dwellings in the draft Local Plan.</p>	<p>Statutory</p>	<p>In accordance with the Strategic Housing Land Availability Assessment (SHLAA) 2023, site yields are indicative, in this instance informed by the Nunthorpe Grange Design Code 2018.</p>
<p>Concerns to the delay of the masterplan where there is urgent need for agreement on precisely where housing, roads, community facilities, and green spaces will be located, and on the nature of the various green spaces.</p> <p>The brown colouring in the draft Local Plan is alarming, because the impression is given that the green spaces have been removed.</p>	<p>Statutory</p>	<p>The design code for the site is in the process of being updated.</p> <p>The policies map identifies the full extent of the allocation, which must be implemented in line with the relevant policy. The precise location of open space will be determined through future planning applications.</p>
<p>The Vicarage, List Entry Number: 1329506 Church Of St. Mary, List Entry Number: 1139841 The Lodge, List Entry Number: 1139812. Nunthorpe War Memorial, List Entry Number: 1448373 Gatepiers At Entrance To The Lodge And Poole Hospital, List Entry Number: 1329528. Lychgate And Adjoining Stile, Fence And Gate, C45m South-West Of Church Of St Mary, List Entry Number: 1329525</p> <p>Nunthorpe and Poole Conservation Area</p> <p>A Heritage Impact Assessment is required as part of the evidence base.</p> <p>In addition, there is a requirement in the 1990 Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.</p>	<p>Statutory</p>	<p>A Heritage Impact Assessment (HIA) will form part of the evidence base for the Publication version of the Local Plan. The Policy has been updated to reference the HIA.</p> <p>Policy HI2 Designated Heritage Assets (a) gives regard to Listed Buildings, to sustain and enhance their significance including any contribution made by their setting.</p>

<p>Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is submitted, even though a site is allocated for development in - the Local Plan, the need to pay special regard to the desirability of preserving a Listed Building or its setting may mean that either, the site cannot actually be developed or the anticipated quantum of development is undeliverable.</p>		
<p>Flood risk for the lifetime of the development should be considered when planning the associated layout.</p>	<p>General</p>	<p>Publication Local Plan Policy NE10 identifies the requirement for flood risk to be taken into account at all stages of planned development in areas at current or future risk.</p>
<p>Council has not provided updated local viability assessments in respect of the Stainsby, (HO4a). Newham Hall (HO4b) and Nunthorpe (HO4d) housing allocations. Each of these sites are regarded as unviable based on the 2018 Local Plan Viability Assessment contained in the Council's evidence base.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024).</p>
<p>It is not clear how the Council have arrived at the indicative yields for each site. Ensuring that the indicative yields are. This is now more of an issue than ever since biodiversity net gain became mandatory in February 2024, with a preference for on-site net gain in the first instance. This will significantly reduce the net to gross ratio between developable and non-developable land and therefore the overall site yields. The Council must give this further consideration as the</p>	<p>General</p>	<p>In accordance with the Strategic Housing Land Availability Assessment (SHLAA) 2023, site yields are indicative, in this instance informed by the Nunthorpe Grange Design Code 2018.</p>



<p>conclusions may be that further sites are needed to ensure than the plan is deliverable.</p> <p>It is unclear why the Council in the current Draft Local Plan have reverted back to a suggested yield of 250 dwellings. It is considered that approximately 350 dwellings is a much more reasonable suggested yield from the site which will ensure that more effective and efficient use of the site will be made in accordance with the requirements of NPPF. It is also justified by the detailed work undertaken and adopted by the Council themselves.</p>		
<p>Criteria v of draft policy HO4d seeks to impose the same restriction on access from Guisborough Road. Strong objection to this restriction, as there are no technical or planning reasons why access cannot be provided from Guisborough Road to serve at least the Taylor Wimpey part of the wider Nunthorpe Grange allocation; therefore, it is not justified.</p>	<p>General</p>	<p>No policy amendments required. The requirement is not simply about technical capability of providing access, but a broader policy aim to achieve placemaking and retain character along Guisborough Road.</p>
<p>The wetland around the source of Ormesby Beck needs to be protected from any development and kept as an area for biodiversity.</p>	<p>General</p>	<p>Where relevant, housing site allocation policies include requirements for development to retain existing natural features where appropriate, including through their use as SuDs. This includes features such as mature trees and hedging. Similarly, where appropriate, these policies will also require that that open space is provided.</p> <p>Biodiversity net gain will also require development to deliver a minimum biodiversity uplift of 10%, with priority given to providing this on-site.</p>

		Achievement of Biodiversity Net Gain is set out in Policy NE7, with requirements regarding biodiversity also set out in other policies such as NE1, NE5, CR2, and CR3.
Gentle density town houses and low-rise apartments should be prioritised over low-density family homes, which are currently abundant in the area.	General	Policies HO3, HO5, HO11 and specifically allocation policy HO4d set out requirements for a mix and type of housing that will be expected to be made available within the allocation. The precise design will be considered through the masterplan and future planning applications.
Footpaths and cycle ways connecting to Nunthorpe Railway station should be designed to encourage public transport use over car use.	General	A strong emphasis upon managing the available network more effectively, including measure to achieve modal shift and connectivity runs throughout the Local plan and is specifically identified in the policy. Chapter 7 more specifically identifies the need for a sustainable transport network.

## HO4e Former St Davids School

Summary of issues raised	Statutory or general consultee	Response
A point in this policy criteria should make reference to this historic landfill site, namely Middlesbrough Crematorium which is within 250m of the development and is potentially producing landfill gas, to ensure that it is given adequate consideration as part of any planning application.	Statutory	Policy wording amended.
Acklam Hall Conservation Area  A Heritage Impact Assessment is required as part of the evidence base.	Statutory	As the development has planning permission it is considered that a Heritage Impact Assessment is not required.

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## HO4f Hemlington Grange

Summary of issues raised	Statutory or general consultee	Response
<p>Strong objection to housing in general for the following reasons:</p> <ul style="list-style-type: none"> <li>• Lack of amenities and infrastructure e.g. schooling, doctors, local community space</li> <li>• Historic flooding in the area will get worse</li> <li>• Poor public transport services</li> <li>• Increased traffic</li> <li>• Noise and air pollution</li> <li>• Decrease in existing property values</li> <li>• Safety</li> </ul>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p> <p>The Publication Local Plan has also been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p> <p>A suite of detailed supporting assessments will be required to support a planning application to identify if mitigation measures will be required.</p>
<p>The 2024 policies map indicates a tree line which will be retained at the boundary line of HO4f where Wolseley Way road ends. Please can you confirm how much of this will be retained? The images do not show that there is enough green space given the amount that will be taken down across HO4F</p>	<p>General</p>	<p>The site is being brought forward in accordance with the outline planning permission granted in 2016, which includes a masterplan for the site.</p> <p>The Publication Local Plan includes policies that balance the need for development</p>

<p>plot and the amount of wildlife requiring safe space. In addition, concerns raised about the loss of trees, greenspace and wildlife, which directly contradicts the Local Plan's goals of improving biodiversity and protecting the environment.</p>		<p>against the need to protect certain green spaces, including land important for wildlife. This includes achieving Biodiversity Net Gain in accordance with Policy NE7.</p>
<p>Will security be considered as part of the construction works. There has been a range of building material (bricks, wood etc.) left unattended across the current site, which has resulted in damages.</p>	<p>General</p>	<p>Any decision made upon a planning application will require conditions which should take into consideration the development whilst under construction.</p>
<p>Road infrastructure proposals do not appear to be sufficient in serving the existing and proposed development.  Particular concerns with the increased traffic proposed on Hemlington Grange Way.</p>	<p>General</p>	<p>The 'Transport Infrastructure' part of the policy identifies required improvements to road infrastructure to support development on this site.  The Publication Local Plan has also been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>Affordable housing should be built in central Middlesbrough and Middlehaven first. These areas have all of the infrastructure needed in place already, they have good access to public transport and many more amenities to access.</p>	<p>General</p>	<p>Publication Local Plan Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites. The development of other brownfield sites is supported by the plan where sites are available.  Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites is necessary.</p>

<p>It is not clear what the actual remaining capacity of HO4f is, but it appears to be significantly fewer than the 608 dwellings included. The draft Plan states (para 5.45) “Taking account of planning permissions granted on Hemlington Grange to date it appears that fewer than 1,230 will be delivered on the main site.” This appears to indicate the 608 dwellings is an overestimate, with that being potentially double counted/conflated with the other Hemlington parcels within the trajectory.</p>	<p>General</p>	<p>Policy has been updated with revised yield.</p>
<p>Cycle routes should be integrated throughout the development. All apartment buildings should have cycle lockers available for all residents. Links with existing community facilities at Hemlington and Coulby Newham should be encouraged. The site is too far from transport hubs and employment sites.</p>	<p>General</p>	<p>Bullet g states a requirement to “provide a network of footpaths, cycleways and bridleways that link into the wider network”</p> <p>Chapter 7. Physical, Social and Environmental Infrastructure places a strong emphasis upon actively managing the available network more effectively. Policy IN2 Integrated Transport Strategy, specifically identifies the need for a sustainable transport network, linking employment within Middlesbrough to provide access for all.</p>
<p>Objection in relation to Wolseley way and Austin drive being used as a main access point to new phases within the development. Roads are not suitable for main road traffic, are too narrow, negative impact upon privacy and safety of existing residents.</p>	<p>General</p>	<p>The site is being brought forward in accordance with the original outline permission that set out the key considerations for roads through the site.</p>

## HO4g Hemlington North

Summary of issues raised	Statutory or general consultee	Response
<p>Object to the inclusion of low-rise apartments being included in the proposal. That and the fact</p>	<p>Statutory</p>	<p>No policy amendments required. The purpose of this Local Plan is to review existing policy and</p>

<p>that the proposal could include the possibility of a “landmark” apartment building at the corner of Stainton Way and Stokesley Road which should not exceed four and a half storeys. This goes against Policy H23f Hemlington Grange in the adopted 2014 Local Plan, which clearly states that apartments will not be permitted within the development. Also, it goes against the Stainton and Thornton adopted Neighbourhood Plan, Policy ST8: Design Principles for New Residential Developments Part 1 section 2. Reflect the character of the villages or rural areas, respecting the scale, density, proportion, form and material and section 5. Be of two storeys or less.</p>		<p>update where it considered appropriate. The Council is of the view that in certain circumstances low rise apartments and a landmark building may provide an appropriate design solution to the site.</p>
<p>The site is not big enough to accommodate 35 dwellings. There is insufficient land to accommodate meaningful green space and a SuDs, along with car parking. The site should be left as open space.</p>	<p>General</p>	<p>No policy amendments required. The site has been assessed as having a potential yield of approximately 35 dwellings. The precise number will be determined through the planning application process.</p>
<p>A landmark building of up to 4.5 storeys will be an eyesore and not blend in with the local environment / character of the area. As part of an affordable housing development, will be totally out of place with the surrounding area. It is unlikely to be of the highest quality design and architectural standards, due to the purpose to which it will be put to, i.e., Affordable housing.</p>	<p>General</p>	<p>No policy amendments required. The Council will consider 4.5 storeys where they offer an appropriate design solution to the site.</p>
<p>The masterplan approved for Hemlington Grange was based on the current HLP policies for Hemlington Grange, including the requirement that apartments will not be permitted in the development. As such, the Hemlington North policy should</p>	<p>General</p>	<p>No policy amendments required. The purpose of this Local Plan is to review existing policy and update where it considered appropriate.</p>

be in line with the existing HLP approved policies H23.		
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## HO4h Hemlington Grange South

Summary of issues raised	Statutory or general consultee	Response
<p>Objection to the use as Wolseley Way as main road, it is too narrow for existing traffic, and this will only worsen as the traffic increases as proposed. It has not been designed correctly to accommodate the proposed housing.</p> <p>Residents have not been correctly informed when purchasing properties, they must be kept informed throughout the process.</p>	general	<p>The site is being brought forward in accordance with the outline permission that set out the key considerations for roads through the site.</p> <p>Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, once a planning application has been submitted, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made; and in accordance with the Statement of Community Involvement occupiers of land or properties which are adjacent to and/or have a common boundary with the application site will be notified and given the opportunity to comment.</p>
Too much urban sprawl	General	No policy amendments required. The Local Plan seeks to control the release of land to prevent urban sprawl.

## HO4i Hemlington Grange West

Summary of issues raised	Statutory or general consultee	Response
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<p>Objection in relation to Wolseley way and Austin drive being used as a main access point to new phases within the development. Roads are not suitable for main road traffic, are too narrow, negative impact upon privacy and safety of existing residents.</p>	<p>General</p>	<p>This site is separate to the main site, and will not impact on the roads identified.</p>
<p>Would welcome the inclusion of an orchard and plants and trees that produce fruit, nuts or seeds within landscaping, hedgerows and a green corridor (j. &amp; k). This would support aspects from the Green &amp; Blue Infrastructure Strategy, such as Emerging Opportunities BD3 and BD4, support for pollinators and Theme 2: Biodiversity and Geodiversity.</p> <p>Would also like to see opportunities for the provision of markets, as well as scope for diverse and temporary sustainable food retail (such as pop-up social supermarkets e.g. Eco Shops) as a part of the Local Centre (e.) to support the social and economic character of the area and providing a diverse range of retail opportunities for residents, which includes access to local, sustainable and affordable food.</p>	<p>General</p>	<p>Policy wording amended to include reference to GBI checklist.</p> <p>No other policy amendments required.</p>
<p>As a land owner in proximity to the proposed site the following objections are made:</p> <ul style="list-style-type: none"> <li>• Devaluation of property</li> <li>• Overlooking/loss of privacy</li> <li>• Loss of light or overshadowing</li> <li>• Highway safety</li> <li>• Traffic</li> <li>• Noise</li> <li>• Effect on conservation area</li> <li>• Impact upon wildlife</li> </ul> <p>As mitigation, if the development where to go ahead the Council should make an offer to buy the nearby property at Stainton View.</p>	<p>General</p>	<p>A suite of detailed supporting assessments will be required to support a planning application. Where required mitigation measures will be provided.</p> <p>Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, once a planning application has been submitted, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made. All material considerations will be considered as part of the decision process in accordance</p>



		with the NPPF Chapter 4 'Decision making.'  Property values are not a material consideration in Planning.
As per comments of HO3, suggest that the inclusion of "bungalows" be removed from HO4i Criteria A.	General	No policy amendments required.
As per the Original Hemlington Grange Masterplan, the site should be allocated for employment. There is high unemployment in the area, and Hemlington is too far away from current employment in the town centre.	General	The Middlesbrough Employment Land Review (ELR) (2021) concluded that there was no need for employment land in this area and that it should be de-allocated.

### HO4j Ford Close Riding Centre

Summary of issues raised	Statutory or general consultee	Response
The site is too far from employment areas, transport hubs and the town centre, and would be better suited as a local green space.	General	The site is an existing allocation and has been granted planning approval. It is therefore considered an appropriate housing site for the Publication Local Plan.

### HO4k Hemlington Lane

Summary of issues raised	Statutory or general consultee	Response
Objection raised due to the loss of a substantial amount of tree cover and associated biodiversity and ecology, contrary to the National Policy Framework 2021 (para.174d), Local Plan Policy DC1(e), CS4(j), and the council's Green Strategy which requires biodiversity assets, wildlife species and green infrastructure to be protected.	General	Policy includes a require to "provide compensatory tree planting both on and off-site to mitigate for the loss of existing trees on the site".  Achievement of Biodiversity Net Gain is set out in Policy GR7, with requirements regarding biodiversity also set

		out in other policies such as GR1, GR5, CR2, and CR3.
Traffic volumes along Ladgate Lane are already problematic at times and would be further exacerbated by a housing development on this site.	General	<p>A strong emphasis upon managing the available network more effectively, including measure to achieve modal shift and connectivity runs throughout the Local plan.</p> <p>The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
The current pollution levels for houses on that stretch already exceed two WHO limits for PM2.5 and NO2 ( <a href="https://addresspollution.org">https://addresspollution.org</a> ). Building houses here will expose residents to unacceptable levels of pollution that will contribute to health problems.	General	Other policies in the plan deal with pollution. Future planning applications will be subject to consultation with the Council's Environmental Health Team who will advise planning on the suitability of development, and any mitigation required (as appropriate).

## HO4I Land East of Driving Range

Summary of issues raised	Statutory or general consultee	Response
<p>An adjacent resident objects to develop the site as housing as there is no planning layout and the following is unclear:</p> <ul style="list-style-type: none"> <li>potential loss of wildlife</li> </ul>	General	A suite of detailed supporting assessments, plans and drawings will be required to support a planning application. Any legal

<ul style="list-style-type: none"> <li>• Loss of trees and habitat, and natural screening from the main road etc.</li> <li>• A covenant on the land to remain as a golf course</li> <li>• Potential loss of privacy/overlooking</li> <li>• Increase in traffic</li> </ul>		<p>restrictions will be dealt with outside the planning process. Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, once a planning application has been submitted, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made. All material considerations will be considered as part of the decision process in accordance with the NPPF Chapter 4 'Decision making.'</p>
<p>If the development were to go ahead there should be bungalows proposed as part of the development.</p>	<p>General</p>	<p>Criterion a of the Policy, along with Policy HO3 require a mix of dwelling type and sizes, including bungalows.</p>
<p>The site is not likely to be able to appropriately accommodate that scale of development and it should be around 50 dwellings.</p> <p>Once taking the factors of the criteria into account, the net developable area is considered to be much less than the 2.2ha assumed in the SHLAA Addendum with a consequent reduction from the assumed capacity of 77 homes</p>	<p>General</p>	<p>The Council has assessed this site as having a potential yield of approximately 75 units and this is proposed for the Publication Local Plan. The precise number will be considered through the planning application stage.</p>
<p>General objections include loss of green space, disturbance of wildlife, too far from transport hubs and employment sites; and result in additional traffic on the road network.</p>	<p>General</p>	<p>A suite of detailed supporting assessments, plans and drawings will be required to support a planning application.</p> <p>Once a planning application has been submitted, all material considerations will be considered as part of the decision process in accordance with the NPPF Chapter 4 'Decision making.'</p>
<p>Middlesbrough has over performed against its current housing local plan requirements by 25%; it has 7 years housing land supply available; the Middlesbrough Development Corporation is planning for 1500 dwellings over</p>	<p>General</p>	<p>In line with the NPPF, the Plan encourages the development of previously developed/brownfield land and give substantial weight to the value of using them for homes and other identified needs. Specifically, Policy CR2 of the Plan</p>

<p>the period of the plan; Council can prioritise the expansion of the existing Hemlington Grange development and brownfield sites for a buffer against its 253 dwellings per annum.</p>		<p>identifies that re-use of previously developed land will be encouraged. Publication Local Plan Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p>
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### HO4m Coulby Farm Way

Summary of issues raised	Statutory or general consultee	Response
<p>The site is used as green open space and is not worth the loss for the development of 17 dwellings.</p>	<p>General</p>	<p>The inclusion of this site follows a decision by the Council that it is not required for open space. It has been assessed as being suitable for a small scale housing development.</p>

### HO4n Land west of Cavendish Road

Summary of issues raised	Statutory or general consultee	Response
<p>Adding additional routes to this immediate area will increase already irresponsible motorbike users.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>If the development is to be social housing this is likely to contribute to the anti-social behaviour that already exists in the area.</p>	<p>General</p>	<p>No policy amendments required. A mix of housing types is required, and there is no specific policy requirement for affordable (social) housing.</p>
<p>The loss of green space would be detrimental to the residents of the area, and against your own policies in the plan.</p>	<p>General</p>	<p>The inclusion of this site follows a decision by the Council that it is not required for open space. It has been assessed as being</p>

Further comments that for the gain of 16 houses, does not outweigh the harm for the loss of green space.		suitable for a small scale housing development.
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## HO4o Land North of Low Lane

Summary of issues raised	Statutory or general consultee	Response
When designing the layout of any development, flood risk for the lifetime of the development should be considered to protect residents from current and future flood risk.	Statutory	Publication Local Plan Policy GR7 identifies the need for flood risk to be taken into account all stages of the planning process to avoid development in areas at current or future risk.
It would be particularly appropriate to incorporate water efficiency measures into policies for strategic new housing allocations where design principles will underpin the masterplanning process, as well as in the creation of new development and places supported by policies CR1, CR2 and CR3.	Statutory	No policy amendments required. Water efficiency is addressed through Publication Local Plan Policies CR2 and GR10.
<p>Sites at Policy HO4p Holme Farm and Policy HO4o Land North of Low Lane should be removed from the draft Local Plan. Both sites are within the Stainton and Thornton Neighbourhood Plan area and proposals for development should have regard to the requirement of the Neighbourhood Plan.</p> <p>Other reasons to exclude both sites are they are BOTH outside the current limit of development and the Land North of Low Lane (Stainton Vale) is designated GREEN WEDGE by MBC and classed as “undeliverable” in their SHLAA and 5-year HLSA dated 1st April 2023 and indicates that housing development is contrary to this</p>	Statutory	An assessment of potential housing sites has been undertaken through the SHLAA and sites have been selected in accordance with Publication Local Plan ST2 Spatial Strategy. In order to meet the housing requirement it is necessary to select greenfield sites including those previously designated Green Wedge. The local plan process allows for the review and update of polices, including Green Wedges.

designation and should be removed from the plan.		
<p>Pair Of Dovecotes And Linking Outhouse, C.20m North- West Of Stainton Vale Farmhouse, List Entry 1139815 Stainton Vale Farmhouse, List Entry 1312282.</p> <p>A Heritage Impact Assessment is required as part of the evidence base.</p>	Statutory	A Heritage Impact Assessment (HIA) will form part of the evidence base for the Publication version of the Local Plan. The Policy has been amended to reference this HIA.
<p>Multiple concerns raised to housing allocation for the following reasons:</p> <ul style="list-style-type: none"> <li>• Loss of woodland, greenspace and wildlife</li> <li>• Increased traffic, with associated noise and air pollution</li> <li>• Lack of amenities and infrastructure, ie shops, schools, doctors.</li> <li>• Loss of greenspace upon mental health and wellbeing.</li> <li>• Too far from employment sites</li> </ul>	General	<p>A suite of assessments have been used to inform the Local Plan process, on housing need, employment, green and blue infrastructure etc.</p> <p>The Council is satisfied that it has selected the most appropriate housing sites to meet the housing requirement.</p>
<p>Affordable housing should be built in central Middlesbrough and Middlehaven first. These areas have all of the infrastructure needed in place already, they have good access to public transport and many more amenities to access.</p>	General	<p>Housing sites have been selected in accordance with Publication Local Plan Policy ST2, which prioritises the use of brownfield land. PolicyST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p>
<p>As a smaller developer of the site, support the allocation for housing and would like to see connections to the larger housing site to provide for an integrated and connected site for both foot and vehicle traffic.</p>	General	<p>The policy sets out expectations regarding the access requirements alongside the on site road, public transport and active travel arrangements. Planning applications will not be acceptable where they do not comply with</p>

