

*High Density  
Development:  
Flats and Apartments*

Supplementary Planning  
Guidance

***April 2005***



**Stockton-on-Tees**  
BOROUGH COUNCIL

**SUPPLEMENTARY PLANNING GUIDANCE 4:**  
**HIGH DENSITY DEVELOPMENT: FLATS AND APARTMENTS**

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**1.0 Introduction.**

1.1 In recent years the Council has received numerous applications for flats and apartments in areas of larger, more conventional housing. Although traditionally flats have been aimed at the lower end of the housing market and have a reputation for being low quality prefabricated structures, much of the pressure for flats is now aimed at the top end of the market with quality buildings, in areas of traditionally high wealth and status. Such change invites opposition from local residents and pressure groups who have a negative perception of flats, particularly where they are direct neighbours to a proposed site. However, Government wishes to see more balanced communities through providing a more diverse range of accommodation, which includes flats.

The argument for flats:

- they are sustainable forms of development by increasing housing density, thus reducing the pressure for Greenfield land outside the built up area.
- they provide a wider choice of dwelling size and type for a changing population, often in areas where house prices are beyond the means of many people.

The argument against flats:

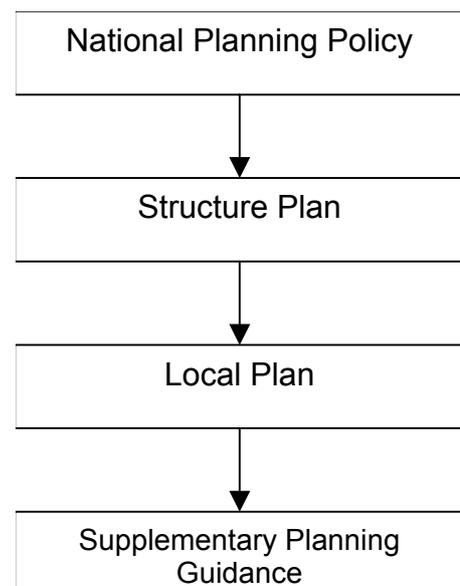
- they are developed way above the suggested density threshold set out in national Planning Policy Guidance note 3 (which encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net));
- they are not always located on genuinely sustainable sites where they may realistically reduce the need to use the private car.
- they do not always respect local character or architecture by often displacing older houses of period character and appearance.

1.2 This Supplementary Planning Guidance note develops the themes set out above to ensure that flats are built in appropriate locations, are well designed, and add value to the housing stock of the Borough. The guide does not seek to put a blanket ban on flats being built, nor encourage an ‘anything goes’ policy, but gives guidance to developers about what the Council expects them to produce, as well as to inform the public how and why decisions are made.

**2.0 The Status of Supplementary Planning Guidance.**

2.1 Supplementary Planning Guidance sits within a hierarchy of plans and strategies that guide development in Stockton. National guidance in the form of Planning Policy Guidance notes and Planning Policy Statements set out the broad Government objectives. Structure Plans then introduce area-based strategic plans and policies. Then Local Plans add more detailed policies that are site specific. Supplementary Planning Guidance notes are used to add detail to the Local Plan policies by adding ‘flesh to the bone’s’ of the policy.

2.2 The Planning system is to undergo a major overhaul following the implementation of the Planning and Compulsory Purchase Act in 2004. The process for preparing and adopting Supplementary Planning Guidance will change as part of that Act, however, the aims and themes explored in this Supplementary Planning Guidance note will remain the same. This Supplementary Planning Guidance is prepared under the ‘old’ system.



2.3 Supplementary Planning Guidance is exactly as it states: guidance. It should be used in preparing and determining planning applications, but where there are overriding circumstances, it can be set aside.

### **3.0 Policy Background.**

#### **National Policy.**

3.1 Government policy in the form of PPG3 “Housing” advocates higher density development in order to reduce the pressure for so-called ‘Greenfield’ land. PPG3 advocates development at 30-50 dwellings per hectare (12-20 dwellings per acre), or higher in sustainable locations. This development should ideally take place on previously developed land (so-called ‘brownfield land’). The definition of previously developed land may be found in the appendices. To summarise the definition, private gardens ARE classed as previously developed land.

3.2 PPG3 also advocates the provision of a broader range of dwelling types so that people have a wider choice of where to live. This is especially important in areas where houses are predominantly large and expensive, and people are priced out of the market, such as young families or first time buyers. The Government is also aware that there is an ageing population, and that more and more people are choosing to live alone, or put off having families, so more, but smaller dwellings are needed.

#### **Design**

3.3 The guidance above sets out the justification for higher density, and by default the justification for flats. However, the need for flats is not the only consideration in determining planning applications, and the Government is also keen to see good design in the built environment. There are various sources of design policy at national level, including Planning Policy Statement 1, PPG3, and various Commission for Architecture and the Built Environment (CABE) publications.

3.4 Rather than prescribing specific solutions to design problems, PPG3 sets out the broad themes of ensuring design is appropriate;

*“New housing development of whatever scale should not be viewed in isolation. Considerations of design and layout must be informed by the wider context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology should all help to determine the character and identity of a development, recognising that new building technologies are capable of delivering acceptable built forms and may be more efficient. Local planning authorities should adopt policies which:*

- *create places and spaces with the needs of people in mind, which are attractive, have their own distinctive identity but respect and enhance local character;*
- *promote designs and layouts which are safe and take account of public health, crime prevention and community safety considerations;*
- *focus on the quality of the places and living environments being created and give priority to the needs of pedestrians rather than the movement and parking of vehicles;*
- *avoid inflexible planning standards and reduce road widths, traffic speeds and promote safer environments for pedestrians; and*
- *promote the energy efficiency of new housing where possible.”*

3.5 The CABE/DETR companion document to PPG1 “By Design”, and PPG3 companion document “Better Places to Live”, both provide useful additional design-led advice for creating sustainable, attractive and desirable residential layouts. It is recommended that these documents are used at an early stage when proposing any flatted development.

**Local Policy.**

3.6 Stockton Local Plan contains a policy specific to flats, but it concerns only the conversion of existing properties into flats. Policy HO6 states:

*“Within built up areas proposals for the conversion of large residential properties to flats and bedsits will normally be permitted provided that*

- i) there would be no adverse effect on the amenity of neighbours; and*
- ii) conversion would not have a detrimental effect on the character or appearance of the building or area; and*
- iii) adequate provision can be made for access and the parking of vehicles in a manner which safeguards the visual amenity of the area. In certain cases, normal parking standards may be relaxed to take account of the likely rate of car ownership amongst occupants.”*

New purpose-built flats are covered under Policies HO3 and HO11 which state:

Policy HO3:

*“Within the limits to development, residential development may be permitted provided that:*

- i) the land is not specifically allocated for another use; and*
- ii) the land is not underneath electricity lines; and*
- iii) it does not result in the loss of a site which is used for recreational purposes; and*
- iv) it is sympathetic to the character of the locality and takes account of and accommodates important features within the site; and*
- v) it does not result in an unacceptable loss of amenity to adjacent land users; and*
- vi) satisfactory arrangements can be made for access and parking.”*

Policy HO11

*“New residential development should be designed and laid out to;*

- i) provide a high quality of built environment which is in keeping with its surroundings;*
- ii) incorporate open space for both formal and informal use;*
- iii) ensure that residents of the new dwellings would have a satisfactory degree of privacy and amenity;*
- iv) avoid any unacceptable effect on the privacy and amenity of the occupiers of nearby properties;*
- v) pay due regard to existing features and ground levels on the site;*
- vi) provide adequate parking, access and servicing;*
- vii) subject to the above factors. To incorporate features to assist in crime prevention.”*

3.7 This Supplementary Planning Guidance note is based on these policies and develops the themes into more detailed guidance on how they are applied in determining planning applications for flats.

**Housing Needs Survey**

3.8 A housing needs survey was completed for the Borough in 2000 on behalf of the Council by DCA. The survey included face-to-face interviews, a 16,550 household postal survey, and a review of other housing information sources such as the house price index and other sources.

The survey found:

- The number of flats and maisonettes in Stockton Borough is half the national average
- The number of houses and bungalows is much higher than the national average.
- There is an ageing population who are likely to live alone or in couples and do not necessarily want or need a large house.
- 37% of respondents sought a flat, and some 73% of respondents indicated that they wanted small accommodation –26% one bedroom and 47% two bedroom.

- Most new housing demand is for semi-detached houses, terraced houses and flats, all of which are poorly represented in the stock.
- There will be unmet needs because of the mismatch between available supply and new household needs, both in terms of house types and location.

3.9 From the above findings it is clear that there is a real need for flats throughout the Borough, including for local people who want to remain in the area where they have lived, but perhaps cannot afford a large house. Therefore the Council will not consider as valid any objections against the need for smaller dwellings in an area.

### **Census information**

3.10 Data from the Tees Valley Joint Strategy Unit's web site shows a number of changes and trends emerging over the years. These statistics point to a need for a broad range of dwellings to be provided to meet the needs of more people in society.

- Nearly 38% of people aged 16+ in households in the borough are not living in couples, indicating a large proportion of the population who do not need a large house. This is not met by the housing supply which is mostly made up of larger semi- and detached dwellings
- Over 31000 people are over retirement age, around 15% who are likely to need smaller accommodation as families move out.
- 30% of households have no car, while nearly 63% of workers between 16 and 74 drive to work, indicating a need for more dense housing near to transport hubs and services and facilities.
- 4.4% of households are overcrowded, which shows that there is a need for more dwellings, and most likely to be more affordable dwellings
- the number of flats and maisonettes is almost half that of the national average, which provides the opportunity to present a greater spread of dwellings.
- over 7% of the Borough are permanently sick or disabled, indicating a need for more accessible dwellings in more convenient locations

### **Policy summary**

3.11 The Council considers flats to be an acceptable form of development in the Borough, but will scrutinise closely the location, design and density of each application to ensure that communities can reap the benefits of flatted development, and avoid any of the potential drawbacks.

## **4.0 Types of Flats.**

### **Conversion of existing properties.**

4.1 It is common in other areas to convert old docklands or industrial warehouses, however there are few buildings in Stockton Borough that are suitable for conversion, either because of poor location or the former use is incompatible with residential use. The industrial uses in the Borough are more commonly chemical sites, and as such have contamination issues that are likely to prevent conversion to residential use. There are however numerous buildings with vacant upper floors – especially in town centres – and the conversion of these is supported.

4.2 Where conversion is considered acceptable, the Council will expect that any features of architectural or historic merit are protected and any alterations or extensions to the built fabric are sympathetic to the building and the neighbouring buildings. Extensions must be subservient to the main building, leave a useable amount of amenity space for residents, and respect the building. More detailed guidance regarding extending residential buildings may be found in the Supplementary Planning Guidance 2: Household Extension Design Guide, available from Planning Reception, or on the Stockton Borough Council website.

### **Demolition and replacement**

4.3 The Council will seek the retention of architecturally or historically interesting buildings or groups of buildings in preference to demolition. In established residential areas the Council will

consider the number and scale of similar recent developments, and the individual and cumulative effects that a further demolition and replacement would have on the character of the area.

