

HARTLEPOOL RURAL PLAN



STAKEHOLDER COMMENTS AND RURAL NEIGHBOURHOOD GROUP RESPONSES CONSULTATION 2015

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POLICY GEN1 - VILLAGE ENVELOPES

Synopsis

- For most the green gaps should be protected
- Villages to be protected from “ Urban Sprawl” and maintain village life
- Suggestion that it may restrict growth of the village
- Important not to have negative impact on local amenities and restrict investment

Comment	Response
HRPS1 HIGHWAYS ENGLAND Agree. Highways England will consider all development in term of the operation and safety of the Strategic Road Network (SRN).	Noted
HRPS2 THIRTEEN GROUP Agree	Noted
HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree	Noted

HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)

Strongly Disagree

On behalf of my client I have reviewed the above Rural Neighbourhood Plan (HRNP) in the context of their landholding at Hart Village and submit representations accordingly. On their behalf I have completed and attached a proforma questionnaire supported by this cover letter to address the omission of a significant parcel of land and to address inaccuracies within the draft document, finally, this letter requests a review of your proposed land allocation at Hart Village. I also ask that you undertake a review of the Objectively Assessed Needs of the settlement and the deliverability/ Suitability/ availability of the proposals you advance. In this letter I refer to the Hartlepool SHMA (2015), SHLAA (2014), Emerging and adopted Local Plan and a Policy update statement from HBC 2014. For clarity I attach a copy of my client's landownership plan, the SHLAA extract from the 2014 assessment and an extract from your document.

My client owns the freehold of the land associated with Home Farm including land to the south and east of Glebe Farm, which has been identified in various Strategic Housing Land Availability Assessments (SHLAA) as being suitable for development within the next 15 years, some in years 0-5. The sites are outside of the current development limits and have historically been divided into two distinctive parcels of land known as Sites 30 and 31.

In 2013 Sites 30 and 31 were considered suitable for development within years 6-10 with a potential yield of circa 103 units. The breakdown is detailed below.

A subsequent review of the SHLAA process and an updated Draft Final Report December indicates the site is now, following formal submissions, annotated as Sites 4, 5 and 6 as having a yield of 81 units in the first 15

The Hartlepool SHMA has been consulted. The Rural Plan Group is in consultation with Hartlepool Borough Council.

While accepting the sites mentioned in this response are deliverable all sites considered deliverable are not brought forward into Local Plans - there are a great many sites across the Borough but selecting all would far exceed the housing needs of the area. The Rural Plan Group have assessed sites around Hart and chosen enough to meet the needs of Hart in what they believe to be the best deliverable site that will provide a natural extension to the village and also provide the most suitable environment more conducive to the quality of live residents might expect, for example away from the increasingly busy A179.

years with approximately 27 units available within years 0-5.

Within the HRNP (2015-2029) a 15 year timeframe is applied in accordance with the latest SHLAA document. Policy H1 HRNP identifies that within Hart Village only Site 4 (of my clients land interests) is deliverable with an allocated number of units of between 15 and 17 and the potential to provide a significant area of open space. Clearly this does not allow for an efficient use of land and excludes the wider land take potential.

Draft Policy H1 of the HRNP refers to a 15 year supply of housing land within the rural areas of “at least 117 new dwellings” in the Plan area by 2029. This we are told equates to a requirement to provide 30-34 units in Hart Village up to 2029.

This Rural Areas Document seeks to identify the eastern part of 9 acres (eastern part 3) within Hart within Council ownership for 15/17 units. This land has not been formally assessed for its deliverability and sustainability by Hartlepool Council (The current land owners). There are more sustainable options which are eminently more deliverable.

The justification provided by Draft HRNP for the proposed allocations states that the Plan has relied upon evidence in the SHLAA undertaken to evidence the emerging Hartlepool Local Plan. The SHLAA report states that a sites inclusion or otherwise does not confirm that a site has been justified robustly. Paragraph 8.28 of the Draft HRNP identifies that the site should provide a mixture of house types, mainly two bedroom houses and bungalows laid out around an open space and should contribute towards the provision of the “proposed” Community Open Space. There is no reasoned justification for the house types or the provision of open space on these sites and indeed there is no justification for what appears to be a constrained number of residential units which does not accord with the Local Plan evidence base for this settlement. Whilst there remains no Objectively Assessed Need (OAN) in Hartlepool, stipulating housing

The Rural Plan seeks to provide incremental growth in keeping with the size of Hart village.

Major new open space proposed for Hart, which compared with the other villages has limited public open space, would be developed on the Nine Acres site which is Local Authority owned and therefore more likely to be deliverable.

Nine Acres site is in the SHLAA (site No3)

Hartlepool Borough Council SHMA consulted but may need to be reassessed as result of findings from Housing Needs Survey conducted by Rural Plan Group.

Provision of open space seeks to provide high quality living environment for residents and in the interests of community building, safety, health, etc. Need identified during consultation in Hart.

numbers, this document is currently unreliable.

It is understood that neighbourhood planning provides local communities power to share a vision of the way their towns and villages are shaped through assessed growth however without a rational assessment of need (OAN) and site deliverability we cannot support the proposals.

The neighbourhood planning tool seeks to ensure that communities get the right type of development for their community where the ambition of the neighbourhood is “*aligned with the strategic needs and priorities of the wider local area*”. In this regard NPPF paragraph 16 is clear that neighbourhoods should:

- Develop Plans that support the strategic development needs set out in Local Plans, including Policies for housing and economic development.
- Plan positively to support local development, shaping and directing development in their area which is outside the strategic elements of the Local Plan.
- Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their Neighbourhood Plan to proceed.

We understand that where a Neighbourhood Plan is brought forward before an up to date Local Plan is in place, the qualifying body and the Local Planning Authority should discuss and aim to agree the relationship between Policies in:

- The Emerging Neighbourhood Plan.
- The Emerging Local Plan.
- The Adopted Development Plan.
- With appropriate regard to National Policy and Guidance.

Needs identified by H.B.C. SHMA & Rural Plan Housing Needs Survey.

Noted

Rural Plan Group working closely with Local Authority

It is in this regard that we query the scale of development proposed and the time period in which the delivery of the housing numbers are suggested. We are of the opinion that the numbers are low and the timing of the delivery. We assume that 30-34 houses could be delivered in Hart up to 2019 (Rather than the stipulated 2029), then beyond this timeframe there should be a further allowance to reflect the Governments Growth Agenda enshrined in NPPF specifically to boost the supply of housing.

We would see clarification and amendment to the proposed housing allocations within your neighbourhood document to include the delivery of residential development of all of the land identified within my client's ownership, over the 15 year period of the Neighbourhood Plan as detailed in the table below as supported by the 2014 SHLAA.

Document	Date	Site reference	Potential Yield	Suitable
SHLAA 2013	October 2013	30 & 31	37 & 66 (Total 103)	Yes
SHLAA 2014	December 2014	4,5 & 6	27, 36 & 18 (Total 81)	Yes
Draft HRNP 2015	18 February 2015	Hart Glebe Farm East 4	15-17 (Total 15-17)	Yes

The table above indicates the relationship between my clients land potential yield as assessed within the HBC SHLAA off-set against the HRNP assessment of a smaller percentage of the land.

Of further note is the March 2015 SHMA which states that the future of the Hartlepool Housing Market will be determined as follows;

The aim of the Rural Plan Group is to seek gradual incremental growth over the plan period rather than for villages to 'explode'. This is in the interests of protecting the character and social cohesion of the rural communities while meeting the needs of future generations and allowing any new residents the ability to be integrated into the existing social structures. Consultations identified the high value set upon the strong community provided by the villages.

“The population of Hartlepool Borough is estimated to be 92,600 in 2014 27 and this is projected to increase by 5.5% to 97,400 by 203728. Over the next few decades, there will be a marked increase in the number and proportion of residents aged 65 and over which is expected to increase by 50.6% from 17,000 in 2014 to 25,600 in 2037.”

A key driver in determining the tenure and type of future development is stated in the SHMA as including:

- The need to continue development to satisfy household aspirations, in particular the development of detached and semi-detached houses and a range of property sizes to offset identified market imbalances;
- Developing an increasing range of housing and support products for older people;
- Delivering additional affordable housing to help offset the identified net shortfalls; and diversifying the range of affordable options by developing intermediate tenure dwellings and products; and
- The economic viability of delivering affordable housing on sites across Hartlepool Borough.

The SHMA also identifies at Table B9 the overall annual net affordable housing requirements for Hartlepool Borough by ward, designation (general needs and older person) and property size 2014/15 to 2018/19. What is acutely clear is that the General need for the Hart Ward is for 5x 2 bed properties and 32 x 3+ beds. The Net total for the ward (Deducting Old person) is 32 affordable units. Affordable housing includes social rented, affordable rented and intermediate tenure dwellings. New affordable development by Registered Providers will be affordable rented (with rents of up to 80% of open market rent) and in order to recommend an appropriate split between social rented and intermediate tenure, Table B10 summarises the preferences of both existing households in need and

Noted – suggested increase in proportion of residents over 65 could suggest need for developments to include more bungalows and therefore reduced yield from housing sites.

Noted

Hart Ward differs from Hart village or parish and includes large part of urban Hartlepool. Rural Neighbourhood Plan only has to concentrate designated Rural Plan Area.

newly forming households by tenure. Overall, this gives a tenure split of 70.4% social/affordable rented and 29.6% intermediate tenure across Hartlepool Borough.

To deliver the required 32 Affordable units over the period to 2029 in the Hart Ward alone would require the delivery of some 107 units. This is based upon Policy H2 of the HNRP which requires 30% (27.5%) affordable provision on development sites of 5 or more units or on land greater than 0.4ha. The proposed housing allocation for Hart of a maximum of 34 units will only yield the delivery of 9 units over the next 15 years (should viability allow).

The Hart Ward (The northern area in the HRNP) has a requirement to deliver 32 affordable units which equates to the delivery of 107 units on the northern area alone. Clearly the proposed allocation cannot sustain the future needs of affordable housing. For this reason alone the numbers should be increased to reflect this identified need.

The Housing Need in Hartlepool as a whole has been under severe scrutiny. HBC has now accepted (Nov 2014 – Planning Policy Justification Statement) that there has been a record of persistent under delivery of housing. As a result there is a requirement to significantly increase the provision over the first 5 years by an additional 20% (moved forward from later in the plan period). In the years 2015/16 to 2019/20 which constitute the next 5 years, the Council cannot demonstrate a 5 year supply of deliverable housing sites. Currently the Council is approximately 290 dwellings short of demonstrating a 5 year supply, which equates to a 4.2 year supply of deliverable housing sites. What this means is that housing decisions for potential development sites will be made in accordance with the Development Control Policies of NPPF specifically Paragraph 14. It is incumbent upon the HRNP to get it right and allocate sufficient housing land in a deliverable and sustainable manner.

My clients land is not only deliverable but has been shown to be

Noted – leaving strategic sites to Hartlepool Borough Council

sustainable with no encumbrance upon title. It is available now and could assist in delivering the requisite numbers of housing required over the 15 year period and assist in delivering the assessed need for affordable housing in the Hart Ward.

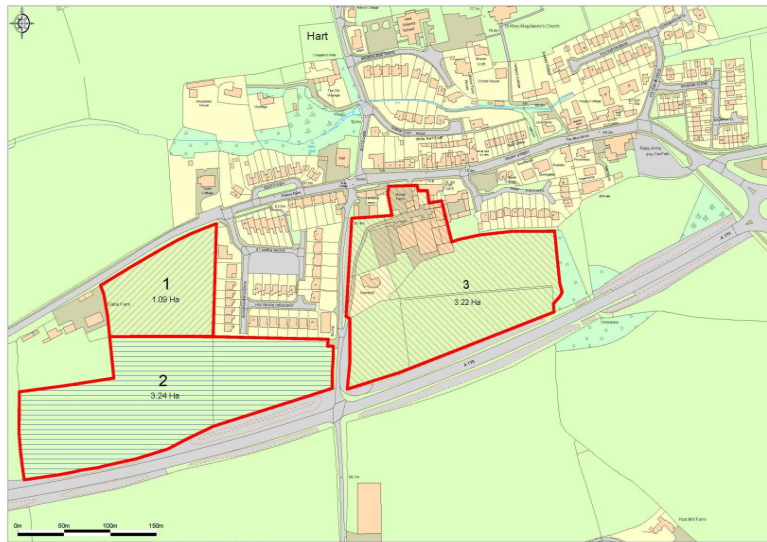
In summary, we object strongly to the exclusion of the wider land take potential in Hart, we also object to the limited site yield proposed for a sustainable, deliverable site with road frontage access. Our representations request the amendment of Policy H1 to reflect the wider allocation of land at Hart to deliver the following;

Site	Open Market Yield	Provision of Affordable	Timeframe (years)
Glebe Farm East (4)	27	Yes	0-5
Glebe Farm South (5)	36	Yes	5-10
Home Farm (6)	18	Yes	10-15

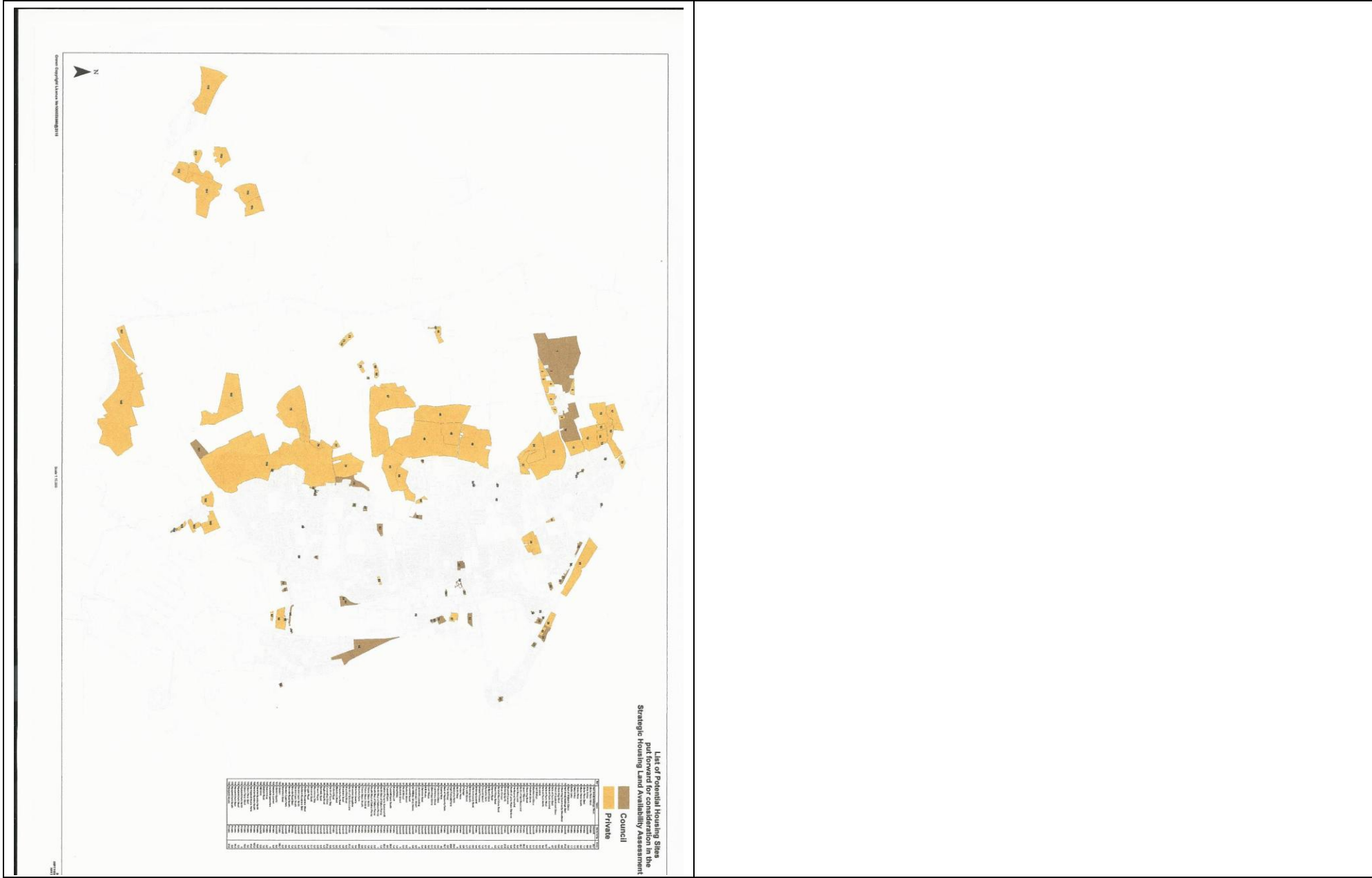
We look forward to receiving your written confirmation that you are in receipt of these representations. Should you wish to discuss my clients land holding and potential for allocation please feel free to call me directly.

Noted but Rural Plan Group have chosen what they consider to be best sites for reasons stipulated earlier.

Noted – see responses above.



Site Ref	Site Name	Ward	Sequential Approach	BF/ GF	Site Area	Net Developable Area	DPH	Yield	0-5 years	6-10 years	11-15 years	15 Years +	Major Issues & Constraints	Comments	Class
26	North of Voltaire Drive	Elwick	Urban Edge/Countryside	GF	0.48	0.39	25	10	0	0	10	0	RSS and Local Policy issues so 11-15 years. Believe to be a ransom strip leading to the site. Reduce yield to 25ha for bigger high end units.	Will check the ransom strip and review in future.	Dev
27	East of Millbank Close	Elwick	Urban Edge/Countryside	GF	0.84	0.68	25	17	0	0	17	0	Would effect Hart Village Strategic gap (RSS policy). Outside village envelope.	RSS and Local Policy issues so 11-15 years	Dev
28	North of Raby Arms Paddock	Elwick	Urban Edge	GF	0.2	0.2	25	5	0	5	0	0	Outside of current village envelope	Small site to merge with site 29. Both in the same ownership but were submitted separately.	Dev
29	Raby Arms Paddock	Elwick	Urban Edge	GF	0.77	0.63	25	16	0	16	0	0	Outside of current village envelope	Small site to merge with site 28. Both in the same ownership but were submitted separately.	Dev
30	Home Farm	Elwick	Urban Edge	GF	2.41	1.49	25	37	0	37	0	0	Outside of current village envelope. Steep gradient will reduce the yield.	Reduce developable area by 30% due to steep gradient of site.	Dev
31	Glebe Farm	Elwick	Urban Edge/Countryside	GF	4.3	2.66	25	66	0	66	0	0	Potential constraint to develop site due to steep gradient from the A179 Hart Bypass.		Dev



Shales No	Site Name	Ownership	Suitable		Size	Yield	Notes	Years				
			1	2				0-5	6-10	11-15	>15+	
4	Glebe Farm East	Private	Yes	Yes	1.1	27		27	0	0	0	0
5	Glebe Farm South	Private	Yes	Yes	3.1	36	Need to one in with site 4 due to access, half yield due to access constraints.	0	36	0	0	0
6	Home Farm	Private	Yes	Yes	3.6	18	quarter yield due to constraints	0	0	18	0	0
7	Raby Arms	Private	Yes	Yes	1.1	23	Planning permission granted on appeal 8/9/14	0	0	0	0	0
8	Bulls Lane	Private	Yes	Yes	1.7	21	half yield due to constraints and buffer to protect countryside	0	0	21	0	0
9	East of Millbank Close	Private	Yes	Yes	0.9	22		22	0	0	0	
10	Heart Small Holdings East	HGC	Yes	Yes	21.2	15	Quarter yield due to constraints, church etc some small scale (6/10/15) development may be suitable where the site adjoins the village boundary.	0	15	0	0	
11	Clawering Community Woodland	Private	No	No	8.5	191	Not achievable without significant environmental damage and unsuitable to look at. Two birds yield.	0	0	0	0	
12	Clawering West	Private	Yes	15+	14.6	219	1-5 years if the ransom strip can be sorted out. 11/05 - 10 years.	0	0	0	175	
13	West of Applewood Close	Private	Yes	Yes	0.8	20	same as site 12, half yield due to buffer	0	20	0	0	
14	Nelson Farm East	Private	Yes	Yes	4.7	53	same as site 12, half yield due to buffer	0	0	0	53	
15	Nelson Farm Central	Private	No	No	2	45	Possible to come forward as a long term plan, other sites would need developing before this one. Ownership issues?	0	0	0	45	
16	Nelson Farm West	Private	No	No	13.7	308	Can only be developed if area to the east comes first. Could only come forward later in the plan period if at all.	0	0	0	308	
17	Nelson Farm North	Private	No	No	8.4	208	Can only be developed if area to the east comes first. Could only come forward later in the plan period if at all.	0	0	0	208	
18	Seasview	Private	No	No	8.3	187	unsuitable due to topography	0	0	0	0	

HRPS22 ID PLANNING (FOR DARNHAM LTD)

Strongly Disagree

As highlighted in the attached letter, it is considered the former RHM site, a brownfield site, could be brought forward for a housing led mixed use development that could incorporate a park and ride facility and other community facility associated with the nature areas. Such a development would support the local economy and rural tourism.