<p>Would ask the Local Planning Authority to ensure the development of the large site by the house builder should not preclude the delivery of the land that is not within their control.</p>		<p>this policy, including where they prevent other parts of the site being brought forward.</p>
<p>Delivery in 2026/27 (in two years) is therefore unrealistic, and a realistic lead-in time may see some of the 700 homes delivered outside of the Plan period. Although the site is actively promoted, it is likely that there will need to be some form of collaboration among the interests to deliver the allocation, with co-ordination of planning applications and then delivery thereafter.</p>	<p>General</p>	<p>The housing trajectory has been reviewed and updated. The Council is considering a planning application for a site and it is considered reasonable to assume delivery within the stated period.</p>
<p>Objection on the grounds that some of the policy requirements are not justified or are ineffectively worded:</p> <p>Policy HO4o (b) - The comments made on Policy HO3 should also be considered to apply to here. In addition question whether a cross reference to the policy is even necessary if Policy HO3 applies to all residential developments in any case.</p> <p>Policy HO4o (c) - Suggest the policy wording is clarified to ensure that dwellings that achieve Building Regulation requirement M4(2) and Building Regulation requirement M4(3) meet the policy requirement of 'accessible and adaptable dwellings' and 'wheelchair adaptable dwellings' rather than this left to interpretation.</p> <p>Alternatively, this policy wording could be removed as Policy HO3 applies to all residential developments in any case.</p>	<p>General</p>	<p>The policy has been updated where it is considered appropriate. In other instances where the Council disagrees with the points raised, no wording changes have been applied. The policy seeks to achieve sustainable development a create a quality place.</p>

<p>Policy HO4o (d) - The comments made on Policy HO11 should also be considered to apply to here.</p> <p>Policy HO4o (e) - The comments made on Policy HO5 should also be considered to apply to here.</p> <p>Policy HO4o (f) - further flexibility should be introduced to the policy requirement to recognise the difficulty of attracting sufficient market interest to deliver a local centre, particularly with working from home and online deliveries skewing demand. Equally, the Council has not put forward any evidenced need or market interest at this stage.</p> <p>Policy HO4o (g) - To provide further clarity with regard to implementation of the policy, would suggest that the Historic England building references of the assets are added to the policy wording to avoid any confusion on what assets the site layout should preserve.</p> <p>Policy HO4o (h) - To avoid any confusion when implementing this policy requirement, the policy wording should be updated to cross refer or specifically reference the Northumbrian Water guidance. It is the understanding that there are set measurements for what operations can be carried out in proximity to Northumbrian Water assets which should be reflected in the policy requirement wording. 'Immediately adjacent' is not defined and can be easily replaced with the specific Northumbrian Water guidance.</p>		
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<p>Policy HO4o (k) - The policy requirement should be amended to require a safe and accessible access rather than specify an intervention which is not evidenced.</p> <p>Policy HO4o (l) - The term 'penetrate' is not defined nor is it clear how a future planning application or development proposal would meet this policy requirement. The policy requirement should be amended to require any future development proposal to demonstrate it can accommodate public transport as well as suitable access to public transport provision.</p> <p>Policy HO4o (m) - The policy requirement should be supported by a clear Infrastructure Delivery Plan and Viability Assessment which has identified and tested the necessary improvements. Currently this policy requirement requires 'provide for any necessary off-site improvements' (emphasis added) which is an open-ended requirement and does not align with the Regulation 122 statutory tests.</p> <p>Policy HO4o (n) – strong objection to this policy requirement and strongly advocate that this policy approach is not sound. The Council has put forward no evidence to support the requirement for this infrastructure intervention.</p> <p>Policy HO4o (o) - suggest that this policy requirement is deleted and replaced with a policy requirement that</p>		
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<p>specifically references the necessary, if any, off-site improvements based on robust and proportionate evidence.</p> <p>Policy HO4o (p) - would stress that any contributions should be aligned with the Regulation 122 statutory tests and appropriately evidenced.</p> <p>Policy HO4o (q) - object to this policy requirement as currently drafted. Contribution to off-site infrastructure should be where the need for such improvements is clearly evidenced, viable, directly relate to the development and reasonable in scale to the development. Suggests amending to align with the statutory tests.</p> <p>Policy HO4o (r) - questions the need to improve cycle and pedestrian connectivity to Thornton and whether the policy wording is aligned with the Regulation 122 statutory tests.</p> <p>Policy HO4o (s) - Object to this policy requirement because it is not evidenced nor is it clear if such a requirement could be delivered.</p> <p>Policy HO4o (t) - Concerns that the requirement for 'significant areas of woodland' could compromise the ability for the Policy HO4o area and the Site to deliver the other ambitions of the policy including but not limited to the new 700 residential dwellings.</p>		
<p>The site lies immediately to the south of HO4a (Stainsby), and is constrained by the need to deliver the SWWE link road and highways capacity issues. The</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts</p>

<p>allocation of a further site in this area will result in a further cumulative impact which will need to be mitigated. It is adjacent to the A19, and therefore Highways England are likely to have concerns about this site given they have raised issues in relation to the Stainsby site. Mitigating identified issues will result in delays to delivery when the trajectory shows delivery from 2026/7 onwards. This is not considered to be realistic.</p>		<p>that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>Multiple ownership of the site could cause issues with delivery of the allocation. The Council should not allocate the site without evidence that a suitable access can be achieved taking into account land ownership and is financially viable.</p>	<p>General</p>	<p>The Council has updated the policy in regard to achieving suitable access to the site.</p>
<p>The site is currently identified as a Green Wedge in the adopted Local Plan. The Core Strategy confirms that a Green Wedge is designated to prevent coalescence of urban areas and protect local identity. Development in this location would be highly visible and impact upon the setting of Stainton Village.</p> <p>In addition, the adopted Neighbourhood Plan places importance on the retention of the Green Wedge (paragraphs 8.18-8.19). The plan sets out a number of design principles (Policy ST8), one of which seeks to prevent the urban area of Middlesbrough from coalescing with the villages of Stainton and Thornton.</p> <p>Similar comments received that state the Council has failed to provide any justification for the removal of green wedge</p>	<p>General</p>	<p>The local plan process provides the opportunity to reviewed and update all policies, including Green Wedges.</p> <p>To inform the review of the Local Plan, an assessment of each of the green wedges (Green wedge Study) has been undertaken to establish whether the land still meets the purpose for which it was designated and whether any amendments to the boundaries are required.</p> <p>Over time amendments to the boundaries of the green wedge are made to ensure that sufficient land is available for Middlesbrough to meet its development needs.</p> <p>Policy E2 Green Wedges is a saved policy from the Local Plan 1999, and is considered extremely out of date. The Green Wedge Study 2023, recommends the exclusion of this land.</p>

designation to this piece of land; and is not in accordance with existing Policy E2 Green wedges.		
<p>At the very least the scale should be reduced to mitigate the impact of developing this site and the resultant coalescence of Stainton with the main urban area.</p> <p>The northern part of the Grange Farm site should be allocated as it is a site that can be delivered in the short term and it can provide a suitable access from Stainton Way for both Grange Farm and the adjoining Holme Farm site.</p>	General	The Council has assessed all potential housing sites and selected what it considered the most appropriate sites to deliver the housing requirement. It is necessary to ensure efficient and effective use of land, and the provision of 700 dwellings in this location is considered to be an appropriate level of development. The precise number will be determined through the planning application process when more detail will be available.
It is unclear how Criteria k will be met with respect to increased traffic, and how access arrangements will affect land owners at Stainsby Hall Farm.	General	The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.
Criteria n. The bridge connects a private road to the public right of way. The type of transport needs clarifying and how public transport will impact upon Stainsby Hall Farm.	General	Finer details would be outlined/determined at planning application stage. The policy requires that applicants work with the landowners to achieve a route over the bridge to link into the Stainsby site.

## HO4p Holme Farm

Summary of issues raised	Statutory or general consultee	Response
It would be particularly appropriate to incorporate water efficiency measures into policies for strategic new housing allocations where design principles will underpin the masterplanning process, as well as in	Statutory	No policy amendments required. Water efficiency is addressed through Publication Local Plan Policies CR2 and GR10.

<p>the creation of new development and places supported by policies CR1, CR2 and CR3.</p>		
<p>Sites at Policy HO4p Holme Farm and Policy HO4o Land North of Low Lane be removed from the draft Local Plan. Both sites are within the Stainton and Thornton Neighbourhood Plan area and proposals for development should have regard to the requirement of the Neighbourhood Plan.</p> <p>Other reasons to exclude both sites are they are BOTH outside the current limit of development and the Land North of Low Lane (Stainton Vale) is designated GREEN WEDGE by MBC and classed as “undeliverable” in their SHLAA and 5-year HLSA dated 1st April 2023 and indicates that housing development is contrary to this designation and should be removed from the plan.</p>	<p>Statutory</p>	<p>An assessment of potential housing sites has been undertaken through the SHLAA and sites have been selected in accordance with Publication Local Plan ST2 Spatial Strategy. In order to meet the housing requirement, it is necessary to select greenfield sites including those previously designated Green Wedge. The local plan process allows for the review and update of polices, including Green Wedges.</p>
<p>Stainton Grange And Garden Walls, List Entry 1329531</p> <p>In addition, there is a requirement in the 1990 Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.</p> <p>A Heritage Impact Assessment is required as part of the evidence base.</p>	<p>Statutory</p>	<p>A Heritage Impact Assessment will form part of the evidence base for the Publication version of the Local Plan. The Policy wording has been updated to make reference to the HIA.</p>
<p>Affordable housing should be built in central Middlesbrough and Middlehaven first. These areas have all of the infrastructure needed in place already, they have good access to public transport and many more amenities to access.</p>	<p>General</p>	<p>Housing sites have been selected in accordance with Publication Local Plan Policy ST2, which prioritises the use of brownfield land. PolicyST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites. Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some</p>

		greenfield sites would be required.
<p>The area has poor public transport links, and infrastructure. With the increased development in the south, the infrastructure will fail. The increase in housing and traffic will lead to:</p> <ul style="list-style-type: none"> <li>• Lack of schools</li> <li>• Lack of GPs</li> <li>• Flooding</li> </ul>	General	<p>A suite of assessments have been used to inform the Local Plan process, on housing need, employment, green and blue infrastructure etc.</p> <p>The Council is satisfied that it has selected the most appropriate housing sites to meet the housing requirement. An Infrastructure Delivery Plan has been prepared to inform the Publication Local Plan.</p>
<p>As a landowner in proximity to the proposed site the following objections are made:</p> <ul style="list-style-type: none"> <li>• Devaluation of property</li> <li>• Overlooking/loss of privacy</li> <li>• Loss of light or overshadowing</li> <li>• Highway safety</li> <li>• Traffic</li> <li>• Noise</li> <li>• Effect on conservation area</li> <li>• Impact upon wildlife</li> </ul> <p>As mitigation, if the development were to go ahead the Council should make an offer to buy the nearby property at Stainton View.</p>	General	<p>A suite of detailed supporting assessments will be required to support a planning application. Where required mitigation measures will be provided.</p> <p>Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, once a planning application has been submitted, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made. All material considerations will be considered as part of the decision process in accordance with the NPPF Chapter 4 'Decision making.'</p> <p>Property values are not a material consideration in Planning.</p>
<p>Object at this stage on the grounds that some of the policy requirements are not justified or are ineffectively worded:</p> <p>HO4p Criteria a - Refer to earlier comments provided on Policy HO3</p>	General	<p>The policy has been updated where it is considered appropriate. In other instances where the Council disagrees with the points raised, no wording changes have been applied. The policy seeks to achieve sustainable</p>

<p>with regards to the provision of bungalows.</p> <p>HO4p Criteria b - With regards to criteria b, please refer to the earlier comments provided on Policy HO3.</p> <p>HO4p Criteria e - concerns criteria not in line with NPPF Paragraph 35b as it has not taken viability and deliverability into consideration.</p> <p>HO4p Criteria f - Whilst discussed further in the comments provided on Policy HO11 and HO3. Objects to the inclusion of criteria f in Policy HO4p due there being no evidence to suggest a need for self-build plots on large scale strategic allocations and is therefore not aligned with paragraph 35b of the NPPF.</p> <p>HO4p Criteria g The Council needs to clarify the specific identified need for a new primary school on this allocation in particular.</p> <p>HO4p Criteria h &amp; i - this criteria needs to be subject to a sufficient evidence base presented by the Local Highway Authority to justify the need and context to any off site highways infrastructure mitigation and that it complies Regulation 122 of the CIL Regulations and meets the three tests.</p> <p>HO4p Criteria J - In the absence of a specific heritage impact assessment as evidence with the Local Plan, we question whether a landscape buffer zone is justified at this stage and consider that this request as part of the Policy is not justified and not in accordance with the guidance for assessing impact to heritage assets set out at Section 16 of the NPPF.</p> <p>HO4p Criteria l - Objection to the inclusion of criteria L and requests that it be omitted from Policy HO4p.</p>		<p>development a create a quality place.</p>
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<p>Holme Farm is the only housing allocation within the draft Local Plan which is required to provide an equipped play area.</p> <p>HO4p Criteria m - Bellway should only be responsible for providing links to the edge of their boundary to allow future connections and access.</p> <p>HO4p Criteria n – This may be achievable but should not be a blanket requirement. More flexibility needs to be provided in the wording.</p> <p>HO4p Criteria o and p - Requests that flexibility be applied to criterion o and p to ensure compliance with paragraph 35b and to prevent the preclusion of development.</p>		
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### HO4q Land at Stainsby Road

Summary of issues raised	Statutory or general consultee	Response
<p>It would be particularly appropriate to incorporate water efficiency measures into policies for strategic new housing allocations where design principles will underpin the masterplanning process, as well as in the creation of new development and places supported by policies CR1, CR2 and CR3.</p>	<p>Statutory</p>	<p>No policy amendments required. Water efficiency is addressed through Publication Local Plan Policies CR2 and NE10.</p>
<p>Concerns raised to housing allocation for the following reasons:</p> <ul style="list-style-type: none"> <li>• Loss of greenspace and wildlife</li> <li>• Increased traffic, with associated noise and air pollution</li> <li>• Proximity to the A19 is not good for health and wellbeing</li> <li>• Existing parking problems will be exacerbated, especially with the existing school and community uses already contributing to this</li> <li>• Loss of open space and impact upon mental health</li> </ul>	<p>General</p>	<p>A suite of assessments have been used to inform the Local Plan process, on housing need, employment, green and blue infrastructure etc.</p> <p>In addition, a Habitats Regulation Assessment, a Viability Assessment, Transport study, Strategic Flood Risk Assessment and an Infrastructure Delivery Plan have informed the Publication Local Plan. By establishing what</p>



		infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.
<p>The land is not suitable for development due to the following:</p> <ul style="list-style-type: none"> <li>• The ground is contaminated</li> <li>• It is a flood plain</li> <li>• There are two main water supply pipes and several sewers from the said estates run into an 8-foot diameter sewer pipe</li> </ul>	General	The Policy has been amended to include point j restrict built development of the site to Flood Zone 1 only and maintain a buffer to ensure no development takes place within 8 metres from watercourse within the site. Where a flood risk is identified, a Flood Risk Assessment would be required to accompany a planning application, and mitigation measures provided in accordance with Policy NE10
<p>The development should not be entirely private and should also include affordable housing.</p>	General	Policy HO5 Affordable Housing, require residential developments of 10 or more homes, within the wards of Acklam, Coulby Newham, Hemlington, Kader, Ladgate, Marton East, Marton West, Nunthorpe, Stainton & Thornton, and Trimdon, a minimum of 15% of the homes will be required to be affordable.
<p>The town centre should be considered a better place for development of housing. The shopping centre is no longer viable and there are areas that need regenerating.</p>	General	<p>Housing sites have been selected in accordance with Publication Local Plan Policy ST2, which prioritises the use of brownfield land. Policy ST3 identifies that the MDC area aims to deliver 1,500 new homes. It is anticipated that these would largely be on brownfield sites.</p> <p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p>

<p>Properties directly adjacent to the site have access for parking to the rear, will this be affected by the development?</p>	<p>General</p>	<p>The site does not include any areas currently used for parking, so current parking arrangements for residents should remain unaffected. Residents adjacent to the site will continue to be consulted throughout the stages of the Local Plan. In addition, once a planning application has been submitted, legislation requires us to allow a minimum of 21 days for any comments to be made on planning applications, before a decision can be made. All material considerations will be considered as part of the decision process in accordance with the NPPF Chapter 4 'Decision making.' A suite of detailed supporting assessments will be required to support a planning application. Where required mitigation measures will be provided.</p>
<p>Adjacent housing currently exceeds two WHO limits for air pollution: PM2.5 and NO2 (<a href="https://addresspollution.org">https://addresspollution.org</a>) - the proposed development is even closer to the A19, and those levels are likely to increase as they get closer, but also if further developments to the south of the town are allowed. Building here is condemning residents to life-long health issues.</p>	<p>General</p>	<p>Other policies in the plan deal with pollution. Future planning applications will be subject to consultation with the Council's Environmental Health Team who will advise planning on the suitability of development, and any mitigation required (as appropriate).</p>

## Policy HO5 – Affordable Housing

Summary of issues raised	Statutory or general consultee	Response
The need for affordable housing for NHS staff and those employed by other health and care providers should be factored into housing needs assessments, and any other evidence base studies that inform the Local Plan.	Statutory	The policy deals with the provision of affordable housing the management of this is dealt with outside of the planning system, no changes to the policy are required.
Housing for older persons, in the form of sheltered and extra care housing, should be exempt from delivering affordable housing. This would ensure the plan is justified and consistent with national policy.	General	The Policy will be implemented in accordance with national policy, no changes are required to the Plan.
<p>Following the requirement that 25% of affordable homes should be provided as First Homes, it is stated 'In addition, a minimum of 10% of the total number of homes on site shall be provided as affordable home ownership'.</p> <p>Clarity is required to confirm whether the 10% minimum is in addition to the affordable homes, or in addition to the First Homes. Moreover, it was noted that the policy should reflect the aims of the NPPF (paragraph 66) and relevant PPG.</p>	General	The Policy has been amended to reflect these comments.
<p>Numerous different responses were received on the policy's tenure mix requirements.</p> <p>It was stated that this tenure split is not supported by the LHNA or SHMA. In addition, the Local Plan Viability Assessment (2018) does not account for recent matters, such as Biodiversity Net Gain and Nutrient Neutrality, that may impede viability and therefore jeopardise housing delivery. It was therefore suggested that, to ensure the policy is justified, additional evidence is required to</p>	General	The Policy has been amended to reflect these comments and provide clarity.

<p>fully account for the current status of viability.</p> <p>It was also stated that the rigidity of the requirement is not appropriate. To account for the variety of factors that affect affordable housing delivery, it was recommend that the policy adopts a flexible approach to affordable housing tenure mix. Likewise, it was suggested that the figures should be used as guidance for development, with each proposal to be considered individually based upon context and local requirement. As such, rather than a rigid requirement authority-wide requirement, the mix of tenures to be provided on each site should be determined by evidenced need for the locality to make sure that the changing local need is met.</p> <p>The wording of the requirements was also said to be confusing and unclear, with the potential to lead to inconsistent application. It was therefore recommended that all the percentages listed should be given as a proportion of the same figure and that a full breakdown is provided. The breakdown could also include a worked example in the supporting text.</p> <p>Finally, it was noted that the tenure mix relates to development of 100 or more dwellings. It was therefore indicated that it is unclear what the requirements would be for developments below this threshold and whether this allows for the full 15% affordable requirement on developments of 10 or more dwellings being entirely affordable home ownership. While such flexibility</p>		
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<p>was welcome, it was requested that, for the avoidance of doubt, the Council should provide clarity on this matter.</p>		
<p>The policy identifies that ‘on residential developments of 10 or more homes ... a minimum of 15% of the homes will be required to be affordable’. Clarity was requested that going above this requirement would be at the discretion of the developer, rather than higher proportions being sought by the Council.</p>	<p>General</p>	<p>The Policy has been amended to reflect these comments and provide clarity.</p>
<p>It was suggested that the wording of ‘a minimum’ and ‘at least’ be removed in relation to the percentage affordable dwellings required as it is excessively prescriptive.</p>	<p>General</p>	<p>It is considered the wording is necessary within the Policy to secure affordable dwellings.</p>
<p>Rather than always being rounded up to the nearest whole dwelling number, the number of affordable homes required by a development should just be rounded to the nearest whole dwelling number. It was stated that this is standard practice and would avoid ‘excess rounding up’.</p>	<p>General</p>	<p>The approach set out in the Policy is considered the most appropriate to meet affordable housing requirement. No policy amendments required.</p>
<p>The policy states that viability assessments ‘will be made publicly available’. This would mean that commercially sensitive information is released. Therefore, to ensure confidentiality is maintained, this statement should be removed altogether. Alternately, it should be clarified that such assessments may be redacted prior to publication.</p> <p>It was also suggested that the inclusion of this statement in the policy is unnecessary as national planning practice guidance already provides a clear direction on the matter.</p>	<p>General</p>	<p>The Policy is considered to be in accordance with the Planning Practice Guidance, no amendment to the policy is required.</p>
<p>Necessary evidence base documents that test the implications of this policy’s</p>	<p>General</p>	<p>An updated Viability Assessment has been prepared to support the Publication Local Plan and will be</p>

requirements against other requirements for residential developments, such as a PPG compliant Viability Assessment, should be highlighted.		available as part of the evidence base.
The policy states that 'On residential developments elsewhere the provision of affordable housing will be encouraged'. For the benefit of both parties in the determination of planning applications, additional clarification was requested on why affordable housing in these areas is not justifiable.	General	The policy's supporting text, namely paragraphs 5.59 – 5.61, explains why the provision of affordable housing will not be sought for development in certain areas of Middlesbrough.
To provide clarity and avoid confusion, the exact split of affordable home ownership tenure should be provided.	General	The Policy has been amended to reflect these comments and provide clarity.
The distinction between social rent and affordable rent should be clarified.	General	The Policy has been amended to reflect these comments and provide clarity.
Rather than setting a blanket requirement of 25% of affordable homes on site being First Homes and then half social rent and half affordable rent, the mix and tenure of affordable homes should reflect local housing needs at the time of application. Should local housing need information not be up to date, requirements should be led by Registered Providers. This would ensure that delivery of affordable housing meets the boroughs needs and requirements.	General	The Policy has been amended to reflect these comments and provide clarity.
Affordable housing provision should be located more around the town centre/brownfield sites.		As explained in the supporting text, within the northern areas of Middlesbrough, including the town centre, the Council recognises that it is not economically viable for private sector housebuilders to provide affordable housing. However, a significant number of affordable homes will be delivered in the north of the borough by