4.4 Where the replacement of buildings is considered acceptable in policy terms, the design of the new building should make reference either to the building that has been demolished, or to surrounding buildings in order to ensure that it is not obtrusive in the street scene, whichever is more appropriate. The Council may not necessarily allow the development to achieve the same developed footprint or building mass as the existing building. Any increase in the footprint will be considered against the quality of the design in its context. Details regarding the character are set out later in the document.

#### **New build on new sites**

4.5 Where proposals for new flats are on new sites (for example windfall sites or sites allocated in the Local Plan), the Council will not consider such developments as starting with a 'blank canvas', and will still require considerate design appropriate in its context.

### **5.0 Locating flatted development**

5.1 The Council supports the Government's objectives in PPG3 "Housing". In accordance with this guidance it will seek to ensure that new flatted development is located within the limit to development as defined on the Proposals Map in the Local Plan, is sited on previously developed land (or a committed housing allocation site), is close to services and facilities, and is accessible by a choice of means of transport.

#### **Limits to development**

5.2 The limit to development is a line drawn on a map around the built up area of Stockton, Billingham, Norton, Thornaby, Ingleby Barwick and Yarm which marks the separation of urban and rural. Within the line, the principle of flatted development is generally permissible where it satisfies the requirements of this Supplementary Planning Guidance. Outside the limit to development (except on sites specifically allocated for housing in the Local Plan), residential development is not generally supported unless there are material circumstances that override Policy. Where such circumstances exist, the Council will consider carefully the nature and form of housing proposed in relation to its intended purpose.

5.3 Some of the villages surrounding the main built up area are of such a size that they have their own limits to development. The Council considers these villages to be relatively poor in terms of proximity to services and facilities, and therefore unable to support the high-density development associated with flats.

#### **Previously Developed Land**

5.4 The Government seeks to prevent the loss of 'greenfield' land by directing development onto land that has been developed previously. The definition of previously developed land is given in Annexe 1. The Council will grant planning permission for flats where they are located on previously developed land, or on land specifically allocated for housing in the Local Plan where the application accords with the Council's approach to locating flats in Para 5.7.

#### **Close to services and facilities**

5.5 Higher density development must be sited so that residents are able to walk to a number of local services, such as schools, shops, pubs and other leisure and entertainment uses, and employment. Obviously town, district and local centres are ideal locations for higher density, but suburban areas are less sustainable in terms of number and variety of services and facilities. The Council considers that a single service or facility is not enough to justify high density development. Therefore, the location of the development will be a determining factor in the scale of the development.

### Accessible by a choice of means of transport

5.6 Flatted development is permissible only in locations that have good transport links to a variety of locations such as schools, shops, doctor's surgeries, employment sites, leisure and entertainment facilities and other everyday locations. The Council considers walking and cycling to be the most sustainable form of transport, but proximity to railway stations and major bus routes is also important for longer journeys. Public transport can only be considered a viable alternative to the motorcar where there is one or more regular service to a range of locations.

### The Council's policy for locating flats

5.7 Given the above, the Council has adopted a sequential approach to assessing proposals for flats in terms of location, and all proposals for flats of any type must satisfy the criteria:

Flatted development **MUST** be located

- within the limit to development defined on the Local Plan Proposals Map around the main built up area of Stockton, Norton, Billingham, Thornaby, Ingleby Barwick and Yarm, (but not including the villages which have their own limit to development)
- on previously developed land or on land allocated for housing
- within 500m of a stop on a main bus route that has more than one regular service, including Sundays, bank holidays and evenings.

**AND** within one or more of the following:

- 100m of a convenience store selling a variety of daily needs goods
- 250m of a designated neighbourhood centre as defined in Local Plan Alteration No 1
- 500m of a designated Local or District centre as defined in Local Plan Alteration No 1
- 1km of the defined Stockton Town Centre

All of these distances must be measured in realistic, safe, well-lit routes, without significant obstruction, that could reasonably be expected to be used by everyone including those with disabilities. Distances must not be measured 'as the crow flies'.

Sites that are considered acceptable for housing development in principle, but do not meet the criteria above will not be granted planning permission for flats, and an alternative form of housing will be encouraged at lower densities (eg 30-50dph), however this may include a proportion of flats as part of a wider scheme.

## **6.0 Layout.**

### **Character**

6.1 The character of an area is made up of a myriad elements which collectively create a sense of place. Any development must compliment this sense of place by observing and maintaining the elements of the character.

6.2 The following list highlights those elements that assist in collectively creating a sense of place, but the list is by no means exhaustive.

- the dominant architectural style
- building materials
- building details and dimensions
- plot size and orientation
- ratio of building to open space
- means of enclosure
- trees and other vegetation

6.3 Planning permission will only be granted where the character of the area would be maintained or enhanced.

### **Amenity Space**

6.4 For flats, communal amenity space provided for the exclusive use of residents of the development may be acceptable provided its location, size, shape and aspect enable it to be enjoyed by occupants. The amenity space should be accessible from each dwelling and be landscaped and well maintained. Usable communal amenity space excludes driveways, garages, parking and vehicle hardstandings, service areas and refuse storage areas.

6.5 Where a site is located near to existing public amenity space eg a park, then the requirement to provide on-site amenity space may be negotiated. Contributions to improving existing facilities may be required.

6.6 People buying flats may not necessarily want a lot of space, but they may still require some private outdoor space, therefore the use of roof gardens and balconies is encouraged in appropriate locations. Caution must be exercised in the design of these elements however, as there could be significant problems with the issue of overlooking neighbouring properties. The opportunity for overlooking from a balcony or roof garden is significantly greater than from a window, and therefore the Council will only support these elements where there would be no detrimental impact on neighbouring plots through overlooking. Ground floor flats may benefit from direct access to private gardens.

6.7 Where communal amenity space is to be handed over to the Council, it must be designed to the satisfaction of the local planning authority, and an appropriate commuted sum is payable. Where communal space is not to be given to the Council, an appropriate management plan will be required to ensure that it is maintained in perpetuity.

### **Landscaping**

6.8 The Council expects any existing landscape feature of value to be maintained within the site, including trees, hedges, significant changes in level or other feature. Proposals that involve significant change to the landscape must be justified, and the Council will expect the relocation or replacement with additional features to compensate any loss to be provided on site. The Council will expect that the standard of landscaping around flats is of a significantly higher quality than that normally seen in suburban residential development. Any landscaping proposed on the site should make use of native species of plants and trees. Landscaping should be designed to avoid creating hiding places to assist in crime prevention. Communal landscaped areas should be overlooked and/or adjacent to pedestrian routes. It is important to make private space distinct from public space.

### **Siting and Orientation**

6.9 The block(s) of flats must be sited with a regard for the building line within the street. Where there is a clear building line, such as where the neighbouring house types are the same, the proposed development will not be allowed to cross the line. Where there is more variety in the building line, an average will be established to mark the limit of any acceptable footprint.

6.10 Blocks must be designed to maximise the passive solar gain, siting habitable rooms to face south and west wherever possible. Regard must be had for the effect of shadows throughout the day, both in terms of those cast *by* the development and for those cast *on* the development.

6.11 Layout should allow for pedestrian movement in convenient and direct routes, but include a clear distinction between private and public spaces. This does not have to be achieved through physical boundaries, as changes in surface height, material or texture may result in defining spaces. All spaces must be well lit, without hiding places or areas for non-residents to congregate.

### **Parking and access**

6.12 Visibility splays will be required to meet the adopted standards, and where these cannot be met, planning permission will be refused in the interests of highway safety.

6.13 Developers may be required carry out a road safety risk assessment which should be based upon National Road Safety Audit guidelines. The Engineers will be pleased to offer pre-planning advice and guidance to applicants to set out what may be required in a road safety risk assessment. Each application will be assessed on its merits, however in some cases additional information regarding highways issues may be requested.

6.14 Appropriate access for service vehicles and emergency vehicles will be required on to the site, preferably with access to all sides of the building.

6.15 Parking standards are 1.5 spaces per flat, except within the defined town centre or district centres, where parking standards may be relaxed. This will ensure that the use of private cars is discouraged, but that there is sufficient parking available for residents and visitors. The use of under-croft parking should be thoroughly explored in order to provide more security for vehicles, as well as avoiding the profligate use of land. Parking in the 'front garden' of the site will not normally be acceptable in the interests of protecting the street scene, and therefore parking should be located to the rear. Car parking should be laid out to avoid headlights shining in to windows. Parking areas must be well lit, but not allow light pollution, and be overlooked to aid security.

6.16 Cycle stores must be provided at a ratio of 1 space per dwelling plus 1 space per 6 dwellings for visitors. The Council will look favourably on developments that provide additional cycle parking above the minimum requirement. Cycle parking must be covered, enclosed, secure, well lit and easily accessible to residents.

#### **Future Maintenance**

6.17 Provision should be made for the ongoing maintenance of communal areas through appropriate management plans and/or legal agreements.

### **7.0 Design considerations**

7.1 It is not the purpose of this Supplementary Planning Guidance note to stifle design flair by dictating that any particular architectural theme be followed. Instead, a number of basic considerations and requirements are laid out concerning the design of buildings in terms of their functional and operational effectiveness.

7.2 Architectural design is a subjective matter, so the Council will consider proposed schemes with regard for the advice given by CABA (the Commission for Architecture and the Built Environment). CABA published a document titled "Building in Context". Its purpose is to stimulate a high standard of design when development takes place in historically sensitive contexts. Although the Council is mindful that the focus of the document is on building in historically sensitive areas, the core principles may be applied to development in any location in order to produce the most satisfactory solution.

*"The belief underlying this publication is that the right approach is to be found in examining the context for any proposed development in great detail and relating the new building to its surroundings through an informed character appraisal. This does not imply that any one architectural approach is, by its nature, more likely to succeed than any other. On the contrary, it means that as soon as the application of a simple formula is attempted a project is likely to fail, whether that formula consists of 'fitting in' or contrasting the new with the old'. A successful project will*

- *relate well to the geography and history of the place and the lie of the land*
- *sit happily in the pattern of existing development and routes through and around it*
- *respect important views [NB: it is not the role of the planning system to protect an individual's view]*
- *respect the scale of neighbouring buildings*

- *use materials and building methods which are as high in quality as those used in existing buildings*
- *create new views and juxtapositions which add to the variety and texture of the setting.*

*The right approach involves a whole process in addition to the work of design, from deciding what is needed, through appointing the architect, to early discussions with and eventual approval by the planning authority. It may involve the preparation of a formal planning or development brief for the site in question and will certainly involve discussing the matters usually dealt with in such documents and coming to an agreement. Collaboration, mutual respect and a shared commitment to the vision embodied in the project will be needed if the outcome is to be successful. The best buildings arise from a creative dialogue between the planning authority, the client, the architect and the other key professionals involved.”*

7.3 Good design is considered to be buildings that are built in context with their surroundings, having regard for neighbouring features and themes, but without slavishly copying them. By the same token, in the interests of protecting the amenity of any established neighbours, the Council will not support proposals for designs that will be obtrusive or incongruous in their setting. The Council does not consider ‘pastiche’ buildings to be good design, nor will it accept ‘off-the-shelf’ designs for flats. New buildings should look new and individual, but not out of place.