On behalf of our client, Darnham Ltd, I hereby submit a completed consultation questionnaire and provide representations below in relation to policy EC3 regarding land known as the 'former RHM site'.

The site is a redundant industrial site located either side of Marsh House Lane 370m to the south of Greatham to the immediate south of the railway line and a group of four existing residential properties. The site measures approximately 12 hectares and previously contained a mix of industrial buildings up to two-storeys in height but has now been cleared and is therefore a previously developed brownfield site.

It is noted that within the draft Rural Plan the former RHM site is promoted as having the potential to deliver a community and leisure use such as a park and ride facility associated with the re-opening of Greatham train station, a visitor centre and a solar energy installation.

The draft policy also states any development should enhance the landscape and should not increase traffic movements when compared to the previous industrial use. This consultation document also confirms that proposals have been included in the Tees Valley Metro Project for the re-opening of Greatham Station. The consultation draft Rural Plan proposes that the northern part of the site adjacent to the rail line would be suitable for a park and ride facility.

Whereas the provision of community and leisure facilities and a park and ride facility are clear aspirations for the site, this is only appropriate, and

Noted

The re-opening of Greatham Station is aspirational

<p>could only be delivered, in conjunction with new housing being provided on the site therefore it is proposed that policy EC3 (and other relevant policies of the consultation draft) should be amended to promote the RHM site for housing.</p> <p>It is considered that the proposed residential development on the Marsh House Lane site would represent sustainable development and there would be no adverse impacts that would justify refusal of the principle of housing development for the reasons outlined below.</p> <p>The site is a brownfield site (Local Plan policy Hsg5 seeks 75% housing to be delivered on brownfield land) located just 370m from Greatham and is immediately adjacent to existing housing. Greatham contains a variety of local services and amenities including a primary school, post office, general store, pubs and has a good bus service providing links links to Middlesbrough, Billingham, Norton and Hartlepool. The recent SHLAA also acknowledges the potential for Greatham to increase its population from the current number of around 1,000 occupants by indicating the potential for new housing sites within the village (SHLAA sites 102-106).</p> <p>With regard to any highways implications, it is clear that the site has a long established use as a major industrial site that included large vehicles accessing the site along Marsh House Lane. Whereas parts of Marsh House Lane narrow, there are no physical constraints to any localised widening therefore it is considered a suitable access can be provided to the site.</p> <p>To the north is open farmland and the scale of the development would allow for appropriate assimilation with this landscape.</p> <p>In terms of the adopted policy context, Hartlepool Local Plan Policy Ind5 identifies the site as an industrial area where B1, B2 and B8 are supported provided there is no significant detrimental effect on highway safety. However, the December 2014 Employment Land Review states the</p>	<p>While the provisions suggested for the area near Greatham Station are aspirational the facilities in particular associated with what is a burgeoning wildlife site linked to the Environment Agency realignment scheme at Greatham Creek and RSPB interest associated with their site at Saltholme may be delivered without input from a new housing development.</p> <p>The adjacent housing are the former Station Cottages and the facilities in Greatham are about a mile away and the bus service mentioned even further so any housing development on the former RHM site would be considered isolated.</p> <p>Noted</p> <p>The site was marketed for business use prior to demolition with no positive result. The access at the end of a long winding country lane may have contributed to this. The factory was originally located at this site being adjacent to the salt workings and with access to the railway.</p>
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<p>site should be de-allocated from employment use due to the difficulty in gaining HGV access and presence of existing residential properties adjacent to the site. We disagree with this review as the site has development potential.</p> <p>In terms of national policy, the council have confirmed they are unable to demonstrate a five year housing land and by virtue of paragraph 49 of the NPPF, “relevant policies for the supply of housing should not be considered up-to-date” if a 5 year supply cannot be demonstrated. Instead, housing applications should be assessed under paragraph 14 of the NPPF and the presumption in favour of sustainable development. That requires such applications to be granted unless they are not sustainable in terms of the NPPF, any adverse impacts would significantly and demonstrably outweigh the benefits, or other specific policies in the Framework justify refusal. The NPPF supports the development of brownfield sites and it is considered the development of the RHM site would be compliant with the NPPF.</p> <p>I have already discussed the potential for developing the site with Hartlepool Borough Council who have confirmed that there was no objection to the principle of housing on the site could be acceptable, subject to development control issues being satisfactorily addressed.</p> <p>Discussions have also taken place with the Health and Safety Executive (HSE), Office of Nuclear Responsibility (ONR) and Northern Gas Networks (NGN).</p> <p>The HSE state the site is within an outer consultation zone of two hazardous installations and they would not object to a residential development on the site.</p> <p>Northern Gas Networks confirmed that they operate the pipelines that run adjacent to the railway line that borders the site and easements of up to 3m would be required. Such easements can be accommodated.</p>	<p>Noted</p> <p>The Rural Plan Group considers this site to be remote, located at a distance from the adjacent village and not conducive to a sustainable or pleasant environment especially in comparison to other sites available. The site lies in closer proximity to heavy industry including two COMAH sites and the Nuclear Power Station. It is perhaps worth noting the village of Graythorp which was located on the other side of the Conoco Phillips Oil Tank Farm was cleared in the late 70s because of the growth of heavy industry in this locality.</p>
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<p>The ONR confirmed the site is not within the consultation zone for Hartlepool Nuclear Power Station and that they would not wish to be consulted on any proposed residential development.</p> <p>Network Rail has not objected to the principle of housing development. The site is not considered to carry any constraints that would preclude development and is available, deliverable, and achievable.</p> <p>Based on the above, the site is considered to be suitable for residential development in conjunction with delivering the desired community facilities. Therefore, it is requested that the draft Rural Plan be amended to include the former RHM site as a housing allocation.</p> <p>I trust that you have all the information required to reconsider the proposed designation for the site and would be grateful if you can please confirm safe receipt of this submission. I would be interested in meeting to discuss the content of this letter and the consultation draft Rural Plan further if you would like to contact me on the number below.</p> <p>If you require anything further in the meantime, please do not contact us.</p> <p>Thank you for confirming receipt. Would it be possible to meet up with the Party members to discuss the content of the letter and thoughts for the former RHM site?</p> <p>Regards Andrew Windress Principal Planner, ID Planning, Atlas House, 31 King Street, Leeds LS1 2HL Tel: 0113 2436116 Mob: 07808647725</p>	<p>See Network Rail response for concerns regarding access via level crossing in Marsh House Lane.</p> <p>Rural Plan Group prioritising sites to meet identified needs, the former RHM site is certainly not considered to be the best from selection available.</p>
<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Strongly Disagree</p> <p>Villages should be allowed to expand to meet the current and future needs of the settlement, both to maintain vitality and viability of local</p>	<p>Noted & agree – at Elwick North Farm Site would provide up to 39 dwellings which is a significant increase bearing in mind the current size of the village and the needs identified.</p>

<p>services and facilities and retain population and encourage the retention of young families.</p>	
<p>HRSP25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY Not applicable to our society interest</p>	<p>Noted</p>
<p>HRPS26 STOCKTON BOROUGH COUNCIL PLANNING SERVICES The area of North Burn has been included within a village envelope/limits to development, it would possibly be clearer if this terminology was the same on the policies map and in the document. Furthermore, there is no reference in the document to the North Burn area, links to strategic policies in the Hartlepool Local Plan, or any required infrastructure. This area is a strategic site which may need further explanation/discussion in the document. The views of the Spatial Planning team at Hartlepool Borough Council will be crucial in clarifying this matter.</p>	<p>Inclusion of North Burn is an error in the production of the map and will be removed. The Rural Plan Group consider the North Burn site to be part of the rural landscape, to be unsustainable in terms of development and not required either to meet identified housing or business needs. There is an oversupply of business/employment land in the Borough of Hartlepool. The adjacent Wynyard development (partially in Stockton on Tees Borough) is already transforming business allocations to housing sites. If there was demand for further land for business use this could have been accommodated within the existant Wynyard allocations.</p>
<p>HRPS27 THE HOME BUILDERS FEDERATION The policy seeks to retain new development within the existing village envelopes where it accords with site allocations and designations. The HBF supports the provision of new housing in sustainable locations. Whilst the policy seeks to achieve this aim, the focus upon site allocations and designations may inhibit sustainable development coming forward on sites which are not allocations or designations. These may be in the form of windfall sites or sites not originally considered deliverable within the allocations process. Providing such sites are sustainable and fulfil other policy considerations within the plan they should be brought forward. The HBF suggests the following modifications to the policy;</p>	<p>Noted – the policy will be amended to allow for windfall/infill within the village envelopes and subject to fulfilling other policy considerations contained in the Rural Neighbourhood Plan. The wording to section 8.2 will also be amended.</p>

<p><i>‘Within the Village Envelopes as defined on the Proposals Map, development will be permitted where it accords with site allocations and designations. Non-allocated sites will be also be permitted provided they are of an appropriate scale and accord with other plan policies’.</i></p> <p>The supporting text to the policy does not consider the possibility that the emerging Hartlepool Local Plan may consider the expansion of one or more village envelopes. To ensure that the rural plan remains consistent with the Local Plan, and therefore does not become out of date, it is recommended that this possibility be discussed in the supporting text.</p>	<p>Noted - The Rural Plan Group liaise closely with Hartlepool Borough Council</p>
<p>HRPS28 PERSIMMON HOMES</p> <p>The Policy seeks to retain new development within the existing village envelopes where it accords with site allocations and designations.</p> <p><u>Windfall / Non-Allocated Sites</u></p> <p>Whilst the policy seeks to achieve this aim, the focus upon site allocations and designations may inhibit sustainable development coming forward on sites which are not allocations or designations. These may be in the form of windfall sites or sites not originally considered deliverable within the allocations process. Providing such sites are sustainable and accord with the other policy considerations within the plan, they should be allowed to be brought forward. The HBF representation has suggested the following modifications to the policy;</p> <p>“Within the Village Envelopes as defined on the Proposals Map, development will be permitted where it accords with site allocations and designations. <u>Non-allocated sites will be also be permitted provided they are of an appropriate scale and accord with other plan policies”</u></p> <p>Persimmon Home would agree to this amendment as we feel that the current policy, as written, is overly restrictive and does not align with the NPPF’s requirement for plans to be ‘positively prepared’ and ‘flexible</p>	<p>Noted – the policy will be amended to allow for windfall/infill within the village envelopes and subject to fulfilling other policy considerations contained in the Rural Neighbourhood Plan. The wording to section 8.2 will also be amended.</p>

enough to accommodate needs not anticipated in the plan' to deliver a wide choice of high quality homes and widen opportunities for home ownership. The policy in its present format is therefore contrary to condition 'a' of the basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The HBF's suggested re-wording would overcome this objection and greater align with the Neighbourhood Plan with the aims and objectives of the NPPF, and its own housing delivery target of a minimum of 170 units by 2030.

Green Gaps

In addition, Persimmon Homes are also concerned that the that the 'green gap' and 'village envelope' designations, as illustrated on the Draft Rural Plan Proposals Map, overlap to the north east of the village of Elwick, and therefore draws the development limits tighter than originally intended. The extent of this issue is highlight on the image below:



Noted and agree – the map will be adjusted so that the green gap does not overlap into areas within the village envelope.

North Farm is recognised as a potential housing site in policy H1.

<p>As set out within Policy GEN1, “development within the Green Gaps shown on the Proposals Map will only be permitted in exceptional circumstances where it is connected with the essential functioning of agriculture or forestry and does not compromise the openness of the countryside between the villages, Hartlepool and Billingham.”</p> <p>The policy therefore contradicts itself by on the one hand suggesting that development in this area is acceptable in principle but then at the same time prohibiting the wider development of the North Farm site despite it being well related to the village, and within the village envelope on the grounds that it may compromise the openness of the countryside.</p> <p>Persimmon Homes support the revised village envelopes as we believe the area to the north east of the village would allow for the natural ‘rounding-off’ of the village to the north, we would therefore suggest that the current green gap is amended to sit beyond the proposed village envelope so that it does not come into conflict and cause contradictions within the Plan.</p>	
<p>HRPS29 TEES ARCHAEOLOGY</p> <p>Agree</p> <p>I am pleased to see that consideration of heritage assets is firmly embedded in the policy justification on Village Envelopes (para 8.2).</p>	<p>Noted</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>Policy GEN1 is the first policy and is a village envelopes policy. The policy as worded (particularly paragraph three) could preclude any HBC strategic extensions and key essential infrastructure projects. When viewing the plan as a whole and in liaising with plan group members it is noted that the plan seeks to allow HBC to determine strategic sites and therefore HBC</p>	<p>Noted & agreed - an initial strategic policy will be will be included.</p>

<p>consider that the impetus of the plan should better reflect this from the beginning. The inclusion of an initial strategic policy may overcome this; otherwise the policy may be better worded if it were to make reference to key infrastructure and strategic extensions.</p> <p>HBC consider that this policy seeks to protect village envelopes and protect green gaps; the title of the policy could be more reflective of this.</p> <p>8.4 and GEN1 - the justification for the policy is inconsistent with the policy itself; for example reference is made to development in the open countryside outside village envelopes being unacceptable “unless it can be shown to be essential to local needs and the rural economy and cannot be accommodated within existing settlements” The policy states “In the countryside outside the village envelopes and green gaps, development will be permitted where it is essential for the purposes of agriculture, forestry, public infrastructure or to meet the social needs of the local rural community”.</p>	<p>Noted – will review title</p> <p>Noted – reword policy</p>
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POLICY GEN 2 - DESIGN PRINCIPLES

Synopsis

- Maintain village character
- Design should be in keeping with village character
- Developers should engage with local people
- Higher standards of design should be expected in conservation areas especially regarding energy efficiency

Comment	Response
<p>HRPS1 HIGHWAYS ENGLAND</p> <p>Agree. We do not specifically comment on the design principles of any development. We will comment on any impact on the SRN. However, we have a design panel that will ensure quality design is incorporated into Highways England outputs.</p>	<p>Noted</p>
<p>HRSP2 THIRTEEN GROUP</p> <p>Agree</p>	<p>Noted</p>

<p>HRPS3 NORTHUMBRIA WATER</p> <p>In particular Policy GEN2- Design Principles which also in its justification outlines surface water management goals which will assist in the prevention of flooding in line with the aims of the National Planning Policy Framework. Surface water discharge to the public sewer should always be the last resort after all other options have been explored through the hierarchy of preference (Part H, Building Regulations).</p>	<p>Agree – wording to justification to be adjusted</p>
<p>HRPS5 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY</p> <p>This policy advocates the use of Sustainable Drainage Systems (SuDS). We welcome and support this approach. However, it should be noted that the SuDS to be implemented/proposed must be suitable for its location. For example, development proposals should not encourage poor quality water to be discharge to controlled waters, particularly groundwater which is used for public supply within the plan area. It should also be noted that groundwater levels across the plan area may be high or comprise of superficial drift cover (typically boulder clay). Therefore, there may be limited capacity for the ground to accept additional discharges without causing localised flooding or potential groundwater pollution issues.</p> <p>With respect to design principle 3, we would welcome references to the use of locally native species in the public areas within this sentence.</p>	<p>Noted</p> <p>Noted – use of locally native species should be encouraged – see environment policy NE1 bullet point 4c.</p>

<p>We welcome the inclusion of design principle 9, which encourages sustainable surface water management solutions. However, it is vital that consideration is given to all sources of flooding, including fluvial. In particular, all new developments should seek to reduce and management flood risk from all sources. Therefore, we would welcome references to this within the design objective.</p> <p>Consideration should be given to the 'Safe by Design' standards. This is a police initiative which encourages the building industry to adopt crime prevention measures in the design of developments to assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment.</p>	<p>Noted – principle 9 to be adjusted.</p> <p>Noted – new criteria 10 on safety and security to be added to cover this. Should be noted that town and country are very different (eg. Levels of anti-social behaviour) and principle should be to meet experience of rural communities.</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Strongly Agree</p> <p>The housing proposed at the former RHM site would accord with these objectives.</p>	<p>Noted</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS27 THE HOME BUILDERS FEDERATION</p> <p>The policy correctly emphasises the need for good design. The HBF encourages the use of Building for Life 12 (BfL12) to aid discussion upon design issues. Whilst the HBF is supportive of BfL12 and many of our members accord to its requirements it is important that it does not become mandatory for all developments as this would remove flexibility. The HBF recommend the following amendment to the policy;</p>	<p>Noted</p>

<p><i>'2. New housing should be well designed and score highly using the most recent Building For Life criteria, applicants are encouraged to submit their own Building for Life assessment to form the basis for discussions on design quality'</i></p> <p>Criterion 6 of the policy refers to; <i>'incorporating the highest standards of energy efficiency'</i>. Whilst a laudable aim the recent ministerial statement by Eric Pickles, 25th March 2015, identifies that upon commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, expected late 2016, energy performance requirements will be set solely within the Building Regulations, therefore criterion 6 is not required as it cannot be enforced after this date.</p> <p>The NPPF is also clear that development viability is a key component of planning decision making and policy setting. A requirement for development to go beyond the Building Regulations would be likely to place unsustainable burdens upon the development industry and stall development coming forward. It is therefore recommended that this criteria be removed.</p> <p>Paragraph 8.10 refers to the housing standards consultation, this has now been superseded by the ministerial statement, noted above, as well as the amendments to the Planning Practice Guidance (PPG).</p>	<p>Noted but disagree – para 96 NPPF requires energy efficiency & H/pool Rural Neighbourhood Plan seeks to encourage developers to go above and beyond minimum standards.</p> <p>Noted – if developer cannot achieve due to viability reasons a viability assessment should be provided to Hartlepool Borough Council. Where the scheme's viability may be affected, such that an adequate amount of affordable housing cannot be provided, developers will be expected to provide viability assessments which will be submitted as an open book viability assessment. See also policy H2 point 7</p> <p>Noted</p>
<p>HRPS28 PERSIMMON HOMES</p> <p>In terms of GEN 2 Design Principles, Persimmon Homes would echo the concerns raised by the HBF. The policy currently emphasises the need for good design in accordance with paragraph 56 of the NPPF. Persimmon Homes are general supportive this approach but have concerns with bullet-points 2 (Building for Life 12) and 6 (Energy Efficiency) of the proposed principles.</p> <p><u>Building for Life</u></p>	<p>Noted – see responses to Home Builders Federation</p>

