

## **Stainton & Thornton Neighbourhood Plan Examination**

### **Middlesbrough Council Officer Response to Examiner Question (a) – dated 17.09.21.**

#### **Examiner Question:**

- a. A revision to the National Planning Policy Framework was published by the Ministry of Housing, Communities and Local Government on 20 July 2021 alongside a final version of the National Model Design Code. Could both Councils please advise me if they consider any modifications are necessary to the Stainton & Thornton Neighbourhood Plan as a result of the publications?**

#### **Middlesbrough Council Officer Response:**

In respect of the revisions to the National Planning Policy Framework (NPPF), and the publication of the National Model Design Code, the draft policies of the Neighbourhood Plan would benefit from being made more succinct and more locally defined, particularly in design terms. Currently a number of the draft policies focus on a list of requirements that large-scale developers need to meet, rather than catering for or identifying other types and scale of development.

In referencing (where appropriate) the above national and local documentation, there would be no need for policies to keep reiterating existing regulative text or planning guidance, and/or unintentionally going beyond current statutory requirements. In addition, the revised NPPF and Model Design Code encourage the preparation of development briefs, especially for large-scale developments, negating the need for policies to comprehensively list detailed development requirements.

Modifications are suggested to the following draft policies, in order that they are more reflective of the above documentation:

- ST1: Green Infrastructure – the last sentence should be expanded to include a reference that green infrastructure can also deliver wider benefits for nature and help support local efforts to address climate change. This additional text would build-upon the revisions of the NPPF in respect of enhancing and maintaining green infrastructure.
- ST3: Natural Environment – (as with Policy ST1), it is suggested that the policy should include a reference that development proposals will be supported where they are in accordance with the Model Design Code and the NPPF in respect of providing natural environment improvements etc.
- ST6: Traffic/Parking/Public Transport and Roads – it is considered that the first four sentences of criterion 1 are supporting text and provide background to the policy. It is therefore suggested that these sentences would be better placed in the supporting text part of this policy. Reference to the Model Design Code could also be incorporated in the policy to ensure high quality roads and street layouts in new large/medium and small-scale developments are provided (see NPPF paragraph 28).
- ST7: Infrastructure and Rights of Way – aspects of this policy are largely covered in Policies ST1 & ST3, and the Council's own Infrastructure Plan (see NPPF paragraph 16(f) unnecessary duplication of policies). The list of 'Green Links' could be moved

to the Appendices. Further consideration should be given to whether this policy is required, if it is, cross-referencing to relevant policies could be incorporated.

- ST9: Design Principles – modifying this policy to incorporate references to the NPPF, the National Design Guide and the Model Design Code would ensure that the local context to the proposed design principles are fully catered for, in relation to a range of development proposals. It is also suggested that criterion 9 be amended to say ‘for use by the local community’, so that the whole community are able to use these spaces.
- ST10: New Development on Green Field Sites (Rate of New Build/ Density/ Landscaping/ Green Corridors) – aspects of this policy are reflected in other policies of the Plan. It is suggested that cross-referencing to other policies in the Plan would make the policy more concise and easier to implement. As the policy is about new development on green field sites, consideration should be given to referencing the National Guide and Model Design Code principles.

On a general note, there are some concerns in relation to terminology used in a number of the draft policies e.g. Policies ST3, ST6, ST7, & ST8 especially where the terminology refers to ‘all’, ‘any’ or future development. The terminology used can appear ambiguous and confusing, as it currently does not differentiate from large-scale to minor householder development proposals. The terminology we suggest should be more clearly defined to reflect the type and scale of development the policy is aiming to address, and accord with the NPPF (paragraph 16).