### **Mixed occupancy**

7.4 Proposals for flats will be expected to provide a broad range of accommodation in order to appeal to the whole community. Based on the findings of the 2000 housing needs survey which identified a need for 26% one bedroom accommodation and 47% two bedroom accommodation, the Council will seek to ensure that developments incorporate a range of dwelling sizes. This may be provided by variations in floorspace as well as in the number of rooms. The Council would also wish to see an element of larger accommodation and disabled-friendly accommodation designed in accordance with the aims of the Disability Discrimination Act and Part M of the Building Regulations.

7.5 It is recognised that wheelchair standard housing is more expensive to build because of the higher space standards needed, but it greatly increases the flexibility of the accommodation provided. The particular design features of disability housing are desirable and convenient for any potential occupier, not just disabled people.

7.6 On larger sites, a greater mix of dwellings will be sought incorporating both flats and houses. This will improve people’s choice of house type and create a more balanced community. On such mixed developments the requirement for a range of flat sizes may be relaxed as the variety will be provided across the development.

### **Density**

7.7 Government guidance in the form of PPG3 “Housing” requires a higher density of development in order to make the best use of land. Flatted development by its very nature is high density and so in its broadest sense is considered acceptable in policy terms. However, the Council is mindful that flatted development is often proposed well above the figure suggested in PPG3, and this may have a detrimental impact on the area in terms of maintaining any character. There needs to be a balance between increasing the development density and protecting the character and amenity of an area.

PPG3 states:

*“Local planning authorities should therefore:*

- *avoid developments which make inefficient use of land (those of less than 30 dwellings per hectare net)*
- *encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and*

- *seek greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors.”*

Alongside the above, PPG3 states:

*“56. New housing development of whatever scale should not be viewed in isolation. Considerations of design and layout must be informed by the wider context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology should all help to determine the character and identity of a development, recognising that new building technologies are capable of delivering acceptable built forms and may be more efficient. Local planning authorities should adopt policies which:*

- *create places and spaces with the needs of people in mind, which are attractive, have their own distinctive identity but respect and enhance local character;*
- *promote designs and layouts which are safe and take account of public health, crime prevention and community safety considerations;*
- *focus on the quality of the places and living environments being created and give priority to the needs of pedestrians rather than the movement and parking of vehicles;*
- *avoid inflexible planning standards and reduce road widths, traffic speeds and promote safer environments for pedestrians; and*
- *promote the energy efficiency of new housing where possible.”*

7.8 The Council understands the advice given in PPG3 to mean that a balance is required between design and density in the context of the site characteristics and surroundings. It is considered that the proximity to local services and facilities should determine the density of flatted development, with consideration for the scale and character of neighbouring development. On larger developments providing a range of dwelling types, the density figure may be read as an average across the site, subject to a reasonable distribution.

7.9 The table below shows the key locations where flats are considered acceptable, and the **indicative** maximum density of development it could support. The figures show a range of densities from 50dph which is the maximum suggested in PPG3 in order to make better use of land. Above the 50dph threshold, developers must demonstrate that their scheme has “earned” a higher density through exceptional proximity to a range of services and facilities.

Centre type	Distance from centre					Outside these areas
	Within	100m	250m	500m	1000m	
Convenience store	N/a	50dph	No flats	No flats	No flats	No flats
Neighbourhood centre	60dph	60dph	50dph	No flats	No flats	
Local centre	70dph	60pdh	60dph	50dph	No flats	
District Centre	By negotiation	70 dph	60 dph	60dph	No flats	
Town Centre	By negotiation	80dph	70dph	60dph	50dph	

7.10 In agreeing an appropriate density, the Council will consider the proposal against a range of factors, for example:

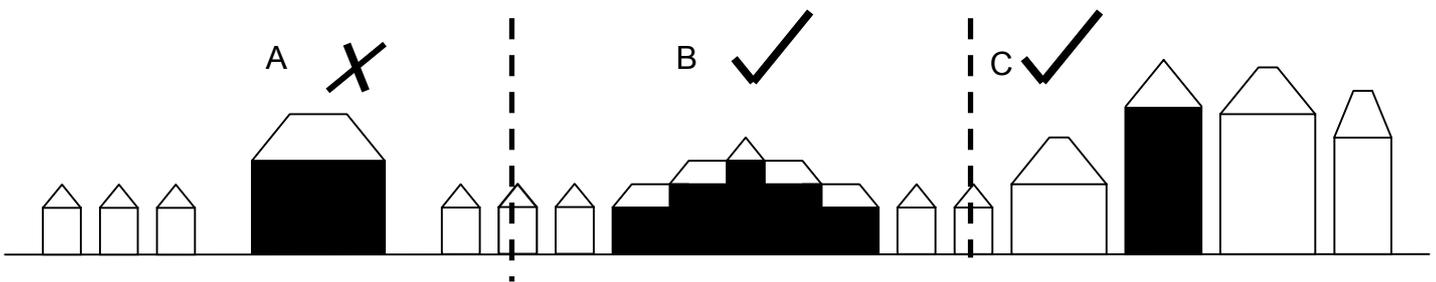
- the figures in the table above in the context of the proximity to basic services and facilities
- the proximity to main public transport routes and major road networks
- the type and character of existing housing in the area

- the proposed design and layout of the development in context of the site surroundings
- the number and size of recent flatted development in the vicinity of the application site
- accessibility to schools
- accessibility to major employers
- in larger schemes, the average density across the wider development (eg where flats and houses are proposed together).

7.11 Sites which are considered suitable for residential development but fall outside the criteria in the table above should not be developed with flats, however a scheme involving a mixture of dwelling types which may include a proportion of flats may be acceptable. The acceptable density of such a development will still be assessed in the context of local services and facilities.

**Height, spacing and massing**

7.12 Flats are by their very nature large buildings, often more visually agreeable in a town centre where there are other large buildings, but out of scale with suburban development. However with careful design and consideration of details, flats may be built sympathetically in suburban areas.



*Fig. Buildings in context : A is too tall and poorly related to its neighbours. B introduces new height gradually and makes reference to the standard spacing of the street. C is well proportioned in relation to its neighbours but does not necessarily need to be stepped down.*

7.13 Neighbouring buildings may introduce a standard pattern in to which any new building must fit if it is to avoid being obtrusive. This does not prevent taller buildings, but it will require a more detailed design to soften any change in heights, although it does not necessarily follow that buildings should be “stepped down” to the level of its neighbour – this will depend on the detailed design of the proposed building.

7.14 The perceived bulk of large buildings can be reduced by variations in the building footprint, height, and spacing. As elevations are varied, the perceived massing of the block of flats will automatically be reduced, as multiple smaller components do not look as big as a single large one. The use of the ‘one-box’ design is unlikely to be acceptable on any site.

**Materials**

7.15 The choice of materials should be made with regard to the predominant material in the vicinity of the development site – either matching or complimenting them. Occasionally a local feature building will introduce an alien material, which may be used as a partial influence on the flats, but should not be used throughout the whole design. Introducing completely new materials for the main structure that have no precedent in the area should be avoided, but new materials may be used for decorative purposes. The construction materials and colours can also help to soften the perceived bulk of flats by providing variation, although such techniques should not be used without careful consideration.

## **8.0 Detailing.**

### **Doors**

8.1 Traditionally, large houses sported large front doors, to emphasis the importance of the entrance, as opposed to the servants' entrance. As most flats are large buildings with many people using an entrance, it is considered that they should have large, grand entrances too. This will also help in balancing the elevations and giving proportion to the vastness of the building.

8.2 The doors should be on the front of the block of flats to allow pedestrians to arrive and leave more easily, and in larger blocks no more than 10 flats should share a communal entrance. Main entrances should not be located to give priority to access from the car park or the sides and rear of the building, but a second entrance may be provided for this. The opportunity for ground floor flats to have their own private entrances should be thoroughly explored.

8.3 Blocks of flats should have lockable outside doors with controlled entry e.g. by entry phone system with adequate maintenance. External doors should be of substantial construction. A peep hole viewer should be included in the front doors of individual flats, and any letterboxes should be at least 400mm from the door lock.

### **Elevations**

8.4 Walls composed entirely of a single material that creates blank expanses will not be accepted for elevations. Wherever possible, elevations must be broken up by windows or doors. Where there are issues with overlooking from windows, especially at first floor or above, other methods of breaking up the expanse of blank wall will be required.

8.5 Corner plots must be designed to turn the corner and have 'two fronts'.

### **Pedestrian permeability**

8.6 Public footpaths and communal areas must be well lit and overlooked. Lamp standards need to be carefully placed in relation to landscaping to avoid casting shadows; bollard lighting can be good in avoiding casting shadows but is more accessible to vandals. Footpaths should have a clear view through to public areas without any blind bends or corners. Paths should have a reasonable width (without high walls or fences adjacent) to allow two pushchairs to pass. Rear access ways to dwellings should be avoided as should access through a block of flats or between houses to other flats or houses.

### **Finishing Detail**

8.7 Buildings should be finished off with appropriate detailing features that compliment the building and its surrounding structures. Often this will introduce features such as chimneystacks, ornate fascia boards, and decorative ironwork, or smaller details such as a brick wall surrounding the plot, outside lamps and house numbers in the common street style. These minor details can turn a good development into a great development, achieving a high quality finish that sits well in its context.

8.8 A "For sale" signboard holder is required in the grounds of the property, so signs do not need to be fastened to the building itself.

### **Internal layout.**

8.9 The internal arrangement and shape of rooms should aim to maximise the amenity of occupiers, eg living rooms near to kitchens. Long, narrow kitchens, passageways and corridors should be avoided. The vertical arrangement of rooms should ensure that bathrooms are not located above or under living areas unless a suitable scheme of acoustic insulation is proposed. Roof space in blocks of flats should be divided to prevent access to the roofs of flats from adjoining flats or communal roof space. Bathrooms and kitchens require steam extraction equipment, but opening windows are preferred.

## **9.0 Environmental considerations**

9.1 Secure, covered refuse storage, with ease of access for residents and collection agents is essential, and all developments of flats are expected to incorporate separate storage facilities for glass, plastics, paper and cardboard, metals and general waste. Wherever possible this should be integral to the design of the building and not a stand-alone unit. The use of underground bins is encouraged.

9.2 The Council is committed to reducing household consumption and will actively seek to encourage developers to provide a range of environmental systems within developments, including but not exhaustively carbon-neutral buildings, photovoltaic cells and grey water recycling.

9.3 Developers will be expected to show that they have considered the choice of materials, and wherever possible used renewable or recycled materials from managed sources. The whole life costs of the building must be considered, as it may be more cost effective to spend more on the build in order to reduce the amount of future maintenance required.

## **10.0 Applying for planning permission**

10.1 The Council welcomes pre-application discussion from all potential developers, particularly where proposals for flats are concerned. Many problems and issues may be highlighted at an early stage which will result in time, money and effort being saved. The free and confidential Planning One Stop Shop meets every week to discuss potential development projects, and this should be the first point of contact.

10.2 Because of the impact that flatted development can have on the character of an area, it is essential that the full visual impact of proposals may be accurately assessed. CABE's 'By Design' guide states:

***"Information requirements for a planning application***

*Adequate plans and drawings must be submitted as part of a planning application, so that the design can be properly assessed. They will be required for the benefit of planners, councillors (on planning and other committees), residents and amenity groups, among others. ... Models and computer-based representations are particularly useful in the case of large scale or complex development proposals.*

...