<p>The policy states that's the 'new housing should be well designed and score highly using the most recent Building For Life criteria'. Whilst Persimmon Homes support good design in the built environment and look to incorporate the principles of Building for Life wherever possible within our developments, we consider the compulsory submission of a detailed assessment onerous; particularly at a time when Government through the NPPF are looking to reduce the burden of red tape on developers to facilitate sustainable growth.</p> <p>Persimmon Homes therefore suggest that such a requirement is optional as all developments will be accompanied by a detailed Design & Access Statement, the purpose of which is to demonstrate to the Local Planning Authorities and interested parties that the design principles of the proposed development accord with the NPPF and local design policies contained within Local Plans and Neighbourhood Plans. Also restricting development to Building for Life also removes any flexibility the developers have to build to an alternative good design practice guide. Again this is lack of flexibility is consider contrary to the requirements of the NPPF so the policy should be amended accordingly.</p> <p><u>Energy Efficiency</u></p> <p>Bullet-point 6 of the policy GEN2 also refers to; 'incorporating the highest standard of energy efficiency'. Enhancing the energy-efficiency of new homes plays a vital role minimising energy consumption and reducing CO2 emissions which are important considerations in the move towards a low carbon, sustainable society.</p> <p>As set out by the HBF, the government announced plans in March 2014 to consolidate housing regulations and standards, including the scrapping of the Code for Sustainable Homes in an attempt to rationalise the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.</p>	<p>Noted</p> <p>Para 8.7 to be amended to reflect Design & Access requirements</p> <p>Noted – building for life to be amended – use criteria developed by Hartlepool Rural Neighbourhood Plan</p> <p>Noted but disagree – para 96 NPPF requires energy efficiency & H/pool Rural Neighbourhood Plan seeks to encourage developers to go above and beyond minimum standards.</p>
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<p>To achieve this, the government has created a new approach for the setting of technical standards for new housing. The new system will comprise new additional optional Building Regulations which will set revised national standards for water efficiency, security, accessibility and energy, including a zero carbon standard from 2016 as well as introducing a new national internal space standard. This system will complement the existing set of Building Regulations, which are mandatory.</p> <p>These new national technical standards are expected to come into force in October 2016. From this date, as set out by Eric Pickles in a written ministerial statement on the 25th March 2015, all local energy-efficiency requirements will not be enforceable and therefore any reference made by bullet-point 6 would be ineffectual. It is therefore Persimmon Homes' opinion that this bullet-point should be removed from the policy.</p>	
<p>HRPS29 TEES ARCHAEOLOGY Strongly Agree</p>	<p>Noted</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL HBC recognise the intension of the policy to ensure design is of a high quality. HBC support such a desire. HBC consider that as worded, the policy is too restrictive and not flexible enough. HBC would considered the inclusion of wording such as, where appropriate, where possible or where necessary within the opening sentence as not all development will meet all of the bullet points all of the time and there will be examples where that would be acceptable yet the policy does not allow for non-compliance of any kind.</p> <p>Bullet point 2 - HBC has concerns with regard to Building For Life. HBC does not have an assessor and therefore is concerned about how this</p>	<p>Noted – adjust first sentence</p> <p>Noted – change from building for life to Hartlepool Rural Plan developed criteria.</p>

<p>element will be implemented. HBC are developing a design criteria check list and would request that the rural plan is more aligned to expecting development to be designed with HBC design criteria in mind.</p> <p>Reference to safety, security, crime and fear of crime should be considered.</p> <p>8.7 Design and Access Statements (DAS) are not a requirement on `all` planning applications. A DAS is required with planning applications for major development, for Listed building consent applications and for some other heritage asset applications.</p> <p>Para 8.8 – delete Conservation Area Assessments and make reference to Conservation Area Character Appraisal, the appraisals add wider value along with providing a historical context.</p> <p>8.9 Reference is made to Lifetime Homes, but the standard is not referenced within the policy. Is it the intention to apply the standard, if so it may be more appropriate stating that the principles of the standard are encouraged as the standard may not always exist. Or consider stating that homes should be flexible to the changing needs of residents.</p> <p>8.10 update Government position accordingly and possibly build in wording that will recognise that this area may be subject to change. Alternatively reflecting a more local position/problem and solution may be more bespoke.</p> <p>8.12 The Environment Agency also provides advice on surface water management.</p>	<p>Agree add suitable worded bullet point 10 from rural point of view.</p> <p>Noted – adjust (8.7) add an appendix with checklist for developments and encourage the use of our checklist and for monitoring.</p> <p>Agree – adjust (8.8) accordingly</p> <p>Agreed – add as bullet point 12. Build homes to meet needs of future generations. Adjust 8.9 – reference some points & high elderly demographic and aim of keeping people in their own communities with support networks.</p> <p>Noted – adjust (8.10).</p> <p>Noted – include wording in (8.12).</p>
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POLICY H1 HOUSING DEVELOPMENT

Synopsis

- Access to sites being considered for development
- Consideration for Types of houses relating to the types of people who require them
- Comments on proposed number of houses required in each villages vary
- Question marks over some sites that have been proposed with in some villages

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY.</p> <p>Traffic generation from proposed housing is not at a level where Highways England would formally comment on in terms of congestion as it would generate less than 30 trips at any junction (ref 3/2013). However we have safety concerns regarding the non-grade-separated junctions at Elwick and Dalton Piercy from incremental increases in traffic using Elwick N & S and Dalton Piercy junctions. Options are being considered towards alleviating this.</p>	<p>Noted</p> <p>Highways England contacted in hope of elaborating on graduated separation junction/bypass at Elwick – no response given</p>
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>

HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)

Strongly Disagree

On behalf of my client I have reviewed the above Rural Neighbourhood Plan (HRNP) in the context of their landholding at Hart Village and submit representations accordingly. On their behalf I have completed and attached a proforma questionnaire supported by this cover letter to address the omission of a significant parcel of land and to address inaccuracies within the draft document, finally, this letter requests a review of your proposed land allocation at Hart Village. I also ask that you undertake a review of the Objectively Assessed Needs of the settlement and the deliverability/ Suitability/ availability of the proposals you advance. In this letter I refer to the Hartlepool SHMA (2015), SHLAA (2014), Emerging and adopted Local Plan and a Policy update statement from HBC 2014. For clarity I attach a copy of my client's landownership plan, the SHLAA extract from the 2014 assessment and an extract from your document.

My client owns the freehold of the land associated with Home Farm including land to the south and east of Glebe Farm, which has been identified in various Strategic Housing Land Availability Assessments (SHLAA) as being suitable for development within the next 15 years, some in years 0-5. The sites are outside of the current development limits and have historically been divided into two distinctive parcels of land known as Sites 30 and 31.

In 2013 Sites 30 and 31 were considered suitable for development within years 6-10 with a potential yield of circa 103 units. The breakdown is detailed below.

A subsequent review of the SHLAA process and an updated Draft Final Report December indicates the site is now, following formal submissions, annotated as Sites 4, 5 and 6 as having a yield of 81 units in the first 15

The Hartlepool SHMA has been consulted. The Rural Plan Group is in consultation with Hartlepool Borough Council.

While accepting the sites mentioned in this response are deliverable all sites considered deliverable are not brought forward into Local Plans - there are a great many sites across the Borough but selecting all would far exceed the housing needs of the area. The Rural Plan Group have assessed sites around Hart and chosen enough to meet the needs of Hart in what they believe to be the best deliverable site that will provide a natural extension to the village and also provide the most suitable environment more conducive to the quality of live residents might expect, for example away from the increasingly busy A179.

years with approximately 27 units available within years 0-5.

Within the HRNP (2015-2029) a 15 year timeframe is applied in accordance with the latest SHLAA document. Policy H1 HRNP identifies that within Hart Village only Site 4 (of my clients land interests) is deliverable with an allocated number of units of between 15 and 17 and the potential to provide a significant area of open space. Clearly this does not allow for an efficient use of land and excludes the wider land take potential.

Draft Policy H1 of the HRNP refers to a 15 year supply of housing land within the rural areas of “at least 117 new dwellings” in the Plan area by 2029. This we are told equates to a requirement to provide 30-34 units in Hart Village up to 2029.

This Rural Areas Document seeks to identify the eastern part of 9 acres (eastern part 3) within Hart within Council ownership for 15/17 units. This land has not been formally assessed for its deliverability and sustainability by Hartlepool Council (The current land owners). There are more sustainable options which are eminently more deliverable.

The justification provided by Draft HRNP for the proposed allocations states that the Plan has relied upon evidence in the SHLAA undertaken to evidence the emerging Hartlepool Local Plan. The SHLAA report states that a sites inclusion or otherwise does not confirm that a site has been justified robustly. Paragraph 8.28 of the Draft HRNP identifies that the site should provide a mixture of house types, mainly two bedroom houses and bungalows laid out around an open space and should contribute towards the provision of the “proposed” Community Open Space. There is no reasoned justification for the house types or the provision of open space on these sites and indeed there is no justification for what appears to be a constrained number of residential units which does not accord with the Local Plan evidence base for this settlement. Whilst there remains no Objectively Assessed Need (OAN) in Hartlepool, stipulating housing

The Rural Plan seeks to provide incremental growth in keeping with the size of Hart village.

The major new open space proposed for Hart, which compared with the other villages has limited public open space, would be developed on the Nine Acres site which is Local Authority owned and therefore more likely to be deliverable.

Nine Acres site is in the SHLAA (site No3)

Hartlepool Borough Council SHMA consulted but may need to be reassessed as result of findings from Housing Needs Survey conducted by Rural Plan Group. Provision of open space seeks to provide high quality living environment for residents and in the interests of community building, safety, health, etc. Need identified during consultation in Hart.

numbers, this document is currently unreliable.

It is understood that neighbourhood planning provides local communities power to share a vision of the way their towns and villages are shaped through assessed growth however without a rational assessment of need (OAN) and site deliverability we cannot support the proposals.

The neighbourhood planning tool seeks to ensure that communities get the right type of development for their community where the ambition of the neighbourhood is “*aligned with the strategic needs and priorities of the wider local area*”. In this regard NPPF paragraph 16 is clear that neighbourhoods should:

- Develop Plans that support the strategic development needs set out in Local Plans, including Policies for housing and economic development.
- Plan positively to support local development, shaping and directing development in their area which is outside the strategic elements of the Local Plan.
- Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their Neighbourhood Plan to proceed.

We understand that where a Neighbourhood Plan is brought forward before an up to date Local Plan is in place, the qualifying body and the Local Planning Authority should discuss and aim to agree the relationship between Policies in:

- The Emerging Neighbourhood Plan.
- The Emerging Local Plan.
- The Adopted Development Plan.
- With appropriate regard to National Policy and Guidance.

Needs identified by H.B.C. SHMA & Rural Plan Housing Needs Survey.

Noted

Rural Plan Group working closely with Local Authority

It is in this regard that we query the scale of development proposed and the time period in which the delivery of the housing numbers are suggested. We are of the opinion that the numbers are low and the timing of the delivery. We assume that 30-34 houses could be delivered in Hart up to 2019 (Rather than the stipulated 2029), then beyond this timeframe there should be a further allowance to reflect the Governments Growth Agenda enshrined in NPPF specifically to boost the supply of housing.

We would see clarification and amendment to the proposed housing allocations within your neighbourhood document to include the delivery of residential development of all of the land identified within my client's ownership, over the 15 year period of the Neighbourhood Plan as detailed in the table below as supported by the 2014 SHLAA.

Document	Date	Site reference	Potential Yield	Suitable
SHLAA 2013	October 2013	30 & 31	37 & 66 (Total 103)	Yes
SHLAA 2014	December 2014	4,5 & 6	27, 36 & 18 (Total 81)	Yes
Draft HRNP 2015	18 February 2015	Hart Glebe Farm East 4	15-17 (Total 15-17)	Yes

The table above indicates the relationship between my clients land potential yield as assessed within the HBC SHLAA off-set against the HRNP assessment of a smaller percentage of the land.

Of further note is the March 2015 SHMA which states that the future of the Hartlepool Housing Market will be determined as follows;

The aim of the Rural Plan Group is to seek gradual incremental growth over the plan period rather than for villages to 'explode'. This is in the interests of protecting the character and social cohesion of the rural communities while meeting the needs of future generations and allowing any new residents the ability to be integrated into the existing social structures. Consultations identified the high value set upon the strong community provided by the villages.

“The population of Hartlepool Borough is estimated to be 92,600 in 2014 27 and this is projected to increase by 5.5% to 97,400 by 203728. Over the next few decades, there will be a marked increase in the number and proportion of residents aged 65 and over which is expected to increase by 50.6% from 17,000 in 2014 to 25,600 in 2037.”

A key driver in determining the tenure and type of future development is stated in the SHMA as including:

- The need to continue development to satisfy household aspirations, in particular the development of detached and semi-detached houses and a range of property sizes to offset identified market imbalances;
- Developing an increasing range of housing and support products for older people;
- Delivering additional affordable housing to help offset the identified net shortfalls; and diversifying the range of affordable options by developing intermediate tenure dwellings and products; and
- The economic viability of delivering affordable housing on site across Hartlepool Borough.

The SHMA also identifies at Table B9 the overall annual net affordable housing requirements for Hartlepool Borough by ward, designation (general needs and older person) and property size 2014/15 to 2018/19. What is acutely clear is that the General need for the Hart Ward is for 5x 2 bed properties and 32 x 3+ beds. The Net total for the ward (Deducting Old person) is 32 affordable units. Affordable housing includes social rented, affordable rented and intermediate tenure dwellings. New affordable development by Registered Providers will be affordable rented (with rents of up to 80% of open market rent) and in order to recommend an appropriate split between social rented and intermediate tenure, Table B10 summarises the preferences of both existing households in need and

Noted – increase in proportion of residents over 65 could suggest need for developments to include more bungalows and therefore reduced yield from housing sites.

Noted

Hart Ward differs from Hart village or parish and includes large part of urban Hartlepool. Rural Neighbourhood Plan only has to concentrate designated Rural Plan Area.

newly forming households by tenure. Overall, this gives a tenure split of 70.4% social/affordable rented and 29.6% intermediate tenure across Hartlepool Borough.

To deliver the required 32 Affordable units over the period to 2029 in the Hart Ward alone would require the delivery of some 107 units. This is based upon Policy H2 of the HNRP which requires 30% (27.5%) affordable provision on development sites of 5 or more units or on land greater than 0.4ha. The proposed housing allocation for Hart of a maximum of 34 units will only yield the delivery of 9 units over the next 15 years (should viability allow).

The Hart Ward (The northern area in the HRNP) has a requirement to deliver 32 affordable units which equates to the delivery of 107 units on the northern area alone. Clearly the proposed allocation cannot sustain the future needs of affordable housing. For this reason alone the numbers should be increased to reflect this identified need.

The Housing Need in Hartlepool as a whole has been under severe scrutiny. HBC has now accepted (Nov 2014 – Planning Policy Justification Statement) that there has been a record of persistent under delivery of housing. As a result there is a requirement to significantly increase the provision over the first 5 years by an additional 20% (moved forward from later in the plan period). In the years 2015/16 to 2019/20 which constitute the next 5 years, the Council cannot demonstrate a 5 year supply of deliverable housing sites. Currently the Council is approximately 290 dwellings short of demonstrating a 5 year supply, which equates to a 4.2 year supply of deliverable housing sites. What this means is that housing decisions for potential development sites will be made in accordance with the Development Control Policies of NPPF specifically Paragraph 14. It is incumbent upon the HRNP to get it right and allocate sufficient housing land in a deliverable and sustainable manner.

My clients land is not only deliverable but has been shown to be

Noted – leaving strategic sites to Hartlepool Borough Council

sustainable with no encumbrance upon title. It is available now and could assist in delivering the requisite numbers of housing required over the 15 year period and assist in delivering the assessed need for affordable housing in the Hart Ward.