		Registered Providers, where 100% of the dwellings will be affordable.
<p>A Local Plan Viability Assessment (LPVA) was not publicly available for the consultation. Consequently, there is no evidence to demonstrate that the proposed affordable housing requirements are viable.</p> <p>As such, by limiting opportunities for comment of the LPVA, the Council has deviated from national guidance and the Local Plan is not considered positively prepared, justified, effective, and consistent with national policy.</p>	General	<p>A new Viability Assessment has been prepared to support the Publication Local Plan. This document will be available in the Local Plan evidence base.</p>
<p>Affordable housing should seamlessly blend with market housing, with layouts designed so no two consecutive housing units are affordable.</p>	General	<p>As drafted, the policy states that affordable housing should ‘be provided on-site, be indistinguishable in appearance from the market housing and be grouped in clusters spread throughout the site in order to help achieve mixed and balanced communities’.</p> <p>It is considered that a requirement that no two consecutive houses are affordable would be overly prescriptive. No policy amendments required.</p>

## Policy HO6 – Gypsy, Traveller and Travelling Showpeople Accommodation

Summary of issues raised	Statutory or general consultee	Response
<p>The policy would benefit from an additional criterion that ensures any windfall proposals where there would be an impact on heritage assets are designed in such a way to avoid and minimise any harm.</p>	Statutory	<p>The Policy has been amended to take account of this comment.</p>
<p>Significant number of objections were received in relation to this policy and the proposed allocation</p>	General	<p>A Gypsy and Traveller Site Assessment has been undertaken to support the Local Plan. The Local Plan has been amended to remove</p>

<p>of Land at Teessaurus Park as a Gypsy and Traveller site.</p> <p>A range of more suitable alternate locations were suggested including Cannon Park Lorry Park, land opposite the existing Metz Bridge site, and land near the Riverside Stadium. It was also suggested that the existing Metz Bridge site be upgraded and/or extended.</p>		<p>the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>A significant number of responses objected to the proposed allocation as it would result in the loss of unique open public green space of community and recreational value that has recently been regenerated.</p> <p>Many responses objected to the allocation of Land at Teessaurus Park due to the impact it would have on wildlife/the natural environment. It was stated that the site is of ecological importance and there were also concerns on the impact that it would have on the neighbouring Local Wildlife Site (LWS). A lack of evidence regard the allocations impact on the LWS and the ability to achieve a Biodiversity Net Gain of 10%.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment 2024 has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>Many comments stated the proposed site does not have adequate infrastructure and is not conveniently located for access to schools, shops, health services, and other facilities. It was also raised that the site is poorly served by public transport.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment 2024 has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>The site is not sustainable.</p> <p>Specifically, it was stated that the proposed allocation would contravene the requirements of paragraph 16 of the NPPF and does not contribute towards the achievement of sustainable development. It was therefore</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment 2024 has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>



<p>said that the policy would be considered unsound.</p> <p>The site is conflicts with the UN Sustainable Development Goals.</p>		
<p>A significant number of responses said the allocated site was inappropriate due to concerns with the quality of residential amenity it would provide. These concerns related to light, noise, and air pollution, as well as privacy, odours, dust, and traffic/vehicular movements.</p> <p>Multiple responses also highlighted concerns that the land at the site may be contaminated and that this would pose a hazard with regards to residential occupation.</p> <p>Finally, given its proximity to chemical and industrial plants, some respondents stated that the site may be located within a HSE blast zone and therefore be unsuitable for residential development.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>It was stated that the site is not appropriate as it is prone to flooding/waterlogging.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>Concerns were raised with respect to the maintenance of public footpaths/right of ways around the site and how the development of the site would impact access to the park and River Tees and the Teesdale Way, National Cycle, and Tees Heritage Walk routes.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>The Gypsy and Traveller Site Assessment (GTSA) is inadequate.</p> <p>Many of the concerns with the site assessment suggested that it does not adequately have regard</p>	<p>General</p>	<p>A further detailed Gypsy and Traveller Site Assessment has been undertaken to support the Publication Local Plan. This assessment has used a detailed criteria to assess sites.</p>

<p>for/adhere to Government guidance, namely 'Planning Policy for Gypsy and Traveller sites' (December 2023) and 'Designing Gypsy and Traveller Sites Good Practice Guide' (May 2008).</p> <p>The main specific issues raised with regard to the site assessment and its recommendation to allocate Land as Teessaurus Park were that:</p> <ul style="list-style-type: none"> <li>• the scoring methodology does not take sufficient account of the 'Planning Policy for Gypsy and Traveller sites' guidance and the weightings are therefore inappropriately focussed, not addressing the need to provide a sustainable community for future Gypsies and Travellers;</li> <li>• it does not take adequate regard of the impacts on surrounding land uses, including the economic impact on the locality;</li> <li>• there is a lack of consideration of any privately owned sites, site owned by other public bodies, or sites that the Council is seeking to dispose of;</li> <li>• it fails to give appropriate weighting to the objectives identified in paragraph 13 of the 'Planning policy for traveller sites' document and, in particular, the proposed allocation conflicts with parts a, b, c, e, f, and h of paragraph 13;</li> <li>• it does not address the propensity for Travellers who may in the future move into brick-and-mortar homes, as set out in the House of Commons briefing paper on Gypsies and Travellers (May 2019);</li> </ul>		
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<ul style="list-style-type: none"> <li>the projected growth in Middlesbrough 'far outstrips' recent trends of growth at both Metz Bridge and nationally and;</li> <li>it conflicts with the 'Designing Gypsy and Traveller Sites Good Practice Guide', with the scoring of sites not adequately considering/give appropriate weighting to the objectives detailed in paragraphs 3.1, 3.2, 3.3, 3.10, and 4.49-4.52.</li> </ul>		
<p>The proposed allocation would be harmful to the economy of Middlesbrough and the Tees Valley.</p> <p>Specifically, it was stated that any form of residential site within a business and industrial park is incompatible. The noise associated with industrial operations in the area would be harmful to the proposed residential use of the site. There were concerns that having a residential site in the area may lead to constraints being placed upon industrial operations and that this would negatively impact viability, existing and future investment, and local jobs.</p> <p>With reference to the provisions of paragraph 193 of the NPPF, it was stated that no evidence examining how the proposed allocation would co-exist within the dominant industrial setting without significant harm being cause to the living conditions of future residents. Moreover, no evidence has been put forward which examines whether a traveller site in this location would place restrictions on existing companies in the area.</p>	<p>General</p>	<p>A Gypsy and Traveller Site Assessment has been undertaken to support the Local Plan. The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>There is no justification for an allocation of a Gypsy and Traveller of this scale in Middlesbrough.</p>	<p>General</p>	<p>The 2024 Gypsy and Traveller Accommodation Assessment (GTAA) identified a need for</p>

<p>To this point, concerns were raised with the needs assessment, i.e. the Gypsy and Traveller Accommodation Assessment or 'GTAA'. It was stated that this assessment is not valid and further information regarding the terms of reference for its commission and the methodology that the consultants followed was requested.</p> <p>In addition, responses stated that Metz Bridge is not fully occupied. It was therefore suggested that making the existing site fit for purpose to ensure it can be fully utilised should be prioritised before any consideration is given to the provision of additional sites. Moreover, it was put forward that the Metz Bridge could potentially accommodate additional plots and/or be extended.</p>		<p>fourteen additional pitches to meet the needs of Gypsies or Travellers across the plan period. These additional pitches are in addition to that are provided at Metz Bridge. As such, it is necessary and justified that the Local Plan identifies and allocates a suitable area of land that can meet this identified need.</p>
<p>The removal of dinosaur sculptures from Teessaurus Park would contradict with the Council's Cultural Strategy.</p>	<p>General</p>	<p>The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>
<p>More broadly, it was stated that there is no evidence to demonstrate that the proposed site is developable and deliverable. The policy would therefore be considered unsound.</p>	<p>General</p>	<p>The Local Plan has been amended to remove the allocation of Teessaurus Park and replace with an allocation at Cannon Park.</p>

## Policy HO7 – Space Standards for Residential Uses

Summary of issues raised	Statutory or general consultee	Response
<p>The Nationally Described Space Standards (NDSS) are an optional standard and can only be introduced as a requirement where there is a clear need and development viability can be retained.</p>	<p>General</p>	<p>The Council considers the introduction of the NDSS appropriate to ensure high quality development across the town.</p>

<p>The inclusion of this policy therefore requires the Council to provide robust, justifiable evidence in line with the criteria set out in National Planning Practice Guidance (Reference ID: 56-020-20150327).</p>		
<p>Should suitable evidence be provided to support the policy, it should be subject to a transitional period, as per National Planning Practice Guidance (Reference ID: 56-020-20150327). Specifically, it was recommended that the NDSS is only be applied to outline or full applications submitted one year after the Plan is adopted. In addition, it was recommended that Reserved Matters applications to any outline planning consents granted prior to the end of the transition period should be exempt.</p> <p>Likewise, it was suggested that a level of flexibility be applied to the policy, as there may be instances where Accessible and Adaptable Dwellings (M4(2)) and Wheelchair User Dwellings (M4(3)) are delivered that are not NDSS compliant.</p>	<p>General</p>	<p>It is not considered necessary to have a transition period, no amendments to the Policy are required.</p>
<p>The implication that this policy would have upon site yields and development viabilities needs to be considered in the plans proposed housing allocations.</p>	<p>General</p>	<p>A Viability Assessment has been prepared to support the Publication Local Plan. This has considered the Affordable Housing Policy. This document will be available in the Local Plan evidence base.</p>

## Policy HO8 – Conversion and Sub-Division of Buildings for Residential Use

Summary of issues raised	Statutory or general consultee	Response
In the assessment of whether a proposal would exacerbate an oversupply (criterion c.), does the Council have information on the number of conversions that have taken place.	General	The Local Plan's evidence base includes a Local Housing Needs Assessment. This information establishes the make up of Middlesbrough's existing housing stock and identifies any areas of shortage/oversupply. This evidence has informed the Plan's housing policies, which will be utilised in determining applications for planning consent. The Council's record of planning applications provides information on proposals which have been granted consent, including proposals for the conversion and sub-division of buildings for residential use.
The lack of information regarding the assessment of development following construction, to ensure the policy's criteria is being strictly adhered to, was queried.	General	The Council's Planning Enforcement team would investigate and assess any reported breach of planning consent and then undertake any appropriate form of action required. As this mechanism relates to all forms of development for which consent is required, it has not been specifically identified in the Plan for any particular form of development/policy.
In alignment with the Sustainability Appraisal, it was suggested that reference to ensuring the positive effects for potential occupiers could be strengthened.	General	It is considered this is addressed by point a. of the policy, no changes to the Policy are required.

## Policy HO9 – Houses in Multiple Occupation (HMOs)

Summary of issues raised	Statutory or general consultee	Response
The Council's knowledge of existing HMO numbers, and therefore its ability to assess	General	Properties occupied by five or more persons who are living as two or more separate

HMO proposals if these numbers are not known, was questioned.		households require a HMO licence. The Council holds a publicly available register of these HMO licences.
The Councils mechanism for monitoring and enforcing management plans was queried. It was suggested that this mechanism should be clearly stated within the policy.	general	The Councils Planning Enforcement team can investigate and assess any reported breach of planning consent, including any conditions related to the management plan that may be attached, and undertake any appropriate form of action required.

## Policy HO10 – Student Accommodation

Summary of issues raised	Statutory or general consultee	Response
<p>Clarification is needed on whether applications from private landlords for the change of use of commercial buildings or family dwellings to student accommodation in the future are to be treated as ‘specialist’ student accommodation, subject to them including communal areas and being conditioned to restrict, in perpetuity, their occupation to students only.</p> <p>If not it was suggested that there would likely be an increase in proposals for HMOs instead of self- contained student studios as these are not subject to the same space standards.</p>	Statutory	No changes required to the Policy.
Point a. would be strengthened if it were amended to reference context and identity, in alignment with the principles set out in the National Design Guide.	Statutory	The Policy has been amended to reflect these comments.
Part f. does not allow sufficient flexibility for constrained sites,	General	No changes required to the Policy.

<p>where designing the layout of accommodation to be reconfigurable to meet general needs housing may not be feasible. The policy should be worded to ensure the requirement is only enforced where it is possible.</p>		
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## Policy HO11 – Self-build and Custom Build Housing

Summary of issues raised	Statutory or general consultees	Response
<p>It is unnecessary for both this and Policy HO3 to set out requirements for self-build and custom house building. It was suggested that the requirement should be removed from HO3 to avoid unnecessary duplication.</p>	<p>General</p>	<p>This Policy is considered appropriate it sets out the Council’s detailed approach to self and custom build housing.</p>
<p>The policy is not justified and should be removed from the plan.</p> <p>It was suggested that there is a lack of evidence to indicate that demand for self-build and custom house build housing is set to grow over the plan period. Specifically, the statement within the policy that the self-build and custom build housing requirement is ‘subject to the Council’s self-build register demonstrating demand for this level of plots’ was said to be unclear and adequately justified if further analysis is required to demonstrate the need for the policy.</p> <p>In addition, as paragraph 5.88 establishes that Neighbourhood Plans would aid the identification of sites if the need arises, Policy should be omitted.</p>	<p>General</p>	<p>The Policy is considered appropriate deliver the identified need for self and custom build housing over the plan period.</p>
<p>The policy should be written to allow flexibility. Applying the requirement to every site does</p>	<p>General</p>	<p>The requirement only applies to sites over 200 dwellings not all sites within the Plan, no</p>



<p>not take into account site specific context and is therefore not appropriate.</p> <p>It is noted that a different respondent stated that the wording for self-build and custom house building within Policy HO3 allows for appropriate flexibility to respond to specific sites and contexts.</p>		<p>amendments to the Policy are necessary.</p>
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## Chapter 6 – Green and Blue Infrastructure

### General comments

Summary of issues raised	Statutory or general consultee	Response
<p>There is a lack of clarity about what the Council is including in the phrase Green and Blue Infrastructure (GBI) network. Our understanding is that in this chapter you are using the term to refer broadly to biodiversity and geodiversity. If this is the case, it should be made clearer in the preamble text to the chapter and in Strategic Objective E. For example, is the overarching strategic objective to protect and enhance biodiversity and geodiversity, which includes GBI?</p>	Statutory	Objective has been amended.
<p>This chapter draws together various statutory and non-statutory drivers for promoting and delivering environmental protection and enhancement. However, these are not clearly linked nor is it clear how they will work together. For example, how will the Local Nature Recovery Strategy for the Tees Valley provide a statutory framework for your authority's GBI Strategy, and how will Biodiversity Net Gain delivery be prioritised to deliver it?</p>	Statutory	Chapter has been updated.
<p>All development proposals will be expected to comply with the RBMP. The RBMP states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. A failure to demonstrate these actions have not been considered will mean the requirements of the WFD have not been met, unless the</p>	Statutory	Publication Local Plan Policy NE10 sets out a requirement to contribute to the Northumbria River Basin Management Plan in complying with the Water Framework Directive.

<p>provisions of Article 4.7 of the WFD can be met.</p> <p>For many development applications, a WFD assessment may be required as part of planning permissions. To complete this, the Clearing the Waters for All guidance should be followed – Water Framework Directive assessment: estuarine and coastal waters - GOV.UK (www.gov.uk).</p>		
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### Policy GR1 Green and Blue Infrastructure

Summary of issues raised	Statutory or general consultee	Response
<p>At present whilst criteria point b. mentions existing infrastructure features, this could go further to mention heritage assets or alternatively a separate criteria point could be added.</p>	<p>Statutory</p>	<p>Policy wording amended.</p>
<p>It is recommended that the current wording of Policy GR1, 'Development should:' be replaced with a stronger requirement such as that used in other policies, for example, 'will be expected to ensure that', or 'will be allowed in the following circumstances', or 'providing'. A more stringent requirement would align not only with environmental objectives, but the aspirations for the Beck valleys and waterways to be corridors of sustainable transport for expanding communities to live, work and play in.</p>	<p>Statutory</p>	<p>This is considered to be unnecessarily restrictive and no wording changes have been made.</p>
<p>The introduction of this policy could be improved by linking Green and Blue Infrastructure (GBI) to the wildlife and</p>	<p>Statutory</p>	<p>No policy amendments required.</p>

biodiversity that it supports. The more diverse GBI is, the greater the benefit will be for wildlife and the community.		
Brownfield register sites should be considered as an important part of GBI, and they should be managed and enhanced to support GBI. High quality GBI could be provided whilst linking it to Middlesbrough's industrial heritage, which would also support paragraph 6.8 in this policy's narrative.	Statutory	Sites on the brownfield register have been selected for their potential to deliver housing not GBI. No policy wording amendments required.
Whilst this policy aims to protect designated sites and the species that they are designated for, a stronger approach would be to also include a section which targets other protected species. For example, internationally and locally important species including fish such as European Eel, Atlantic Salmon, Sea Trout and River/Sea Lamprey etc.	Statutory	Policy wording amended.
Recommend that Point D within the policy should read "...management of priority habitats and species, and other protected species" not "priority natural habitats". This point could also include supporting narrative of the pieces of legislation underpinning such habitats and species, which are the Natural Environment and Rural Communities Act (NERC) 2006 and Wildlife and Countryside Act 1981. This policy should also be underpinned by the RBMP and WFD legislation.	Statutory	Policy wording amended.
Point I should be strengthened to read 'adhere to the requirements', rather than 'have regard to the requirements', as the current wording leaves room for unfavourable interpretation.	Statutory	No policy amendments required.
The policy may be strengthened through reference to the Council's existing GBI Strategy and Delivery Plan.	Statutory	No policy amendments required.

<p>Further certainty may be achieved by means of clear criteria by which proposals will be assessed – for example with respect to quantity and quality/features. In terms of quantity and accessibility our green infrastructure standards offer one source of relevant information, for consideration alongside the Council’s published ‘open space needs assessment 2022’ (source - evidence library). Welcome the 15 minute standard inclusion. In addition, however the framework’s proposed 3.0 Ha/1000 population metric may help to support more specific policy outcomes.</p>	<p>Statutory</p>	<p>No policy amendments required.</p>
<p>This chapter should have stronger policy links with the health, wellbeing, and inclusion themes.</p>	<p>General</p>	<p>Policy wording amended.</p>
<p>The policy uses the equivocal “should” rather than the definite “must”, and echo the SA’s observation that health inequalities are not explicitly recognised in this suite of policies.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>This policy is welcome and the opportunities it brings for food to play a part in our green and blue infrastructure. Would welcome reference to these opportunities through adding the following to point f. increase opportunities for healthy living through provision of space for food growing and landscaping that include plants that produce fruit, nuts and seeds.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>Multiple worded comments suggest the policy specifically ‘protect and enhance’ is contradictory with greenfield sites being developed and proposed for housing. Namely Stainsby (Mandale Meadow), Newham Hall and Cavendish Road.</p>	<p>General</p>	<p>Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required.</p>

Similarly, a road through Mandale meadow will cause damage to existing green and blue infrastructure.		
Policy GR1 should be amended to include a reference to a 10% net gain as set out in the Environment Act to ensure that the policy is consistent with national policy.	General	Achievement of Biodiversity Net Gain is set out in Publication Local Plan Policy NE1, with requirements regarding biodiversity also set out in other policies such as NE5, NE7 CR2, and CR3. No policy amendments required.
This policy isn't currently justified nor consistent with other policies contained in the draft Local Plan, such as Policy HO4a criteria n which states that development should 'retain mature trees where possible'. As such, for consistency and to ensure compliance with Paragraph 35b of the NPPF, Policy GR1 should be amended to allow for flexibility and read as follows:  Protect, enhance and restore existing green and blue infrastructure features where possible.	General	No policy amendments required to address this point.
Policy GR1 further states that development should 'make contributions towards the establishment, enhancement and on-going management of Green and Blue infrastructure'. However, this has not been accounted for in the Council's Local Plan Viability Appraisal (2018) and so until this has been provided, this criterion is not justified and should be amended to include 'where appropriate and subject to viability'.	General	No policy amendments required.
Policies GR1, GR5 and GR6 in association with Local Nature Recovery, Biodiversity Net Gain, protecting and enhancing biodiversity and water quality could be addressed through woodland creation in line with	General	No policy amendments required.

tree planting targets where appropriate.		
The Council should ensure that the policy wording is sufficiently flexible to recognise that green and blue infrastructure should be encouraged and delivered, where possible and assessed on a site-by-site specific basis.	General	No policy amendments required.
Would like to see the green and blue infrastructure recognised for the part it plays in the cultural heritage of the town; this is particularly the case given we have such good early historic evidence of our Landscape through the Lordship Map in the Dorman Museum.	General	Policy wording has been amended to make reference to the historic environment.
There is currently no strategy to actively expand Local Wildlife Sites that I'm aware of – hoping that they can at least be managed better and at some point all 'well managed' – has there been a strategic look from the Council about connecting sites through the town i.e. a plan with clear outcomes.  In the medium to long-term more biodiverse public green space should be cheaper to manage as well as more resilient in the face of climate change – in the short term Middlesbrough has access to grants to help it get the correct equipment and training for public spaces.	General	No policy amendments required. These matters are addressed in other policies.
How does the Council intend to achieve a bio-diversity net gain of 10%. Please indicate how this will be achieved for each of its housing allocations, that has not yet been given planning permission, with more than 200 proposed houses.	General	Achievement of Biodiversity Net Gain is set out in Policy NE1, with requirements regarding biodiversity also set out in other policies such as NE5, NE7, CR2, and CR3.
How does the Council, as a Competent Authority justify the pollution of the Teesmouth and Cleveland SPA / RAMSAR site,	General	Development proposals that fall within the scope of Nutrient Neutrality will need to comply

without having any mitigating nutrient neutrality measures in hand.		with Publication Local Plan Policy NE8.
Please indicate how the development of green field sites amounting to over 8000 houses reconciles with a climate emergency.	General	The Local Plan will be the statutory development plan, and has been prepared in accordance with legislation and national planning policy.
The reference to swift bricks in the Green Infrastructure checklist is very welcome, implementing paragraph 023 of NPPG Natural Environment 2019, but more detail is required for effective implementation. Therefore, please add to the policy: Swift bricks to be installed in new developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development. Artificial nest cups for house martins may be proposed instead of swift bricks where an ecologist specifically recommends it.	General	No policy amendments required.