***Design statement***

*Design statements submitted with planning applications should:*

- *Explain the design principles and design concept.*
- *Explain how the design relates to its wider context (through a full context appraisal where appropriate).*
- *The written design statement should be illustrated, as appropriate, by:*
- *Plans and elevations.*
- *Photographs of the site and its surroundings.*
- *Other illustrations, such as perspectives."*

10.3 Given the above, the Council will consider any application for flatted development incomplete and therefore invalid if an application is not supported by a detailed design statement and drawings showing the proposed block of flats in the context of the street scene.

10.4 The Council will take a balanced view of proposals for flatted development and take into consideration National Policy, the provisions set out in this Supplementary Planning Guidance note, and neighbour opinion in reaching a decision.

## **11.0 Contacts**

Stockton-on-Tees Borough Council  
Telephone 01642 393939  
[www.stockton.gov.uk](http://www.stockton.gov.uk)

Planning Section,  
Stockton On Tees Borough Council,  
PO BOX 34,  
Municipal Buildings,  
Church Road,  
Stockton – on – Tees,  
TS18 1LE.  
[development.control@Stockton.gov.uk](mailto:development.control@Stockton.gov.uk)

Richard McGuckin  
Engineering and Transportation  
Stockton-on-Tees Borough Council  
PO Box 229  
Kingsway House  
West Precinct  
Billingham  
TS23 2YL  
[richard.mcguckin@Stockton.gov.uk](mailto:richard.mcguckin@Stockton.gov.uk)

For additional advice on security and crime prevention measures, please contact the Cleveland Police Crime Reduction and Architectural Liaison Officer on 01642 302271.

## **12.0 Supporting Material**

- Planning Policy Statement 1 “Creating sustainable communities” (2004) HMSO
- Planning Policy Guidance 1 “General policy and principles” (2001) HMSO
- Planning Policy Guidance 3 “Housing” (2000) HMSO
  
- “Building in context”, (2001) CABE with English Heritage,
- “By Design - Urban Design in the Planning System: Towards Better Practice”, (2000) CABE with DETR
- “Better Places to live”, (2001) CABE with DTLR
  
- “Stockton-on-Tees Local Plan”, (Adopted 1997) Stockton Borough Council,
- “Supplementary Planning Guidance note 2 Household Extension design guide”, (2004) Stockton Borough Council

**Annexe 1: PPG3 Definition of Previously Developed [Brownfield] Land.**

*“Previously-developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously-developed land may occur in both built-up and rural settings. The definition includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.*

*The definition excludes land and buildings that are currently in use for agricultural or forestry purposes, and land in built-up areas which has not been developed previously (e.g. parks, recreation grounds, and allotments - even though these areas may contain certain urban features such as paths, pavilions and other buildings). Also excluded is land that was previously developed but where the remains of any structure or activity have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings), and where there is a clear reason that could outweigh the re-use of the site - such as its contribution to nature conservation - or it has subsequently been put to an amenity use and cannot be regarded as requiring redevelopment.”*

*“The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site (as defined above) will also be defined as previously-developed.*

## **Glossary of terms**

### **Annexe 2: Glossary of terms**

#### PPG1

Central Government advice regarding the Planning System.

#### PPG3

Central Government advice regarding housing

#### CABE

Commission for Architecture and the Built Environment

#### DETR

Department of the Environment, Transport and the Regions – a Government Department.

#### (Local) Planning Authority

Stockton on Tees Borough Council with statutory authority

#### Highways Authority

Stockton on Tees Borough Council with statutory authority

#### Local Plan

Suite of policies and proposals to guide development in Stockton Borough.

#### Structure Plan

Plan which sets out broad strategic planning policies for development in the Tees Valley, prepared by the Joint Strategy Unit

#### Supplementary Planning Guidance

See section 2.0 on page 1.

#### Flats/Flatted development/Apartments

Flats, apartments and other forms of high density homes that feature some degree of shared facilities.

#### Planning application

The statutory paperwork required to obtain permission to develop land or property. Basically comprises a series of maps, plans and elevation drawings and a written description of the development. However, it is often necessary to provide additional information to enable a robust decision to be made.

#### Elevations

The external appearance of buildings. A normal house will have 4 elevations: front, rear, left and right.

#### Disability Discrimination Act

The statutory requirement for new buildings to be 'disabled friendly'.

#### Building Regulations

The statutory building standards that new buildings must meet in order to pass safety and construction tests.

#### Carbon-neutral

Buildings and the use of buildings naturally create carbon emissions. However, through considerate construction and design, and some chemical processes the carbon emissions

may be reduced to a point that the carbon going in is the same as the carbon going out, thus achieving non-polluting buildings.

#### Photovoltaic cells

A process that creates electrical energy from the sun through the use of roof-mounted solar panels. Some solar panels are used differently and use the sun's power to heat water.

#### Grey water recycling

A process which recycles 'used' household water that is no longer fit for washing or drinking, but is not particularly polluted. The best example is using water from a washing machine to flush to toilet, thus saving clean water.

#### Greenfield land

Land which has not been developed, normally in agricultural use. May also include land which has been previously developed but which has been 'reclaimed' by natural processes and has the characteristics of undeveloped land.

#### Brownfield land

Another name for Previously developed land - See Annex 1 for definition

#### Previously developed land

Another name for Brownfield land - See Annex 1 for definition

#### Passive solar gain

Siting buildings to utilise the energy of the sun to heat and light buildings.

#### Tees Valley Joint Strategy Unit (JSU)

Prepare and publish the Tees Valley Structure Plan which sets out broad strategic planning policies across the wider Tees Valley

#### Windfall site

Site which becomes available for development during the plan period which were not available when the plan was being prepared, or which is or would be, inappropriate to allocate for a specific use.

#### Proposals Map

The map of the Borough that shows the extent of areas designated in the Local Plan.

#### Affordable Housing

Housing for sale or rent at a price which can be afforded by those persons identified as being in need and unable, because of insufficient income, to compete in the local housing market.

#### Conservation Area

An area designated under the Town and Country Planning Acts as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

#### District Centres

Shopping areas usually containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants, normally serving a distinct settlement. District centres include Yarm, Thornaby and Billingham.

#### Local Centre

Smaller group of shops than a District Centre, but still with a broad range of shops. These serve a small number of housing estates.

**Neighbourhood Centre**

A smaller group of shops and services that support a neighbourhood.

**Convenience Store**

A single shop that serves a limited number of streets for daily or top-up items such as newspapers, bread and milk, but is not normally used for a full grocery shop.

**Infrastructure**

The roads, sewers, water, gas and electricity mains etc. which are needed to allow development to take place and support the population generated by the development.

**Listed building**

A building included in a list compiled by the Secretary of State for the Environment as being of special architectural or historic interest.

**Open Space**

Amenity - parcels of land and landscaped areas the principle function of which is to enhance the appearance of an area.

Recreational - parks and areas of open land the principal function of which is to provide a facility for informal outdoor activities and sport.

**Renewable Energy Sources**

Sources of energy that occur naturally and repeatedly in the environment such as wind, sun and wave action. These can include sources arising from man's activity ie. waste.

**Tree preservation order**

Order made by the Council under section 198 of the Town and Country Planning Act 1990, to prevent the felling or pruning of trees of high amenity value without its consent.

**Limits to Development**

The limit to development is a line drawn on a map around the built up area of Stockton, Billingham, Thornaby, Ingleby Barwick and Yarm which marks the separation of urban and rural. Some larger villages also have their own Limit to Development.

**Green Belt**

A statutory designation setting out a wide tract of land to limit further encroachment into the countryside around major built up areas. No such designation exists in Stockton Borough.

**Green Wedge**

An area of land designated at the local level to prevent distinctly separate settlements from coalescing into one. Stockton Borough has several such Green Wedges.

**DPH**

Dwellings per hectare – a measurement of the number of individual homes on a given parcel of land.

**Annexe 3: Summary of representations**

<b><u>Persimmon Homes NE, Persimmon House, Clasper Way, Swalwell, Newcastle, NE16 3BE</u></b>	
I welcome the detailed background information at the start of the guidance which I think is useful to members and indeed developer's understanding. I particularly welcome the fact that your housing needs survey bears our market experience that there is insufficient flatted accommodation in Stockton Borough, there is an ageing population and that in survey analysis, flatted accommodation was proven to be in demand.	Support welcome. Note that Persimmon Homes were consulted using an older draft of the Supplementary Planning Guidance and therefore there have been some changes made following Planning Committee and Cabinet process.
I agree that the conclusion of this analysis work is that there is a real need for flats throughout the Borough particularly for local people who wish to remain in the area where they have lived but cannot afford a larger property.	Support welcome
Whilst policies specifically draw attention to the defined settlement boundary I believe it should also draw attention to Ingleby Barwick as this is missed out of the list of settlements.	Agree – the Limit to development does indeed include this significant settlement. Ingleby Barwick added to Para 5.2
The document is internally inconsistent in relation to the location of flatted development. Reference should include PDL, Greenfield sites with planning permission, or other allocated residential land.	The consultation draft included a 'sequential' approach highlighting the preferred locations for flats which includes those locations. Sites with planning permission and allocated sites may be considered the same thing as the principle of housing is established. Greenfield windfall sites are no longer accepted in national policy, so all remaining sites will be PDL.
In relation to the proximity to public transport, recognition should be paid to the fact that operators will improve services as development is completed and thus patronage levels increased. There ought to be reference to some sites (eg Ingleby Barwick) where the provision of services outside of developers' control will be brought forward by the public transport authority to serve the new ratepayers.	This is a specific detail that will be a material consideration for each application to be assessed on its own merits. It will not be a particularly common occurrence and so there is no pressing need for it to be included in the Supplementary Planning Guidance.
In relation to the approach towards a sequential sequence my gut reaction from experience is that this is going a little too far (albeit I accept that this is purely Supplementary Planning Guidance) and prevents applications which are appropriate coming forward and being considered on their own merits. I believe that measured distances are inappropriate and indeed walk times used elsewhere, for example in the production of green travel plans. In my experience from major schemes it is perfectly acceptable that high density developments are within a	Disagree – it is considered essential that higher density development can be supported by an appropriate infrastructure of shops, services and facilities, and backed up by public transport networks. Therefore it is entirely appropriate to direct high density developments to such locations. Where sites exist that could in theory support residential development but are outside the indicative distances, alternative forms of housing will be sought in preference to flats to reduce the density and the number of people having to travel for basic services. If there are