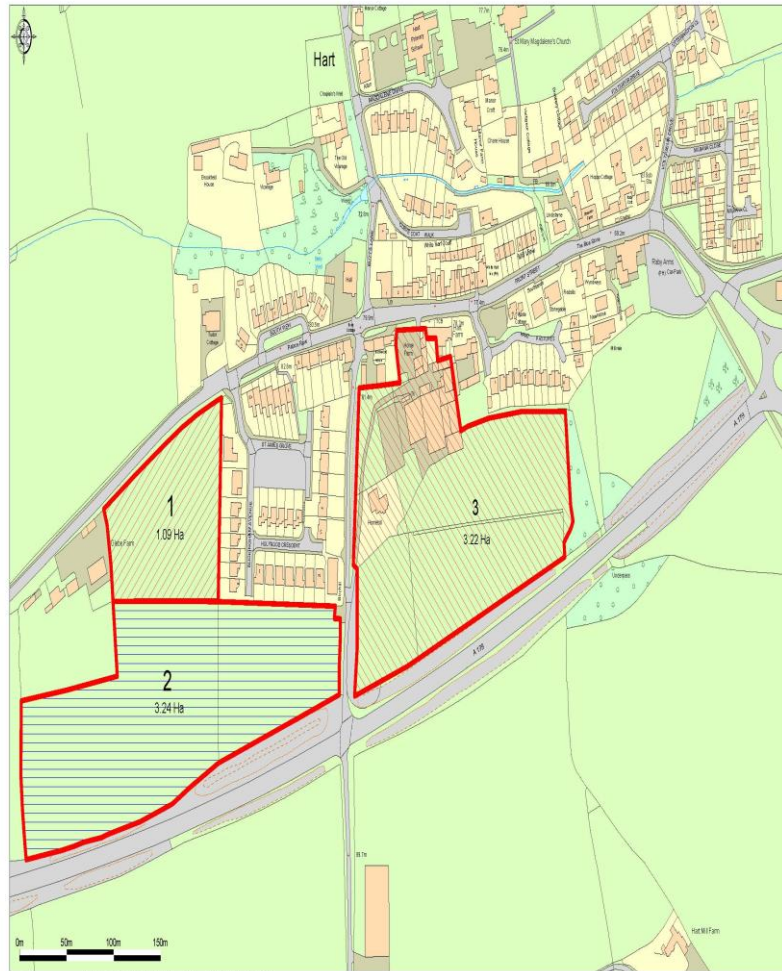
In summary, we object strongly to the exclusion of the wider land take potential in Hart, we also object to the limited site yield proposed for a sustainable, deliverable site with road frontage access. Our representations request the amendment of Policy H1 to reflect the wider allocation of land at Hart to deliver the following;

Site	Open Market Yield	Provision of Affordable	Timeframe (years)
Glebe Farm East (4)	27	Yes	0-5
Glebe Farm South (5)	36	Yes	5-10
Home Farm (6)	18	Yes	10-15

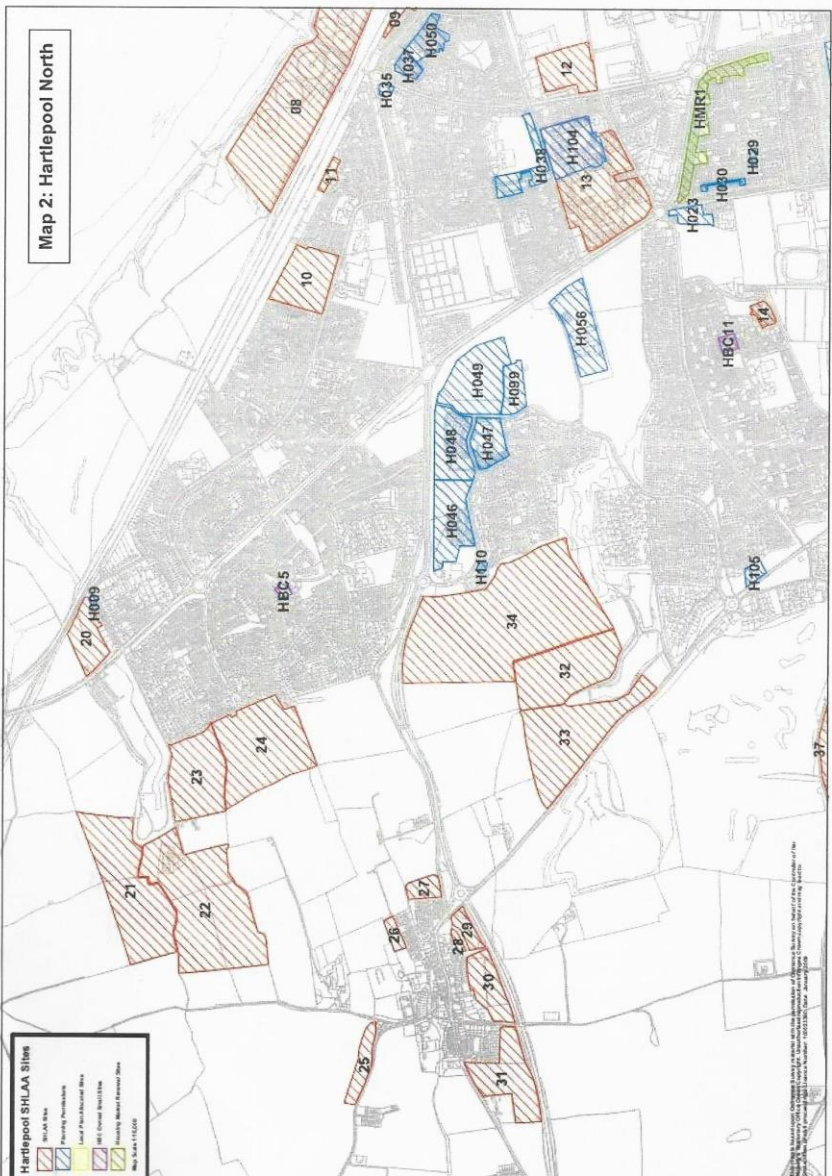
We look forward to receiving your written confirmation that you are in receipt of these representations. Should you wish to discuss my clients land holding and potential for allocation please feel free to call me directly.

Noted but Rural Plan Group have chosen what they consider to be best sites for reasons stipulated earlier.

Noted – see responses above.



Map 2: Hartlepool North



Site Ref	Site Name	Ward	Sequential Approach	BF/ GF	Site Area	Net Developable Area	DPH	Yield	0-5 years	6-10 years	11-15 years	15 Years +	Major Issues & Constraints	Comments	Class
26	North of Voltaire Drive	Elwick	Urban Edge/Countryside	GF	0.48	0.39	25	10	0	0	10	0	RSS and Local Policy issues so 11-15 years. Believe to be a ransom strip leading to the site. Reduce yield to 25ha for bigger high end units.	Will check the ransom strip and review in future.	Dev
27	East of Millbank Close	Elwick	Urban Edge/Countryside	GF	0.84	0.68	25	17	0	0	17	0	Would effect Hart Village Strategic gap (RSS policy). Outside village envelope.	RSS and Local Policy issues so 11-15 years	Dev
28	North of Raby Arms Paddock	Elwick	Urban Edge	GF	0.2	0.2	25	5	0	5	0	0	Outside of current village envelope	Small site to merge with site 29. Both in the same ownership but were submitted separately.	Dev
29	Raby Arms Paddock	Elwick	Urban Edge	GF	0.77	0.63	25	16	0	16	0	0	Outside of current village envelope	Small site to merge with site 28. Both in the same ownership but were submitted separately.	Dev
30	Home Farm	Elwick	Urban Edge	GF	2.41	1.49	25	37	0	37	0	0	Outside of current village envelope. Steep gradient will reduce the yield.	Reduce developable area by 30% due to steep gradient of site.	Dev
31	Glebe Farm	Elwick	Urban Edge/Countryside	GF	4.3	2.66	25	66	0	66	0	0	Potential constraint to develop site due to steep gradient from the A179 Hart Bypass.		Dev



Shales No	Site Name	Ownership	Suitable		Size	Yield	Notes	Years				
			1	2				0-5	6-10	11-15	15+	
4	Glebe Farm East	Private	Yes		1.1	27		27	0	0	0	0
5	Glebe Farm South	Private	Yes		3.1	36	Need to one in with site 4 due to access, half yield due to access constraints.	0	36	0	0	0
6	Home Farm	Private	Yes		3.6	18	quarter yield due to constraints	0	0	18	0	0
7	Raby Arms	Private	Yes		1.1	23	Planning permission granted on appeal 8/9/14	0	0	0	0	0
8	Bulls Lane	Private	Yes		1.7	21	half yield due to constraints and buffer to protect countryside	0	0	21	0	0
9	East of Millbank Close	Private	Yes		0.9	22		22	0	0	0	0
10	Hart Small Holdings East	HGC	Yes		21.2	15	Quarter yield due to constraints, church etc some small scale. (6/10/15) development may be suitable where the site adjoins the village boundary.	0	15	0	0	0
11	Clawering Community Woodland	Private	No		8.5	191	Not achievable without significant environmental damage and unsuitable to look at. Two birds yield.	0	0	0	0	0
12	Clawering West	Private	Yes	15+	14.6	219	1-5 years if the ransom strip can be sorted out. (10/5 - 10 years.	0	0	0	0	175
13	West of Applewood Close	Private	Yes		0.8	20	same as site 12, half yield due to buffer	0	20	0	0	0
14	Nelson Farm East	Private	Yes		4.7	53	same as site 12, half yield due to buffer	0	0	0	0	53
15	Nelson Farm Central	Private	No		2	45	Possible to come forward as a long term plan, other sites would need developing before this one. Ownership issues?	0	0	0	0	45
16	Nelson Farm West	Private	No		13.7	306	Can only be developed if area to the east comes first. Could only come forward later in the plan period if at all.	0	0	0	0	306
17	Nelson Farm North	Private	No		9.4	208	Can only be developed if area to the east comes first. Could only come forward later in the plan period if at all.	0	0	0	0	208
18	Seasview	Private	No		8.3	187	unsuitable due to topography	0	0	0	0	0

<p>HRPS21 WYNYARD RESIDENTS ASSOCIATION</p> <p>Do the numbers constitute development to meet the sustainability statement for schools etc as set out in the introduction to the plan?</p>	<p>Noted – limited growth would be covered</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Strongly Disagree</p> <p>The former RHM Site should be developed for housing to help meet the housing deficiencies in Hartlepool.</p> <p>As highlighted in the attached letter, it is considered the former RHM site, a brownfield site, could be brought forward for a housing led mixed use development that could incorporate a park and ride facility and other community facility associated with the nature areas. Such a development would support the local economy and rural tourism.</p> <p>On behalf of our client, Darnham Ltd, I hereby submit a completed consultation questionnaire and provide representations below in relation to policy EC3 regarding land known as the ‘former RHM site’.</p> <p>The site is a redundant industrial site located either side of Marsh House Lane 370m to the south of Greatham to the immediate south of the railway line and a group of four existing residential properties. The site measures approximately 12 hectares and previously contained a mix of industrial buildings up to two-storeys in height but has now been cleared and is therefore a previously developed brownfield site.</p> <p>It is noted that within the draft Rural Plan the former RHM site is promoted as having the potential to deliver a community and leisure use such as a park and ride facility associated with the re-opening of Greatham train station, a visitor centre and a solar energy installation.</p> <p>The draft policy also states any development should enhance the landscape and should not increase traffic movements when compared to</p>	<p>Noted</p> <p>The re-opening of Greatham Station is aspirational</p>

the previous industrial use. This consultation document also confirms that proposals have been included in the Tees Valley Metro Project for the re-opening of Greatham Station. The consultation draft Rural Plan proposes that the northern part of the site adjacent to the rail line would be suitable for a park and ride facility.

Whereas the provision of community and leisure facilities and a park and ride facility are clear aspirations for the site, this is only appropriate, and could only be delivered, in conjunction with new housing being provided on the site therefore it is proposed that policy EC3 (and other relevant policies of the consultation draft) should be amended to promote the RHM site for housing.

It is considered that the proposed residential development on the Marsh House Lane site would represent sustainable development and there would be no adverse impacts that would justify refusal of the principle of housing development for the reasons outlined below.

The site is a brownfield site (Local Plan policy Hsg5 seeks 75% housing to be delivered on brownfield land) located just 370m from Greatham and is immediately adjacent to existing housing. Greatham contains a variety of local services and amenities including a primary school, post office, general store, pubs and has a good bus service providing links links to Middlesbrough, Billingham, Norton and Hartlepool. The recent SHLAA also acknowledges the potential for Greatham to increase its population from the current number of around 1,000 occupants by indicating the potential for new housing sites within the village (SHLAA sites 102-106).

With regard to any highways implications, it is clear that the site has a long established use as a major industrial site that included large vehicles accessing the site along Marsh House Lane. Whereas parts of Marsh House Lane narrow, there are no physical constraints to any localised widening therefore it is considered a suitable access can be provided to the site.

While the provisions suggested for the area near Greatham Station are aspirational the facilities in particular associated with what is a burgeoning wildlife site linked to the Environment Agency realignment scheme at Greatham Creek and RSPB interest associated with their site at Saltholme may be delivered without input from a new housing development.

The adjacent housing are the former Station Cottages and the facilities in Greatham are about a mile away and the bus service mentioned even further so any housing development on the former RHM site would be considered isolated.

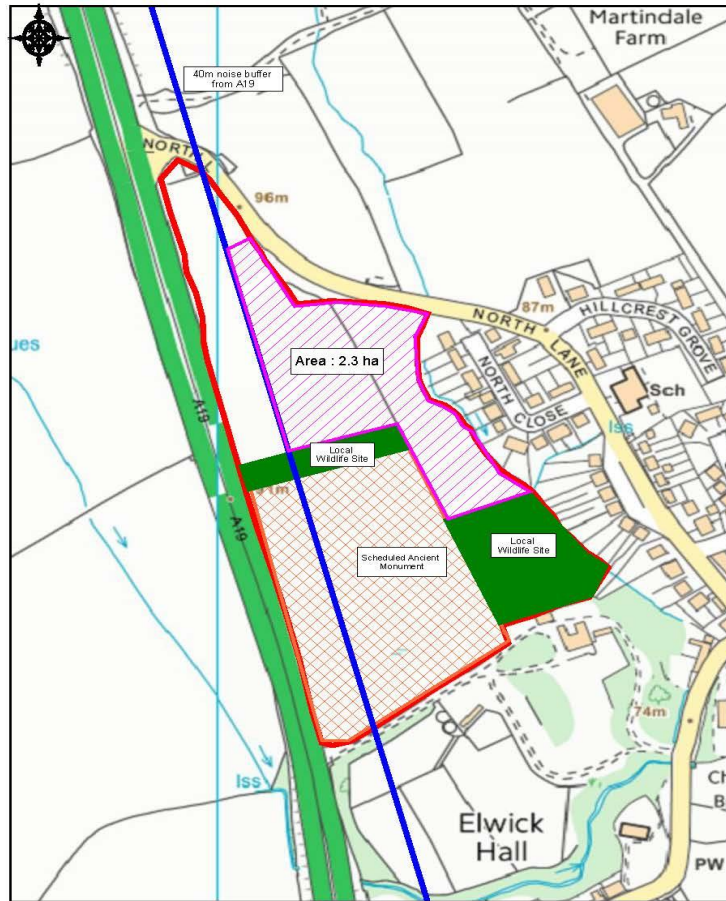
Noted

<p>To the north is open farmland and the scale of the development would allow for appropriate assimilation with this landscape.</p> <p>In terms of the adopted policy context, Hartlepool Local Plan Policy Ind5 identifies the site as an industrial area where B1, B2 and B8 are supported provided there is no significant detrimental effect on highway safety. However, the December 2014 Employment Land Review states the site should be de-allocated from employment use due to the difficulty in gaining HGV access and presence of existing residential properties adjacent to the site. We disagree with this review as the site has development potential.</p> <p>In terms of national policy, the council have confirmed they are unable to demonstrate a five year housing land and by virtue of paragraph 49 of the NPPF, “relevant policies for the supply of housing should not be considered up-to-date” if a 5 year supply cannot be demonstrated. Instead, housing applications should be assessed under paragraph 14 of the NPPF and the presumption in favour of sustainable development. That requires such applications to be granted unless they are not sustainable in terms of the NPPF, any adverse impacts would significantly and demonstrably outweigh the benefits, or other specific policies in the Framework justify refusal. The NPPF supports the development of brownfield sites and it is considered the development of the RHM site would be compliant with the NPPF.</p> <p>I have already discussed the potential for developing the site with Hartlepool Borough Council who have confirmed that there was no objection to the principle of housing on the site could be acceptable, subject to development control issues being satisfactorily addressed.</p> <p>Discussions have also taken place with the Health and Safety Executive (HSE), Office of Nuclear Responsibility (ONR) and Northern Gas Networks (NGN).</p>	<p>The site was marketed for business use prior to demolition with no positive result. The access at the end of a long winding country lane may have contributed to this. The factory was originally located at this site being adjacent to the salt workings and with access to the railway.</p> <p>Noted</p> <p>The Rural Plan Group considers this site to be remote, located at a distance from the adjacent village and not conducive to a sustainable or pleasant environment especially in comparison to other sites available. The site lies in closer proximity to heavy industry including two COMAH sites and the Nuclear Power Station. It is perhaps worth noting the village of Graythorp which was located on the other side of the Conoco Phillips Oil Tank Farm was cleared in the late 70s because of the growth of heavy industry in this locality.</p>
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<p>The HSE state the site is within an outer consultation zone of two hazardous installations and they would not object to a residential development on the site.</p> <p>Northern Gas Networks confirmed that they operate the pipelines that run adjacent to the railway line that borders the site and easements of up to 3m would be required. Such easements can be accommodated.</p> <p>The ONR confirmed the site is not within the consultation zone for Hartlepool Nuclear Power Station and that they would not wish to be consulted on any proposed residential development.</p> <p>Network Rail has not objected to the principle of housing development. The site is not considered to carry any constraints that would preclude development and is available, deliverable, and achievable.</p> <p>Based on the above, the site is considered to be suitable for residential development in conjunction with delivering the desired community facilities. Therefore, it is requested that the draft Rural Plan be amended to include the former RHM site as a housing allocation.</p> <p>I trust that you have all the information required to reconsider the proposed designation for the site and would be grateful if you can please confirm safe receipt of this submission. I would be interested in meeting to discuss the content of this letter and the consultation draft Rural Plan further if you would like to contact me on the number below.</p> <p>If you require anything further in the meantime, please do not contact us.</p>	<p>See Network Rail response for concerns regarding access via level crossing in Marsh House Lane.</p> <p>Rural Plan Group prioritising sites to meet identified needs, the former RHM site is certainly not considered to be the best from selection available. Concerns existing in Greatham about noise and smells from the industrial areas – this proposal would provide housing even closer to the industrial causes.</p>
<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Strongly Agree</p> <p>We strongly support the need for at least 170 dwellings in Hartlepool Rural area. Villages should be allowed to expand to meet the current and future needs of the settlement, both to maintain vitality and viability of local services and facilities and retain population and encourage the retention</p>	<p>Agree – the figures will be re-assessed</p>

<p>of young families.</p> <p>Only 98 dwellings (plus Dalton Piercy) have been identified for allocation. There is therefore an identified shortfall of 72 dwellings which needs to be addressed.</p> <p>We propose a site for allocation adjacent to Elwick (please see attached) which would help meet the identified shortfall.</p> <p>The proposal would be for low density, high quality family houses and bungalows of 2-5 bedroom properties. The site is 2.3 ha and based on a developable area of 80% and a dwelling density of 20dph the site could deliver 36 dwellings.</p> <p>The site is well located to minimise impact on existing properties and will help support existing village services and facilities. The site is constrained to the west by the A19 and to the south by the identified Local Wildlife Sites and Scheduled Ancient Monument (Fishpond, Enclosures and Section of Field System 165m North West of Elwick Hall).</p>	<p>Includes those with planning permission – 68 have existing permissions though not yet provided.</p> <p>Noted – Rural plan group consider they have identified best sites in terms of deliverability and desirability. Site proposed here is adjacent to the A19 with all the negatives of being alongside a very busy noisy major road. There would also be potential negative impact on wildlife, archaeology and ancient monuments. The adjacent beck has flood concerns too.</p>
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Land at Elwick



Promap
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Location Plan

<p>HRPS27 THE HOME BUILDERS FEDERATION</p> <p>The policy refers to a requirement of; <i>‘at least 170 new dwellings will be developed in the plan area by 2029’</i>. The HBF is supportive of the requirement being identified as a minimum, this accords with the NPPF requirement for plans to be positively prepared.</p> <p>It is, however, unclear how the figure of 170 new dwellings has been derived and whether this may need to change as a consequence of work upon the emerging Hartlepool Local Plan. It is important that the Rural Plan remains consistent with the emerging Local Plan and its evidence base. If work upon the Local Plan identifies a higher housing requirement within the rural area this will need to be reflected and considered.</p> <p>The table identifies very specific figures for individual sites based upon work undertaken as part of the SHLAA. It is unlikely that these figures will be accurate in all instances once development proposals have been submitted or indeed if other sustainable sites come forward. It should also be noted that the figures for allocations and commitments add up to a maximum of 169 dwellings, this is insufficient to meet the plan requirements of at least 170. To be consistent with the ‘at least’ stance of the policy it is recommended that the figures for individual villages are identified as indicative minima and additional sites are considered. The proposed HBF modifications to Policy GEN1 also assume greater importance as without additional sites the housing requirement will not be met.</p>	<p>Noted</p> <p>The housing figure (p.21 & p.22) has been derived from potential of proposed allocation in the neighbourhood plan and undeveloped sites with existing planning permissions.</p> <p>Noted – wording to be adjusted in plan to read ‘approximately 170’ and column giving allocation to read ‘Max. No. allocated’ These are in addition to strategic sites which will determined by Hartlepool Borough Council.</p> <p>Noted</p> <p>Number of sites allocated sufficient for plan period and to deliver limited incremental growth suited to the village situation.</p>
<p>HRPS28 PERSIMMON HOMES</p> <p>Policy H1 Housing Development allocates a number of sites around the Rural Plan area to accommodate the identified level of housing growth over the next 15 years. Whilst Persimmon Homes are pleased to see that the Neighbourhood Plan commits to a <u>minimum</u> target of new dwellings</p>	

over the plan period, we have a number of fundamental concerns with the policy as proposed and its relationship with other policies of the Plan.