## Policy GR2 Green Wedges

Summary of issues raised	Statutory or general consultee	Response
Request that particular consideration be undertaken to protect Green Spaces in: Church Lane - The Nunthorpe community asks Middlesbrough Council to acknowledge the creative development of Triangle Wood by zoning the adjacent field as a Local Green Space in addition to its designation relating to nutrient neutrality. Muirfield Park - The Nunthorpe community welcomes that Muirfield Park has not been	Statutory	The Council does not consider it appropriate to designate these sites as Local Green Space.



<p>zoned for housing, but requests that the space be positively zoned as a Local Green Space. Conservation Area - The preservation of the entire Conservation Zone is welcome, including the area Southwest of Grey Towers Farm which has recently been the subject of a planning application.</p>		
<p>Policy GR2 Green Wedges, goes against the Stainton and Thornton adopted Neighbourhood Plan, Policy ST8: Design Principles for New Residential Developments Part 1 section 6 Avoid contributing to the coalescence of Stainton and Thornton with other areas of Greater Middlesbrough and surrounding urban areas.</p>	<p>Statutory</p>	<p>The Green Wedges have been reviewed alongside the broader development requirements that the plan seeks to address. It is necessary to change the Green Wedge designations in a number of places.</p>
<p>Acklam Hall Estates land north of Acklam Hall (ACK3) is identified as part of a wider Green Wedge which is located within the urban area of Middlesbrough, and it is considered that it does not meet the requirements of these policies and therefore should not be allocated as such, specifically but it does not fulfil the function of preventing the merging of neighbourhoods, and the site no longer performs any formal green infrastructure or recreational function. (Para 6.12) There is no reason why the Council's assessment should have changed between 2017 and now. The site should therefore be removed from the green wedge designation.</p>	<p>General</p>	<p>No policy amendments required. The most recent Green Wedge assessment recommends that this area be included in the Green Wedge.</p>
<p>As currently worded, the requirements of part e) are unclear, with the wording suggesting that all of the requirements of Policy GR3, which specifically relates to existing Open Space as defined on the policies map, would apply to every Green Wedge site.</p>	<p>General</p>	<p>Policy wording amended.</p>

Suggest that the wording ‘where applicable’ be applied to part e) to clarify this matter.		
Would like to see additional text be added to the policy wording setting out that Green Wedges will not be removed from the Local Plan in future reviews without having undertaken an open space/green wedge review first which will be consulted upon as part of the plan making process.	General	The Green Wedge Study was undertaken in 2023, and made available here <a href="#">Evidence library   Middlesbrough Council</a> , the report has been used to inform the DLP.
Policy GR2 should be amended to indicate that Green Wedges adopted in the Council’s 2014 Local Policies Plan should remain undisturbed.	General	The Green Wedge Study was undertaken in 2023, and made available here <a href="#">Evidence library   Middlesbrough Council</a> , the report has been used to inform the Publication Local Plan.
Multiple comments that suggest the policy is contradictory to proposed developments being allocated on areas that could be green wedge allocations. Specifically Mandale Meadow and land at Cavendish Road.	General	The Green Wedges have been reviewed alongside the broader development requirements that the plan seeks to address. It is necessary to change the Green Wedge designations in a number of places.
Policy GR2 Green Wedges - needs removing as The Council cannot promise to protect and enhance Green Wedges but then allow development within Green Wedges.	General	The Green Wedges have been reviewed alongside the broader development requirements that the plan seeks to address. It is necessary to change the Green Wedge designations in a number of places.
Protect all remaining green wedge allocations as village green or LGS status.	General	The Green Wedges have been reviewed alongside the broader development requirements that the plan seeks to address. It is necessary to change the Green Wedge designations in a number of places. It is not considered appropriate to designate these areas as suggested.

### Policy GR3 Existing Open Space, Sport and Recreation Facilities

Summary of issues raised	Statutory or general consultee	Response
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<p>With regard to criterion (b) Enhancement - propose that reference to suitable criteria would strengthen the application of this policy.</p>	<p>Statutory</p>	<p>No policy amendments required.</p>
<p>With regard to criterion (c) note the council's GBI Strategy reference to the critical importance of the local community in terms of GBI design, delivery and optimal use. Propose that this criterion is amended to include suitable reference to input from the local community in order not to inadvertently undermine existing locally valued areas of open space and provide scope for feedback on the merits of proposed alternative GBI/open space.</p>	<p>Statutory</p>	<p>No policy amendments required.</p>
<p>Object to the fact that a designation of Local Green Space has been proposed to the north of the allocation of HO4a Stainsby.</p>	<p>General</p>	<p>Once the Country Park has been provided the Council considers that it would be appropriate to designate this as Local Green Space. The designation will happen only once the Country Park is provided.</p>
<p>The land to the north of Acklam Hall (ACK3) is identified as existing open space, sports and recreational facilities under draft policy GR3 of the emerging Local Plan. The site is privately owned and does not form any function as open space and it is therefore considered that the site should not be identified as open space on the proposals map.</p>	<p>General</p>	<p>Green wedges may include green space in private ownership to which the public has no right of access but is considered important for its visual amenity value and/or its ecological value.</p>
<p>It is considered that for clarity and to aid decision making additional text should be added to the final paragraph to read 'A proposal that results in the whole or partial loss of a Local Green Space or would undermine the reasons for its designation will not be supported unless there are very special circumstances, in</p>	<p>General</p>	<p>No policy amendments required.</p>

accordance with national planning policy which sets out that Local Green Space should be consistent with Green Belt.’		
Multiple comments that request green space be saved as it is important to Middlesbrough’s residents. Specifically green space such as Mandale meadow should not be lost to development.	General	The Publication Local Plan identifies open space designation where the Council considers it appropriate.
It is suggested that the parcels of land to the east and to the west of Newham Hall should be designated as Local Green Space.	General	It is not considered appropriate to designate these areas as suggested.

### Policy GR4 New Open Space, Sport and Recreation Provision

Summary of issues raised	Statutory or general consultee	Response
Scope exists for the policy to refer to the Council’s GBI Strategy and action plan. Propose the policy makes clear this reference source.	Statutory	The policy states ‘in accordance with Policy NE1’, which identifies the need for development to (criterion i) have regard to the requirements of the GBI Strategy and Action Plan, including the GBI checklist.
Where proposals for new open spaces or sport/recreation facilities are not part of a broader planning application, they may be considered a ‘project’ in their own right. Recommend that you’re the Council considers if this policy should reference policy GR6 (Nutrient Neutrality) and the need to undertake a Habitats Regulations Assessment for proposals that could result in additional nitrogen entering the Tees hydrological catchment.	Statutory	No policy amendments required.
Would welcome reference to opportunities for food growing within this policy.	General	No policy amendments required.
Policy GR4 states that new open space should be integral and central to the design of new	General	No policy amendments required.

developments. Policy GR4 contradicts Policy HO4a criteria which states that other open space should be provided throughout the development.		
Policy GR4 Criteria states that a new country park and playing pitches should be delivered as part of the Stainsby allocation. Developers should only be responsible for providing what is required within their phase under pending applications.	General	No policy amendments required.
There are no allotments allocated for in the local plan	General	No policy amendments required. Allotments have been identified for protection where appropriate.
Policy GR4 states that new open space should be integral and central to the design of new developments. To ensure that Policy GR4 is effective, the Council should stipulate the requirement for open space provision on allocated sites. For instance, the Council could adopt a similar approach to that taken by Sunderland City Council and set out the minimum amount of open space in hectares to be provided per number of bedspaces created through the development.	General	Policy NE4 Criterion a-i identify new open space and sport and recreation facility requirements for specific allocations within Plan. No policy amendments required
Objection to Criteria f. regards the need for a play area, and requests the requirement be removed here and Policy HO4p.	General	No policy amendments required.
Multiple comments regards the loss of Mandale Meadow, specifically in the respect that there is ample existing open space without any of the new proposals. Suggestions to leave as it is, new open space is not required.	General	No policy amendments required.

## Policy GR5 Biodiversity and Geodiversity

Supporting text comments

Summary of issues raised	Statutory or general consultee	Response
Council does not have a specific policy on BNG but has included detail in the supporting text. Strong recommendation that Council consider adding a policy to set out the requirements of BNG and how the delivery of BNG will be spatially prioritised to contribute to the Tees Valley LNRS and your authority's GBI Strategy.	Statutory	New Publication Local Plan Policy NE7 deals with BNG.
You have stated "Within the Middlesbrough boundary is the Teesmouth and Cleveland Coast SPA which is also a 'Ramsar' site and has international protection". This should be corrected to reflect the fact that the SPA and Ramsar boundaries are not the same and that the areas of the SPA that are also a Ramsar site are not located within the Middlesbrough boundary.	Statutory	Text amended.
You have stated "The Teesmouth and Cleveland Coast Special Protection Area (the SPA) is a complex of discrete coastal and wetland habitats centred on the Tees estuary". We recommend amending this sentence to include reference to the Teesmouth and Cleveland Coast Ramsar site, as well as SPA. It may be simplest to refer to the Teesmouth and Cleveland Coast SPA/Ramsar throughout the Local Plan.	Statutory	Text amended.

Summary of issues raised	Statutory or general consultee	Response
The reading of the different narrative sections seems quite standalone and disjointed. There is an opportunity for this policy to be more cohesively linked and	Statutory	Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.

<p>help to drive other policies. The descriptions of the international, national, and local sites are great, but it would read better if they were moved before the sections on BNG and Local Nature Recovery Strategies (LNRS). This would mean that the context of the important sites that are located in Middlesbrough, including the importance of biodiversity and geodiversity, are stated first, which would better lead into how BNG and LNRS will aim to protect and enhance these sites.</p>		
<p>This policy does not give adequate weight to protected species as the policy focuses heavily on statutory and non-statutory designated sites. Despite mentioning species and habitats of principal importance, there is no mention of these within the policy and how it will ensure their protection and retention. As an example, there is an important urban population of water vole in the watercourses throughout Middlesbrough. The policy could be strengthened by putting forward a position of 'no development' within a buffer around the watercourses.</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>
<p>Point C, which discusses locally important sites, could be improved by including within the policy, or in its supporting narrative, an example of the sites that this local plan is aiming to protect.</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>
<p>The sentence in the policy which states 'opportunities to de-culvert watercourses will be encouraged' could be improved by changing it to 'opportunities to de-culvert and/or to restore the natural form and processes of watercourses will be encouraged.' This point of the policy could also go into</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>

<p>further to detail on which proposals should seek these opportunities and in which situations.</p>		
<p>This policy should also include reference to invasive non-native species (INNS), which are currently not considered. The policy should include a stipulation that any development on a site demonstrated to have INNS present, should include a robust plan for their treatment and removal to prevent their spread.</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>
<p>The relevant legislation is not specified in this policy. You may wish to consider including reference to the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981, and (although not legislation) the National Planning Policy Framework.</p>	<p>Statutory</p>	<p>Supporting text has been revised to include reference to legislation.</p>
<p>With regard to the introductory text – recommend that the mitigation hierarchy is set out in three separate sentences to avoid any misunderstanding that mitigation and compensation can be considered simultaneously. It also would strengthen the policy to specify that compensation will only be relevant in exceptional circumstances.</p>	<p>Statutory</p>	<p>Supporting text has been revised.</p>
<p>With regard to criterion “a. Internationally important sites” - Clear reference should be made to the need to undertake a Habitats Regulations Assessment and what that process involves, including Stage 1 (screening for likely significant effects), Stage 2 (appropriate assessment), Stage 3 (Derogations).</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>
<p>With regard to criterion “a. Internationally important sites” - Clear reference should be made to the relevant strategic document that sets out your authority’s approach to managing</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>



<p>recreational impacts to coastal designated sites. In addition, the 6km buffer that is referenced here is not clearly on the draft Policies Map. This should be corrected.</p>		
<p>With regard to criterion “a. Internationally important sites” - Additional clarity is needed regarding your statement about nutrient neutrality. ‘Nutrient Neutrality’ is a strategic approach to mitigating the impacts of new overnight accommodation, which enables this type of development to be progressed whilst preventing additional nutrients reaching the affected designated site. However, all development types that result in additional nutrients being discharged into a relevant hydrological catchment should be assessed through the HRA process. This includes agricultural, industrial and commercial developments. Some of which may not be able to fully mitigate their impacts and your authority may need to consider if they should be progressed to Stage 3 of the HRA. Non-residential developments should be considered on a case-by-case basis.</p>	<p>Statutory</p>	<p>Policy wording has been revised and split into Publication Local Plan Policies NE5 and NE6 to address this point.</p>
<p>Air quality impacts to internationally designated sites are referenced in the supporting text to GR5 but this is not mentioned or elaborated on in the policy text. It would strengthen the policy if a specific criterion were added to clarify your approach to air quality impacts and if a strategic approach can be taken.</p>	<p>Statutory</p>	<p>No changes required.</p>
<p>Object with regards to the proposed designation of a Local Wildlife Site to the north of the Stainsby allocation under Policy HO4a, as concerned that there is no evidence or justification provided to include it within the</p>	<p>General</p>	<p>No policy amendments required.</p>

<p>retained allocation, and is not a requirement of the adopted Local Plan.</p>		
<p>Green and Blue Infrastructure contains limited information relating to woodland creation or tree planting. Policies GR1, GR5 and GR6 in association with Local Nature Recovery, Biodiversity Net Gain, protecting and enhancing biodiversity and water quality could be addressed through woodland creation in line with tree planting targets where appropriate.</p>	<p>General</p>	<p>Policies NE4 and specific housing allocation policies provide criteria which identify creation of new open space etc. No policy amendments required.</p>
<p>Disappointed that the policy does not set a minimum requirement for deliverable biodiversity net gain in line with the Environment Act - which is recognised in the supporting text. The Council should remove the words 'wherever possible' from the second paragraph, especially as by the time the Local Plan is adopted small sites will also be expected to deliver BNG.</p> <p>The Council should be ambitious and strive for a much more progressive % target, e.g. a minimum of 20% on larger sites.</p>	<p>General</p>	<p>Achievement of Biodiversity Net Gain is set out in Policy NE1, with requirements regarding biodiversity also set out in other policies such as NE5, NE7, CR2, and CR3.</p> <p>No policy amendments required.</p>
<p>NPPF indicates that plans should distinguish between the hierarchy of international, national and locally designated sites; Councils should allocate land with the least environmental or amenity value. What evidence can the Council produce to illustrate that it has undertaken an objective assessment of its alternative housing allocations, taking account of the SPA / RAMSAR site?</p>	<p>General</p>	<p>Work on a Habitats Regulation Assessment has been undertaken and forms part of the evidence base for the Publication Local Plan.</p>
<p>Various comments regards Mandale Meadow and the loss of wildlife/flora/fauna should the proposed elements go ahead. Specifically, no amount of</p>	<p>General</p>	<p>Policy HO4a, sets out various criterion to protect and enhance our green and blue infrastructure. Criteria m, more specifically identifies that development proposals should</p>

mitigation will replace the existing biodiversity.		enhance the wildlife site in the north of the site and provide compensatory provision for any loss of habitat required for highway access.
The policy is contradictory to the Hemlington Grange proposal, as it will see the loss of existing woodland.	General	The Hemlington Grange proposal is being brought forward in line with the outline planning approval.
Given the housing allocations are on Greenfield sites, with established habitats, the policy is contradictory.	General	Middlesbrough would not be able to achieve its identified housing requirement on brownfield sites alone. The development of some greenfield sites would be required. A balanced approach has been taken to ensure development can take place whilst protecting and enhancing habitats as appropriate.

## Policy GR6 Nutrient Neutrality Water Quality Effects

Summary of issues raised	Statutory or general consultee	Response
A point within the policy refers to the creation of constructed wetlands as a provision of alternative mitigation for nutrient impacts. This represents an excellent opportunity for BNG and the creation of functional sites that support protected species. This policy could be strengthened by linking back to other policies in the Local Plan more directly. If competent and experienced conservation bodies and/or consultants are engaged, it could result in multiple benefits such as the creation of habitat of principal importance (such as reedbed) and deliver benefits for flood risk.	Statutory	No policy amendments required.

<p>The sentence within this policy that states “permission will only be granted where effects can either be excluded or, if that is not possible, appropriately mitigated” could be improved by adding further detail as to how it is expected to be appropriately mitigated. The current wording may be subject to interpretation.</p> <p>Equally, the sentence: “when making planning decisions which may affect these sites”, could be reworded or include information to explain what is meant by ‘these sites.’</p>	<p>Statutory</p>	<p>Policy amended to refer to “protected sites”.</p>
<p>Recommend that this policy also notes that development should not create a pathway for nitrates to enter and impact groundwater.</p>	<p>Statutory</p>	<p>Policy wording amended.</p>
<p>The policy states: “The provisions of the Regeneration and Levelling Up Act 2023 include a duty for water authorities in nutrient neutrality areas to upgrade their waste treatment works by 2030. This will help ensure nitrogen is removed before it is discharged into affected rivers. Once these upgrades are in operation, it is expected that the requirements of the habitats regulations, in respect of Nutrient Neutrality, will be satisfied.” This statement is incorrect and should be corrected. The upgrades to wastewater treatment works are not expected to fully mitigate the additional nitrogen from new overnight accommodation proposals nor are these upgrades necessarily relevant to other development types.</p>	<p>Statutory</p>	<p>Policy wording amended.</p>
<p>The Nutrient Neutrality Budget Calculator was updated following the publication of the Notice of Designation of Sensitive Catchment Areas 2024.</p>	<p>General</p>	<p>Policy wording amended.</p>

<p>The updated calculator accounts for the water treatment works due to be upgraded by 2030. Therefore, recommend that the Council revisits its reference to 'Any mitigation for Nutrient Neutrality must be provided 'in perpetuity'...' as the measures referred to at sub-section b) would not need to be provided only until April 2030. It is important that planning decisions continue to be taken based on material planning considerations. The need for mitigation in perpetuity is no longer appropriate. This policy places a lot of emphasis on the development industry to protect water quality, to ensure water resources, to protect the environment and to create nutrient neutrality, whereas most of the actual responsibility for these elements will be reliant on the work of the water industry.</p>		
<p>The Council may also want to update paragraph 6.27 of the justification text in light of the latest policy and guidance in relation to biodiversity net gain.</p>	<p>General</p>	<p>Supporting text amended and new Policy NE7 Biodiversity Net Gain.</p>
<p>The Local Plan Viability Assessment (2018) evidence base has not been updated to reflect the presence of Nutrient Neutrality, which can have a significant impact on the viability of sites being delivered in the authority. Recommend the Local Plan Viability Assessment (2018) is updated to reflect the above</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024)</p>
<p>Policies GR1, GR5 and GR6 in association with Local Nature Recovery, Biodiversity Net Gain, protecting and enhancing biodiversity and water quality could be addressed through woodland creation in line with</p>	<p>General</p>	<p>No Policy amendments required.</p>

<p>tree planting targets where appropriate.</p>		
<p>Do not consider the policy is necessary for inclusion within the Local Plan. Nutrient loading is already controlled without the addition of a Local Plan policy which could place unnecessary controls on something which is evolving very quickly. It is possible that other solutions to Nutrient Neutrality emerge which the policy does not currently recognise. In its current form Policy GR6 is therefore not considered sound due to its conflict with national policy as per NPPF paragraph 35.</p>	<p>General</p>	<p>Policy retained with amended wording.</p>
<p>Additional flexibility in the policy wording to allow developers to reassess should the circumstances change, for example if the national circumstances change again.</p>	<p>General</p>	<p>Policy wording amended.</p>
<p>The criteria set out within the policy to achieve mitigation for nutrient neutrality should be hierarchical e.g.          ‘A – the provision of alternative mitigation on site, that could include: i. changing the use of land [...]; ii the development of infrastructure that removes [...]          B – the provision of alternative mitigation off-site;          C – The purchase of credits from the Natural England Mitigation Scheme.’          Whilst it is recognised that credits are a form of off-setting, the aim should be for nutrients to be removed from any discharge into the River Tees or tributaries, As such the opportunity to purchase credits, whilst necessary should be a last resort.</p>	<p>General</p>	<p>Policy wording amended in some parts, but do not agree this needs to be hierarchical as suggested.</p>
<p>Council owned land shown on the Policies map south of Newham Hall does not meet the</p>	<p>General</p>	<p>The land has been used for agriculture immediately prior to its consideration for Nutrient</p>

<p>definition of agricultural land. It is classified as historic parkland, being part of the Grade 2 listed Newham Hall estate of John Mills. As such, the designation should be removed, and grazing returned to the historic parkland.</p> <p>An objection is submitted that the GR6 allocation insofar as it pertains to land to the south of Newham Hall should be deleted from the Policies Map.</p> <p>Following on from the above, as set out in other responses, the respondent considers that on all greenfield housing allocations the requirement should be that nutrient neutrality be delivered within the extent of the housing allocation and development limits.</p>		<p>Neutrality. The designation will be retained.</p> <p>It is not possible to place such a restriction on land through policy. Mitigation for Nutrient Neutrality must accord with the legislation. The Council has already agreed an approach to achieve Nutrient Neutrality on its land holdings and the Local Plan seeks to safeguard this approach.</p>
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## Policy GR7 Climate Change and Flood Risk

Summary of issues raised	Statutory or general consultee	Response
<p>It may be more appropriate to include impacts to water quality within a different or more focused policy in the Local Plan, rather than be included here.</p>	<p>Statutory</p>	<p>Policy structure has been amended. Publication Local Plan Policy NE9 Climate Change and NE10 Flood Risk and Water Management.</p>
<p>The title of the supporting chapter that accompanies this policy is titled 'Climate Change, Flood Risk and Water Management', whilst the policy title seems to omit the 'water management' point. We would recommend that this wording is included within the policy title.</p>	<p>Statutory</p>	<p>Policy structure has been amended.</p>
<p>This policy could include, or within its supporting narrative, references to minimising the risk of pollution as per Section 85 of the Water Resources Act 1991</p>	<p>Statutory</p>	<p>No policy amendments required.</p>
<p>It should be noted in the policy narrative that the stretch of the River Tees in this area is a</p>	<p>Statutory</p>	<p>Supporting text amended.</p>