<p>short (5-10 minute) walk distance of convenient services.</p>	<p>material circumstances that justify a departure from this then they will be assessed on their merits.</p> <p>The 500m figure was devised as the distance ‘a reasonable person on a reasonable day could walk in five minutes’. As a guidance figure it provides a more robust starting figure for negotiations than a walking time, but as it is Supplementary Planning Guidance it retains a degree of flexibility to accommodate marginal sites.</p>
<p>I am somewhat curious as to the quantitative measurements placed in the document. Where is the justification for the 50sqm communal amenity space, plus 5sqm per additional unit over 5 units. Equally I would question the criteria for balcony size, spacing distances involved to prevent overlooking (which do not reflect PPG3) and the wish for private gardens to ground floor flats which has no policy justification and significantly restricts the efficient use of land. These may be appropriate on a particular scheme but should not be universally applied.</p> <p>Clearly I must stress that many of these issues are market-oriented and the guidance does not pay recognition to the fact that the key drivers are providing range and choice and affordability. I accept that there needs to be appropriate amenity space etc associated with all developments. However it is my strong view that it is inappropriate to dictate this without a full understanding of the market considerations and drivers behind the provision of the particular flatted scheme in the first place.</p>	<p>Having studied other Local Authorities’ guidance, the 50sqm amenity space plus 5sqm for every unit over 5 units was used, and so this document merely reflects that figure. 50sqm represents a cumulative figure, not a single space, but there is a requirement to ensure that there is a useable space. However it is agreed that the current wording is prescriptive and will not apply in all cases, therefore a suggestive sentence is more appropriate and the requirement changed.</p> <p>The balcony figures and amenity distances were removed in the consultation draft.</p> <p>Private gardens for ground floor properties is also written prescriptively. It is reworded to be a recommendation, not a requirement.</p> <p>The Guidance is aimed at ensuring that choice and affordability is provided, but in such a way that it is not to the detriment of the quality of either the development itself nor the location. The guidance is trying to be general, not specific and in this regard many of the issues covered in the guidance may not apply to every scheme, but this does not mean that they should not be included in the guidance. Where there are justifiable circumstances for a departure from the guidance these will be material considerations.</p>
<p>In relation to parking, I believe that as the Supplementary Planning Guidance is written, this is reasonable flexible. However experiences to date with the Council’s engineers are that these will be used as minimums rather than maximums as PPG3 intends. Again issues of undercrofting must bear a relationship to the issues I have outlined above, such as affordability but also impact on collapsible structures legislation etc. In simple terms to insist upon such a requirement would render a significant proportion of schemes in the North East unviable. In</p>	<p>The parking requirement is set by the Highway Engineers, not Planning. Where material circumstances necessitate a variation, this must be approved by the Engineers.</p> <p>Undercrofting is encouraged to allow more open amenity space instead of hard landscaped car parking, but its absence will not result in refusal of Planning Permission. It can be expensive and complex on some sites, but not beyond the realms of possibility.</p>

<p>relation to cycle storage I find this requirement totally over the top. We have undertaken flatted developments throughout the North East of England and always provide cycle stores for each individual block of flats where there is sufficient room for secure sheltered storage on the basis of one cycle per flat.</p>	<p>The cycle parking requirement of 2 spaces per dwelling is not considered to be over the top, however as written it is not consistent with the engineer's standards of 1 space per dwelling plus 1 space per 6 dwellings. Wording is amended to reflect this.</p>
<p>I note the Local Plan Policies, PPG3 and the comments of CABE, in relation to understanding the context of a site. I have no problem with this, however as this is specific to Stockton Council there must be due regard to the extensive work undertaken to reach agreement on the Ingleby Barwick Masterplan, which provides for high density development nearer the town centre. In this regard the criteria stated is difficult to apply, as much of the land does not immediately adjoin existing development (where it does it will be massed appropriately). The high density/ massing is being used to create a focal area of high visibility at a centralised point in close proximity to services and facilities. I therefore feel that mention is required of the positive role it can play towards settlement planning such as that occurring at Ingleby.</p>	<p>The Ingleby Barwick Masterplan showing flats and high density development will be a material consideration in any development proposal at Ingleby Barwick and as such does not need to be specifically mentioned in this document.</p>
<p>Again I would like to raise questions concerning your comments in relation to mixed occupancy and the provision of a range of accommodation. The comments pay no regard to flats coming forward as part of a more inclusive development providing an accompanying range of smaller terraced, detached and semi-detached properties. When schemes of this nature come forward there is, in market terms, little need to provide range within the flats themselves. We find that flexible 2 bedroom accommodation suits most cases with slightly larger accommodation served via small terrace units and upwards. In addition to this far more choice of size is available within the sheltered accommodation ie 1,2,3 bedroom units.</p>	<p>The requirement for mixed occupancy is valid as the housing needs survey shows both a need and a requirement for 1 bed and 2 bed properties. There is also a case for 3 and 4 bed flats in appropriate locations. However, the requirement for mixed occupancy can be met where appropriate by variation in floorspace, not just in terms of number of rooms and so a revised wording has been inserted to reflect this.</p> <p>On larger sites where a variety of dwellings is being proposed – not just flats – this may justify the relaxing of the requirement to provide a range of flat sizes and designs. This is touched on in the document, but will be made clearer.</p>
<p>In addition to this I would draw your attention to the requirements of Part M of the Building Regulations which require us to plan for the disabled people. Coupled with this it is our intention to seek to provide sheltered accommodation closer to the centre of Ingleby Barwick which will meet the requirement for more elderly and severely disabled people as specified in your guidance. Again, recognition needs to be made to the fact that developments such as that in Ingleby Barwick provide range and choice across the board which need not be specifically provided for within an individual building as the case may be elsewhere.</p>	<p>The section on disability housing was relaxed in the Consultation Draft to reflect the requirement of Part M.</p> <p><i>Again, the issues surrounding the mixed occupancy etc may be relaxed where material circumstances, such as the rest of the wider development scheme, can be demonstrated.</i></p>
<p>I agree with your comments in relation to density, but again due to the</p>	<p>Generally agreed. In large sites the density calculation should be over</p>

<p>incorrect assumption of some people, reference needs to be made that on larger schemes densities ought to be averaged if not over the entire development, over the neighbourhood in which it sits. It is inappropriate to take a small section where a block of flats sits and state that it is over and above the 50dph.</p>	<p>the whole site, or on large allocated sites, over a reasonable neighbourhood. The siting and design within that development will then be scrutinised to ensure the distribution is appropriate, but it must remain within the tolerances of the indicative densities. There still needs to be a network of services and facilities to support the development, and on allocated sites this may require some mixed use to generate that support network.</p>
<p>In relation to the small graph, again I find this overly prescriptive preventing applications to be considered on their own merits</p>	<p>The table is INDICATIVE of the density normally appropriate in an area, and any density above this threshold must be justified through proximity to other services and facilities. It is such an approach that dictates that every application HAS to be considered on its own merits.</p>
<p>I agree entirely with your comments in relation to scale and massing of buildings.</p>	<p>Support welcome.</p>
<p>Many of the points relating to detailing are taken on board and generally agreed with within the context set out above in relation to purpose and affordability.</p>	<p>Support welcome.</p>
<p><b>Councillor Terry Bean via e-mail</b></p>	
<p>There are several Town Centres in the Borough. Is the guide to relate to Stockton Town Centre?</p>	<p>The hierarchy of town centres has evolved through the Tees Valley Structure Plan and the Local Plan Alteration Number 1. Yarm, Thornaby and Billingham have been reclassified District Centres, and Norton is a Local Centre. Stockton is now the only Town Centre. The Supplementary Planning Guidance makes references to this and gives advice on locating near to these defined centres.</p>
<p>Less provision for amenity space could be justified by the availability of adjacent community space eg parks, other open space.</p>	<p>Agreed – this could be a material consideration and text has been inserted in the document to reflect this.</p>
<p>Some form of balcony is necessary for drying purposes, to deter the use of internal appliance dryers.</p>	<p>Partially agree – some outdoor space is encouraged, it will be dependent on the site and surroundings – eg balconies may lead to overlooking etc. Dealt with in Amenity space section.</p>
<p>1-2 bedroomed flats are generally occupied by singles or couples. Most do not need the extra responsibility of maintaining garden areas. Access to private gardens, for some, will run the possibility of future conflict. Better that it all stays as common amenity. Whereas private gardens are for families, it is very unlikely that they would want to occupy flats of any size.</p>	<p>The Supplementary Planning Guidance requires a broader range of accommodation, and so it is entirely possible that the occupier may want a garden. Eg where flats are the only affordable residence in an expensive area, an occupier may still want to have a garden. However there will be times when this is inappropriate eg in a town centre. This will obviously be site specific and therefore the <i>requirement</i> for a private garden is changed to a <i>suggestion</i>.</p> <p>It is not accepted that families will not want to occupy flats. Whilst the</p>

	<p>desire for many may be for a family detached dwelling, other circumstances may dictate occupation of a flat – especially in the uncertain future in the context of the housing market.</p>
<p><b>Commission for Architecture and the Built Environment (CABE)</b></p>	
<p>The key consideration is the quality of the proposed development and how it responds and respects its context without necessarily mirroring it. It is important that the guidance is not over-prescriptive in terms of design and materials; often we find schemes we are consulted on would benefit from a calmer approach to the architecture and the employment of a limited palette of materials. It is also important that any architectural detail or feature used are functional parts of the building and not applied decoration.</p>	<p>It is considered the Supplementary Planning Guidance is broad in its requirements for design, concentrating on the functionality of the building(s), instead of dictating its appearance. The aesthetic considerations are that it respects its location and is designed in context. In this regard it is not considered to be overly prescriptive.</p>
<p>Whilst illustrations of good and bad practice are useful we suggest photographs of local projects are included rather than sketch diagrams as these can be misleading; stepping down for example to the height of adjoining properties does not always result in a better building in many of the projects we see.</p>	<p>It is agreed that photographs are very effective, however it is considered inappropriate to show local schemes as there may be issues surrounding the development that are sensitive. Photographs from outside the Borough lose value as there may be different circumstances.</p> <p>The sketch diagrams are intended to illustrate points and in no way imply that all developments should conform – eg stepping down. Proposals will be assessed on their merits and if the design is appropriate it will be approved. The diagram and caption have been amended.</p>
<p>It is important to encourage high quality, well thought out open space with a clear purpose. It may not be necessary for all new flatted developments to provide new communal open space as it may be of more value to negotiate a contribution from the developer to provide additional or upgraded facilities on existing open spaces.</p>	<p>Agree – chapter on amenity space to be reworded to be less dictatorial in space requirements depending on site characteristics. Option of supporting off-site open space to be inserted, but only where on-site would be inappropriate, and not just as a “get out clause” for developers.</p>
<p>With regards to the section on landscaping, we recommend keeping this to key principles such as clear definition between public and private space, providing clear sightlines and the use of high quality durable materials. Avoid being over-prescriptive about types of planting or lighting.</p>	<p>The landscaping section does not address the ‘landscape’ issues in detail other than taking onboard comments regarding security – eg keep bushes below 1m high, and providing sturdy light fixings etc. The only requirement is that native species are used as a link to other initiatives in the Borough.</p>
<p>The success of any new open space will be dependent on good management and maintenance and the Supplementary Planning Guidance should require any developer to include a plan and funding for the long term management of communal/public open space, with clarity on who will be responsible for maintaining these areas and standards of</p>	<p>Agree – text regarding management plans for long term maintenance has been inserted.</p>