Allocations

At this moment in time, as discussed, Policy Gen1 Village Envelopes restricts development to only where it accords with site allocations and designations. Future residential development in the area would therefore be limited to the existing commitments detailed within the table accompanying paragraph 8.23 and the proposed allocations and windfall sites identified within Policy H1 Housing Development. Considering that two of the locations at Dalton Piercy and Newton Bewley included within Policy H1 are for infill development only of 'less than 5' units, the best case scenario is that these sites are expected to deliver 4 units each. When these units are combined with the remaining allocations and the existing commitments the total number of units equals 169, below the minimum target of 170 units. In this regard, Persimmon Homes believe that the plan is fundamentally flawed as its policy objectives are simply not deliverable given the proposed policy constraints.

To resolve this issue, Persimmon Homes recommend reviewing the proposed allocations for further capacity over and above the yield detailed within Policy H1. Notably, Persimmon Homes have promoted the site at North Farm (Elwick) through the now withdrawn Local Plan, the 2014 SHLAA process and more recently the earlier stages of consultation on the Neighbourhood Plan. In reviewing the draft Neighbourhood Plan, our attention has been drawn to the fact that whilst the village envelope has been drawn around Persimmon Homes' land interests suggesting that the site is acceptable in principle for development, the North Farm allocation does not accord with our representations. Persimmon Homes therefore believe that there is scope at North Farm Elwick for an increased allocation across the larger site identified below which will increase the housing numbers within the plan and therefore overcome our fundamental

Noted – the policy will be amended to allow for windfall/infill within the village envelopes and subject to fulfilling other policy considerations contained in the Rural Neighbourhood Plan. The wording to section 8.2 will also be amended.

Noted – numbers to be adjusted and wording changed from 'at least' to 'approx.'

Number of sites allocated sufficient for plan period and to deliver limited incremental growth suited to the village situation. 39 is a significant development in relation to the existing size of Elwick village.

concerns outlined above. We would therefore request that the allocation is amended to be drawn as follows.



The site at North Farm is included within the most recent Hartlepool SHLAA (2014) and has been identified as a 'deliverable and development' site with capacity for 50 units. The cogency of the site as a location for residential development is well demonstrated by the previous allocations within the withdrawn Local Plan and this approach would allow for the village's boundary to be set by a meaningful landscape masterplan, based upon clear landscape, townscape and technical considerations.

Persimmon Homes would also strongly recommend that the table within Policy H1 is amended so that the final columns read 'Indicative Yield' rather than 'No Allocated' so as not to act as a constraint upon the site and ensure from the outset that the plan provide sufficient flexibility for the sites to respond to changing needs. The scale and character of the

North Farm has existing permission for 14 homes, Hartlepool Borough Council suggest expansion to 39/40 which is accepted as still within incremental growth and actual need.

Noted – wording on table to be adjusted to 'max. No. allocated'

sites could then still be governed by other policies in the plan to ensure that all development remains commensurate to the size of the settlement.

Calculating the Housing Requirement

In addition, Persimmon Homes also wish to express concerns with how the minimum target of 170 dwellings over the plan period has been calculated. The NPPF is clear in so much that it requires plans to be 'positively prepared' and 'aspirational but realistic'. Unfortunately, as set out within paragraph 8.16 of the Neighbourhood Plan, the housing requirement is based upon an aim to 'continue on a similar scale in the form of small scale incremental growth, conversions and infilling.'

Persimmon Homes would therefore suggest that the calculations to arrive at this figure of 170 units are inconsistent with the approach outlined within the NPPF. The Company fail to see how this approach is supported by an appropriate evidence base to ensure that plan meets the full housing needs in the area; how this represents a positive approach to meeting the future housing requirements or how this is sufficiently aspirational to contribute toward boosting the supply of housing at a local level. The National Planning Policy Guidance is clear and confirms that:

"Where a neighbourhood plan comes forward before an up to date Local Plan is in place, the local planning authority should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress and to share evidence used to prepare their plan.

Neighbourhood plans should deliver against the objectively assessed evidence of needs."

The current approach to establishing the housing requirement cannot be supported by Persimmon Homes as it is contrary to condition 'a' as set out within in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. Work should therefore be

Scale and character to be governed by policies

We are being positive and aspirational – this is not at odds with seeking small scale incremental growth in the villages rather than these strong valued communities being overwhelmed by excessive estates – the plan is allowing space for strategic sites which are coming forward on the urban edge.

170 includes existing permissions

Group have conducted a housing needs survey and looked at Hartlepool Borough Council SHLAA.

Consultations undertaken have shown clear desire to preserve character of the villages. The group have looked at sites and considered density. Desirability is to mirror existing good examples in the villages including density and provision of community spaces (eg. Dalton Piercy College Close & Elwick The Paddock).

Group is working with local planning authority

Housing needs survey done.

undertaken with Hartlepool Borough Council to establish an objectively assessed housing need for the area which can be used to inform the Plan.

Paragraph 8.26

Persimmon Homes also object to paragraph 8.26 of the Neighbourhood Plan. The paragraph attempts to dictate the location and type of affordable housing to be provided on site. The paragraph reads as follows:

“Elwick: The site to the north of Potters Farm to be integrated into the sites at North Farm with no further access being created across the village green. A mixture of house types and sizes should be provided including two bedroomed homes set around incidental open space. (Further information to be added from Newcastle University Design Project)”

Persimmon Homes consider it highly unreasonable for a policy to dictate the details of the house types and layout prior to a full technical and viability appraisal being undertaken. Such a stipulation could prevent the development coming forward. Instead the supporting text should read that the affordable housing provision should be representative of the identified affordable housing needs with affordable units located at appropriate locations within the development. This would provide the document with sufficient flexibility should the evidence base be updated.

Whilst Persimmon Homes understand that many communities, particularly those in rural areas may be averse to allowing new house building, we believe that new development is vitally important to ensure the long term vitality of rural communities. When designed correctly at a level commensurate with the existing villages, new development can complement and enhance the existing character of rural area and bring with it an influx of new residents which will in turn help to support local shops, services and bus routes. We believe that the current approach to allocating housing within the neighbourhood plan area is fundamentally flawed for the reasons set out above and therefore strongly request that

Plan does say subject to viability assessments.

Noted

Noted – designed correctly at a level commensurate with the existing village – the plan endeavours to clarify commensurate as limited incremental growth in sympathy and keeping with existing village.

Policies are based on robust evidence base and site assessments including Hartlepool Borough Council evidence and housing needs survey undertaken by rural plan group

<p>our recommendations are taken on board to address the outstanding issues prior to the next stage of the plan making process to create a robust and deliverable Neighbourhood Plan.</p>	
<p>HRPS29 TEES ARCHAEOLOGY</p> <p>The majority of proposed housing sites have archaeological potential due to being within or adjacent to the historic villages. Archaeological evaluation would be required on most of these sites (please note it has already been carried out at Mellanby Lane, Greatham and North Farm, Elwick).</p>	<p>Agree – will look to include need for archaeological evaluations to housing sites within or adjacent historic villages.</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>HBC would encourage the plan group to provide further information with regard to where the figure of 170 dwellings over the next 15 years derives.</p> <p>HBC note the inclusion of housing sites within the policy.</p> <p>Policy as worded does not allow for the likely scenario that significant areas of housing growth will be in the rural plan area outside the urban area.</p> <p>HBC can confirm that the Elwick site and Hart sites were considered as part of the Council’s SHLAA and were deemed appropriate for housing development.</p> <p>The infill options for Newton Bewley and Dalton Piercy are noted. Infilling options may be appropriate when considered against the 2006 Hartlepool Local Plan. Development at Newton Bewley must have regard to the A689; the current Local Plan policies seek to prevent additional access and intensification of access onto the A689.</p> <p>HBC can confirm that the SHLAA did not consider any sites adjacent to Dalton Piercy and Newton Bewley as appropriate for housing</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agree – add paragraph for Newton Bewley and mention need to have regard to A689 and seek to prevent additional access and intensification of access onto A689.</p> <p>Noted.</p>

<p>development.</p> <p>Two of the four Greatham sites were included in the Council's SHLAA. SHLAA site 106 Hill View/Saltaire Terrace was considered to be a suitable housing site within the SHLAA.</p> <p>SHLAA site 104 includes parts of the Mellanby Lane site. The site was deemed to be a suitable site providing that adequate access arrangements can be achieved</p> <p>The rear garden of 15 High Street and Grove House Nursery were not considered the SHLAA, however both sites are within the existing limits to development and therefore providing that all the necessary requirements in all other policies are satisfied then development is acceptable within the locations.</p> <p>Consider drawing attention to the status of Grove House Nursery Sites, which is a locally listed building at the centre and that any development should consider the setting of this building.</p> <p>HBC would seek to ensure that all land owners have been contacted and that the sites are available for development.</p> <p>HBC have not published a preferred options local plan and therefore HBC have not yet determined which sites are most appropriate. HBC would expect the rural plan group to have sufficient justification for choosing some sites over others.</p> <p>The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p>	<p>Noted</p> <p>Noted - review access and adjust site on map.</p> <p>Noted</p> <p>Noted – adjustment to be made</p> <p>Landowners have been consulted</p> <p>Noted</p> <p>Agree</p>
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POLICY H2 AFFORDABLE HOUSING

Synopsis

- Affordable housing is questioned as viable without sufficient amenities
- Fear that affordable housing may encourage a breakdown in the social makeup of the village
- Guarantee that units provided remain affordable (when the 2015 Government manifesto made a commitment to extend the right to buy to tenants in HAs to enable more people to buy their own homes)
- Right choice of affordable housing

Comment	Response
<p>HRPS2 THIRTEEN</p> <p>Agree</p> <p>A Government exclusion report with regards to RTB/RTA currently covers these villages and as such further clarity is required from Ben Holmes.</p>	<p>Noted (RTB/RTA = Right to Buy/Right to Acquire)</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>

<p>HRPS21 WYNYARD RESIDENTS ASSOCIATION</p> <p>8.32</p> <p>27 affordable homes/ year for 5 years = 135 but H1 has a total of 170, therefore leaving only 35 for all the other categories of 3+ bedrooms and bungalows. There is a stated need for bungalows for downsizing in the plan.</p>	<p>Figures to be checked/updated with 2015 SHLAA</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS27 THE HOME BUILDERS FEDERATION</p> <p>The policy identifies an affordable housing threshold of five or more units, this is contrary to the PPG and the ministerial statement, 28th November 2014. These identify a lower threshold of 6 units or more within designated rural areas. The 0.4ha threshold has also been replaced by 1,000sqm gross internal floor area and as such should not be used. Providing the whole of the 'Rural Plan' area is a designated rural area under section 157 of the Housing Act 1985 the policy should be amended to reflect this. If not the higher threshold must be used.</p> <p>Part 1 of the policy also indicates that the policy will relate to changes of use and conversions. This is contrary to the PPG and ministerial statement which introduces a vacant building credit. The vacant building credit is discussed in detail within the PPG (paragraphs 23b-021 to 023). The HBF therefore recommend the following amendments to part 1 of the policy;</p> <p><i>'Affordable housing will be required in applications for residential development that consist of a gross addition of five six or more dwellings' (or 0.4 hectares). These include residential new build, renewal of lapsed-unimplemented planning permissions, changes of use and conversions'</i></p>	<p>Noted- PPG guidance cancelled in light of High Court ruling. Thresholds to remain. All applications subject to viability (if necessary)</p>

Additional supporting text which acknowledges and explains the vacant building credit would also be beneficial.

Paragraph 8.39 of the supporting text indicates that for developments of between 6 and 10 dwellings on-site provision is preferred due to the small amount of affordable housing which will be provided. Whilst this may be the case the plan cannot insist on on-site provision as this would be contrary to national guidance. The PPG clearly states that where the lower (6 units or more) threshold is applied;

'...local planning authorities should only seek affordable housing contributions from developments of between 6 to 10-units as financial contributions and not affordable housing units on site. Any payments made (whether as an affordable housing contribution or contribution to a pooled funding pot for general infrastructure provision) should also be commuted until after completion of units within the development.' (PPG para. 2a-017)

18. Part 2 of the policy indicates a borough wide need for 27.5% affordable housing. The policy indicates that contributions will be made to assist meeting this target. The policy does not, however, provide any guidance upon the actual policy requirement. The NPPF, paragraph 174, indicates that policy requirements, including those for affordable housing, should be identified with the plan. Plan paragraph 8.32 suggests a 15% target is generally achievable. It is unclear what this is based upon, but if based upon credible evidence this should be utilised as the target requirement. If this level makes development unviable part 7 of the policy would then be invoked. The Council should be updating its Affordable Housing Economic Viability Assessment (2009) to consider current economic conditions and the implications of other policies. This may be useful evidence to assist in setting the affordable housing requirement for the Rural Plan.

Group seek to retain affordable homes within the rural area so people do not have to move away from their communities. Higher land values in rural area make more necessary and viable.

Policy to include target of 18% based on past trends. Subject to viability assessments.

Rural Neighbourhood Plan Group liaises with Hartlepool Borough Council and will have regard to all H.B.C. evidence as this comes forward.

HRPS28 PERSIMMON HOMES

Policy H2 Affordable Housing sets out a number of provisions to control the delivery of affordable housing within the Rural Plan area.

Persimmon Homes must stress that affordable housing can significantly affect the viability of a site and subsequently its delivery. It is therefore essential that the policy acknowledges this and is flexible enough to allow a lower overall provision and/or an alternative tenure mix when it is shown that a development is unviable. In this regard, Persimmon Homes are supportive of the general principle of points 2 and 7 of the policy in which it states that the affordable provision and tenure and mix will have “regard to the economic viability of the development and the most up- to- date evidence of housing need, aspiration and the local housing market”.

However, whilst the policy identifies a borough-wide need for 27.5% affordable housing, the policy does not provide any guidance upon the actual policy requirement with the Neighbourhood Plan area. Paragraph 174 of the NPPF requires policies, including those for affordable housing, to identify the policy requirements so that the cumulative impact of the policies can be assessed and demonstrated not to put at risk the implementation of development and the plan.

In addition, the policy identifies an affordable housing threshold of five or more units which is contrary to the guidance of the NPPG and the ministerial statement of 28th November 2014, both of which identify a lower threshold of 6 units or more within designated rural areas. Therefore in order to comply with national policies and advice, it is essential that the threshold is increased to 6 units or more.

Noted – bullet point 7 - Where the scheme’s viability may be affected, such that an adequate amount of affordable housing cannot be provided, developers will be expected to provide viability assessments which will be submitted as an open book viability assessment. There may be a requirement for the provision of 'overage' payments to be made to reflect the fact that the viability of a site will be agreed at a point in time and may need to be reviewed, at set point(s) in the future.

Group seek to retain affordable homes within the rural area so people do not have to move away from their communities. Higher land values in rural area make more necessary and viable.

Policy to include target of 18% based on past trends. Subject to viability assessments.

Noted- PPG guidance cancelled in light of High Court ruling. Thresholds to remain. All applications subject to viability (if necessary)

HRPS32 HARTLEPOOL BOROUGH COUNCIL

A recent court ruling has led to the deletion of certain sections of the NPPG guidance relating to affordable housing. The impetus of The Localism Act (2011) is that Local Planning Documents should set local thresholds and therefore HBC would seek to ensure that further justification is provided with regard to the 5 unit and 0.4 hectares threshold. Can such size schemes deliver affordable units or may a scheme be rendered unviable? Have these thresholds already been tested? The results from the housing need survey should be linked to this policy.

Have registered providers, for example Thirteen been consulted? and what are their views on possible taking over one or two units? HBC experience has been that they prefer to take on a number of units rather than one or two.

Bullet point 2 – the 2015 SHMA indicates that the borough wide need for affordable housing is now 44% and not 27.5%.

8.37 consider amending the wording to allow for the possibility of providing the housing within the urban area, given the difficulty in obtaining suitable sites this may be the only option. If a site were available the current wording could result in a scenario where the affordable housing is provided some distance away where there might be a closer site in Hartlepool itself.

Noted – high value, high demand, high profit, suggest 5 viable within scheme.
H2 bullet point 7 - Where the scheme's viability may be affected, such that an adequate amount of affordable housing cannot be provided, developers will be expected to provide viability assessments which will be submitted as an open book viability assessment. There may be a requirement for the provision of 'overage' payments to be made to reflect the fact that the viability of a site will be agreed at a point in time and may need to be reviewed, at set point(s) in the future.

Thirteen included in consultation – agree with policy

Evidence to be updated with 2015 SHLAA

Group seek to retain affordable homes within the rural area so people do not have to move away from their communities. Need within rural area. Higher land values in rural area make more necessary and viable.