<p>tidal/transitional waterbody. New drainage systems within the estuary must ensure no erosion, scour or loss of WFD higher and lower sensitivity habitat where possible. This may involve designing scour protection at outfall sites.</p>		
<p>Point E of this policy has missed a circumstance where a Flood Risk Assessment (FRA) is required. Government guidance also states that an FRA is required for developments less than 1ha in size in Flood Zone 1, including a change of use in development type to a more vulnerable class (for example from commercial to residential), where they could be affected by sources of flooding other than rivers and the sea (for example surface water drains or reservoirs).</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>Middlesbrough has areas at risk of groundwater flooding, however, flood risk from this source is overlooked within this policy. The opening line of this policy could be improved by stating: 'Flood risk from all sources will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk'.</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>Point F i-iii in this policy includes the wording 'or where not reasonably practicable'. Would recommend changing this wording to 'or where not suitable'. This would then cover where the land is unlikely to be suitable for drainage or where the land use poses a high pollution risk.</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>Paragraph 6.51 within this policy narrative explains that opportunities will be sought, where possible, to maintain and</p>	<p>Statutory</p>	<p>No changes required.</p>



<p>enhance the biodiversity and habitat of watercourses through protecting or restoring natural channel morphology. This is welcomed, but it could be strengthened by providing further details of how the plan will aim to achieve this. The Local Plan could be more ambitious by outlining a dedicated plan or policy which details how watercourses will be improved, which watercourses will be improved, and what measures will be taken to improve riverine habitat for aquatic species.</p> <p>Paragraph 6.51 could also be strengthened by replacing 'wherever possible' with 'measures must be identified', or an alternative action must be identified if measures are robustly assessed as not possible</p>		
<p>Recommend adopting suitable policies that address the wider impacts of climate change and how to become climate resilient regarding these wider impacts.</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>SuDS have mainly been described as means to address flood risk, omitting the potential of strategic nature based solutions to contribute to wider climate change resilience.</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>In this policy no consideration is given to the potential use of other nature based solutions for climate mitigation and adaptation e.g. woodland creation.</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>
<p>Recommend the consideration and inclusion of "resilience" in this policy. As per supporting paragraph 6.43 water is also a finite resource and should be used efficiently. Although the North East is not classed as an existing water stretched region, we are mindful of the need to</p>	<p>Statutory</p>	<p>Publication Local Plan Policy NE10 sets out amended approach.</p>

<p>build resilience into new development wherever possible. Population growth, rising water use, and climate change are increasingly affecting water resources across the UK. If water efficiency action is not increased, the UK could be hit by water shortages by 2050. Recommend that the emerging Local Plan makes clear policy reference to water efficiency measures.</p>		
<p>Mandale Road, and the A19 between the A66 and A174 are prone to flooding, a road through Mandale Meadow would exacerbate these existing issues.</p>	<p>General</p>	<p>Work on a Strategic Flood Risk Assessment has been undertaken and forms part of the evidence base for the Publication Local Plan.</p>
<p>Concerns raised around flooding with numerous housing sites proposed on greenspaces. More specifically, numerous concerns re. Mandale Meadow</p>	<p>General</p>	<p>Work on a Strategic Flood Risk Assessment has been undertaken and forms part of the evidence base for the Publication Local Plan.</p>

## Policy GR8 Renewable and Low Carbon Energy

Summary of issues raised	Statutory or general consultee	Response
<p>Concerned that the policy provides little detail on adapting buildings to increase energy efficiency including retrofit. Whilst we are supportive of the urgent need to address climate change impacts, careful consideration must be given to the impact of proposals on heritage assets.</p> <p>Suggest a separate policy on energy efficiency within existing buildings including the role of embodied carbon.</p>	<p>Statutory</p>	<p>Chapter 3 Creating Quality Places, specifically Policies CR1, CR2 and CR3 require development to adapt to and minimise the likely impacts of climate change, by seeking to achieve zero carbon buildings and incorporating energy efficiency measures into the fabric of a building.</p> <p>Policy CR3 requires a Heritage Impact Assessment for development affecting a heritage asset.</p> <p>The policies in the Historic Environment Chapter will also be</p>

		used to consider proposals affecting heritage assets.
The policy could be strengthened by including further narrative on the importance and benefits of renewable energy. This policy targets standalone energy installations, such as solar and wind farms, but further narrative and information could be provided on supporting and encouraging house-holder renewable energy installations.	Statutory	Chapter 3 Creating Quality Places, specifically Polices CR1, CR2 and CR3 require development to adapt to and minimise the likely impacts of climate change, by seeking to achieve zero carbon buildings and incorporating energy efficiency measures into the fabric of a building.
Point A within this policy should be amended to state that renewable and low-carbon energy development should be located and designed to also avoid unacceptable significant adverse impacts on land and water (surface and groundwater), in addition to those already listed.	Statutory	Policy wording amended.
This policy and/or supporting narrative has the opportunity to actively promote low carbon construction techniques and materials. A target could also be set for carbon capture projects, for example, increased tree planting, becoming an early connector into the Tees Cluster H2 production network and the Tees Cluster biogas producers, and aim to convert all offices to zero or low emissions.	Statutory	Chapter 3 Creating Quality Places, specifically Polices CR1, CR2 and CR3 require development to adapt to and minimise the likely impacts of climate change, by seeking to achieve zero carbon buildings and incorporating energy efficiency measures into the fabric of a building.
With regards to criterion “a.” - Recommend that the term “wildlife” is replaced with a broader term for the natural environment. For example, it may be better to use the phrase ‘biodiversity and geodiversity’	Statutory	Policy wording amended.
The policy reads more negatively than should be the case for a policy relating to renewable / low carbon energy. Furthermore, it does not take account of the planning balance	General	Chapter 3 Creating Quality Places, specifically Polices CR1, CR2 and CR3 require development to adapt to and minimise the likely impacts of climate change, by seeking to achieve zero carbon

<p>that proposals should be considered against; whereby adverse impacts are considered appropriately against a scheme's wider benefits. As such, it could be bolstered to:</p> <ol style="list-style-type: none"> <li>1. explicitly set out the Council's support for the development of low carbon energy; and</li> <li>2. include appropriate caveats to ensure the planning balance is considered</li> </ol>		<p>buildings and incorporating energy efficiency measures into the fabric of a building. No policy changes required.</p>
<p>Criterion C should be added to strengthen the policy and be considered sound to read: 'any adverse cumulative impacts of proposals including to key vistas and the important setting of the North York Moors National Park,'</p>	<p>General</p>	<p>No policy changes required.</p>
<p>Numerous comments to suggest renewable energies such as solar panels, should be a requirement for all new housing.</p>	<p>General</p>	<p>Chapter 3 Creating Quality Places, specifically Policies CR1, CR2 and CR3 require development to adapt to and minimise the likely impacts of climate change, by seeking to achieve zero carbon buildings and incorporating energy efficiency measures into the fabric of a building.</p>

## Chapter 7 – Physical, Social and Environmental Infrastructure

### Policy IN1 Strategic Infrastructure Provision

Summary of issues raised	Statutory or general consultee	Response
There is need for an evidence base approach to infrastructure identification and the need to demonstrate that such infrastructure is deliverable and able to be funded.	Statutory	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.
No reference is made to improve road infrastructure to accommodate the extra developments. These sites should not be allocated/approved, until the Stainton Way Western Extension is fully implemented, and full traffic surveys are carried out to be ensure the road infrastructure is able to accommodate the extra traffic (Policy IN2, d i, ii and iii)	Statutory	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.
Concerns raised with a draft policy that there is currently no evidence for at this stage with regards to the Infrastructure Delivery Plan (IDP). Reserve the right to comment upon publication of an up to date IDP.	General	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.
There should be no additional housebuilding until the road networks have been improved	General	The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this

		approach to be acceptable in terms of impacts to the highway.
Additional infrastructure needs should be funded by developers, with public monies used for residents.	General	Policy CR4 Developer Contributions, sets out the requirements a developer will need to contribute towards as a consequence of a development. The level of development will be commensurate with the nature and scale of the proposal.

## Policy IN2 Integrated Transport Strategy

Summary of issues raised	Statutory or general consultee	Response
A more robust inclusion of the Nunthorpe area is needed within the Transport Strategy as transport links are important in this area. The nearest District Centre being some distance from the village.	Statutory	The policy sets out the ambitions of an integrated and sustainable transport strategy for Middlesbrough collectively and within the wider Tees Valley. It would not be appropriate to specifically reference Nunthorpe here.
Would welcome reference to the England Coastal Path, which extends along a significant stretch of the riverside (from just east of the A66/A171 roundabout as far as the A1032 bridge crossing.	Statutory	The Council does not consider it appropriate to reference the Coastal Path in this policy, which reflects the adopted Integrated Transport Strategy.
The Council has been unable to deliver the infrastructure requirements set out in the 2014 HLP, required to support the housing allocations identified for South Middlesbrough, in particular the Stainton Way Western Extension, Ladgate Lane link road and the Nunthorpe Park and Ride, yet no reference is made to the implications arising from this and the impact of potential new housing allocations (Policy IN2, IN3)	General	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.
The proposed greenfield site allocations in the draft Local Plan will exacerbate already significant traffic issues associated with the	General	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure

<p>A19/A174/A1130 roads, and should not be approved, until the Stainton Way Western Extension is fully implemented, to accommodate the extra traffic (Policy IN2, d ii)</p>		<p>needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>Residents have been misinformed regards the SWWE providing a bus link.</p>	<p>General</p>	<p>The provision of bus routes through the Stainsby site are supported through Policy HO4a.</p>
<p>Policy IN2 is not in accordance with NPPF Paragraph 35b. Whilst developers can ensure new development scheme roads can be designed and constructed suitable to be bus penetrable, the more complex aspect is securing the bus operators commitment to serve the new development in perpetuity, due to the commercial reality that it may not be viable with a low critical mass of new residents unless delivering large scale allocations. Even then, bus usage will be limited at the early stage phases of development. Even with interim funding and Travel Plan incentives, it remains a challenge. As such, Policy IN2 should be amended to read ‘Enhancing and extending the accessibility to, and quality of the bus network where possible and viable, through...’ to allow an element of flexibility as the provision of a bus route is not essential to making a site accessible.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>With regards to paragraph d) we note that this aspect of Policy IN2 seeks to enhance road network capacity and traffic flows through implementing criteria i) – v) listed which includes reference to a package of junction improvements. Insufficient information on what this entails has been provided at this stage and request that this evidence base is presented. We would welcome consultation on</p>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>

<p>these measures, which it is assumed will take place within the IDP update. Whilst our clients have no issue with making contributions where evidenced and in line with the Regulation 122 of CIL regulations 2010, so that they meet all three of the requirements of being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. Further regard has to be given to the NPPF paragraph 115 and whether the infrastructure works are required in order to avoid a severe impact on the highway network.</p>		
<p>Strong objection to the continuation of the SWWE linking the B1380 and the A1130 through the Stainsby development. The link road should be realigned to avoid the local nature reserve and local green space. Numerous comments SWWE will not alleviate traffic. It will become a rat run, will congest Mandale meadow further, and increase pollution</p>	<p>General</p>	<p>No policy amendments required. This scheme is a key part of the Integrated Transport Policy, the site allocation in Policy HO4a and the adopted Stainsby Masterplan.</p>
<p>Multiple comments regards the public bus service, and improvements that are needed to service particular routes.</p>	<p>General</p>	<p>Criteria b of the policy sets out the requirements to enhance and extend the accessibility to, and quality of, the bus network through.</p>
<p>Multiple comments regards poor existing cycle lanes (Linthorpe Road) and the need for additional/improved routes.</p>	<p>General</p>	<p>Criteria a of the policy sets out the requirements to enhance and extend the accessibility to, and quality of, a safe pedestrian and cycle network.</p>
<p>A need for more rail stops are needed to reduce road traffic and improve congestion.</p>	<p>General</p>	<p>Criteria c of the policy sets out the requirements to enhance and extend the accessibility to, and quality of, the rail network</p>
<p>General comments regards the unnecessary housebuilding, which will create more traffic problems.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to</p>



		<p>accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure. In addition, the Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>Baseline evidence for existing provision/issues should be identified to determine 'key points' of congestion/traffic problems.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>

### Policy IN3 Transport Requirements for New Development

Summary of issues raised	Statutory or general consultee	Response
<p>Policy IN3 criteria d states that 'where [EV] charging points are not provided for each dwelling, community charging points should be located in prominent areas with high levels of natural surveillance'. Our clients offer EV charging points as standard with all their plots, as has become a requirement through Building Regulations in 2022. As such, we would recommend that criteria D is deleted or updated to reflect this. It is therefore considered that Policy IN3 is not justified.</p>	<p>General</p>	<p>No policy amendments required.</p>

<p>Numerous comments objecting to the inclusion of criteria f in Policy IN3 as it is not justified. Developers can provide the road infrastructure to accommodate buses, however, it is ultimately to a large extent up to the bus operators to serve the new developments which is largely dependent on a critical mass of new residents. It should not preclude the delivery of central phases within allocated sites. Therefore, criteria f should be deleted to ensure the draft Local Plan is in accordance with paragraph 35b of the NPPF.</p>	<p>General</p>	<p>No policy amendments required. Bus routes can be secured where development would otherwise be unsustainable.</p>
<p>Numerous comments state Council has been unable to deliver the infrastructure requirements set out in the 2014 HLP, required to support the housing allocations identified for South Middlesbrough, in particular the Stainton Way Western Extension, Ladgate Lane link road and the Nunthorpe Park and Ride, yet no reference is made to the implications arising from this and the impact of potential new housing allocations (Policy IN2, IN3)</p>	<p>General</p>	<p>The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>Concerns raised with the wording of part a) of the policy which requires highways layouts to be designed to ‘naturally restrain vehicle speeds to 20mph or less without the need for traditional traffic calming’. In the first instance, it is requested that the LPA confirm what is defined as ‘traditional traffic calming’. Also request further evidence on the validity, safety and deliverability of this requirement. As presented, this requirement has not been adequately justified and does not accord with national guidance as required by NPPF paragraph 35.</p>	<p>General</p>	<p>No policy amendments required.</p>

<p>In addition, multiple comments questioning the feasibility of 20mph.</p> <p>The policy should remove the reference to the 20mph speed limit and by ensuring that the road layouts are designed to national standards, an appropriate speed limit for that area and road in particular would be applied. Where lower speeds are required, a flexible approach to achieving this needs to be considered which takes into account site constraints (e.g. level differences or site size/shape).</p>		
<p>Part of (e) of this policy requires the provision of high quality covered and enclosed cycle parking. The current wording of the policy suggests that covered cycle parking would be required for all dwellings. If this is not the case, the wording should be amended accordingly to confirm where covered parking would be required. If this is required, garages and sheds should be considered as covered cycle parking and included in the policy.</p>	<p>General</p>	<p>No policy amendments required.</p>
<p>Policy IN3 needs to be amended to incorporate the requirement to provide pavements on at least one side of any existing or new road, which currently does not have pavements and is impacted by a new housing allocation. To encourage greater levels of walking, associated with new developments, introduce pavements onto the B1365 and along the entirety of Brass Castle Lane, in order that people can access walking routes and public footpaths safely, without taking their lives in their hands when walking along these roads.</p>	<p>General</p>	<p>No policy amendments required.</p>

More general comments regards new and improved safe walking and cycling routes.		
General comments regards additional proposed housing impacting negatively upon existing road infrastructure.	General	The Publication Local Plan has been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.

## Policy IN4 Community Facilities

Summary of issues raised	Statutory or general consultee	Response
The population of Nunthorpe has grown significantly since the 2014 Plan. Request that provision to further extend the Community Centre is incorporated into the Middlesbrough Council Local Plan 2024	Statutory	No policy amendments required. Policy HO4d, criterion g identifies the need to provide a community hub and community garden, community hall or place of worship.
The criterion to justify the loss of community facility is not considered effective. The disposal of redundant or no longer healthcare suitable sites and properties for best value (open market value) is a critical component in helping to fund new or improved services within a local area.	Statutory	No policy amendments required.
Multiple comments regards the lack of community facilities and the need to improve existing and increase new facilities.	General	The Publication Local Plan has been informed by the Infrastructure Delivery Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new

		development is supported by appropriate infrastructure.
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## Policy IN5 Education Provision

Summary of issues raised	Statutory or general consultee	Response
<p>The sites identified for potential new schools form part of greenfield housing allocations and it is, on balance, considered the overarching effect of such provision upon this objective is likely to be negative without associated mitigation. Further positive effects could be achieved where overall delivery of new schools incorporates wider measures for enhancement and biodiversity gains.</p>	Statutory	<p>The Policy has been amended to include reference to protecting and enhancing biodiversity and geodiversity. All new development, including schools, will be subject to the overall approach set out in the plan, including Chapter 6 Natural Environment and specifically Policy GR7 Delivering Biodiversity Net Gain.</p>
<p>Objection to criterion d for the following reason. Whilst recognising the resource implications of demanding maintenance schedules can be significant, quality buildings made from either innovative or traditional materials can make for inspiring learning space and important community assets. One of the reasons we value old building, including our schools and universities (see policy H12), is that they function as receptacles of longstanding municipal and community care and attention, with the patina of generations of Middlesbrough's schoolchildren, teachers, and caretakers, subsequently evident in the building's fabric. See suggested word changes.</p>	General	Policy wording amended.
<p>In terms of reserving land for primary school provision within allocations and the flexibility that they can be considered for appropriate alternative uses if</p>	General	<p>No policy amendments required. The primary school is a key part of the scheme as included in the Stainsby Masterplan. Policy HO4a recognises its provision to be</p>

<p>the school is not required. However, we make cross reference back to our concerns raised regarding Policy HO4a criteria D) at paragraph 3.22 of this report, and request consistency is applied between Policy IN5 and the allocation policy HO4a criteria D) to ensure that the “if required” wording is introduced into the Stainsby allocation in relation to the primary school.</p>		<p>“when need arises”. The approach in IN5 sets out further detail on considerations should a new school not be needed.</p>
<p>Criteria G states that new education provision will ‘provide financial contributions and/or physical works to reduce and manage the impact of car parking associated with the ‘school run’ in the vicinity of the school sites’. We interpret that this contribution will be sought from the development of the school, however, we seek clarity that this contribution will not be sought from residential development proposals. With regard to the above, considered criteria g is not necessary to make the development at Stainsby acceptable nor does it directly relate to the development, and object to IN5 on this basis. Request that criteria g be removed from Policy IN5.</p> <p>Specific reference to:          -Stainsby development          -Holme Farm          In addition:          Policy IN5i requires the reservation of land for primary school provision at Stainsby. Because such a school would benefit residents more widely than those at Stainsby, the costs of reserving the land and providing the schools should be borne more widely, too.</p>	<p>General</p>	<p>Policy wording amended.</p>

<p>Multiple comments identify the need for more schools to serve the newer/proposed developments in the area.</p> <p>In addition, sufficient parking should be provided for any new schools.</p>	<p>General</p>	<p>Paragraph 2 of the policy identifies specific locations for primary school provision, which reflect proposed housing allocations.</p> <p>Criterion f, g and h identify the provision for sustainable travel related specifically to new school development.</p>
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## Policy IN6 Health and Wellbeing

Summary of issues raised	Statutory or general consultee	Response
<p>Specific additional policy requirements to promote healthy developments should include:</p> <ul style="list-style-type: none"> <li>• Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space)</li> <li>• Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.</li> <li>• Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.</li> <li>• Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.</li> <li>• Ensure development embraces and respects the</li> </ul>	<p>Statutory</p>	<p>The policy has been amended following considerations of the issues raised here and in other comments. It is not appropriate to address all of the matters raised in this policy, with most points being dealt with through other policies in the plan.</p>

<p>context and heritage of the surrounding area.</p> <ul style="list-style-type: none"> <li>• Provide the necessary mix of housing types and affordable housing, reflecting local needs.</li> </ul>		
<p>Public Health South Tees propose an alternative supporting text and policy framework that explicitly foregrounds a HIA approach, draws on local data assets, national policy, and international guidance, and extends the definition of health to encompass both the community and planetary scale.</p>	General	Policy wording amended.
<p>Issues raised specifically with HIA requirements.</p> <p>The requirement for HIA for all major developments without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.</p> <p>In addition HIAs should be required on a site by site basis.</p> <p>Also the wording of 'major development' should be defined as either in accordance with the NPPF or differently.</p>	General	Policy wording amended.
<p>There is no mention of the Health and Wellbeing boards, or the Joint Health and Wellbeing Strategy for 2023-28 or working with partners or in a collaborative way in the Middlesbrough Draft Local Plan.</p>	General	No policy changes required.
<p>Policy is welcomed but should be strengthened with the follow wording 'all major development</p>	General	Policy wording amended to set out a revised approach to HIA.



proposals, including those coming forward on allocated sites, should be supported by a Health Impact Assessment to demonstrate...' (CPRE 45)		
Multiple comments pertain to loss of greenfield sites which are proposed for housing, yet could contribute to health and wellbeing of residents.	General	Policy wording amended to set out a revised approach to health. The plan seeks to ensure development proposals support healthy lifestyles.
The SWWE will contribute to ill health (physical and mental) due to loss of greenspace and additional traffic pollution.	General	Policy wording amended to set out a revised approach to health. The plan seeks to ensure development proposals support healthy lifestyles.

### Policy IN7 Digital and Communications Infrastructure

Summary of issues raised	Statutory or general consultee	Response
Policy IN7 should make clear that the responsibility for the delivery of this infrastructure as whole lies with the communications industry, as the current wording places too much emphasis on developers being responsible. Multiple comments argue that the wording of the policy should align with the requirements of providing such infrastructure in accordance with Building Regulations, and that no additional onerous requirements are expected of developers.	General	No policy changes required.

### Policy IN8 Burial Grounds

Summary of issues raised	Statutory or general consultee	Response
The site allocated for burial space at St Mary's Church is located adjacent to St Mary's Church a Grade II listed building and also adjacent to Nunthorpe and Poole Conservation Area.	Statutory	Policy wording amended.