<p>maintenance.</p>	
<p>We suggest you make reference to the CABE/DETR documents PPG1 companion guide “by design” and PPG3 companion guide “better places to live”. Finally we are unsure of the meaning of the term quarterhouse and the document could usefully include a glossary of terms used.</p>	<p>Reference has been made to these documents. The word quarterhouse has been removed from the draft. A short glossary is included.</p>
<p><b>HJ Banks, Inkerman Road, Tow Law, Bishop Auckland, Co Durham, DL13 4HG,</b></p>	
<p>We acknowledge that more developers (such as ourselves) are looking at proposing flatted development in response to national planning policy which discourages Greenfield developments and focuses new housing back into towns and cities. In these areas land is a scarce resource with a high existing value. It is inevitable that developers will seek to enhance the value of the land in order to make the development worthwhile. However it would be useful to know exactly how many flats have been developed in recent years. The figures might be much less than perception.</p>	<p>Although it is understood that land values are high, this is not a material circumstance and should not be used to justify otherwise inappropriate development. The Supplementary Planning Guidance notes that there is a shortage of flats and apartments in terms of need and desire. Until new evidence is presented to the contrary it must be assumed that there is still a need for such accommodation.</p>
<p>The Supplementary Planning Guidance notes a change in emphasis in flats from serving the lower end of the market to the upper end. Our perception is that the new wave of flats often serve young middle income earners and so they are neither lower or upper end. In some areas this has particular benefit in stabilising and improving the image of an area. Thornaby in one such area where flats will add to the diversity of the local population.</p>	<p>The emphasis is that flats are now sought after by people who may traditionally seek lower density ‘houses’ – resulting in flats being desirable to a broader range of people, whatever their economic makeup. This adds to the justification for flats and should go some way to removing the negative perception of flats that some may hold.</p>
<p>We agree that flatted development will usually be inappropriate outside the settlement boundary.</p>	<p>Support welcome</p>
<p>The four locational criteria set out in paragraph 5.7 are generally appropriate but it would be sensible to carry out a sieve mapping exercise to see how much land within the settlement boundary would be discounted by these criteria.</p>	<p>It is not considered necessary to undertake such an exercise. The locational criteria merely requires high density development to be sited where it may benefit from services and facilities in order to be sustainable. The quantity of land this excludes is not the issue – the emphasis is on creating sustainable patterns of development.</p>
<p>It is inevitable however that occasionally some sites will fall outside the criteria. Such proposals should not be automatically discounted as suggested by the statement towards the end of paragraph 5.7. They should be treated on their merits.</p>	<p>In terms of the locational criteria there is no justification for high density development where there is no sustainable infrastructure to support it. If flats are required on a site that does not have any support from services and facilities, a mixed use scheme will be more appropriate as it will provide the services on site, thus justifying the flats. Where this is not appropriate or not possible, then the Council will need to be convinced that high density is appropriate on a case by case basis.</p>
<p>We are particularly concerned that the Banks Group development at Bowesfield should not be prejudiced by this guidance. We would like</p>	<p>This is site specific and is not for consideration in the Supplementary Planning Guidance document.</p>

<p>the development to contain a range of housing sites including flats but at present it does not fall within the criteria. To some extent the principle of flatted development is already established by dint of an outline planning permission which indicated apartment buildings as well as detached houses. In the fullness of time it is likely that the numbers of houses at Bowesfield combined with a large working population will justify local retail provision but it is a ‘chicken and egg’ situation. Allowing flatted development here could actually bring forward the prospect of local services making Bowesfield the sustainable community we hope for.</p>	
<p>We doubt whether it is a relevant factor whether flats are located close to school since this type of housing is not usually attractive to people with children.</p>	<p>Strongly disagree – it is the aim of this Supplementary Planning Guidance to make flats attractive to as broad a range of people as possible – including families. This will help to make balanced communities, and also balanced developments. If larger flats are being proposed then they it is entirely possible that flats will be occupied by families and lone parents and therefore proximity to schools can be a relevant factor.</p>
<p>We believe that the densities proposed in the table are not sufficiently flexible. They do not take into account variations in sites such as the amount of open space which can easily be incorporated within the site. The [simplified] table below indicates the flatted development the Banks Group has been promoting in the last two years.</p> <p>Reed Blast 70dph          Bedlington 90dph          Queens Ave 109dph          Lime Street, Newcastle 245dph          Villiers St Sunderland 300dph</p> <p>The table demonstrates that the lowest density for this type of development was 70dph [Reed Blast] and this was within a site which was predominantly houses rather than flats. In a city centre location the density had risen to 300. In this instance there was no need for car parking and the building was able to rise higher as a result of the context. At Queens Avenue we have proposed undercroft car parking which increases density <i>and</i> improves residential amenity. This should be encouraged by the Supplementary Planning Guidance.</p>	<p>The indicative densities are flexible, but require the developer to justify a departure by demonstrating that the site is well located in terms of services and facilities. Where this cannot be demonstrated, the SPG4 table shows the indicative figure that the Council would generally feel is appropriate. The table is aimed squarely at flexibility and site specific consideration.</p> <p>The table supplied is irrelevant as three of the five schemes are outside of the Borough Council’s remit, two of which are within major cities where much higher density can be supported anyway by way of more sustainable infrastructure.</p> <p>However, the Reed Blast site example shows clearly that an average density of 70dph can be achieved with a mix of dwelling types in order to improve the sustainability of the development as a whole with the provision of sustainable infrastructure in a mixed use scheme.</p> <p>The use of undercroft parking <i>is</i> encouraged and supported by the Supplementary Planning Guidance.</p>
<p>The table [supplied by HJ Banks shown in the cell above] illustrates that densities in the range proposed in the Supplementary Planning</p>	<p>The examples supplied actually reinforce the aims of the Supplementary Planning Guidance, not fail its tests: Highest density in city centres,</p>

<p>Guidance do not reflect what may be reasonably achieved provided developments are sensitively designed. In these circumstances it would be contrary to national guidance to artificially constrain densities on brown field sites in the Borough, particularly considering the large number of outstanding Greenfield units at Ingleby Barwick.</p>	<p>mixed occupancy sites and designing in context.</p> <p>The Supplementary Planning Guidance is flexible, but will require written justification with the planning application where departures are proposed. If there is justification, then this will be assessed on its merits.</p>
<p><b>Norman Douglas, Campaign to Protect Rural England, 26 Ashville Avenue, Eaglescliffe, Stockton on Tees, TS16 9AX</b></p>	
<p>We are aware of the legal definition of brownfield land as stated in PPG3, but are still very strongly of the view, formed from the comments of many MP's, that when they passed the legislation, they had not realised that PPG3 included perfectly sound and attractive established houses and their gardens as opposed to derelict industrial, commercial or public buildings and associated land. As you are aware this legislation has given the opportunity to builders and developers to acquire houses, often at prices way above their market value, to demolish and maximise profits by building flats at the highest density possible. This has been done, not out of the altruistic motives of PPG3 to benefit society, but for sound commercial reasons. Almost without exception all the local residents and Parish Councils in the Eaglescliffe area are strongly opposed to this type of development because of the detrimental effects that it has on the character of the area and on the way of life if family homes are replaced by single or two person flats.</p>	<p>Whilst the MP's and local people may not like the definition of brownfield land that includes houses and gardens, it remains national policy and therefore cannot be changed by Stockton Borough Council. Until such time that PPG3 is amended, the definition remains and therefore the development of flats in such locations cannot be prevented.</p> <p>The price of land is not a material consideration, nor is the intention to make profit.</p> <p>The need and desire for flats is shown in the Supplementary Planning Guidance, taken from an independent Housing Needs Survey, and therefore the principle of developing flats is accepted. While there is local opposition, there is also a market as well as sound planning reasons for developing flats across the Borough.</p> <p>Notwithstanding the above, the Council is mindful of the concerns of local residents and has produced this document to make sure that where flats are proposed the effect on the character of the area is preserved through sensitive design in the context of the surroundings. The Council is neither for nor against flats – instead it is for appropriate sustainable development and against poor design.</p>
<p>I have enclosed a copy of the questions recently asked of the Deputy Prime Minister by Dari Taylor MP in the House, regarding this issue and his response. As you will see he has promised to make a detailed reply to Ms Taylor and I presume therefore the document will not be finalised until it has been received.</p>	<p>The reply from Keith Hill MP on behalf of the Deputy Prime Minister has now been received. The letter does not clarify or alter the definition of previously-developed land. The letter does acknowledge that development can be seen as altering a character, but that it may also a achieve a better housing mix. In short, the letter promotes sustainable development and good design, which is in parallel with the aims of SPG4.</p>
<p>We, as an organisation do not dispute the requirements for a mix of</p>	<p>There is no policy objection to building being demolished and replaced</p>

<p>building types and acknowledge the fact that there is a demand for some flats in the area. We would point to some of the Yarm Town riverside developments as being both appropriate and sensible as they did in one instance, replace a derelict tannery that, when operating, created severe environmental problems. Where we take issue is when large traditional family homes, for which, in Eaglescliffe there is a proven demand, are demolished to be replaced by flats. This is not only detrimental from a social and community point of view, but critically, it is removing an extremely important element from the housing stock, namely executive housing. Our future prosperity will be largely dependent on inward investment and the relocation of businesses and enterprises to this area. Stockton has to be able to offer, not only new build executive housing such as Wynyard, but top of the range traditional housing in established areas such as exists at present in Eaglescliffe.</p>	<p>by new buildings, regardless of their original use or condition, unless it is Listed.</p> <p>Whilst it is agreed that the loss of large executive housing is unfortunate, it is not a sufficient argument to refuse its demolition. After all, demolition does not require planning permission unless it is in a Conservation Area. In such cases, the test is whether the replacement building is of sufficient quality and will preserve or enhance the Conservation Area.</p> <p>The issue of executive housing in Eaglescliffe is important, but the number of dwellings actually being demolished compared with the number available is low, and certainly not enough to be a threat. The guidance states that the number of similar developments in proximity to a proposed development will be taken into account, and the individual and cumulative effects will be taken into consideration. This does not mean however that adjacent plots may not be developed.</p>
<p>Our principal concerns regarding the proposed guidelines relate to their subjective nature and how they may be interpreted.</p>	<p>The Supplementary Planning Guidance is deliberately written to be flexible so that it may be applied to any site within the Borough. Its status is explained in section 2.</p>
<p>4.3 states: “The Council will seek the retention of architecturally or historically interesting buildings in preference to demolition. In established residential areas the Council will consider the number and scale of similar recent developments, and the individual and cumulative effects that a further demolition and replacement would have on the character of the area.” At first glance this would appear to give a significant degree of protection to the current built environment in Eaglescliffe. We could see that under one planning regime it could virtually eliminate the possibility of “demolition and replacement” however should control of the Planning Department change another Head of Planning might interpret the clause totally differently. For example it is within my lifetime that Victorian building has changed form being derided to being appreciated and ‘thirties’ architecture is at present undergoing similar re-evaluation! In an area such as this who would decide whether a building is historically interesting?</p>	<p>It is not the intention to eliminate the possibility of demolition and replacement through the Supplementary Planning Guidance. In addition the guidance is not specifically aimed at Eaglescliffe. The guide seeks to ensure that any development that takes place anywhere in the Borough is appropriate. It is not clear how a change in personnel at SBC will change the way decisions are made as the planning system is largely set at National level.</p> <p>Historically or architecturally interesting buildings in a national context are Listed by the DCMS, and these are subject to strict controls regarding development. The Supplementary Planning Guidance seeks sympathetic treatment of buildings that are not worthy of national Listing but are historically or architecturally above average locally. Developers must consider first conversion and adaptation rather than replacement. Justification will have to be provided where this is not considered viable.</p>
<p>To give an example “Copsewood” was built by John Fowler, the</p>	<p>This is a site-specific example and the Supplementary Planning</p>