POLICY H3 RURAL EXCEPTIONS HOUSING FOR LOCAL NEEDS

Synopsis

- Potential back door route for the destruction of the proposed rural corridor separating urban development and the villages. Concern for the protection of the village envelope
- Are restrictions set out in this policy sustainable
- The understanding of “exceptional circumstances for local needs”
- Interpretation of Local needs

Comment	Response
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p> <p>Thirteen Group is currently reviewing Local Lettings Plans to reflect the needs of the villages we serve and the demand for the accommodation to ensure those residents who have resided for many years in the village can continue to do so and that we can provide services to meet their needs.</p>	<p>Noted and welcomed</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS16 HEADLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>

<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Disagree</p> <p>Whereas the thrust of the policy is agreed and the former RHM site could deliver a significant number of affordable units, the restriction to sites of no more than 10 units is not supported as the RHM site could deliver significantly more affordable units.</p>	<p>Noted – this is an exceptions policy 10 is an ample provision</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>Bullet point 5 – HBC has concerns regarding the implementation of this policy criterion.</p> <p>HBC would support further justification with regards to the formation of the criteria, is it similar to that of Thirteen Group for example?</p> <p>Practically what if a resident moves on, but there is no one who meets the criteria to move in, will the property remain vacant? HBC believes the policy wording does not address such eventualities, using the phrase in the first instance.... may be of use.</p> <p>Policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p>	<p>Noted</p> <p>Noted – incorporate into policy</p>

POLICY H4 HOUSING IN THE COUNTRYSIDE

Synopsis

- Use of unused farm out buildings and abuse of the right to build on such sites
- Types of controls and the ability to monitor any planning.
- The understanding of exceptional buildings/housing. Present criteria used is subjective and more guidance is to be provided

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY.</p> <p>Can I refer you to our comments on the recent The SPD from Hartlepool' New Dwellings outside Development Limits'. This is aimed at new development in the countryside which is defined as comprising 1 or 2 buildings or families, and as such these would be unlikely to constitute a material impact upon our network, although depending upon the proposed means of access there may be a road safety or operational consideration.</p> <p>Whilst we would not have any specific comments on the Consultation Document we would wish to be consulted on any development which would potentially impact upon the operation of our network whether that be though capacity, safety or operational grounds. We would then assess each site on its individual merits against any relevant policy at that time.</p>	<p>Noted</p> <p>Noted</p>

<p>HRPS2 THIRTEEN GROUP Agree</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree</p>	<p>Noted</p>
<p>HRPS16 HEDLEY PLANNING SERVICE (FOR CLIENT HOME FARM, HART) Agree</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY This policy sets out the criteria for the development of housing outside the village envelopes. With respect to foul sewage, the first presumption must be to provide a system of foul drainage discharging to public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.</p>	<p>Agree – add comment on foul sewerage to policy</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD) Strongly Disagree The RHM site is a brownfield site that has previously been occupied by large industrial buildings and is therefore considered to be appropriate for housing. Developing this site will help preserve other more sensitive site from development.</p>	<p>The Rural Plan Group considers this site to be remote, located at a distance from the adjacent village with its facilities and not conducive to a sustainable or pleasant environment especially in comparison to other sites available. The site lies in closer proximity to heavy industry including two COMAH sites and the Nuclear Power Station. It is perhaps worth noting the village of Graythorp which was located on the other side of the Conoco Phillips Oil Tank Farm was cleared in the late 70s because of the growth of heavy industry in this locality.</p>

<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy H4 deals with housing in the countryside. New housing is required to be sensitive to the heritage assets of the area. Building conversions are required to avoid extensive alteration, rebuilding or extension. In respect of both it is necessary to have regard to the impact proposals may have on the significance of any heritage assets, but it is especially the case in respect of the latter, where the building in question may itself be a heritage asset, designated or otherwise.</p>	<p>Agree – add comment on heritage assets into policy</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p>	<p>Incorporate into vision</p>

POLICY H5 HOUSING DEVELOPMENT ON THE EDGE OF HARTLEPOOL

SYNOPSIS

- Maintaining the flow of traffic within the rural area may require further planning
- Protect villages from over development
- Villages should be protected from an increase of traffic
- Build the access roads before any housing development

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY</p> <p>Highways England have been consulted by HBC on significant large Housing Sites (in excess of 1000 dwellings as extensions to the urban area of Hartlepool. Some of this development falls within the Rural Plan area and some outside. Highways England are in consultation with Hartlepool BC on these large sites. We will require measures to mitigate generated traffic to be put in place as these sites are likely to have a significant impact on the SRN.</p>	<p>Noted</p>
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Agree</p> <p>Fens Residents Association believes that it is very important that if the SWEX goes ahead, then a simple clay bund should be discreetly placed</p>	<p>Noted</p> <p>Bund would be outside rural plan area – understand development proposals include for flood shelving within the development site which is considered to</p>

<p>parallel with the beck on its eastern side to protect the houses in Newark Road which face the beck. These residents already see the beck full to the brim after prolonged rainfall. We are also aware that since the absence of a local plan has allowed a high number of permissions for new builds already, that there is no longer a need for a major western extension to the town, either opposite the Fens or elsewhere. Please see the DVD provided, which illustrates how close the beck gets to bursting its banks.</p>	<p>address the problem in Newark Road without the need for an intrusive bund. Need for South West Extension is subject to determination of Hartlepool Borough Council as planning authority</p>
<p>HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART) Agree</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY With regards to bullet point 7 and section 8.51, we would support the inclusion of references to ditches and watercourses. We welcome and support the inclusion of bullet point 10, which states that new housing on the edge of Hartlepool should avoid areas at risk of flooding and incorporate sustainable drainage measures to manage rain water run-off from the development. We would also welcome the inclusion of the following sentence 'All existing watercourses should remain in situ' in paragraph 8.52.</p>	<p>Agree – reference to be incorporated Noted Noted and agree in principle but unsure of practicalities</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD) Agree</p>	<p>Noted</p>

<p>HRPS27 THE HOME BUILDERS FEDERATION</p> <p>The HBF support development which compliments its setting. However the strict stipulation that developments should have a gross density of 25dph or less is likely to be too rigid. A more flexible approach is recommended to enable all local characteristics and issues of development viability to be considered. It is therefore recommended that the policy be amended to read;</p> <p><i>‘3. provide an open and attractively landscaped development, the gross density of the development should normally be about 25 dwellings per hectare (or less)’;</i></p>	<p>Noted but feel alteration to wording unnecessary as ‘<u>about</u> 25 dwellings’ is flexible enough.</p>
<p>HRPS28 PERSIMMON HOMES</p> <p>Policy H5 sets out general principles that should be applied in the layout, design and landscaping of any new residential development on the edge of Hartlepool within the Neighbourhood Plan area. The policy intends to protect the rural area from inappropriate development on the edge of Hartlepool, the likes of which is expected to be large-scale and strategic in nature.</p> <p>There are currently two large-scale ‘strategic’ applications before the Local Planning Authority with no indicate as of yet whether they will be successfully or a timescale for their approval. As such there is no guarantee that this policy may be able to influence the decision making process however, Persimmon Homes understand the rural communities’ wish for such a policy to protect against future development and would like to take this opportunity to outline our concerns with the policy as currently proposed.</p> <p>Whilst we accept that more likely than not, any development on the edge of Hartlepool within the Neighbourhood Plan boundaries is likely to be ‘strategic’ in terms of its scale and nature, the policy does not distinguish</p>	

between sustainable strategic sites and any sustainable, small-scale sites on the edge of the settlement. There is subsequently a risk that some small-scale, sustainable sites on the edge of Hartlepool may not be developable due to the requirements of this policy.

For example, a relatively small, low impact scheme of say 30 units will need to deliver a community centre and shops under the requirements of point 1 of the policy. Persimmon Homes therefore believe that the policy should make clear that it only applies to strategic sites so as not to act as a barrier to any small-scale, sustainable sites that may come forward on the edge of the settlement over the next 15 years. Appropriate landscape and design for these developments would still be governed under the other design related policies of the Neighbourhood Plan.

The following comments are subsequently made in the context of our initial comments above whereby the policy is amended to apply only to strategic sites. Persimmon Homes believe that a more flexible approach should be engaged to enable all local characteristics and issues of development viability to be considered given the uncertainty of the sites coming forward. As such Persimmon Homes strongly believe that the policy should be amended to read as follows:

“New housing development on the edge of Hartlepool should be designed to:

1. create distinct new communities designed to create a sense of place around a central community hub containing a community centre, shops and other local services where necessary on a scale that meets the needs of the new community;
2. incorporate a diverse housing mix with a variety of house types, sizes and tenures;
3. provide an open and attractively landscaped development at a density reflective of its context and setting;

Noted – identifying a size at which the policy should start to fully apply we would consider something the size of Greatham village (which is able to support a range of facilities) at about 450 houses.

Agree to insertion of ‘where appropriate’ in sentence preceding bullet points. Will also consider include something about scale of development in new general principles policy

Point clearer with figure of 25 dwellings per hectare (or less)

<p>4. include <u>appropriate landscaping</u> where the development adjoins the countryside to reduce the visual impact of the development and create a continuous habitat for wildlife linked into existing natural areas and wildlife habitats;</p> <p>5. <u>where appropriate and feasible to do so</u> include landscaped open spaces, roads and footpaths, incorporating children’s play areas, throughout the development linked to the peripheral landscape buffer to provide green routes through the housing areas that enhance the quality of the development and provide wildlife habitats;</p> <p>6. <u>Where possible</u> link new footpath and cycleway routes through the development to routes in the countryside, and to schools, community facilities and the town centre;</p> <p>7. <u>examine the potential</u> to retain existing farmsteads, trees and hedgerows within the development;</p> <p>8. not compromise the Green Gaps between the urban area and villages;</p> <p>9. address any significant impacts arising from an increase in traffic on the road network between Hartlepool and the A19 as a result of the new development. This includes improvements to the junctions from the villages to the A19, A179 and A689 as well measures to discourage traffic from the new development using minor roads through the villages in the plan area and traffic calming where necessary;</p> <p>10. avoid areas at risk of flooding and incorporate sustainable drainage measures to manage rain water run-off from the development.”</p>	<p>We do want <u>strong</u> landscape buffer – leave wording as is</p> <p>We do want landscaped open spaces in all developments – existing examples available of this incorporated in small developments in the villages – ensure this continues</p> <p>If only examining potential will rarely occur – in not practical cover in viability assessment. See comment HRPS30 from Historic England below.</p>
<p>HRPS30 HISTORIC ENGLAND</p> <p>Paragraph 8.51calls for the retention of existing farmsteads, trees and hedgerows 'where possible'. Historic England does not favour the use of the phrase 'where possible' as a qualification. It provides neither clarity as to the circumstances in which the requirement might or might not apply,</p>	<p>Noted</p>

<p>nor allows more flexibility than already exists within planning legislation. Importantly, the policy itself does not include the proviso.</p>	
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>HBC consider the policy is too restrictive and does not allow flexibility, using phrases such as, `where necessary, where appropriate etc. may be useful. For example not all proposals on the urban edge, such as a proposal for 40 dwellings, will, for example require community centre and not all proposals will be for a full mix of house types, yet it may be the case that 40 bungalows or 40 detached properties is appropriate. HBC consider that the policy does not allow for all eventualities and appears to focus on large strategic extensions and there may be instances when a higher or lower density is appropriate.</p> <p>Criterion 10 is too prescriptive as in some circumstances it may be possible to manage flood risk.</p> <p>Although the retention of farmsteads is noted, consider drawing reference to other heritage assets, including archaeology that may exist with the rural area and in particular along the urban fringe.</p> <p>Consider making reference to opportunities for interpretation of heritage to provide some connection to the existing environment for new communities e.g. interpretation panels or as art of wider landscaping or art works. For example in Middle Warren where Pill Boxes have been buried or demolished there is little in the area to refer to the heritage but residents have taken an interest.</p>	<p>Noted – look at development of initial strategic policy Development the size of Greatham expected to provide guidance.</p> <p>Noted - add ‘where appropriate’ to opening sentence at top of policy.</p> <p>Agreed – amend point 7 to include other heritage assets.</p> <p>Noted – adjust 8.51 to make reference to other heritage assets & opportunities for interpretation.</p>

POLICY EC1 DEVELOPMENT OF THE RURAL ECONOMY

Synopsis

- Improvements to technology and communications infrastructure very badly needed now
- The green gap has no consistency and will discourage many investors
- Increased investment and employment will have an impact on traffic flow.

Comment	Response
<p>HRPS2 THIRTEEN GROUP Agree</p>	<p>Noted</p>
<p>HRPS5 GREATHAM COMMUNITY ASSOCIATION The Community Centre in Greatham is essential to the health of the community and brings people together in the only public hall currently available in the village. Presently the centre is regularly used by the youth club, mother and toddler group, carpet bowls, mature movers, sequence dancing, flower class, line dancing, baby clinic and dance exercise. The centre is the base for the Greatham players, central to activities during Greatham Feast and also used by the Parish Council and Greatham Residents Association for meetings. The building hosts public meetings, entertainment including theatre and musical performances, fund raising by other community groups and private parties. Not only does the hall serve the immediate community but draws people from neighbouring areas and provides a bridge linking those communities and the village. In the light of this Greatham Community Association welcomes and supports policies EC1 & C1.</p>	<p>Noted</p>

<p>HRSP6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS7 TEES VALLEY UNLIMITED</p> <p>Certainly support Policy EC1 about the development of the rural economy and focus upon low carbon energy in Policy NE2</p>	<p>Noted and welcomed</p>
<p>HRPS16 HEDLEY PLANNING SERVICE (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Disagree</p> <p>This policy should also include reference to reuse of brownfield sites.</p>	<p>Policy does not preclude brownfield but not explicitly identified. Consider covered in points 1 & 2 policy EC1.</p>
<p>HRPS25 CLEVELAND IND ARCHAEOLOGY SOC</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy EC1 deals with development of the rural economy. The observations in terms of Policy H4 refer.</p> <p>Policy H4 deals with housing in the countryside. New housing is required to be sensitive to the heritage assets of the area. Building conversions are required to avoid extensive alteration, rebuilding or extension. In respect of both it is necessary to have regard to the impact proposals may have on the significance of any heritage assets, but it is especially the case in respect of the latter, where the building in question may itself be a heritage asset, designated or otherwise.</p>	<p>Noted – impact on heritage assets to be included in policies EC1 & H4</p>

HRPS32 HARTLEPOOL BOROUGH COUNCIL

HBC would like further clarity with regard to bullet point three and the use of the phrase small scale business units. What size would small scale be? Could this be elaborated on in the glossary?

The policy needs to a sort of proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.

Will define small scale business – example of Home Farm, Hart where traditional farmyard buildings converted to mixed business uses without dominating village. Add definition into glossary.

HRNP are considering a Local Development Order to allow change of uses – eg. Pub or Shop with house to office use.

POLICY EC2 RETENTION OF SHOPS, PUBLIC HOUSES AND COMMUNITY FACILITIES

Synopsis

- Build more houses in villages to keep community viable
- Plan should reflect the need to encourage and develop such businesses
- Some of these comments do not align themselves with a free market economy
- Shop, public house etc. keep villages alive

Comment	Response
HRPS2 THIRTEEN GROUP Agree	Noted
HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree	Noted
HRPS16 HELDEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART) Agree	Noted
HRPS24 GEORGE F WHITE (ELWICK) New housing and the associated increase in population will help support vitality and viability of existing services and facilities.	Noted

<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy EC2 - not all villages in the Plan area are conservation areas. The phrasing in the final paragraph could be better expressed, thus:</p> <p>'.....heritage assets, including conservation areas, and their settings.'</p>	<p>Agreed – wording to be amended as suggested</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>HBC note the intention of the rural plan in ensuring the villages maintain key facilities i.e a local shop or public house, however HBC are concerned with the implementation of this policy and consider that in many cases rural businesses, along with many other businesses are at the mercy of market forces.</p> <p>HBC consider this policy could be strengthened by linking the justification to The Localism Act (2011) and the `right to bid` rights within it.</p> <p>Consider using “or” instead of “and” after each criterion.</p> <p>Criterion 3 - what does this mean exactly and how would it be assessed? What if there is significant support but the business is simply unviable - it will close anyway.</p> <p>Consider the terminology - heritage assets or conservation area not both. The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p>	<p>Noted – Does not prevent closure – simply seeks a process to ensure facility cannot be retained in some form. Look at sentence in justification regarding evidence to show business is not viable and every reasonable effort has been made to sell, including to community initiative.</p> <p>Agree – include reference to Localism Act 2011 and assets of community value and right to bid.</p> <p>Or not appropriate, emphasis on all 3 conditions being met.</p> <p>Criterion 3 significant community support for retention needs to be translated to action and ability to take over property by rent or purchase – eg. Right to bid and asset of community value.</p> <p>Disagree – see comment from Historic England above.</p> <p>Noted – will add reference to other policies. Also bullet point in vision.</p>

POLICY EC3 FORMER RHM SITE TO THE SOUTH OF GREATHAM STATION

Synopsis

- Reopening of Greatham station could increase traffic through village
- Park and ride as above
- Use of Cerebos area for building houses.
- Leisure facilities including hotel or craft shops
- Use area for building more homes
- Solar farms.

Comment	Response
<p>HRPS2 THIRTEEN GROUP Agree This is a great vision for the area – we hope that there will be resource and buy-in to achieve it.</p>	<p>Noted</p>
<p>HRPS3 FENS RESIDENTS ASSOCIATION Strongly Agree</p>	<p>Noted</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD) Strongly Disagree As highlighted in the attached letter, the site should be brought forward</p>	

for housing in addition to the uses highlighted in the policy.

HARTLEPOOL RURAL PLAN – PUBLIC CONSULTATION MAY/JUNE 2015 – FORMER RHM SITE, GREATHAM

I am writing in connection to the aforementioned consultation.

On behalf of our client, Darnham Ltd, I hereby submit a completed consultation questionnaire and provide representations below in relation to policy EC3 regarding land known as the ‘former RHM site’.

The site is a redundant industrial site located either side of Marsh House Lane 370m to the south of Greatham to the immediate south of the railway line and a group of four existing residential properties. The site measures approximately 12 hectares and previously contained a mix of industrial buildings up to two-storeys in height but has now been cleared and is therefore a previously developed brownfield site.

It is noted that within the draft Rural Plan the former RHM site is promoted as having the potential to deliver a community and leisure use such as a park and ride facility associated with the re-opening of Greatham train station, a visitor centre and a solar energy installation. The draft policy also states any development should enhance the landscape and should not increase traffic movements when compared to the previous industrial use. This consultation document also confirms that proposals have been included in the Tees Valley Metro Project for the re-opening of Greatham Station. The consultation draft Rural Plan proposes that the northern part of the site adjacent to the rail line would be suitable for a park and ride facility.

Whereas the provision of community and leisure facilities and a park and ride facility are clear aspirations for the site, this is only appropriate, and could only be delivered, in conjunction with new housing being provided on the site therefore it is proposed that policy EC3 (and other relevant policies of the consultation draft) should be amended to promote the

Noted

The re-opening of Greatham Station is aspirational

While the provisions suggested for the area near Greatham Station are aspirational the facilities in particular associated with what is a burgeoning wildlife site linked to the Environment Agency realignment scheme at Greatham Creek and RSPB interest associated with their site at Saltholme may be delivered without input from a new housing development.

RHM site for housing.

It is considered that the proposed residential development on the Marsh House Lane site would represent sustainable development and there would be no adverse impacts that would justify refusal of the principle of housing development for the reasons outlined below.

The site is a brownfield site (Local Plan policy Hsg5 seeks 75% housing to be delivered on brownfield land) located just 370m from Greatham and is immediately adjacent to existing housing. Greatham contains a variety of local services and amenities including a primary school, post office, general store, pubs and has a good bus service providing links to Middlesbrough, Billingham, Norton and Hartlepool. The recent SHLAA also acknowledges the potential for Greatham to increase its population from the current number of around 1,000 occupants by indicating the potential for new housing sites within the village (SHLAA sites 102-106).

With regard to any highways implications, it is clear that the site has a long established use as a major industrial site that included large vehicles accessing the site along Marsh House Lane. Whereas parts of Marsh House Lane narrow, there are no physical constraints to any localised widening therefore it is considered a suitable access can be provided to the site.

To the north is open farmland and the scale of the development would allow for appropriate assimilation with this landscape.

In terms of the adopted policy context, Hartlepool Local Plan Policy Ind5 identifies the site as an industrial area where B1, B2 and B8 are supported provided there is no significant detrimental effect on highway safety. However, the December 2014 Employment Land Review states the site should be de-allocated from employment use due to the difficulty in gaining HGV access and presence of existing residential properties adjacent to the site. We disagree with this review as the site has

The adjacent housing are the former Station Cottages and the facilities in Greatham are about a mile away and the bus service mentioned even further so any housing development on the former RHM site would be considered isolated.