<p>Any proposals for infrastructure associated with a burial ground will need to consider impact on these heritage assets.</p> <p>Potential inclusion of wording that states that proposals for burial ground infrastructure at adjacent St Mary's church will need to consider impact on the setting of nearby heritage assets.</p>		
<p>The opening sentence of this policy should be changed to read, 'The Council will protect all existing burial spaces and seek to re-use existing spaces for new burial spaces, where appropriate, and where environmental risks have been suitably assessed'. This will help to ensure that inappropriate sites are not selected for new burial spaces.</p>	<p>Statutory</p>	<p>Policy wording amended.</p>
<p>As potentially formalising and undertaking development on land currently considered as open space or greenfield there may be some minor negative impacts upon whatever habitat is present on those sites. Ensure regard is given to any potential biodiversity implication of change of use of sites through the decision-making process.</p>	<p>Statutory</p>	<p>No policy amendments required. All new development, including schools, will be subject to the overall approach set out in the plan, including Chapter 6 Natural Environment and specifically Policy GR7 Delivering Biodiversity Net Gain.</p>

## Chapter 8 – Managing the Historic Environment

### Policy HI1 Strategic Historic Environment

Summary of issues raised	Statutory or general consultees	Response
<p>A heritage topic paper may be a useful supporting evidence document as part of the examination identifying key themes for the historic environment at a local level.</p> <p>State those aspects referred to in paragraph 8.7 of the reasoned justification will be a priority for conservation and enhancement.</p>	Statutory	Relevant topic papers will be prepared at a future stage. The Policy has been amended to include those aspects referenced in the supporting text.
<p>Also recommend mentioning that the Council will work with partners to proactively find solutions to conserving and enhancing the historic environment within Middlesbrough. This includes heritage assets being an anchor and catalyst to regeneration schemes due to the sense of place they add and their importance to context and identity.</p> <p>State that the Council will work with partners to proactively find solutions to conserving and enhancing the historic environment within Middlesbrough.</p> <p>State opportunities will be sought to use the opportunity that the historic environment provides to act as an anchor for future regeneration projects such as Middlehaven.</p>	Statutory	The Policy has been amended to reflect these comments.
<p>There may also be an opportunity to provide specific reference to the Transporter Bridge given the importance of</p>	Statutory	The Policy has been amended to reflect the comment in relation to the Transporter Bridge.

action to conserve and enhance this heritage asset.		
Potential to refer to cross boundary action between Stockton and Middlesbrough Councils and the Tees Valley Combined Authority to work in partnership to identify solutions for the conservation and enhancement of the Grade II* Transporter Bridge.	Statutory	The Policy has been amended to reflect the comment in relation to the Transporter Bridge.
Middlesbrough's heritage is important and should be preserved an enhanced appropriately.	General	Middlesbrough's heritage is important and the Local Plan aims to set a positive strategy for the historic environment as set out in the NPPF. Objective G and Chapter 8 of the DLP recognise historical assets and manage the historic environment.

## Policy HI2 Designated Heritage Assets

Summary of issues raised	Statutory or general consultee	Response
Listed buildings – we consider the criteria identified under this part of the policy would be better deleted from the policy on the basis that national policy for impacts on heritage assets relate to harm and public benefit. Whilst the criteria identified in the draft policy will likely form part of how conclusions are reached on this, to introduce it in local policy risks steering away from national policy at the risk of harm to heritage assets.	Statutory	The Policy has been amended to take account of this comment and the proposed wording change.
Conservation Areas – there should be reference to development proposals needing being guided by Conservation Area Appraisals where these have been prepared. There may also be the opportunity over the lifetime of the Plan to review conservation area designations	Statutory	The Policy has been amended to take account of this response including adding reference to Conservation Area Appraisals.

<p>within Middlesbrough or the potential for new designations in determining which parts of the borough are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, in accordance with S.69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Policy should be amended to state that development proposals should be guided by Conservation Area appraisals where relevant.</p> <p>State that the Council will over the lifetime of the plan shall review which parts of the borough are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance and determine whether any changes are needed to designation.</p>		
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### Policy HI3 Non- Designated Heritage Assets

Summary of issues raised	Statutory or general consultee	Response
<p>It would improve clarity and focus of the management of the historic environment within Middlesbrough if the policy was separate out further with the potential for multiple policies including those for the local list, and further policies on non-designated heritage assets and archaeology.</p> <p>Consider separating policy to include separate policies on: Local List Archaeology Non-designated heritage assets</p>	<p>Statutory</p>	<p>The Policy has been split in accordance with the response with the following Policies created:</p> <ul style="list-style-type: none"> <li>• HI3 Non-Designated Heritage Assets and the Local List; and</li> <li>• HI4 Non-Designated Archaeology</li> </ul>

<p>It could be clearer, that the section of the policy dealing with archaeology acknowledges that there will be remains which are of national significance, (without just repeating the footnote in the NPPF) that these should be treated with the same sensitivity (and to the same Policy) as if they were a scheduled monument.</p> <p>Need to state that non-designated archaeology of national significance will be treated with same sensitivity as if it was a scheduled monument Need to state that the majority of non-designated heritage assets which are of an archaeological nature will be taken into account and harm to them balanced against public benefits (paragraph 209 of the NPPF).</p>	<p>Statutory</p>	<p>Policy HI3 and Policy HI2 have been amended to take account of this comment.</p>
<p>The section of the policy dealing with information to be submitted with an application could be clearer that this is required in advance of determination – clearer wording would help. It also should include (as per NPPF) that as well as a desk-based assessment, an applicant may be required to produce an archaeological evaluation. Stating that where harm demonstrated to be outweighed by public benefit that there is a process in place with regards recording of finds.</p>	<p>Statutory</p>	<p>The Policy has been amended to provide clarity in relation to the information required as part of any planning application.</p>
<p>Consideration of benefits of the Council re-joining Tees Archaeology service.</p>		<p>This is not something that is possible to address through the Local Plan, no policy amendments required.</p>
<p>The land south of Newham Hall has been designated as a Local Green Space. However, whilst the Hall itself and a number of other structures are listed, the</p>	<p>General</p>	<p>The Local List and Local Plan are separate documents and processes, the former non-statutory and the latter statutory. The Local List is used to inform</p>

<p>parkland and landscape are not currently recognised by the Council, in its Local list. Request to add the Newham Hall parkland and landscape to the Local List.</p>		<p>the policies in the draft Local Plan and continues to be used to inform planning decisions, as required by the non-designated Heritage Asset policy in the National Planning Policy Framework.</p> <p>The Local List when it was originally drafted was a collaborative project to identify locally valuable heritage (non-designated Heritage Assets) in Middlesbrough. The Local List has been in place since 2011, There is no date set to renew it because of resources. If resources become available to review the Local List it will likely be a collaborative project again, with public engagement and a 'call for buildings and sites'.</p>
<p>Stewart Park should be added to the local list</p>		<p>The Local List and Local Plan are separate documents and processes, the former non-statutory and the latter statutory. The Local List is used to inform the policies in the draft Local Plan and continues to be used to inform planning decisions, as required by the National Planning Policy Framework.</p> <p>The Local List when it was originally drafted was a collaborative project to identify locally valuable heritage (non-designated Heritage Assets) in Middlesbrough. The Local List has been in place since 2011, There is no date set to renew it because of resources. If resources become available to review the Local List it will likely be a collaborative project again, with public engagement and a 'call for buildings and sites'.</p>





## Appendices

### Appendix 1 Monitoring Framework

Summary of issues raised	Statutory or general consultee	Response
<p>The Monitoring Framework would be stronger if more specific targets were adopted, and baselines are provided where this is possible. Natural England notes especially:</p> <ul style="list-style-type: none"> <li>• Chapter 3, Creating Quality Places – CR2 – Avoid loss of protected open space. No existing baseline is provided for this policy.</li> <li>• Chapter 6 - Green and Blue Infrastructure – GR 1, GR4 – Green infrastructure created (m2), target is to maximise this. This target in combination with the missing of a baseline makes for a very weak monitoring strategy.</li> </ul> <p>Natural England advises to reconsider the Monitoring Framework to provide baselines and set specific targets where possible.</p>	Statutory	The monitoring framework has been amended to amend target and provide details on baseline.
<p>It would be useful to include the actions to be taken if the targets are not met. More details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified, should be provided.</p>	General	The supporting text indicates that the plan will be monitored through the Annual Monitoring Report which is published by the Council annually, no amendments to the Plan are required.
<p>The framework currently lacks control and should be reviewed and simplified with accountability to the public.</p>	General	The Monitoring Framework is considered appropriate to monitor the Policies in the Local Plan, no amendments to the Plan are required.

## Appendix 2 Site Allocations Location Plans

Summary of issues raised	Statutory or general consultee	Response
Diagrams to accompany the housing development proposals would have been more useful for location and size of the proposed developments within that part of the documentation rather than as an appendix found at the end of the online questionnaire.	General	Supporting text amended to include reference to site plans.

## Appendix 3 Strategic/Non-strategic Policies

Summary of issues raised	Statutory or general consultee	Response
Question as to why some areas are non-strategic. Other comments that the Appendix is confusing.	General	The Council is required to distinguish between strategic and non-strategic policies.  Strategic policies are those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed.

## Appendix 4 Superseded Policies

No comment raised.

## Appendix 5 Key Diagram

Summary of issues raised	Statutory or general consultee	Response
The star showing the Local Centre for the north of Low Lane allocation HO4o should be next to the sporting lodge hotel per the allocation policy and where this works alongside the existing facilities there is and accessible.	General	The key diagram has been amended to reflect this comment.

## Appendix 6 Housing Trajectory

Summary of issues raised	Statutory or general consultee	Response
Would welcome clarification from the Council as to the methodology and evidence used to prepare the housing trajectory table for existing allocations without planning permission, in particular relation to the Stainsby site. It references that the first completions will take place in 2026/2027 at a rate of 45 per year, then 90 per year for the remainder of the plan period.	General	The methodology for preparing the housing trajectory has been based on the most recent Strategic Housing Land Assessment, this has taken account of past build on rates.
Further re-emphasise the comments made in relation to Policy ST2 and the concerns surrounding the lack of specific site allocations in the Middlesbrough Development Corporation area, which is echoed in the Housing Trajectory at Appendix 6 as it does not set out the expected rate of delivery, which is not in line with Paragraph 76 of the NPPF.  Multiple comments of this nature made by housing developers.	General	Policy ST3 on the MDD area has been amendment to provide more detail on the sites in the MDC area. In addition the housing trajectory has been updated to take account of these sites.

## Appendix 7 Neighbourhood Plan Housing Allocations

No comments raised.

## Appendix 8 Nationally Described Space standards

No comments raised.

## Appendix 9 Green Blue Infrastructure Checklist

Summary of issues raised	Statutory or general consultee	Response
SMART objectives might provide helpful guidance – Doorstep standard - 15 mins and/or 3.0Ha/1000 metric?	Statutory	The Green Blue Infrastructure Checklist is taken from the adopted Green and Blue Infrastructure Strategy

		therefore changes are unable to be made to it.
<p>Welcome this checklist, and request the consideration and inclusion of:</p> <ul style="list-style-type: none"> <li>community growing space (with a guide of approximately 0.9sqm per person).</li> <li>orchards and trees and shrubs that produce fruit, nuts and seeds to be included as a part of landscaping and hedgerows.</li> </ul>	General	The Green Blue Infrastructure Checklist references community growing therefore no changes to the Plan are required.
<p>Object to the emphasis placed on SuDs ponds as an aesthetic and landscape feature. The foremost role of a SuDs pond is to attenuate water, and whilst SuDs ponds can be used for aesthetic purposes, this should not detract from the ultimate role of the attenuation feature. Request that criteria 4 be omitted from the checklist.</p>	General	The Green Blue Infrastructure Checklist is taken from the adopted Green and Blue Infrastructure Strategy therefore changes are unable to be made to it. However the Council believes that SuDS can have a dual purpose. No changes to the Plan are required.
<p>The housing allocation policies should align with No.10 Play on the checklist, as oppose to 1 large equipped play area. Request that the checklist is instilled in the policies contained within the draft Local Plan.</p>	General	The Plan has been amended to reference the Green Blue Infrastructure Checklist in housing allocations policies.
<p>Why are the Biodiversity items OPTIONAL! It defeats your whole case (if any) for creating "Country Parks"</p>	General	The Council's approach to biodiversity is set out in the Natural Environment chapter particularly in Policy NE5 and NE7, no amendments to the Plan are required.
<p>The reference to 'swift boxes' in item no.3 is welcome, however implementing paragraph 023 of NPPG Natural Environment 2019 , but more detail is required for effective implementation.</p>	General	It is considered the Green Blue Infrastructure Checklist provides a sufficient level of detail, no amendments to the Plan are required.

## Appendix 10 Glossary

Summary of issues raised	Statutory or general comment	Response
<p>It may be beneficial to add the definition of Optimum Viable Use to the glossary:</p>	Statutory	The glossary has been amended to include reference to optimum viable use.

<p>“if there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.”</p>		
<p>Too complicated, with too many fancy words.</p>	<p>General</p>	<p>The Glossary is a tool provided as an alphabetical list of words relating to the draft local plan document; a brief dictionary.</p>

## Additional comments on Draft Local Plan

Summary of issues raised	Statutory or general consultee	Response
<p>There is minimal text within this plan regarding water quantity, including a plan for how water is going to be provided to new development, which should be considered.</p>	<p>Statutory</p>	<p>Water efficiency is addressed through Publication Local Plan Policies CR2 and GR10.</p>
<p><b>Foul Drainage</b>            Advise that as part of informing your Local Plan, liaison is undertaken with Northumbrian Water Limited (NWL) regarding their foul network capacity and sewage treatment work capacity. We would expect that the foul flows, from the projected increase of 7,600 houses in Middlesbrough, would discharge to public sewer, which is NWL in this area. It is advisable that these discussions begin as early as possible so the projected growth of Middlesbrough can be included in NWLs network improvement works, if necessary.</p>	<p>Statutory</p>	<p>NWL, as a statutory consultee, will be consulted at every stage of the Middlesbrough Local Plan.</p>
<p><b>Groundwater Protection</b>            There is currently no comment in the policies proposed regarding groundwater or Principal Aquifers within the Middlesbrough area, which should be given consideration.            The Local Plan should ensure development proposals do not create a pollution pathway to the underlying groundwater aquifers and look to protect and enhance groundwater quality. The amount of available water should be protected and there should be no detrimental impacts (derogation or flood risk) in terms of groundwater and surface water connectivity. In making effective use of the land, brownfield, contaminated and unstable land should be included.</p>	<p>Statutory</p>	<p>The Publication Local Plan includes Policies on Nutrient Neutrality Water Quality (GR8) and Flood Risk (GR10). Other policies in the plan include requirements to prevent pollution (CR2) and give consideration to aquifers (CR6 Tall Buildings).</p>

<p>Policies should promote the remediation of land contamination to improve land quality that protects people and the environment.</p> <p>There is no reference to some key legislation relating to groundwater and contaminated land, including the Environmental Protection Act 1990 and the Environment Act, which should be considered.</p>		
<p>Recommend considering reference to specific policies in the North East Marine Plan</p>	<p>Statutory</p>	<p>Text has been updated to reference the Marine Plan.</p>
<p>The primary consideration of National Highways is Circular 01/20221 – ‘Strategic road network and the delivery of sustainable development’ (the Circular). With particular reference to this the following comments have been made:</p> <p>Sustainability - it is not clear as to how the sustainability policies (general) and site-specific requirements have been defined as there is no current visibility of any evidence base.</p> <p>Specific allocations -</p> <ul style="list-style-type: none"> <li>• How have the sustainability credentials of the site allocations been weighed into the site selection process.</li> <li>• The allocation policies contain some identified and specific sustainability (and transport) provisions. It is not clear as to how these have been defined as being the most appropriate / adequate to ensure the sites are sustainable (or can be made sustainable) and further information would be welcomed as to how they have been derived.</li> <li>• Would welcome further information on the mechanics of the table presented on pages 41 to 48 of the SA; with a view to the outcomes achieved for the objective bundle that includes</li> </ul>	<p>Statutory</p>	<p>The Publication Local Plan been informed by a Transport Study, alongside the Council’s Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>

<p>objective 11 focussed on ‘reducing the need to travel and promoting the use of sustainable transport options’.</p> <p>Evidence base - Whilst an evidence base has been referred to throughout the Plan, National Highways has not been provided with any detail of the transport evidence base. In line with the Circular, it is vital that the strategies are underpinned by a clear and transparent evidence base which informs the authority’s preferred approach, and we would therefore ask to discuss this in more detail with the Council.</p> <p>Infrastructure Identification, Deliverability and Funding - The general lack of information relating to the evidence base, appears to be at odds with the intentions of the Circular and National Highways would welcome further discussion in this regard.</p>		
<p>Natural England notes that no Habitats Regulations Assessment (HRA) has been carried out to assess this Local Plan Proposal. A HRA should be carried out before proceeding to the next stage of the Local Plan process and we welcome discussion on how to approach</p>	<p>Statutory</p>	<p>A Habitats Regulation Assessment has been prepared and forms part of the evidence base for the Publication Local Plan.</p>
<p>There are significant health inequalities in the area (NHS ICS Strategy North East North Cumbria, Local Authority Health Profiles ).</p> <p>There are several areas of low access to greenspace/high deprivation in the area Green Infrastructure Map (naturalengland.org.uk)</p>	<p>Statutory</p>	<p>A key theme throughout the DLP, Objective E specifically, places strategic emphasis upon the protection and enhancement of the Green and Blue Infrastructure Network.</p>



<p>Given these inequalities and the established links between access to nature and positive health benefits, particular regard should be given to questions around quality and extent of greenspace use throughout the Plan.</p>		
<p>There is no policy included in the local plan regarding sustainable soil management. Natural England advises that a policy is added that considers the protection of Best Most Versatile Land, and sustainable soil management as part of any development.</p> <p>Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England.</p>	<p>Statutory</p>	<p>No policy amendments required.</p>
<p>The Council should engage with the NHS, particularly the ICB, on an on-going basis as part of preparing the Infrastructure Delivery Plan (IDP). A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to support growth, and to ensure that planning obligations effectively support and result in capital funding towards delivery of the required infrastructure.</p>	<p>Statutory</p>	<p>NHS, as a statutory consultee, has been consulted at every stage of the Middlesbrough Local Plan.</p> <p>An Infrastructure Delivery Plan has been prepared to inform the Publication Local Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>Appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies. Such an approach means that developers are adequately informed in advance that they may be required to make contributions towards healthcare infrastructure. A</p>	<p>Statutory</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024). An Infrastructure Delivery Plan has been prepared to inform the Publication Local Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels</p>

<p>separate cost input for health infrastructure in the plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This is particularly important in situations where a viability assessment demonstrates that proposals are unable to fund the full range of infrastructure requirements.</p>		<p>of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p>
<p>It is not clear as to how the sustainability policies (general) and site-specific requirements have been defined as there is no current visibility of any evidence base. The approach to sustainability, its role in the site selection process (see below) and the evidence base (again, see below) is currently lacking in detail and should be made clearer.</p> <p>Whilst an evidence base has been referred to throughout the Plan, National Highways has not been provided with any detail of the transport evidence base. it is vital that the strategies are underpinned by a clear and transparent evidence base which informs the authority's preferred approach.</p>	<p>Statutory</p>	<p>An Infrastructure Delivery Plan has been prepared to inform the Publication Local Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new development is supported by appropriate infrastructure.</p> <p>The Publication Local Plan has also been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>The boundary of Middle Marsh Nature Reserve Local Wildlife Site (LWS) is still not correct. It only shows the area between the A66, Shepherdson Way and Ormesby Beck (and doesn't even include all of that as the top bit of Ormesby Beck where it runs parallel to the Shepherdson Way flyover is not shown). See attachments.</p>	<p>General</p>	<p>The boundary accords with the evidence "Local Wildlife Sites and Local Nature Reserves in Middlesbrough" prepared by the Tees Valley Wildlife Trust. No amendments required.</p>

<p>Multiple comments on DLP policies map - request that the Nutrient Neutrality designation on the Local Green Space on the historic parkland is removed from the Draft Local Plan Policies Map. Middlesbrough Council has made this designation without regard to the impact on the historic parkland.</p>	<p>General</p>	<p>The identification of land for Nutrient Neutrality is consistent with the Council decision to use the land for this purpose.</p>
<p>Recommend that the new plan contains a specific policy to protect, enhance and promote the understanding of the S&amp;DR 1830 Middlesbrough Branch and Port Darlington, its remaining fabric and its setting. Such a policy would be consistent with corresponding policies in the adopted Local Plans for Durham County (policy 46), Darlington Borough (policy ENV2) and Stockton Borough (policy HE3). A policy should also be included to protect the surviving heritage assets and street pattern of the 'new town'. These policies can be informed by the Middlesbrough Branch Line Report 2018, included in the evidence library.'</p>	<p>General</p>	<p>New Policy HI5 has been included in the Publication Local Plan.</p>
<p>Whilst not a matter of soundness it would be helpful if the council could include clause / paragraph numbers within all of the policies. The numbering of each clause / paragraph within a policy will aid referencing for those making representations on the local plan as well as for applicants and decision makers following the adoption of the plan.</p>	<p>General</p>	<p>It is considered that the format of the policies in the Publication Local Plan provides sufficient clarity and useability.</p>
<p>A more up to date Viability Assessment than the 2018 document is required.</p>	<p>General</p>	<p>The Publication Local Plan has been informed by a new Local Plan Viability Assessment (2024).</p>
<p>It is considered that the former Northern School of Art on Green Lane located in the Linthorpe area of Middlesbrough site should be allocated for retail uses in the emerging Middlesbrough Local</p>	<p>General</p>	<p>The MRLS Stage 1 Need assessment (Sept 2020), concluded that in quantitative terms, no expenditure capacity had been demonstrated to support new convenience goods</p>

Plan. The site is vacant and is waiting to be brought back to an economical use, which will also provide an important service to the local community.		retail floorspace in Middlesbrough.
The plan at present makes no reference to the provision of a district heating network. The Local Plan should include a policy to require new developments to connect, or allow provisions for future connection, to a heat network.	General	Building Regulations set standards for the design and construction of buildings to ensure the safety and health for people, and to help conserve fuel and power. No proposals have been put forward for District Heat Networks In Middlesbrough. As such it is considered such an approach would not be deliverable.
The Middlesbrough Development Corporation Masterplan (Supercharging development in Middlesbrough 2023) should be added to the list of key documents in Para 2.6.	General	Text updated to make reference.
Para 4.33 notes that outline planning permission has been granted for 'Outwood Riverside' in Middlehaven yet on the proposals map the site is described as 'Middlehaven Academy'. It is suggested that a consistent naming convention is needed to avoid confusion.	General	Policies Map amended for consistency.
The former Marton Country Club Middlesbrough site should be allocated for retail uses in the emerging Middlesbrough Local Plan. It is considered that a foodstore development will offer significant tangible benefits to the area, including employment opportunities; new facilities for local residents and businesses; and increased consumer choice.	General	The MRLS Stage 1 Need assessment (Sept 2020), concluded that in quantitative terms, no expenditure capacity had been demonstrated to support new convenience goods retail floorspace in Middlesbrough.
The Councils One Planet Living Strategy is not referenced in the key documents, nor is it made available in the Evidence Library.	General	It is not considered necessary to reference this in the Local Plan. The Council's One Planet Living Framework is available on the MBC website <a href="#">One planet living   Middlesbrough Council</a>
Local Plan Vision – (pg.7) It is considered that there are no explicit references to climate	General	Vision has been updated to make reference to climate change.