<p>engineer who adapted the River Tees to enable it to carry the huge commercial traffic flow generated by the development of Middlesbrough as one of the premier Iron and Steel centres in the world. He created landscaped gardens with many exotic plant specimens. Following his death, Capsewood was sold to Thomas Jones, owner of the first major department store in Middlesbrough. As such, Capsewood featured strongly in Malcolm Wilkinson’s recently published history “Victorian Eaglescliffe”. One Head of Planning might consider this house as vitally important in local history, a successor might consider it of no national importance, disregard it, dislike its architecture and instruct the Department accordingly.</p>	<p>Guidance is not the place to discuss it.</p>
<p>6.3 states that “planning permission will only be granted where the character of the area would be maintained or enhanced” Again, this could either give almost complete protection from flatted development for a long established traditional residential area with interesting buildings and landscapes such as Eaglescliffe or open the floodgates – it is very much a matter of opinion.</p>	<p>It is not considered that any areas need ‘protecting’ from flatted development as flats are not ‘the baddies’. The Supplementary Planning Guidance seeks to ensure that all flats are designed well and respect their setting in a number of ways. Where a development would maintain or enhance the character of an area there is no reason to prevent it. The Supplementary Planning Guidance is deliberately written to be flexible so that it may be applied to any site within the Borough.</p>
<p>6.8 states “Any existing landscape feature of value must be maintained within the site, including trees, hedges, significant changes in level or other feature.” This appears to be excellent and gives real protection. However it immediately reads on “Where it is not possible to retain such features, relocation or replacement will be sought, with additional features to compensate the loss.” This second sentence virtually negates the first and should be deleted. As it stands, it once again leaves the matter totally open-ended and to the discretion of the Planner.</p>	<p>Partially agree – the second sentence was envisaged to apply to minor features where they were reasonably considered to be hindering an otherwise legitimate development. A tightening of the wording is made. The Supplementary Planning Guidance is deliberately written to be flexible so that it may be applied to any site within the Borough.</p>
<p>6.10 states “Regard must be had for the effect of shadows throughout the day, both in terms of those cast by the development and for those cast on the development.” What does regard mean? Would shadows prevent a development or not?</p>	<p>In designing a house of any sort, shadows cast on neighbours could be considered to reduce their amenity. Equally, a house built at the foot of a north-facing cliff which would be in permanent shade could have a reduced amenity itself. Shadows would not necessarily prevent a development, but may require a redesign to avoid any excessive shadow casting. Hence Developers should have a regard to the orientation of the sun and the effect of shadows.</p>
<p>7.3 States “in the interests of protecting the amenity of any established neighbours, the Council will not support proposals for designs that will be obtrusive or incongruous in their setting.” This again could give real</p>	<p>Design <i>is</i> subjective, however there are a number of aspects of design as shown in the Supplementary Planning Guidance that will help to define the character of the area in broad terms, and any new</p>

<p>protection but is once again purely a matter of opinion.</p>	<p>development must take this in to account.</p>
<p>7.7 states” the Council is mindful that flatted development is often proposed well above the figure suggested in PPG3, and this may have a detrimental effect on the area in terms of maintaining any character. There needs to be a balance between increasing the development density and protecting the character and amenity of an area” This statement again is of critical importance but is totally open to interpretation. Conversely the statement “Local Planning Authorities should therefore seek greater intensity of development at places with good public transport accessibility such as city, town, district and local centres, or around major nodes along good quality public transport corridors” could be used to justify multiple flatted development in an area such as Eaglescliffe. This is why it is so important that previous clauses are tightened to reduce variable interpretation.</p>	<p>It is considered that the Supplementary Planning Guidance is explicit in directing higher density development of flats to locations where there are services and facilities to support it, including public transport routes. Where there are few services and facilities there tends to be low-density suburban development where a block of high density flats would neither be appropriate or desirable.</p> <p>Eaglescliffe has a broad range of daily needs services and facilities, two railway stations, schools and good bus links. Eaglescliffe therefore is one part of the Borough that could realistically support a proportion of the flats identified in the housing needs survey.</p>
<p><b>Jan Arger Campaign to Protect Rural England, Helm Cottage, Belle Vue, Eggleston, Barnard Castle, DL12 0AD</b></p>	
<p>We welcome the guidance the document offers and the opportunity to support appropriate urban development which is underpinned by sustainable land-use and incorporates quality design. This should result in a raised quality of life for local people and create desirable residential neighbourhoods and an improved image for the area.</p>	<p>Support welcome</p>
<p>We note reference to the housing needs survey and would ask whether car parking requirement or garden/personal outdoor space was included as part of this study? It would be useful to know what percentages result after consideration by the local community. We also note the section that states ‘most new housing demand is for semi-detached houses, terraced houses and flats, all of which are poorly represented in the stock’. Surely if this is so why are developers not directed to address this market, and why are so many larger detached dwellings being allowed?</p>	<p>These issues are not directly related to the Supplementary Planning Guidance and therefore this is not the place to discuss them.</p>
<p>Under Amenity Space there is no mention of quality green space. Mention is made of ‘landscaped and well maintained’ but this is open to interpretation.</p>	<p>There is a requirement for a landscaping scheme, but the details of which will be site specific. How it is termed is irrelevant – the basic requirement is for a high standard of landscaping – hard and/or soft – with a maintenance programme to that it remains well looked after. There are many ways of achieving such a programme including legal agreements, but it is not the place of the Supplementary Planning Guidance to say exactly how such maintenance programmes should be made.</p>
<p>Under 6.15 car park requirement is deemed to be 1.5 spaces per flat.</p>	<p>The parking requirement has been set by the Highways Authority. As</p>

<p>This assumption is difficult to grasp and while we do support the need to limit car use we are aware of the reality of many households having two vehicles, with a requirement for visitor use. Unless car pooling is one of the objectives then .5 of a car seems a strange measure to use.</p>	<p>flats are directed towards locations with good public transport links and local services and facilities, there will be less of a need to own a (second) car and therefore the standard may be reduced.</p>
<p>Under 7.4/7.9 no mention is made of flats over businesses/shops. Given the convenience opportunity and closeness to services/work surely this aspect could be explored? In other parts of the country even new supermarket sites are including upper residential units. Many are even trading up on the type of supermarket to support lifestyle enhancing developments which can include leisure facilities, nurseries etc. Perhaps this is something which could be considered.</p>	<p>Section 7.4 refers to the mixed occupancy of the flats in terms of a range of dwelling types and sizes. Mixed use buildings and sites are dealt with in Section 7.6. A sentence about living over the shop will be inserted into Section 4.1 – conversion of existing properties.</p>
<p>We welcome the guidance on height, spacing and massing. Townscape is something which is difficult to quantify, but quality attractive townscape is something most people are attracted to. This guidance should allow this aspect to be enhanced and should encourage local identity to be safeguarded. As part of community cohesion a respect of ones home base is important and this guidance could limit the use of standard ‘blueprint’ developments which show no local flavour and could be anywhere in the country.</p>	<p>Support welcome</p>
<p>Under 7.15 Materials, the term ‘complimenting them’ is open to interpretation.</p>	<p>As the rest of the sentence is general, it is impossible to be specific about complementary materials. The emphasis is on using a selection of materials that do not clash architecturally – it is up to the developer to choose those materials in the context of the site and the design.</p>
<p>Lighting for pedestrian permeability is vital, and quality street hardware which is appropriate in both scale and style can have significant impact on the desirability of a residential area and through this guidance should be included. This also needs to take into account energy efficiency and best value over time.</p>	<p>Section 6.8 Landscaping and 8.7 Finishing detail address these points adequately. Section 9 deals with environmental considerations, but is added to and expanded with regard to making better use of resources.</p> <p>However, the Council is examining the possibility of developing a “Green Toolkit” which will include issues such as sustainable construction, however this will be separate from SPG4.</p>
<p>Environmental considerations could be more prescriptive with regard to energy efficiency and sustainability. Wouldn’t it be good if Stockton could come up with a dynamic state of the art residential development to show what good practice is all about?</p>	<p>Agree- additional text put in Environmental considerations section.</p> <p>It is not possible to combine the Flats Supplementary Planning Guidance with an energy efficiency handbook as the Council cannot dictate what energy measures should be used over and above the minimum requirement in the Building Regulations, it can only encourage developers to think about them.</p>

<b>Yarm Town Council, Town Hall, High Street, Yarm, Stockton , Teesside, TS15 9AH</b>	
Flatted development in Yarm is expensive and does not bring affordable housing into the area.	Flats are affordable in the context of other types of housing in areas (including Yarm), even if they are still valued out of the means of some. It brings choice to the market and allows those people who do not want or need a large house to remain in an area. Affordable housing by definition – that is legally tied to prevent open market sale – is not a mandatory requirement, but is encouraged within a development.
Flatted development in Yarm will result in increased traffic in an already seriously congested area	The Supplementary Planning Guidance deals with flats in all areas, not just Yarm. The impact of traffic will be a material consideration specific to a planning application and is not for discussion here.
Public transport serving Yarm is inadequate and unreliable	This is outside the control of the Supplementary Planning Guidance, but may be a material consideration in determining a planning application.
The correct balance between increasing development density and protecting the character of Yarm is not being struck.	This is exactly why the Supplementary Planning Guidance is necessary to assist developers in creating better quality developments that are more sustainable and more in keeping in design terms.
<b>Yuill Homes</b>	
I think you recorded the comments of the attendees at the Supplementary Planning Guidance presentation last week, but by way of confirmation, I would confirm our general support for the approach it takes and for what it seeks to achieve.	Support welcome
Our main concern, as indicated to you on the day, relates to size of unit. Apartment schemes, by their very nature, involve a far greater upfront investment, and therefore financial risk than conventional housing schemes and in most cases are substantially completed before any sales take place. The housebuilder has no opportunity to remix the initial selection of dwelling sizes, so the quality of market research, analysis of local demand and experience of similar ventures is crucial.  Apartments are a specialised market sector and their appeal to purchasers rests more on the size, arrangement and specification of the units, together with external factors such as security and convenient parking provision, than on simply the number of bedrooms. Our long experience of such schemes is that even single persons prefer a second ‘bedroom’, even if the real intention is to use it as a study, exercise room or store. The more relevant choice is to provide a range of floor areas from, say, 600sq ft to 1150 sq ft, the largest perhaps in the form of a duplex.	It is just such a risk that makes opening the flats up to a potentially wider market a positive aspect.  Partially agree – variety may be provided in many ways – either the number of bedrooms or the available floorspace and layout. The wording will be amended to reflect this, but emphasis will still be placed on a range of bedrooms as this is what the housing needs survey was based on, and subsequently informed the Supplementary Planning Guidance.  On large developments it will be necessary to provide a range of sizes in terms of both bedrooms and floorspace.