Noted

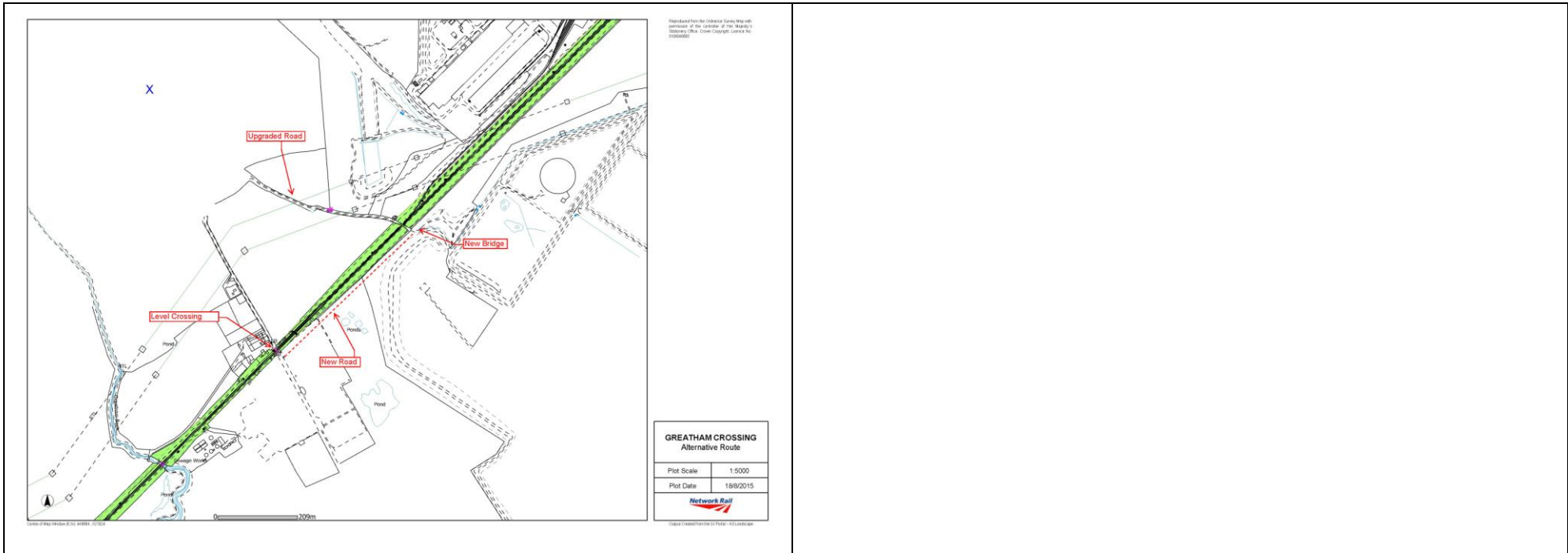
The site was marketed for business use prior to demolition with no positive result. The access at the end of a long winding country lane may have contributed to this. The factory was originally located at this site being adjacent to the salt workings and with access to the railway.

<p>development potential.</p> <p>In terms of national policy, the council have confirmed they are unable to demonstrate a five year housing land and by virtue of paragraph 49 of the NPPF, “relevant policies for the supply of housing should not be considered up-to-date” if a 5 year supply cannot be demonstrated. Instead, housing applications should be assessed under paragraph 14 of the NPPF and the presumption in favour of sustainable development. That requires such applications to be granted unless they are not sustainable in terms of the NPPF, any adverse impacts would significantly and demonstrably outweigh the benefits, or other specific policies in the Framework justify refusal. The NPPF supports the development of brownfield sites and it is considered the development of the RHM site would be compliant with the NPPF.</p> <p>I have already discussed the potential for developing the site with Hartlepool Borough Council who have confirmed that there was no objection to the principle of housing on the site could be acceptable, subject to development control issues being satisfactorily addressed.</p> <p>Discussions have also taken place with the Health and Safety Executive (HSE), Office of Nuclear Responsibility (ONR) and Northern Gas Networks (NGN).</p> <p>The HSE state the site is within an outer consultation zone of two hazardous installations and they would not object to a residential development on the site.</p> <p>Northern Gas Networks confirmed that they operate the pipelines that run adjacent to the railway line that borders the site and easements of up to 3m would be required. Such easements can be accommodated.</p> <p>The ONR confirmed the site is not within the consultation zone for Hartlepool Nuclear Power Station and that they would not wish to be consulted on any proposed residential development.</p>	<p>Noted</p> <p>The Rural Plan Group considers this site to be remote, located at a distance from the adjacent village and not conducive to a sustainable or pleasant environment especially in comparison to other sites available. The site lies in closer proximity to heavy industry including two COMAH sites and the Nuclear Power Station. It is perhaps worth noting the village of Graythorp which was located on the other side of the Conoco Phillips Oil Tank Farm was cleared in the late 70s because of the growth of heavy industry in this locality.</p>
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<p>Network Rail has not objected to the principle of housing development. The site is not considered to carry any constraints that would preclude development and is available, deliverable, and achievable.</p> <p>Based on the above, the site is considered to be suitable for residential development in conjunction with delivering the desired community facilities. Therefore, it is requested that the draft Rural Plan be amended to include the former RHM site as a housing allocation.</p> <p>I trust that you have all the information required to reconsider the proposed designation for the site and would be grateful if you can please confirm safe receipt of this submission. I would be interested in meeting to discuss the content of this letter and the consultation draft Rural Plan further if you would like to contact me on the number below.</p> <p>If you require anything further in the meantime, please do not contact us.</p>	<p>See Network Rail response for concerns regarding access via level crossing in Marsh House Lane.</p> <p>Rural Plan Group prioritising sites to meet identified needs, the former RHM site is certainly not considered to be the best from selection available. Concerns existing in Greatham about noise and smells from the industrial areas – this proposal would provide housing even closer to the industrial causes.</p>
<p>HRPS25 CLEVELAND IND ARCHAEOLOGY SOC</p> <p>Strongly Agree</p> <p>It is important that the Salt industry should be interpreted well as this was the starting point for the Chemical Industry on Teesside which has become so important to the area. Also there is much history associated with land reclamation which is not interpreted anywhere.</p>	<p>Noted – add paragraph to include history of site relating to salt industry</p>
<p>HRPS29 TEES ARCHAEOLOGY</p> <p>I appreciate the recognition of the adjacent Bronze Age, Iron Age and Romano-British archaeological site. I agree that an archaeological assessment would be required to inform of the impact on the significance of archaeological remains. I'm worried that this is clearly spelt out in the policy whilst this is not the case with the housing sites. The proposal for a visitor centre is interesting and archaeological interpretation could feature prominently in this.</p>	<p>Agree – incorporate a sentence about archaeological assessment in policy Gen 2 to cover all development including housing.</p>

<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy EC3 advises that an archaeological assessment of the site should be carried out prior to any development taking place. Ideally such an assessment should be carried out <i>before a decision is made</i> on any proposed development in order to inform that decision.</p> <p>The need to understand the significance of known or potential heritage assets on or otherwise affected by a proposal should be a prerequisite for development anywhere within the plan area, and not just in relation to the former RHM site.</p>	<p>Agree – reword policy as suggested. Also include as new bullet point in policy Gen2</p> <p>Policy GEN2 will be updated to better reflect heritage and archaeological requirements.</p>
<p>HRP31 NETWORK RAIL</p> <p>Although we have no specific objection to the proposal, our chief concern is the level crossing at Greatham and our national policy to seek, wherever possible, the elimination of such crossings or to reduce risks at crossings as far as practicable. As such our responses take this into consideration as our guiding principle.</p> <p>Our attitude to the re-development of the former RHM site has also to be tempered with the need to reduce risk at the level crossing. There is a moot point as to whether the use of the land, following demolition of the buildings, is an intent of intentional abandonment of the use of the site for industrial purposes. Although there is mention of a level of development set at no more than when the factory was in full operation, we would contend that the demolition of the factory has re-set the bar as regards acceptable traffic levels over the crossing, coupled with a change in policy with regards to level crossing safety in general and the notable deterioration in car driver behaviour. Level crossings remain the single biggest risk to the safety and reliability of the rail network, with the majority of misuse occurring at crossings because of the behaviour of the user, pedestrian or vehicular. As such we would prefer to see an</p>	<p>Note concerns</p> <p>Proposed visitors centre would be expected to be smaller than RSPB Saltholme – a satellite site therefore limited numbers. Most would use exiting rights of way, as visitors already do, from Greatham village which includes the bridge in Thorn Tree Lane as well as the level crossing on Marsh House Lane.</p> <p>No preference as to location of Park & Ride, though existing former car park for now demolished factory is on East side of railway.</p> <p>Plan is aspirational but perhaps a realistic one aimed largely at accommodating an existing use which is predominately accessing rights of way with minimal</p>

<p>alternative scenario to the development of this site which would allow for the elimination of the crossing to vehicles, at the very least. Our suggestion would be to promote the use of an alternative route to the factory site via Thorn Tree Lane and bridge and the construction of new lane to the site from the same bridge as illustrated on the attached plan. This would have the twin objective of eliminating the biggest risk at the current crossing (it could still be retained for foot passengers or horses/cyclists or a footbridge be put in place) but also the new road would allow for a greater level of development (at least back to pre-demolition levels) than may currently be the case. In terms of the proposal that is in the plan, for an element of mixed leisure and community uses, our preference would be again for any associated car parking to be on the west side of the crossing, although it should be noted that the risk profile of vulnerable foot users would also increase – as such our preference would be to promote the alternative access scenario as mooted above.</p>	<p>vehicular traffic.</p> <p>The Solar Farm would have very limited traffic.</p> <p>Will seek to continue to liaise with Network Rail.</p>
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HRPS32 HARTLEPOOL BOROUGH COUNCIL

HBC would trust that the land owner is in support of this policy, if not HBC would have concerns regarding the deliverability of this policy.

How are the visitor centre, car park & park & ride to be delivered? Is this viable?

This site is located in a major hazard area. Has the rural group discussed this proposal with the Health and Safety Executive or put the proposal through the PADHI+.

8.71 and the fourth paragraph in the policy which states that “development proposals should not result in an increase of traffic movements above that of the former industrial use of the site.” HBC do not have a record of former RHM traffic movements and would doubt

Land owner was consulted – it is presumed response from planning consultants ID Planning (for Darnham Ltd) originated via owner.

Visitor Centre deliverability from other development such as the Solar Farm but also consider potential through heritage grants, RSPB and other funding.

No response from H.S.E. No PADHI+ , the Rural Plan Group would request Hartlepool Borough Council do this assessment

Agree – reword policy as suggested.

<p>whether the rural plan group does, and therefore HBC have concerns regarding the logistics of comparing past and future traffic movements. If the group are trying to limit traffic through the village then a possible word alteration to “development proposals should not lead to a significant increase in traffic movements through the village, sustainable transport options will be encouraged.” may be more appropriate.</p> <p>The last paragraph could be removed if a strategic policy is included at the beginning of a plan. If not, words to the effect as outlined in the general comments on page 1 may be more appropriate than the existing paragraph.</p> <p>The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p> <p>8.72 An environmental impact assessment may or may not be required depending on what is proposed and subject to a screening opinion.</p> <p>It may not be Natural England that agrees the mitigation, it may be the HBC Ecologist. Consider amending the wording to reflect this.</p>	<p>Keep last paragraph – reaffirms for specific site and important wildlife sites.</p> <p>Include as bullet point in vision</p> <p>Adjust to say ‘It is envisage that proximity to’ instead of ‘In view of the proximity of’</p> <p>Adjust wording to include possibility of H.B.C. ecologist agreeing mitigation – ‘appropriate authority’.</p>
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POLICY EC4 SERVICE STATIONS AND TRAVEL RELATED DEVELOPMENT

Synopsis

- Speed control
- Service stations, motel and shops receive varied comments regarding safe positioning and further hazards caused by vehicles turning in to such areas.
- Is there a need for more service stations etc on the outskirts of Hartlepool on A689?
- Would help increase employment

Comment	Response
HRPS1 HIGHWAYS AGENCY Roadside facilities and their signage should refer to the relevant policy information Ref 3/2013 and TSRG.	Noted
HRPS2 THIRTEEN GROUP Agree	Noted
HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree	Noted
HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART) Agree	Noted

HRPS32 HARTLEPOOL BOROUGH COUNCIL

A19 services allocation on the proposals map is not specific and is therefore too vague and could cause problems at implementation stage.

The final part of this policy needs rewording - what if the Highways Agency ascertains that the use can be intensified without the need for improvements?

The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.

Agree – site to be more clearly identified on map and remove reference to extension

Agree – adjust wording in policy

Include as bullet point in vision

POLICY T1 IMPROVEMENTS TO THE HIGHWAY NETWORK

Synopsis

- Worries regarding the increase volume of traffic in villages
- Improve highway network to deal with any increased traffic
- Speed humps / traffic calming needed
- Improve A19 junctions

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY</p> <p>Strongly agree</p> <p>☐ improvement of the A179/A19 junction;</p> <p><i>Highways England strongly support this particularly from a safety priority</i></p> <p>☐ the dualling of the A179;</p> <p>☐ improved junctions to the A179, A689 and A19 junction from Dalton Piercy, Elwick, Greatham, and Hart;</p> <p>☐ alleviating the impact of the increase in traffic on the A179 and A689 arising from new development in Hartlepool on Greatham, Hart and Newton Bewley;</p> <p><i>Highways England strongly support this and are in consultation with developers and local authorities in this regard</i></p> <p>☐ measures to discourage traffic from any new development on the edge of Hartlepool using minor roads through the villages in the plan area,</p>	<p>All noted and welcomed</p>

<p>including traffic calming, where necessary.</p> <p><i>Highways England strongly support this and are currently undertaking a study to look at improvements to access to the A19 at Elwick with priority on safety.</i></p>	
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p>	Noted
<p>HRPS6 FENS RESIDENTS ASSOCAITION</p> <p>Strongly Agree</p>	Noted
<p>HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	Noted
<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Agree</p> <p>New development can help contribute to the junction improvements, including at Elwick.</p>	Noted
<p>HRPS25 CLEVELAN INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Agree</p>	Noted
<p>HRPS26 STOCKTON BOROUGH COUNCIL PLANNING SERVICES</p> <p>The document and accompanying policies map includes improvements to A19 highway junctions and a new bridge. Improvements to the strategic</p>	Noted

<p>road network are supported in principle, however it is important to be aware of and incorporate the proposals to upgrade the A19 into an expressway. This includes the installation of a concrete central reservation and separate filter roads from the A19, therefore you may wish to contact Highways England for further information. Furthermore, officers of this Council, as well as those in Hartlepool Borough Council area, will be willing to assist you on this matter, if appropriate.</p>	
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>Consider the location of transport policies within the document. Infrastructure is essential to development delivery so consider locating transport policies after an initial strategic policy.</p> <p>Bullet point 3 - consider that improvements from the villages to the A689, A179 and the A19 will be supported, bullet point as written only supports junction improvements.</p> <p>8.81 - Traffic impact assessment may or may not be required depending on the scale of development proposed; this will be a matter for the Highways Authority. It is not clear what improvements to the western A179 junction are required; consider elaborating more on proposals/ideas.</p> <p>The way the paragraph is worded suggests that any development that increases traffic would need to contribute even if this is a very minor development / increase. It would not seem reasonable to impose a requirement for contributions on all development that accesses or results in increased traffic on the A179, this would need to be proportionate and directly related to the impact. In any case this requirement for contributions is not reflected in the policy itself therefore enforcing the requirement may be problematic.</p> <p>8.82 The current proposal for the SW extension does not include a roundabout.</p>	<p>Noted</p> <p>Noted – adjust to include approach roads</p> <p>Noted – add word ‘significant’</p> <p>8.81 to be reworded to clarify</p> <p>Noted – reword by removal of ‘provide access onto and’ add significant</p> <p>Given existing problems on the A179/Hart village and high traffic volumes any development which significantly increases should make contribution. Any development in Hart village should look to improve safety at village accesses.</p> <p>Noted – enlarged scheme did include roundabout at Greatham/Dalton Back Lane junction – improvement to junction still considered to be needed.</p>

POLICY T2 IMPROVEMENTS TO PUBLIC TRANSPORT

Synopsis

- Increase bus services to villages
- Greatham station reopening could be expensive and waste of money

Comment	Response
<p>HRPS1 HIGHWAYS ENGLAND</p> <p>Though Highways England support improvements to the public transport network, we have not studied data to give actual comments on specific improvements.</p>	<p>Noted</p>
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p> <p>There is also no public transport connection to Elwick, which isolates residents. This should also be considered in these plans.</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS7 TEES VALLEY UNLIMITED</p> <p>TVU and the Tees Valley authorities agreed to drop the Tees Valley ‘Metro’ project label some time ago. This was to avoid any confusion that the project was about delivering trams or a new light rail system. The Tees Valley Rail Vision is about providing a step-change in quality and provision</p>	<p>Note change in title – reword policy.</p> <p>Reopening of Greatham station was always considered aspirational so will remain in Neighbourhood Plan as such.</p>

<p>of local rail services on the existing network, much of which will now be delivered through the new Northern franchise. This is in addition to the significant investment in station improvements at all local stations funded recently by TVU. The most high profile was the opening of the new James Cook station. This was developed from the previous TV Metro work as it had a good business case and support from the rail operator. Greatham Station was never taken forward in the previous work as presumably no economic case could be made and the focus for the Durham Coast line is now on service frequency improvements and reduced journey times.</p> <p>More than happy to discuss further.</p>	
<p>HRPS16 HEDLEY PLANNING SERVICES (FOR CLIENT HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Strongly Agree</p> <p>The reopening of Greatham Station can be in part facilitated by developing the former RHM site that can provide a park and ride facility in addition to a housing development. Housing on the site would have excellent access to the station and therefore would not have a significant impact on the local highway network.</p>	<p>Noted</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Agree</p>	<p>Noted</p>

HRPS31 NETWORK RAIL

Although we have no specific objection to the proposal, our chief concern is the level crossing at Greatham and our national policy to seek, wherever possible, the elimination of such crossings or to reduce risks at crossings as far as practicable. As such our responses take this into consideration as our guiding principle.

There is no technical reason why the station at Greatham could not be re-opened, although there is an overall desire to improve journey times along the Durham Coast route and re-opening the station would be counterproductive to that aim (every new station imports a minimum three minutes to journey time). In addition it has to be remembered that Network Rail is not funded for enhancements of this kind, and that financing of the station would depend on a number of factors, not least of which is a business case to support the re-introduction of a station including, crucially, the buy-in of the incumbent Train Operating Company. It is usual that new stations are generally financed on the back of significant residential or commercial development, neither of which is the case in this Plan so in the absence of a robust business case it is unlikely to be taken forward during the Plan period; however it may be possible to indicate on the proposals map an indicative site for a re-opened station as a longer term aspiration. However it should be clearly noted that NR cannot support any car parking in the east side of the level crossing as that will import further risk. Mention of a park and ride facility can only be supported on the basis that the requisite car parking is provided on the west side of the crossing only.

Noted

Noted – re-opening of Greatham Station remains aspirational

Noted – location of station indicated – car park location can be decided if re-opening of station looks to be moving forward – there is an existing car park on the east side but no objections to location of car park on west side.

HRPS32 HARTLEPOOL BOROUGH COUNCIL

Have Network Rail been consulted? Has the viability/possibilities of accommodating/delivering a new car park, bus service to provide a park & ride service with new pedestrian and cycle routes been fully explored?