<p>change mitigation and adaption in the vision. Given the Council's incentive to be net zero by 2029 and the entire District by 2039, both fall within the scope of the Local Plan period (2022-2041) climate change considerations need to be a pivotal part of the Plan Vision which the policies and subsequent decisions need to deliver.</p>		
<p>Green Wedges - Para 6.11-6.14 Green Wedges should be given more weight in the supporting text and policy so set out that Green Wedges will not be removed from the Local Plan in future reviews without a green space/green wedge review having been undertaken and adequately justified first, prior to the results being consulted on with statutory consultees, interested parties and local communities.</p>	<p>General</p>	<p>To inform the review of the Local Plan, an assessment of each of the green wedges (Green wedge Study) has been undertaken to establish whether the land still meets the purpose for which it was designated and whether any amendments to the boundaries are required.</p> <p>Over time amendments to the boundaries of the green wedge are made to ensure that sufficient land is available for Middlesbrough to meet its development needs.</p>
<p>There is no evidence of the Council's Site Selection process for Metz Bridge. There is no evidence of how or why this site was selected in the draft Local Plan or in the Sustainability Appraisal or any other document presented in the Council's Evidence Library. It is of great importance that the local communities are given the opportunity to put forward sites of importance to them and that they are made aware that this opportunity exists to them as part of the Local Plan preparation process.</p>	<p>General</p>	<p>The Council undertook a call for sites from 5th December 2022 to 31st January 2023 for all types of development, including for Gypsies, Travellers and Travelling Showpeople. No private sites were put forward for consideration. Subsequently, in the absence of privately owned sites coming forward, the Council has a duty to bring forward a site on publicly owned land.</p> <p>A new Gypsy and Traveller Site Assessment (2024) has been prepared to inform the Publication Local Plan. A new site is proposed at Cannon Park to meet future needs.</p> <p>In accordance with Planning Policies Privacy Statement <a href="#">Privacy notice - Planning Policy   Middlesbrough Council</a> Individual</p>

		details can be added to the Council's Local Plan Consultation Database, to be kept informed.
In the draft plan there is use of the phrase 'local character' but I don't know of any guidelines that Middlesbrough Council have that reflect local wildflower character nor local tree species selection sufficient that it would respect Middlesbrough's local heritage and create a unique sense of place. If you include 'local character' in your guidelines then you need to be able to show you have a clear idea of what that is in relation to historic vegetation and landscaping features in the Middlesbrough area and currently I don't think you can (or if you can it is not occurring on the ground) with respect to native biodiversity.	General	It is not considered possible to define a single "local character" for the whole of Middlesbrough, as there are many local characteristics across the borough.
There should be separate map to that of the proposals map, one that shows free open space, land that everyone can access freely. The greenspaces are misleading as they show schools, golf courses etc.	General	The Policies Map is a requirement of the plan making system. The Council does maintain other information, and the borough's open space is shown in the Open Space Needs Assessment.
The document overall is very long, and people do not have the time to review it in its entirety.	General	Middlesbrough's Local Plan will cover the whole of the local authority area, covering all planning matters (except for minerals and waste), setting out the long-term strategy for the development of the area.  The one document, in its entirety, will replace the suite of documents that currently make up Middlesbrough's Development Plan.
General comments regards transport and infrastructure particularly in the southern areas and Acklam. The roads must be improved before any development can take place. Modal transport will not solve the problem, as each household has at least two cars.	General	An Infrastructure Delivery Plan has been prepared to inform the Publication Local Plan. By establishing what infrastructure needs to be delivered to accommodate the planned levels of economic and housing growth, the IDP will help ensure that new

		<p>development is supported by appropriate infrastructure. The Publication Local Plan has also been informed by a Transport Study, alongside the Council's Integrated Transport Strategy. This evidence identifies the impacts that the proposed levels of housing and economic growth would have, taking into account proposed mitigation measures. The Council considers this approach to be acceptable in terms of impacts to the highway.</p>
<p>It is not clear on the actual need for additional houses at a ward level. For example, context should be provided about the level of development in nunthorpe in recent years so that residents have a complete view of how many new units have been built in recent years.</p>	<p>General</p>	<p>In accordance with Para 67 of the NPPF 'strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.' There is no requirement to identify housing need at a ward level.</p>
<p>A number of comments suggest the survey was not user friendly, confusing and time consuming. Also, the document and survey not easy to navigate/find. A summary of the document would have been helpful.</p>	<p>General</p>	<p>The Council provides a number of ways to respond to its consultation, the most efficient of which is the online survey. This meets the requirements of the legislation and the Statement of Community Involvement.</p>
<p>Multiple comments centred around the loss of greenfield and open space, which is damaging to the existing residents, nature and climate change.</p>	<p>General</p>	<p>An assessment of potential housing sites has been undertaken through the SHLAA and sites have been selected in accordance with Publication Local Plan ST2 Spatial Strategy. In order to meet the housing requirement it is necessary to select greenfield sites.</p>

## Appendix 2 – Consultation Letter





**Planning Services**

Tel: (01642) 729 377



Direct Line: (01642) 729487 / 729062

Our Ref: Local Plan/DLP

Your Ref:

When telephoning please ask for:

PLANNING POLICY

30<sup>th</sup> January 2024

Dear Consultee

**Consultation on the Middlesbrough Draft Local Plan**

Middlesbrough Council has prepared a Draft Local Plan to enable public consultation to take place on the emerging planning policies, allocations and designations that will be used to guide development in the area for the period to 2041. You are receiving this letter because either your details are held on our Local Plan Consultation Database or your property is in close proximity to a proposed site allocation.

The consultation will take place between **9:00 am. Thursday February 1<sup>st</sup> 2024** and **5:00 pm Friday 15<sup>th</sup> March 2024**.

The Draft Local Plan will be available to view and download from the Planning Pages of the Council's website, which can be accessed at [www.middlesbrough.gov.uk](http://www.middlesbrough.gov.uk) or by using the QR code below. Copies of the evidence base documents that have been used in its preparation will also be available here.



Hard copies of the Draft Local Plan will be available to view in local community hubs and libraries across the borough. It will also be available to view along with the Sustainability Appraisal document at Middlesbrough House, 50 Corporation Road, Middlesbrough TS1 2RH.

A number of drop-in sessions will be held across the town, where officers will be available to provide further information about the Draft Local Plan. Details of these sessions are set out below.

Should you wish to make comments on the Draft Local Plan these must be made in writing and received by the Council during the consultation period specified above. You can submit comments by:

**Regeneration**

Middlesbrough Council, Fountain Court, 119 Grange Road, Middlesbrough, TS1 2DT [middlesbrough.gov.uk](http://middlesbrough.gov.uk)

- Using the online form on the Planning pages of the Council's website available at: [www.middlesbrough.gov.uk](http://www.middlesbrough.gov.uk) or by using the QR code above;
- Email to: [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk); or
- Post to: Planning Policy Team, Planning Services, Middlesbrough Council, Fountain Court, 119 Grange Road, Middlesbrough, TS1 2DT.

If you require any further information regarding this communication, please do not hesitate to contact the Planning Policy Team via the email above. You can also contact the team by telephoning 01642 729487 or 01642 729062.


Yours faithfully,



Paul Clarke  
Head of Planning

<b>Middlesbrough Draft Local Plan Consultation – Drop-in Events</b>		
<b>Venue</b>	<b>Date</b>	<b>Time</b>
Langdon Square Community Centre, Langdon Square, Coulby Newham TS8 0TF	Monday 12/02/2024	3:00 pm – 6:00 pm
Old Fire Station, Town Hall, Albert Rd, Middlesbrough TS1 2QJ	Monday 12/02/2024	4:00 pm – 7:00 pm
Acklam Green Community Centre, Stainsby Road, Acklam TS5 4JS	Tuesday 13/02/2024	3:00 pm – 6:00 pm
North Ormesby Community Hub and Library, Derwent Street, North Ormesby, TS3 6JB	Wednesday 14/02/2024	2:00 pm – 5:00 pm
Thorntree Community Hub and Library, Birkhall Road, Thorntree TS3 9JW	Wednesday 14/02/2024	2:00 pm – 5:00 pm
Easterside Community Hub and Library, Broughton Avenue, Easterside TS4 3PZ	Thursday 15/02/2024	2:00 pm – 5:00 pm
Hemlington Community Hub and Library, Crosscliff, Hemlington TS8 9JJ	Thursday 15/02/2024	2:00 pm – 5:00 pm
Stainton and Thornton Memorial Hall, Strait Lane, Stainton TS8 9BB	Friday 16/02/2024	3:00 pm – 6:00 pm
Acklam Community Hub and Library, Acklam Road TS5 7AB	Monday 19/02/2024	2:00 pm – 5:00 pm
St Margaret's Church, The Oval, Brookfield TS5 8ET	Tuesday 20/02/2024	3:00 pm – 6:00 pm
Grove Hill Community Hub and Library, Bishopton Road, Grove Hill TS4 2RP	Wednesday 21/02/2024	2:00 pm – 5:00 pm
Neptune Centre, Ormesby Rd, Berwick Hills TS3 7RP	Wednesday 21/02/2024	2:00 pm – 5:00 pm
Marlon Community Hub and Library, The Willows, Marlon TS7 8BL	Thursday 22/02/2024	2:00 pm – 5:00 pm
Newport Community Hub and Library, St Paul's Road, Middlesbrough TS1 5NQ	Thursday 22/02/2024	2:00 pm – 5:00 pm
Nunthorpe Methodist Church, Connaught Rd, Nunthorpe TS7 0BP	Friday 23/02/2024	3:00 pm – 6:00 pm
Linthorpe Community Centre, Linthorpe Road, Middlesbrough TS5 6JG	Monday 26/02/2024	3:00 pm – 6:00 pm
Marlon Community Centre, Cypress Road, Marlon TS7 8PZ	Tuesday 27/02/2024	4:00 pm – 7:00 pm





## Appendix 3 – Middlesbrough Council website


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# Welcome to Middlesbrough Council

### Top Tasks

 <p><a href="#">Bin collection dates</a></p> <p><a href="#">Find out more</a> →</p>	 <p><a href="#">Budget 2024-2025</a></p> <p><a href="#">Find out more</a> →</p>	 <p><a href="#">Household Waste Recycling Centre</a></p> <p><a href="#">Find out more</a> →</p>	 <p><a href="#">Household Support Fund</a></p> <p><a href="#">Find out more</a> →</p>
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### Latest news





01/02/2024


## Have your say on Middlesbrough's long term development plan

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**Council and democracy**  
31/01/2024  
[Minister thanks Council for progress made in responding to concerns](#)
- 

**Business**  
01/02/2024  
[Middlesbrough named best value place for workers to rent](#)
- 

**Crime and safety**  
29/01/2024  
[Nuisance bikes seized from homes after complaints](#)


### Need to know



## Have your say on the Draft Local Plan

We're running a consultation to find out what people think of our Draft Local Plan.

[Find out more](#) →



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### What's on




CENTRE SQUARE

Middlesbrough half marathon and junior race

A brand new event in Middlesbrough's sporting calendar, open to everyone of all ages and abilities.

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RIVERSIDE STADIUM

Take That - This Life tour

Take That are returning to the Riverside joined by special guest Olly Murs.

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RIVERSIDE STADIUM

James Arthur - Bitter Sweet Love tour

Middlesbrough-born and Brit Billion-certified artist James Arthur has announced a massive homecoming show.

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Page last updated: 01 February 2024

### Planning policy

- 1. Planning policy
- 2. [Greenfield and reinvest](#)
- 3. [Development guidance](#)
- 4. [Core Strategy](#)
- 5. [Draft Local Plan](#)
- 6. [Infrastructure Funding Statement](#)
- 7. [Housing Local Plan](#)
- 8. [Infrastructure Funding Statement](#)
- 9. [Interim foot road takeaways policy](#)
- 10. [Interim policy on conversions of residential properties](#)
- 11. [Local Development Scheme](#)
- 12. [Neighbourhood plan](#)
- 13. [Regeneration RPP](#)
- 14. [Self-build and custom housebuilding](#)
- 15. [Statement of Community Involvement \(SCI\)](#)
- 16. [Supplementary Planning Documents \(SPD\)](#)
- 17. [Teess Valley Joint Local Aggregate Assessment \(LAA\)](#)
- 18. [Teess Valley Joint Minerals and Waste \(D\)Ds](#)
- 19. [Evidence library](#)

### Draft Local Plan

The Draft Local Plan sets out the vision for the future development of Middlesbrough. It includes the emerging planning policies, allocations, and designations which will be used to guide development in the town until 2041.

Once the Local Plan comes into force (is 'adopted'), it will replace the town's existing planning policies, and will be used to help decide planning applications.

We also have to look at sustainability as part of the Local Plan. This involves doing a sustainability appraisal of the Local Plan to make sure we consider the potential environmental, social, and economic effects of the Local Plan.

### Consultation

We're running a consultation to find out what people think of our Draft Local Plan. The consultation will run from **9am on Thursday 1 February 2024 until 5pm on Friday 16 March 2024**.

### Documents

- [Middlesbrough Draft Local Plan](#) (PDF, 14.96 MB)
  - [Middlesbrough Draft Local Plan sustainability appraisal](#) (PDF, 3.48 MB)
  - [Middlesbrough Draft Local Plan ecopraisal map](#) (PDF, 19.41 MB)
  - [Middlesbrough Draft Local Plan town centre inset](#) (PDF, 9.51 MB)
- You can find supporting evidence documents in our [evidence library](#).
- Not all of these documents are accessible. If you need the information in another format, please email [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk).

### Have your say

If you want to have your say on the Draft Local Plan, you must make your comments in writing. The easiest way to do this is online.

[Have your say](#)

- If you're struggling with the online form, you can [download and fill in the survey](#), and send it:
- by email to: [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk)
  - by post to: Planning Policy Team, Planning Services, Middlesbrough Council, Fountain Court, 119 Grange Road, Middlesbrough, TS1 2QT
- We will not consider responses received after the closing date (5pm on Friday 16 March 2024).

### Drop-in information sessions

- We're holding drop-in events during the consultation period, where you can come and speak to Planning Officers and find out more about the Draft Local Plan.
- Langdon Square Community Centre** - Langdon Square, Couby Newham, TS8 0TF  
Monday 12 February, 3pm to 6pm
  - Old fire station** - Middlesbrough Town Hall, Albert Road, Middlesbrough, TS1 2QJ  
Monday 12 February, 4pm to 7pm
  - Acklam Green Community Centre** - Stainby Road, Acklam, TS5 4JZ  
Tuesday 13 February, 3pm to 6pm
  - North Ormesby Community Hub and Library** - Derwent Street, North Ormesby, TS3 6JB  
Wednesday 14 February, 2pm to 5pm
  - Thorntree Community Hub and Library** - Birkhall Road, Thorntree, TS3 9JW  
Wednesday 14 February, 2pm to 5pm
  - Easterdale Community Hub and Library** - Broughton Avenue, Easterdale, TS4 3PZ  
Thursday 15 February, 2pm to 5pm
  - Hemlington Community Hub and Library** - Crosscliff, Hemlington, TS8 9JJ  
Thursday 15 February, 2pm to 5pm
  - Stainton and Thornton Memorial Hall** - Strait Lane, Stainton, TS8 9BB  
Friday 16 February, 3pm to 6pm
  - Acklam Community Hub and Library** - Acklam Road, TS8 7AB  
Monday 19 February, 2pm to 5pm
  - St Margaret's Church** - The Oval, Brookfield, TS5 8ET  
Tuesday 20 February, 3pm to 6pm
  - Grove Hill Community Hub and Library** - Bishopston Road, Grove Hill, TS4 2BP  
Wednesday 21 February, 2pm to 5pm
  - Neptune Centre** - Ormesby Road, Berwick Hills, TS3 7RP  
Wednesday 21 February, 3pm to 6pm
  - Marlon Community Hub and Library** - The Willows, Marlon, TS7 8RE  
Thursday 22 February, 2pm to 5pm
  - Newport Community Hub and Library** - St. Paul's Road, Middlesbrough, TS1 5ND  
Thursday 22 February, 2pm to 5pm
  - Nunthorpe Methodist Church** - Connaught Road, Nunthorpe, TS7 0BP  
Friday 23 February, 3pm to 6pm
  - Linthorpe Community Centre** - Linthorpe Road, Middlesbrough, TS15 6JG  
Monday 26 February, 3pm to 6pm
  - Marlon Community Centre** - Cypress Road, Marlon, TS7 8PZ  
Tuesday 27 February, 4pm to 7pm

### Frequently asked questions

- [What is the Local Plan?](#)
- [What issues will it cover?](#)
- [Why is the Local Plan being reviewed now?](#)
- [What evidence has been prepared to support the Local Plan?](#)
- [What are the objectives for the Local Plan?](#)
- [How does the Local Plan relate to the Middlesbrough Development Corporation?](#)
- [What level of housing is proposed?](#)
- [Why are greenfield sites being proposed for housing?](#)
- [Why is the entire Stainby site including Mendale Meadow allocated for development?](#)
- [Why is land at Stainby Road allocated for both education and housing?](#)
- [How much affordable housing will be provided and where will it go?](#)
- [Why is the council allocating land for Gypsy and Traveller Accommodation?](#)
- [Why has the site at Teessaurus Park been chosen? And what will happen dinosaur sculptures?](#)
- [When and how will the proposed Gypsy and Traveller site at Teessaurus Park be developed?](#)
- [How will existing infrastructure cope with the additional development?](#)
- [Why is the Stainton Way Western Extension required and what is the purpose?](#)
- [Will any new open spaces be provided as part of the proposed developments?](#)
- [Will the council make money from sites it owns in the plan?](#)
- [How can I obtain further information on the Local Plan review?](#)
- [What are the next steps in the process after the consultation?](#)

### Scoping report

We ran a consultation on the Local Plan Scoping Report from 5 December 2022 to 31 January 2023. You can view the [scoping report](#) (PDF, 266 kB), [supporting sustainability appraisal](#) (PDF, 1.57 MB), and [consultation report](#) (PDF, 1.3 MB).

### Contact

For more information, contact the Planning Policy Team by calling 01642 729062, 01642 729487, or emailing [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk)

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## Have your say on the Draft Local Plan



Post Share

Our Draft Local Plan identifies which parts of the town are suitable for development like housebuilding, and how green spaces and heritage sites should be protected.

Once the Local Plan comes into force (is 'adopted'), it will be used to guide decisions on individual planning applications. Without a Local Plan, we're less likely to be able to influence the type of new development in the town, and where it happens.

### Consultation

We're running a consultation to find out what people think of our Draft Local Plan.

The consultation will run from **9am on Thursday 1 February 2024** until **5pm on Friday 15 March 2024**.

[Find out more about the Draft Local Plan and have your say.](#)

### Drop-in information sessions

We're holding drop-in events during the consultation period, where you can come and speak to Planning Officers and find out more about the Draft Local Plan.

**Langdon Square Community Centre** - Langdon Square, Couliby Newham, TS8 0TF  
Monday 12 February, 3pm to 6pm

**Old fire station** - Middlesbrough Town Hall, Albert Road, Middlesbrough, TS1 2QJ  
Monday 12 February, 4pm to 7pm

**Acklam Green Community Centre** - Stainsby Road, Acklam, TS5 4JS  
Tuesday 13 February, 3pm to 6pm

**North Ormesby Community Hub and Library** - Derwent Street, North Ormesby, TS3 6JB  
Wednesday 14 February, 2pm to 5pm

**Thorntree Community Hub and Library** - Birkhall Road, Thorntree, TS3 9JW  
Wednesday 14 February, 2pm to 5pm

**Easterside Community Hub and Library** - Broughton Avenue, Easterside, TS4 3PZ  
Thursday 15 February, 2pm to 5pm

**Hemlington Community Hub and Library** - Crosscliff, Hemlington, TS8 9JJ  
Thursday 15 February, 2pm to 5pm

**Stainton and Thornton Memorial Hall** - Strait Lane, Stainton, TS8 9BB  
Friday 16 February, 3pm to 6pm

**Acklam Community Hub and Library** - Acklam Road, TS5 7AB  
Monday 19 February, 2pm to 5pm

**St Margaret's Church** - The Oval, Brookfield, TS5 8ET  
Tuesday 20 February, 3pm to 6pm

**Grove Hill Community Hub and Library** - Bishopton Road, Grove Hill, TS4 2RP  
Wednesday 21 February, 2pm to 5pm

**Neptune Centre** - Ormesby Road, Berwick Hills, TS3 7RP  
Wednesday 21 February, 2pm to 5pm

**Marton Community Hub and Library** - The Willows, Marton, TS7 8BL  
Thursday 22 February, 2pm to 5pm

**Newport Community Hub and Library** - St. Paul's Road, Middlesbrough, TS1 5NQ  
Thursday 22 February, 2pm to 5pm

**Nunthorpe Methodist Church** - Connaught Road, Nunthorpe, TS7 0BP  
Friday 23 February, 3pm to 6pm

**Linthorpe Community Centre** - Linthorpe Road, Middlesbrough, TS5 6JG  
Monday 26 February, 3pm to 6pm

**Marton Community Centre** - Cypress Road, Marton, TS7 8PZ  
Tuesday 27 February, 4pm to 7pm

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## Appendix 4 – Example site notice



## PUBLIC NOTICE

### MIDDLESBROUGH DRAFT LOCAL PLAN

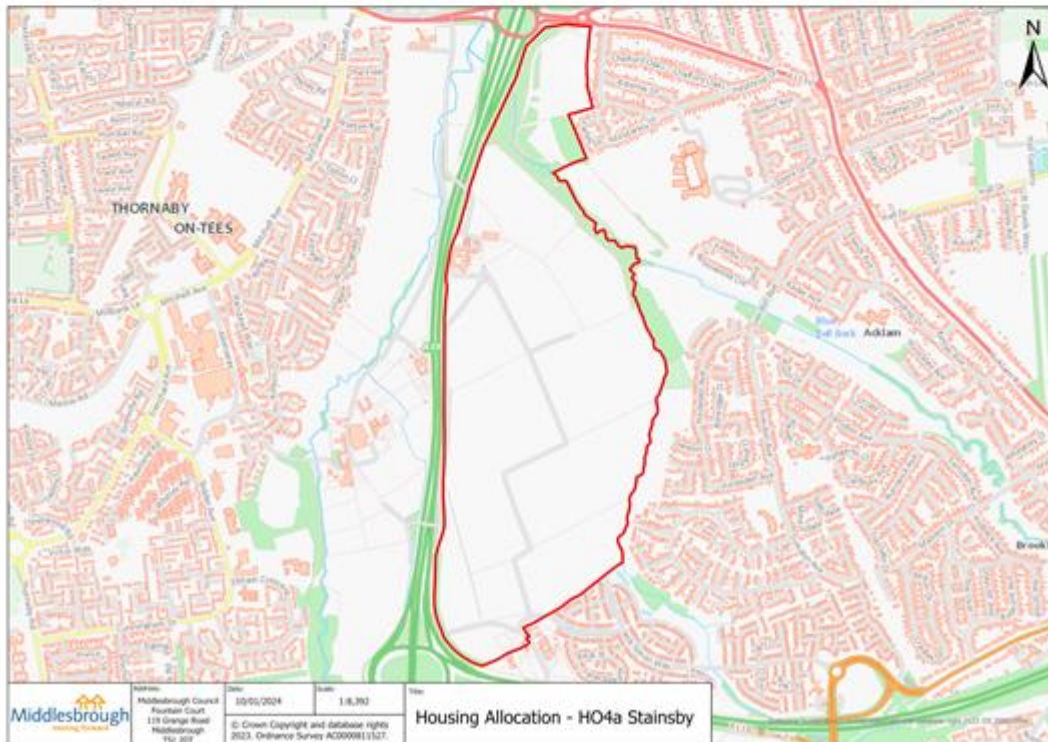
Middlesbrough Council has prepared a Draft Local Plan to enable public consultation to take place on the emerging planning policies, allocations and designations that will be used to guide development in the area for the period to 2041. Stainsby is a site which has been included as a proposed allocation for housing in the document (see site plan below).