<p>I hope therefore that you can couch any policy objective of providing a range of unit size in a way which avoids a reference to the number of bedrooms.</p>	
<p><b>House Builders Federation, Westerdale Suite, Tower Court Business Ctr, Oakdale Road, Clifton Moor, York, YO30 4XL</b></p>	
<p>We do not object to the principle of the Supplementary Planning Guidance relating to flatted development in Stockton on Tees and understand the reasoning and justification behind it, however we do have some concerns with the document, which we feel we ought to comment on.</p>	<p>General support welcome</p>
<p>We consider that the document is too prescriptive in terms of the specific distance criteria set out in the Supplementary Planning Guidance for locating flats. A degree of flexibility is required to take into account individual site circumstances where flats may be wholly appropriate, but the site falls outside the requirements.</p>	<p>It is considered that the indicative distance criteria direct high density development to locations where they may be supported by services and facilities. The Council wishes to allow flats in appropriate locations in terms of reducing the need to travel, therefore the closer a development is to services and facilities the higher density may be supported. Where sites are not located within the requirement, then the Council does not consider high density development to be appropriate and may seek to refuse planning permission on this basis. Flexibility is inherent in Supplementary Planning Guidance and where material circumstances exist it may be over ruled.</p>
<p>Additionally we consider the document to be premature, given that the Tees Valley are on the verge of finalising a comprehensive Housing Market Assessment (HMA) which will in no doubt include relevant information that would be beneficial to Stockton and may influence the principles and objectives of the Supplementary Planning Guidance. It would be logical to withhold the adoption of any Supplementary Planning Guidance, pending the findings of the HMA.</p>	<p>The HMA will inform opportunities to create sustainable communities. The principles and objectives of this SPG4 are to provide guidance which delivers national objectives of sustainability and good design. Therefore it is not accepted that it will be premature.</p>
<p>It is worth noting that there are a number of sites in the North East where the proportion of sales for flats are falling. Therefore it seems inevitable that the market will, to a certain extent, dictate the number of flats being developed rather than being driven solely by policy initiatives.</p>	<p>This is not the experience of SBC as applications continue to be submitted regularly. However, the rate at which applications for flats are submitted is not the issue. The purpose of the guidance is to direct such developments to the most sustainable locations, and raise the quality of the same.</p>
<p><b>Liz Kettle, Blakett Hart and Pratt, Westgate House, Faverdale, Darlington, Co Durham, DL3 0PZ</b></p>	
<p>The paragraphs refer to the fact that flatted development must comply with certain distance criteria. These appear to be too short and we suspect they fall well short of what have been understood to be recognised walking and cycling distances through both Government</p>	<p>PPG6 refers to town centres and retailing, whereas the topic of SPG4 is flatted development. The two should not be confused. PPG6 refers to the distances likely to be walkable carrying shopping, but it is not likely that people will do a full shop in a convenience store because of a more</p>

<p>advice and case law. There appears to be no empirical research, or other justification to support the distances in the Supplementary Planning Guidance. Further clarification is required. For example PPG6 refers to 200-300 metres as appropriate carrying distances for shopping (easy walking distances). It is suggested to require that 50dph flats to be within 100m of a convenience store is unrealistic and would not be upheld on appeal.</p> <p>At the presentation on 25 October it was indicated that the distances to services criteria would not apply to flatted developments built between 30-50dph. This should be made clear within the Supplementary Planning Guidance. The Supplementary Planning Guidance should also state that the distance criteria are guidelines (as made clear at the presentation) and are not prescriptive and that the Council will consider well argued cases for relaxation of the guidelines, where appropriate.</p> <p>Rather than place a blanked ban on flats that fail to reach these criteria, it may be that a requirement be made seeking a positive contribution to improve linkages between a site and nearby services. For example, Green Travel Plans, enhanced bus services, or an improvement to existing footpath links.</p>	<p>limited number of goods. The indicative distances show a 'sliding scale' of proximity based on the size and variety of retail locations. A convenience store has limited appeal as it provides top-up shopping as opposed to a supermarket that would provide weekly grocery shopping, and therefore the support it offers people will be equally limited. Tthis is reflected in the distances accordingly. The Supplementary Planning Guidance clearly states that the suggested distances are indicative and not fixed.</p> <p>PPG3 indicates that sites should be developed at 30-50 dwellings per hectare, or higher where there are services and facilities etc to support it. This is the basis of the distance criteria table in the document. Sites that cannot meet the distances, but are otherwise acceptable for housing should not be developed for flats. In such cases residential development up to 50dph may be appropriate which may include a proportion of flats, but these will be assessed on their own merits. The Supplementary Planning Guidance will be amended to make this more clear.</p> <p>Where density is proposed above the indicative figures in the table, this must be justified through proximity to services and facilities, however these will be site specific. For example, a site that is located adjacent a bus stop and adjacent a convenience store would normally be developed around 50dph in accordance with the guide. However if the site was also adjacent a railway station, school, major employment site and leisure facilities, it could theoretically be developed at a higher density, but it would be up to the developer to provide justification this.</p>
<p>The paragraph sets a minimum size of 50spm for communal amenity space. Does this stem from Government advice, or other recognised body or research? We suggest the focus should be on the design of the area rather than focussing on size. For example, a designed/landscaped area of 30-40sqm would contribute more than a grassed area of 60-70 sqm within a development. Perhaps the Supplementary Planning Guidance could acknowledge this.</p>	<p>Having studied other Local Authorities' guidance, the 50sqm amenity space plus 5sqm for every unit over 5 units was used, and so this document merely reflects that figure. 50sqm represents a cumulative figure, not a single space, but there is a requirement to ensure that there is a useable space. However it is agreed that the current wording is prescriptive and will not apply in all cases, therefore a suggestive sentence is more appropriate and the requirement changed.</p>
<p>Section 106 agreements are required for communal outside areas. Our experience shows that all flatted developments have management companies which cover this as well as the general maintenance and repair/cleaning of the building. Provided the Local Planning Authority</p>	<p>Although an S106 agreement can be complex, the Council is aware of a number of situations where maintenance contracts have expired and significant problems now exist for residents and service providers, as there is no management in place. However, S106 agreements are not</p>

<p>ensures that these matters are to be dealt with in this way, there should be no need for a S106 obligation. Such requirements only build in delays and extra expense into the development process.</p>	<p>the only tool in securing adequate maintenance programmes and so the wording has been changed to reflect this.</p>
<p>There appears to be a blanket ban on front parking. There are occasions where it may be far more appropriate to provide parking in small courtyards in 'front garden' areas. It may be better to refer to a preference to avoid parking in areas that would disturb or adversely affect the street scene. Further, a restriction on parking within 3m of any ground floor window seems excessive. It may be more appropriate to indicate that parking within this distance should be avoided. If parking is to be located within this distance suitable boundary divisions should be used to reduce overlooking or glare from car headlights.</p>	<p>The requirement to locate parking areas to the side or rear is in the interests of protecting the street scene is not a blanket ban on front parking. The Council wishes to avoid a 'sea' of parking in the front, but, subject to site characteristics and context, some limited parking may be acceptable in the front. A slight re-wording has been effected to tone the requirement down. Agreed regarding the requirement to protect ground floor rooms – rewording effected to protect amenity of ground floor rooms without being prescriptive.</p>
<p>In larger schemes, a need for a broad range of accommodation of 1,2 and 3 bedrooms is referred to. As discussed (and agreed by Andrew McMillan and Neil Cole) at the aforementioned presentation, the Supplementary Planning Guidance should refer to a range of floor areas being required/desired and leave the number of bedrooms provided in each flat and the mix to developers.</p>	<p>It was agreed at the meeting to consider the point raised, not to adopt it without question. That said, the requirement now refers to a variety of housing being offered both in number of bedrooms and/or in variety of floorspace.</p>
<p>The requirement for front door appears to be over prescriptive. Individual sites have individual requirements. For example access for residents who have parked at a rear car park may lead to privacy/disturbance problems as they walk around the building and beside another resident's windows, to reach the front door. Whilst clearly flats should have an attractive front façade, a front door may not always be the right design solution.</p>	<p>Disagree. Flats are semi-private buildings where more pedestrian traffic can be expected as numerous residents and visitors will use a common entrance. A front door is essential so that they are able to find easily the main way in from the street. This will prevent non-residents, regardless of their intentions, from moving around the back and sides of the building where they do not have any reason to be. If residents park at the rear, they do not need to use the front door as the simple installation of a back door will solve this problem.</p>
<p>The report is over prescriptive in respect of internal layouts. These have usually been governed either by market forces or the building regulations, or both. Current Building Regulations will, for example, control sound insulation adequately and we would suggest that the latter need not be included in the Supplementary Planning Guidance. The need for windows in bathrooms is also questioned. It is the nature of flatted developments that bathrooms and en-suite rooms need to be located within the centre of the building so that the best use can be made of the external walls for living areas.</p>	<p>Not accepted. The Supplementary Planning Guidance offers advice for better buildings as well as planning requirements. Although the Building Regulations set out the requirements in terms of construction, the guidance seeks to reduce further any potential conflicts within the flats regarding noise by generally putting bathrooms together, bedrooms together etc. Whilst this is not mandatory and designs will differ, considerate internal layout will not damage the viability of any development.</p>
	<p>Partially agree – although bathrooms do not NEED an opening window, it is likely that having one is preferable to aid ventilation and steam escape. The paragraph has been reworded to <i>recommend</i> rather than</p>

<p>Whilst we welcome the document in that it provides guidance and support in respect of the requirements of the Authority when assessing applications for flatted developments, we have general concerns that the draft Supplementary Planning Guidance is over prescriptive. We have given examples of this within the above comments. Every development site and proposal is unique and there must be scope for individual design solutions.</p> <p>The Supplementary Planning Guidance should read as offering advice to applicants/agents, developers, Council Officers and Councillors and the general public. At present the Supplementary Planning Guidance appears to have a negative bias against flatted development, offering a reference point to objectors and Councillors looking for support to refuse planning permission for flatted development applications.</p>	<p><i>require.</i></p> <p>General support welcome. It is considered that the Supplementary Planning Guidance is written in such a way that it takes into account individuality of sites and encourages individuality of developments instead of standardised designs. The Guidance sets out the Councils aspirations for raising the quality of flatted developments so that the negative perceptions of flats in the Borough is reduced. The use of the guidance for refusing applications is deliberate, as it seeks to prevent inappropriate developments and mediocrity in the interests of everyone in the Borough.</p> <p>It is not agreed that the Supplementary Planning Guidance is negatively worded; indeed paragraph 3.11 explicitly states that “The Council considers flats to be an acceptable form of development in the Borough, but will scrutinise closely the location, design and density of each application to ensure that communities can reap the benefits of flatted development, and avoid any of the potential drawbacks.” In short, the Council will accept good developments and refuse bad ones.</p>
<p>Finally we consider that there are certain matters which are omitted and should have been included within the document. These are:</p> <ul style="list-style-type: none"> <li>Secure by design</li> <li>Disabled Access</li> <li>Bin Storage</li> <li>Secure cycle parking.</li> </ul>	<p>There is little point in repeating the Secured By Design guidance, (but an explicit reference is now made to it at the end of the Supplementary Planning Guidance). Instead, the principles of it are incorporated in the guidance – eg the need for public and private space to be defined, need for good lighting of parking areas etc.</p> <p>Disabled access is covered by Part M of the Building regulations, and is touched on in Paragraph 7.4-7.6.</p> <p>Bin storage is dealt with in Paragraph 9.1.</p> <p>Cycle parking is dealt with in 6.16.</p>