The Draft Local Plan is available to view and download from the Planning Pages of the Council's website, accessed via [www.middlesbrough.gov.uk](http://www.middlesbrough.gov.uk) or by using the above QR code. The document can also be viewed at community hubs/libraries and at Middlesbrough House, 50 Corporation Road, Middlesbrough TS1 2RH.

Comments can be made on the Draft Local Plan during the consultation period between **9:00 am on 1<sup>st</sup> February 2024** and **5:00 pm on 15<sup>th</sup> March 2024**.

Comments can be made using the online form available at [www.middlesbrough.gov.uk](http://www.middlesbrough.gov.uk), via email to [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk), or alternatively posted to the Planning Policy Team, Planning Services, Middlesbrough Council, Fountain Court, 119 Grange Road, Middlesbrough, TS1 2DT.

#### Stainsby





## Appendix 5 – Middlesbrough Council Press Release

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[Home](#) > [Latest news](#) > Have your say on Middlesbrough's long term development plan

# Have your say on Middlesbrough's long term development plan

Development and regeneration

Thursday, 01 February 2024



[Post](#) [Share 7](#)

People in Middlesbrough are being encouraged to have their say on the town's long term blueprint for development. Middlesbrough Council has produced a draft Local Plan, identifying which parts of the borough are suitable for development like housebuilding and how green spaces and heritage sites should be protected.

Once in place, it will be used to guide decisions on individual planning applications.

Without a Local Plan, Middlesbrough Council is less likely to be able to influence the type of new development in the town, and where it happens.

People living and working in Middlesbrough now have the opportunity to voice their views on the draft plan during a six-week public consultation, which begins on February 1.

Cllr Theo Furness, Executive Member for Regeneration, said: "The Local Plan is an important document which gives us control over which parts of our town are developed, and how that development looks.

"We're legally required to prepare a document covering a long-term period up until 2041 – which allows us to ensure we have the right housing mix to support our residents as the make-up of the population continues to change. This includes bungalows and adaptable properties for our growing older population, affordable homes, flats and larger family houses.

"It's also important to stress that development at any of the sites identified in the draft plan would still need to gain planning permission in the normal way and wouldn't necessarily all happen as soon as the plan is adopted.

"I'd urge everyone to have their say as part of the consultation."

The draft plan identifies that 400 new homes are required each year, which means that by 2041, 7,600 new homes would need to be built in Middlesbrough.

This would support the Council's ambition for 350 new jobs to be created every year.

The draft plan prioritises housebuilding on brownfield land - but some greenfield sites are included.

This is because brownfield land is less economically viable and often complex to develop, while Middlesbrough's tight boundaries mean there isn't enough available brownfield land to provide the number of homes needed.

Government policy dictates that the housing needs of the Gypsy and Travelling community must be met when land for new homes is identified, in a way that facilitates a traditional and nomadic way of life while respecting the interests of settled communities.

A formal assessment found that 14 additional pitches will be needed above the numbers available at the current site at Metz Bridge.

No privately owned land was identified, therefore land at Teessaurus Park has been proposed in the draft plan.

Any site built on the land in the future would need to go through a full planning and consultation process.

Access to the River Tees and a local wildlife site at the north of the park would be retained – as would access to the dinosaur sculptures, whether at the current site or a suitable alternative space in Middlesbrough.

The consultation will run until March 15, and drop-in events will be held across the town.

Views collected during the consultation will be analysed and amendments will be made where appropriate, before a new, six-week consultation is launched on a revised document.

It will then be submitted to the Secretary of State and examined by an independent planning inspector.

If approved, it would be adopted in May 2025.

You can access the draft document online by visiting [www.middlesbrough.gov.uk/localplan](http://www.middlesbrough.gov.uk/localplan) or in person at Middlesbrough House or any of our libraries and community hubs.

Officers can be contacted by email on [planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk) or by calling 01642 729487.

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## Appendix 6 Press Articles



### Middlesbrough residents to have their say on town's development



Middlesbrough residents will have their say on a major development plan for the town's future. The plan, which includes a new town square and a new library, will be put to a public consultation in the next few weeks.

**'Right mix'**  
Councillors have a mix of views on the plan. Some are in favour of the new town square, while others are concerned about the impact on the town's character.

For more on this story, visit [BBC News](#).

Related Topics: [Middlesbrough Council](#), [Middlesbrough](#)

**More on this story**  
[Council agrees to set out to avoid 'backlog'](#)  
[Lidl experimental in leafy coastal village](#)

**Related Internet Links**  
[Middlesbrough Council](#)

- From other local news sites**  
[Middlesbrough Council: News with service level updates](#)  
[The biggest assisted living care home in the world is being developed in Middlesbrough](#)  
[Middlesbrough: 18 charged after 10 year old student](#)  
[Middlesbrough: 18 charged after 10 year old student](#)  
[Middlesbrough: 18 charged after 10 year old student](#)  
[Middlesbrough: 18 charged after 10 year old student](#)  
[Middlesbrough: 18 charged after 10 year old student](#)  
[Middlesbrough: 18 charged after 10 year old student](#)

#### Top Stories

**Family's urgent case could be heard in court**  
A family's urgent case could be heard in court.

**Woman's search for justice**  
A woman's search for justice.

**Woman's search for justice**  
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**Woman's search for justice**  
A woman's search for justice.

BBC News Services  
Best of the BBC  
Inside the colourful world of...  
The Liberator's live at...  
How just food influenced our...

## Appendix 7 Social media posts



## Appendix 8 Frequently Asked Questions



## Frequently asked questions

• What are the next steps in the process after the consultation?	+
• What is the Local Plan?	+
• What issues will it cover?	+
• Why is the Local Plan being reviewed now?	+
• What evidence has been prepared to support the Local Plan?	+
• What are the objectives for the Local Plan?	+
• How does the Local Plan relate to the Middlesbrough Development Corporation?	+
• What level of housing is proposed?	+
• Why are greenfield sites being proposed for housing?	+
• Why is the entire Stainsby site including Mandale Meadow allocated for development?	+
• Why is land at Stainsby Road allocated for both education and housing?	+
• How much affordable housing will be provided and where will it go?	+
• Why is the council allocating land for Gypsy and Traveller Accommodation?	+
• Why has the site at Teessaurus Park been chosen? And what will happen dinosaur sculptures?	+
• When and how will the proposed Gypsy and Traveller site at Teessaurus Park be developed?	+
• How will existing infrastructure cope with the additional development?	+
• Why is the Stainton Way Western Extension required and what is the purpose?	+
• Will any new open spaces be provided as part of the proposed developments?	+
• Will the council make money from sites it owns in the plan?	+
• How can I obtain further information on the Local Plan review?	+

## Appendix 9 – Display Boards for events

# Middlesbrough's Local Plan

## What is the Local Plan?

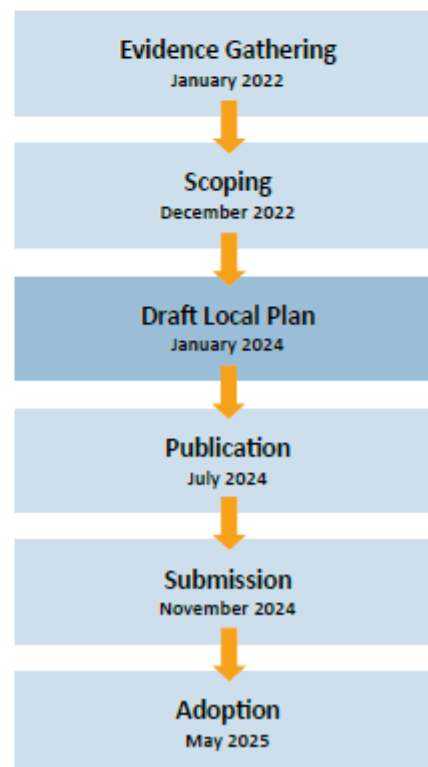
- As a Local Planning Authority, the Council is required to have an up-to-date development plan for the borough. This is known as a 'Local Plan'.
- The Local Plan contains the strategies, policies, and allocations of land that will help to guide development.
- Decisions must be made in accordance with the Local Plan, unless other material considerations indicate otherwise.

## Why are we reviewing the Local Plan?

- The Government places great importance on having an up-to-date local plan. They state that, in order to meet its objective of providing sufficient housing and other development in a sustainable manner, 'preparing and maintaining up-to-date plans should be seen as a priority'.
- At present, Middlesbrough's development plan is made up of a number of documents. Some of these are out of date.
- Given the age of the existing Local Plan documents, there is a need to update the Council's planning strategy so that it effectively addresses the needs and aspirations of Middlesbrough today and in the future.

## What stage are we at in the Local Plan Review?

- In September 2022 the Council agreed to start work on a new Local Plan.
- A Local Plan Scoping Report was approved by the Council in November 2022. This report went out to public consultation between 5th December 2022 and 31st January 2023.
- Comments received during the Scoping Report consultation period enabled the Council to develop the 'Draft Local Plan' document, a key stage in the process of creating the new Local Plan.
- Having produced a Draft Local Plan, a period of public consultation has now begun.
- The purpose of making a Draft Local Plan is to gather views from the public and stakeholders on the Council's preferred approach to addressing planning issues in Middlesbrough.
- Your comments on the Draft Local Plan, and any other issues you think the Local Plan should address, are welcomed. They will be used to help us finalise Middlesbrough's new Local Plan.



## What is included in the Draft Local Plan consultation?

### 1 Draft Local Plan Policy Document

- The document that details the strategies and policies of the Council's preferred approach to addressing planning issues in Middlesbrough.
- It contains further details on all the themes presented on these posters.



### 2 Policies Map

A map that illustrates all the area specific policies and land allocations.

### 3 Sustainability Appraisal

An assessment of the social, environmental, and economic impacts that the Draft Local Plan will have.

## The Strategic Objectives of the Local Plan

- |                    |   |
|--------------------|---|
| <b>Objective A</b> | To deliver new high quality, well-designed and energy efficient development that meets the needs and aspirations of our current and future residents                                      |
| <b>Objective B</b> | To revitalise Middlesbrough Town Centre through diversifying our retail and leisure offer, and attracting new urban dwellers, supported by a strong network of district and local centres |
| <b>Objective C</b> | To strengthen our local economy by supporting existing businesses and attracting new employers  |
| <b>Objective D</b> | To build high quality homes that help strengthen our communities  |
| <b>Objective E</b> | To protect and enhance our Green and Blue Infrastructure Network  |
| <b>Objective F</b> | To ensure that new development is properly served by, and sustainably connected to, new and improved physical, social and environmental infrastructure                                    |
| <b>Objective G</b> | To recognise and value our historical and culturally important assets   |
| <b>Objective H</b> | To achieve healthy and safe communities   |

# Key Themes

The Draft Local Plan is structured around a series of different themes. Each of these themes contains a set of planning policies that will help guide development in the borough.

## Creating Quality Places

### Managing Development

- As new buildings and other forms of development occur, it is important that the impacts they have on infrastructure and the environment are effectively managed.
- All development must be of a high design quality and accord with the Local Plan and its general principles of development.

## Economic Growth

### Jobs

- The plan will continue to support a diverse economy and aims to help deliver significant increases in businesses and jobs.
- Middlesbrough's ambition is to create 350 additional jobs per year and a sufficient amount of land has been allocated to meet this aim.
- In line with the Tees Valley Strategic Economic Plan, Middlesbrough will support and promote the growth of the:
  - ▶ creative media and digital sector;
  - ▶ advanced manufacturing sector and;
  - ▶ professional, health and education sectors.



### Town Centre

- The Town Centre economy will be rebalanced by attracting more commercial and leisure activity into the centre, whilst promoting it as a safe and welcoming place to live and visit.
- The Town Centre will be characterised by six core areas: a Civic, Commercial and Cultural Heart; Retail Quarter; Leisure Quarter; Independent Quarter; Railway Station and Historic Quarter; and the Linthorpe Road South Secondary Shopping Area.

### District and Local Centres

- The existing network of district and local centres will be protected and enhanced.
- New local centres are proposed for Stainsby, Hemlington Grange West, Land North of Low Lane, and Newham Hall Farm.

## Green and Blue Infrastructure

### Open Space, Sport and Recreation Facilities

- Existing open space, Local Green Space, and sport and recreational facilities will be protected and enhanced.
- New open green space will be integral to the design of new developments. The plan includes enhancements to open space in new allocations, including Stainsby Country Park.

### Biodiversity and Geodiversity

- Biodiversity and geological resources will be protected.
- Development will be expected to protect, provide and extend green and blue infrastructure and is required to deliver at least a 10% improvement in biodiversity.

### Climate Change and Flood Risk

- Inappropriate development in areas at current or future flood risk will be avoided.
- The use of natural sustainable drainage systems (SuDs) will be prioritised.



## Housing Development

### Housing Requirement

- In order to realise Middlesbrough's ambition for economic growth, the delivery of 400 homes per year is planned.
- To help achieve this, the plan has allocated parcels of land for residential development. These are illustrated on the Policies Map.

### Mix and Types of Housing

- The delivery of wide range of house types, tenures, and sizes is sought.
- Gaps in the housing market will be addressed, including smaller dwellings for younger people and first time buyers, homes for older people, and larger, higher value properties.



### Affordable Housing

- Housebuilders will be required to provide a minimum of 15% affordable housing on sites of 10 or more homes located in the wards of Acklam, Coulby Newham, Hemlington, Kader, Ladgate, Marton East, Marton West, Nunthorpe, Stainton & Thornton, and Trimdon.

### Gypsy, Traveller and Travelling Showpeople Accommodation

- Land at Metz Bridge will be safeguarded for use as a Gypsy and Traveller site.
- In order to meet the identified need for additional pitches by 2041, land at Teessaurus Park has been allocated as a Gypsy and Traveller site.

## Physical, Social and Environmental Infrastructure

### Transport

- The delivery of an integrated and sustainable transport network will be supported.
- A network of Cycle Super Highways will be created and bus Superstops will serve Local Centres.
- Access to rail stations will be enhanced and the public realm around Middlesbrough Railway Station improved.

### Community Facilities

- The loss of premises or land for community uses will be resisted and the provision of new community facilities supported.

### Education

- The Council will work to ensure that education needs arising from future development are met.
- New education provision will provide high quality facilities, be highly accessible, and located and designed to minimise impacts from associated traffic.

### Health and Wellbeing

- To help promote health and wellbeing, development will:
  - support measures to promote walking and cycling;
  - support the delivery of essential community services and;
  - protect and enhance open space, leisure and recreation facilities.



## Managing the Historic Environment

- Development that affects heritage assets or their settings must be of a high quality, respect its context, and demonstrate a strong sense of place. Heritage assets include Conservation Areas and Listed Buildings.
- The development of heritage assets whose preservation is identified as being at risk will be permitted providing it results in the optimum, viable, and sustainable use of the building or site.

# Draft Local Plan Policies Map

The map that illustrates all the area specific policies and land allocations in the Draft Local Plan

## Legend

### Introduction

□ Town Boundary

### Strategy and Vision

▨ ST2 MDC Boundary

### Creating Quality Places

— CRS Development Limits

### Economic Growth

■ EC2 Employment Locations

■ EC4 Middlehaven

■ EC5 University Campus

■ EC7 Town, District & Local Centres

### Housing Development

■ HO4 Housing Allocations

■ HO6 Gypsy, Traveller and Travelling Showpeople Sites

### Green and Blue Infrastructure

■ GR2 Green Wedges

■ GR3 Existing Open Space, Sports & Recreational Facilities

■ GR3 Local Green Spaces

■ GR5 Teesmouth & Cleveland Coast SPA

■ GR5 Sites of Special Scientific Interest

■ GR5 Local Wildlife Sites

■ GR5 Local Nature Reserves

★ GR5 Local Geological Sites

■ GR6 Nutrient Neutrality

### Physical, Social and Environmental Infrastructure

■ IN2 Stainton Way Western Extension

■ IN5 Middlehaven Academy

■ IN8 Burial Grounds

### Managing the Historic Environment

■ HI2 Conservation Areas

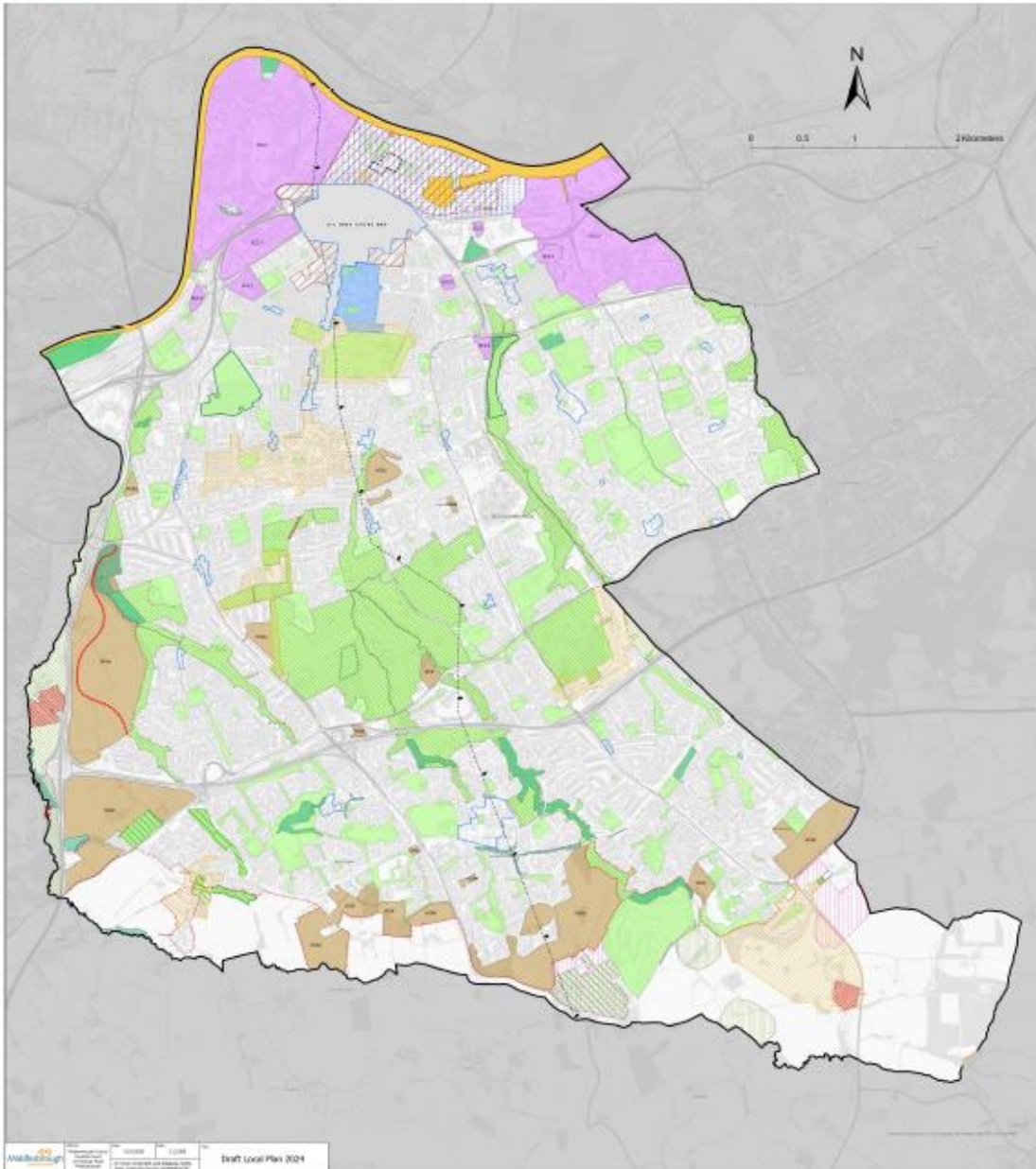
■ HI2 Scheduled Monuments

### Minerals and Waste

■ MWC4 Deep Minerals - Salt

■ MWC4 Shallow Minerals

Note: Opposite entirely covers the Borough of Middlehaven



# How to get involved

## Where to view the Draft Local Plan Document in full

### Online

A digital version can be accessed via the Council's Planning Policy pages at: [www.middlesbrough.gov.uk/planning-and-development](http://www.middlesbrough.gov.uk/planning-and-development)

Alternately, scanning the QR code below will take you directly to the Draft Local Plan page.

### In-person

Physical copies are available to view at Middlesbrough House and local community hubs and libraries.

## How to submit your comments

### Online

Comments can be submitted via the online form found on the Council's Planning webpage: [www.middlesbrough.gov.uk/planning-and-development](http://www.middlesbrough.gov.uk/planning-and-development)

Alternately, scanning the QR code will take you directly to the Draft Local Plan webpage.

The online form can also be downloaded as a Word document. Completed copies can be sent to us via email or post using the respective addresses listed below.



### Email

[planningpolicy@middlesbrough.gov.uk](mailto:planningpolicy@middlesbrough.gov.uk)

### Post

Planning Policy Team, Planning Services, Middlesbrough Council, Fountain Court, 119 Grange Road, Middlesbrough, TS1 2DT

### Phone

For any general enquires or further information about the Draft Local Plan consultation, the Planning Policy Team can be contacted by the above email address or on phone at 01642 729487 or 01642 729062.

**The consultation runs from 1st February to 15th March 2024**

Comments must be received by 5:00pm on 15th March 2024

[middlesbrough.gov.uk](http://middlesbrough.gov.uk)

  
Middlesbrough  
moving forward