8.84 No mention is made of detrimental impacts on residential amenity and highway safety; this needs to be stressed as there will be impacts but they need to be balanced against the benefits.

Network rail has been consulted and replied (HRPS31)

Station is only aspirational at moment. Viability, etc. would be part of business case to support re-opening of a station. Site was a station until the 1970s so has link to road and existing rights of way.

Impact on residential amenity and highway safety is covered in Policy T2 point 1

POLICY T3 IMPROVEMENT AND EXTENSION OF THE PUBLIC AND PERMISSIVE RIGHTS OF WAY NETWORK

Synopsis

- General agreement regarding improving the footpath and bridleway network
- Worries regarding cost
- Some negativity regarding bridges over A689 at Sappers corner and Cowpen Bewley
- Improve the present Paths and safeguard
- Could improve tourism in area

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY</p> <p>For reasons of Highway Safety with particular interest in the SRN Highways England support well developed non-Motorised User (NMU) routes.</p> <p>With particular reference to crossing facilities for the A19 at Elwick, Options for a new grade separated junction to access the A19 near Elwick consider NMU facilities.</p>	<p>Noted</p> <p>Noted</p>
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p>	<p>Noted</p>

<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Agree</p> <p>The development of the RHM site will facilitate new and enhanced public rights of way through the site to local amenities including the nature areas.</p>	<p>Noted</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>The Council continues to look to assist in funding or resource funding to create a suitable and safe bridged crossing point at or close to the village of Elwick. It will need to be sympathetic to the needs and requirements of pedestrian, cyclist and equestrian users.</p> <p>At present there are no prioritised plans to look at a bridged crossing over the A689 near to Greatham village.</p> <p>HBC continually seeks to invest in and improve links between the villages and town. This requires further funding than is presently available and also the consent and agreement from local landowners before it can proceed. The Council also continues to look to secure funding and agreement with local landowners so that improvements to the public and permissive rights of way access network is continued and/or created. HBC would advise that surrounding land owners are on board with proposals that may be upon their land.</p> <p>The Council is looking to secure improvements between Greatham and</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

<p>Greatham Creek so that the community can gain access to Greatham Creek and all it offers in recreation and safer routes to employment. One proposal is the provision of cycle access between Greatham and The Creek. There is already an existing public right of way between these two locations – Public Footpath No.11, Seaton. Consider reflecting this within the plan.</p> <p>8.87: A network of equestrian routes is looking to be developed, where appropriate. The two main elements for such provision have been discussed earlier. Also there is a need to consider where equestrian livery is sited as sometimes there is difficulty in providing safe and relevant access linkage to such businesses. If there is no agreement between some local landowners then the likelihood of such a link being achieved is reduced.</p> <p>Improved links to Brierton are welcomed particularly if the strategic recommendation from the Indoor Facilities Strategy is realised with a 25m 6 lane pool at Brierton.</p>	<p>Noted</p> <p>Footpath described in Policy T3 point 5</p> <p>Noted – Will look at linking provision of equestrian routes to permission for new livery business – reflect in Rural Economy policy RE1. Given the lack of bridleway provision the group will encourage provision/improvement by requiring livery businesses to assist in the enhancement of such routes in the vicinity of their businesses.</p> <p>Noted</p>
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POLICY C1 SAFEGUARDING AND IMPROVEMENT OF PLAY AREAS, SPORTS AND RECREATION FACILITIES AND ALLOTMENTS

Synopsis

- Existing facilities are not adequately maintained
- Villages need financial support to do this.
- Where will these areas be located and will the land need to be purchased
- Safeguarding existing facilities must take priority, new schemes need to be better financed as with only a few properties per year being built it will take forever

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY No comment</p>	Noted
<p>HRPS2 THIRTEEN GROUP Agree</p>	Noted
<p>HRPS5 GREATHAM COMMUNITY ASSOCIATION The Community Centre in Greatham is essential to the health of the community and brings people together in the only public hall currently available in the village. Presently the centre is regularly used by the youth club, mother and toddler group, carpet bowls, mature movers, sequence dancing, flower class, line dancing, baby clinic and dance exercise. The</p>	Noted

<p>centre is the base for the Greatham players, central to activities during Greatham Feast and also used by the Parish Council and Greatham Residents Association for meetings. The building hosts public meetings, entertainment including theatre and musical performances, fund raising by other community groups and private parties. Not only does the hall serve the immediate community but draws people from neighbouring areas and provides a bridge linking those communities and the village. In the light of this Greatham Community Association welcomes and supports policies EC1 & C1.</p> <p>The Trustees of Greatham Community Association along with the users of the building are constantly engaged in fund raising to ensure the doors of the hall remain open. The Association took over the lease of the building knowing it required major refurbishment and have sought grant funding to assist in this work. Any support of source of income is greatly welcomed. We welcome and appreciate the inclusion of Greatham Community Centre among the list of priority schemes in policy C1.</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree</p>	<p>Noted</p>
<p>HRPS22 ID PLANNING (DARNHAM LTD) Agree Such facilities could also be provided on the RHM site.</p>	<p>Noted</p>
<p>HRPS24 GEORGE F WHITE (ELWICK) Agree New development can help contribute to delivering facilities, including the new car park in Elwick.</p>	<p>Noted</p>

HRPS32 HARTLEPOOL BOROUGH COUNCIL

Consider linking this policy to the planning obligations policy. Any money secured through a section 106 legal agreement could potentially be directed toward this priority list. This would assist HBC and developers gain an understanding on where s106 money should be directed.

Consider including a comprehensive environmental improvement list as an appendix.

Consider making reference that Greatham Sports Association has secured community use and the playing pitch strategy recommends to protect and enhance this offer as they need parking and changing facilities.

HBC has concern regarding the development of new sports pitches where there is no infrastructure in place to support it e.g. changing facilities. Consider elaborating further regarding how ancillary facilities are to be secured.

Further clarity should be provided with regards to

How the new community facilities are going to be managed and maintained and where the supporting revenue costs will come from come from?

Hart School playing pitch has informal community use and needs to be protected this is set out in the Playing Pitch Strategy and reference should be drawn to it.

Clarity should be given on what is meant by Local Green Space. Those who are not au fait with the NPPF terminology may consider local green space to be spaces such as village greens, sports fields etc.

Consider making reference to the importance of wetland creation, not least for its flood alleviation benefits, which would be appropriate for much of the plan area, notably the beck corridors.

Noted – link to be added to policy INF1

Noted

Noted – will make reference regarding Greatham Sports Association and also look to adding similar for Elwick Playing Field. Make sure Elwick Playing Field is properly indicated on map.

Add associated facilities to wording and include in policy

Facilities can often be managed privately or by the Council, monies will be requested and secured via section 106 agreements

Noted

Agree – include definition in glossary, reference paragraphs 76 & 77 NPPF. Include sentence ‘green spaces of particular importance designated as local green spaces in line with paragraph 76 & 77 NPPF.

Agree – add in policy NE1

POLICY NE1 NATURAL ENVIRONMENT

Synopsis

- environmental impact assessment in order to determine the effects of the development on local wildlife
- improvement of the environment over the whole rural plan area
- Ref 8.101 states 25 local sites meeting agreed criteria. Why do we need more?

Comment	Response
<p>HRPS1 HIGHWAYS ENGLAND</p> <p>Agree</p> <p>As part of the improvement and maintenance of the A19, Highways England undertake measures to ensure that the Natural Environment is maintained to the highest possible standard on land it manages and work with others towards the general upkeep of the Natural Environment.</p>	<p>Noted</p>
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Agree</p> <p>Fens Residents Association wholeheartedly agrees with this policy and its intention to enhance 'wildlife corridors and river and stream corridors' (2. on page 44 of the consultation document). We also agree with justification 8.106 on page 45 which states that 'wildlife corridors may be</p>	<p>Noted</p>

enhanced by safeguarding, linking and improving the environment and habitats along river and stream corridors'.

Your maps do not seem to highlight Greatham Beck as a Local Wildlife Site or that section of it on the western edge of the Fens Estate which is a Local Nature Reserve. Greatham Beck is one section of a continuous waterway linking Elwick with the Tees Estuary. It is therefore part of an immensely important wildlife corridor for birds, mammals, invertebrates and plant life.

The present proposals for the South West Extension allow for a green wedge alongside the beck, the western boundary of the wedge being governed by overhead power lines. It is totally unacceptable for new homes to be built very close to high voltage overhead power lines. Persimmon are using a separation distance of only 9 metres. Fens Residents Association suggests that the minimum distance should be at least 30 metres to protect residents of the South West Extension from the effects of electro-magnetic pollution and enhance their view of the natural environment. It is also known that the closer children live to power lines the more likely they are to come to harm when playing around them.

Furthermore there is an area near the southern end of Newark Road where the power lines are literally within a stones throw of the beck (see photograph). **This creates a pinch point in the wildlife corridor which the developers refuse to comprehend.** Our map indicates that an area to the west of the power lines should be green wedge and free from development to protect the integrity of the wildlife corridor, and the well being of the residents of the new homes. This would also aid visual amenity for residents both existing and new. Much of the green wedge between the Fens and the South West Extension should become an extension to the present Local Nature Reserve on the eastern bank of the beck.

The map may seem to give the impression that the distance between

Agree – map to be updated to include local nature reserve.

Noted – application passed which includes outline permission for site at Claxton.

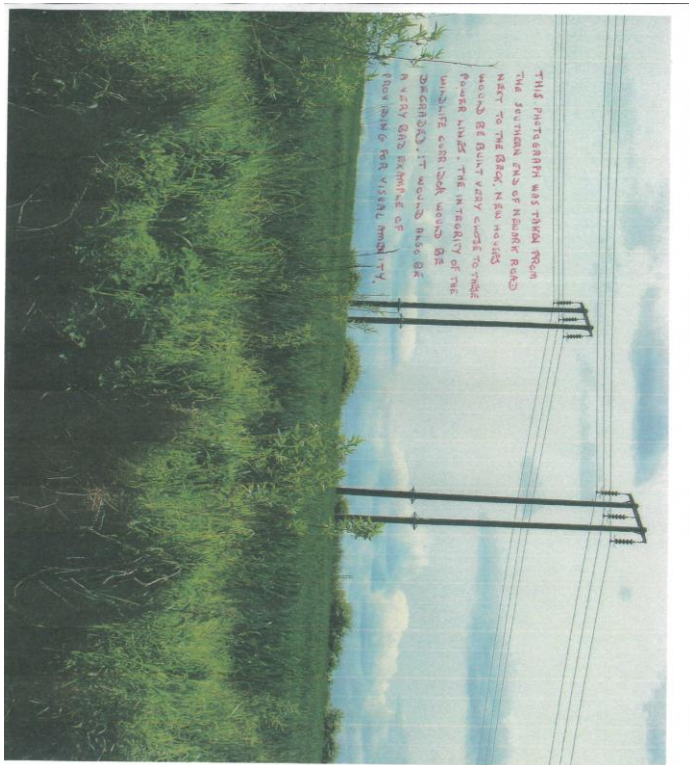
The UK does not have restrictions on how close homes can be built to power lines provided they comply with the statutory safety clearance distances which the 9metres more than satisfies. The overhead cables running through the proposed South West Extension are on wooden poles and 11kV and 66kV. The 11kV lines are to be diverted. Despite a strong recommendation that all overhead power lines are diverted or placed underground the 66Kv is to remain as is with the 9metre separation.

Noted – Outline planning permission granted at this location.

Check with ecologists report to see if any concern regarding width of corridor at this point.

Newark Road and the power lines is 'not so bad'. **To appreciate the reality you need to visit the location.** Fens Residents Association asks that the Rural Plan be amended so that a green wedge alongside the beck (without the pinch point) is linked to the green gaps/corridors presently shown on your proposals map. This would introduce a very comprehensive connectivity.

Please contact our Chairman, Robert Smith on 870613 if any further clarification is needed.





BOUNDARY OF NEW HOUSING SHOULD BE AT THIS RED LINE, PROTECTING THE WILDLIFE CORRIDOR AND CREATING A REASONABLE DISTANCE BETWEEN NEW HOUSING AND HIGH VOLTAGE POWER LINES.

THE DOTS SHOW WHERE A CLAYBUND WOULD PROVIDE FLOOD PROTECTION.

HRPS17 ENVIRONMENT AGENCY

The natural environment section does not make reference to the objectives of the Water Framework Directive. We would therefore support references to WFD within the policy.

It should be noted that Greatham Beck links the village communities through this area and currently has some of the poorest ecological quality of any watercourse in the Tees catchment area. This is due to diffuse pollution and altered flows from roads and highways, intermittent discharges from the public sewerage network; continuous discharges from unsewered domestic residences, and diffuse pollution from agriculture and rural land management. These issues all combine to severely restrict ecological quality.

Deterioration in water quality could also arise through increased foul flows leading to increased discharge of sewer overflows to watercourses. Deterioration could result from failure to incorporate sustainable urban drainage as an integral component of development design.

The connection to the estuary is modified by a tidal control structure which obstructs fish passage. We would therefore welcome the inclusion of references which seeks to ensure that any proposed development within the plan area enhances and improves the ecological quality of rivers, valley habitats and wildlife corridors.

The policy as it currently stands, seeks to ‘encourage the enhancement of wildlife corridors including rivers and streams’. This wording is unlikely to be robust enough to secure the intended outcome. Therefore, it is recommended that the word ‘encouraged’ is replaced with ‘must’ in order to ensure enhancement of the natural environment.

Bullet point 1, criteria b) states that compensatory measures will be required to maintain and enhance conservation interests for locally designated sites. In order to secure the protection and enhancement of

Not essential to reference all statute that applies to the planning system, the objectives of the WFD have been echoed in NPPG and the Rural Neighbourhood Planning Group has had regard to the NPPF and NPPG.

Add to paragraph 8.106 or new paragraph – of particular importance for improvement are waterways including Greatham Beck given that it has some of the poorest ecological quality of any watercourse in the Tees catchment area.

Consider also adding reed beds for potential to improve water quality as natural filter.

Noted

Noted - add to bullet point 2 including improving water quality.

Agree – re-word as suggested

Noted - looked to see if last sentence of bullet point 1b needs strengthening. Rural Neighbourhood Planning Group considered bullet point sufficient to meet what they want to achieve.

<p>the environment, it is recommended that this policy includes an unequivocal biodiversity offsetting policy requirement, which is not limited to designated sites, and that stands alongside other infrastructure requirements. For example, the policy could link to best available methodologies such as the Department for Environment, Food and Rural Affairs (Defra) 'Biodiversity Offsetting Pilots - Technical Paper: the metric for the biodiversity offsetting pilot in England', March 2012.</p> <p>With regards to bullet point 2, we would support the inclusion of references to watercourses within this sentence.</p> <p>Bullet point 3 states 'where possible, new development should conserve, create and enhance habitat' and is limited to the content of the Tees Valley Biodiversity Action Plan. In order to meet the objectives of the WFD, we would support the inclusion of the following sentence 'Any development should not result in, or contribute to, a deterioration in the ecological quality of the Greatham Beck waterbody.'</p> <p>In order to enhance the environment and to meet WFD objectives, opportunities to de-culvert parts of Greatham Beck and its tributaries should be encouraged within the Neighbourhood Plan. De-culverting provides multiple benefits, including improvements to the aquatic and riparian habitats and reductions in maintenance costs and flood risk.</p>	<p>Agreed – add watercourse to river and stream corridors.</p> <p>Agree – add sentence as recommended</p> <p>Noted – enhance should include de-culverting</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Agree</p> <p>The development of the RHM site would protect the nearby nature areas and would facilitate an improvements to on site biodiversity.</p>	<p>Noted</p>

<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Agree</p> <p>New development can help contribute to improving ecologically important sites.</p>	<p>Noted</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS30 HISTORIC ENGLAND</p> <p>Paragraph 8.108- trees should be selected with a view to ensuring that they do not adversely impact upon the buildings themselves as well as the amenity of their occupants.</p>	<p>Agreed – add wording ‘upon buildings themselves’ into paragraph 8.108</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>Consider setting out the requirements of criterion a) in a strategic policy at the beginning of the plan. These requirements are set out in European Legislation and are so significant that they can dictate where development can and cannot go and such specifications may be better placed at the front of the plan within an overall strategic policy.</p> <p>4 a) the 10 metre wooded/tree belt element is too prescriptive and may not always be achievable or appropriate for example due to access and site lines. The wording could be amended so that the 10 metre belt is sought subject to other constraints.</p> <p>Consider making reference to the importance of wetland creation, not least for its flood alleviation benefits, which would be appropriate for much of the plan area, notably the beck corridors.</p>	<p>Noted</p> <p>Agree – replace ‘should be planted’ with ‘must were possible be planted’</p> <p>Agree – include wetland creation in policy.</p>

No reference is made to green tourism, would the plan group support rural tourism? If so consider drawing reference to supporting Green Tourism. This would of course be greatly facilitated if the PROW network linked up better so that there were circular routes.

Agree – add ‘green tourism, amenity, health & wellbeing’ to opening sentence of 8.100

POLICY NE2 RENEWABLE AND LOW CARBON ENERGY

Synopsis

- No more wind turbines
- EU policies may restrict decisions
- Government subsidise will be important in the decisions regarding renewables
- Solar panels preferable
- providing the schemes make economic sense
- This is part of the National Planning Policy Framework

Comment	Response
<p>HRPS1 HIGHWAYS AGENCY</p> <p>Agree</p> <p>Highways England works towards a low carbon economy. However for individual low carbon developments (e.g. Wind and Solar Farms) we would wish to be consulted on any development which would potentially impact upon the operation of our network whether that be through capacity, safety or operational grounds. We would then assess each site on its individual merits against any relevant policy at that time.</p>	<p>Noted</p>

<p>HRPD2 THIRTEEN GROUP</p> <p>Agree</p> <p>Thirteen Group will be able to assist in meeting this policy through energy efficiency projects, albeit on a small scale.</p>	<p>Noted</p>
<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRPS7 TEES VALLEY UNLIMITED</p> <p>Certainly support Policy EC1 about the development of the rural economy and focus upon low carbon energy in Policy NE2</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY</p> <p>It is vital that any new ground source heating cooling schemes or wind farms, which involve extensive drilling into the ground (including installation of turbine foundations typically via piling) do not pose an unacceptable risk to groundwater. We would support the inclusion of criteria which seeks to ensure development does not have a detrimental impact upon the flows of groundwater to any water dependent features within the area including rivers, springs and abstractions points.</p>	<p>Agree – will include where appropriate including as part of policyNE2</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Strongly Agree</p>	<p>Noted</p>

<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy NE2- the Plan should now address the recent government pronouncement that local authorities should only grant planning permission for onshore wind farms if the development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan. This brings with it the converse necessity of identifying areas where it would be inappropriate to site wind turbines because of their impact on the significance of heritage assets (NPPF paragraph 157'.</p>	<p>8.113 identifies wind farm locations at High Volts Farm in Hart Parish and Red Gap in Elwick Parish. There is also a single wind turbine in the rural plan area as part of a scheme at Sheraton. Include these existing locations in policy and on map.</p> <p>Consider also identifying Solar Farms – check for current applications and merit of other sites.</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>Policy appears to suggest that all renewable development will be supported though the matters identified will be considered. It needs to be clear that the decision will be subject to the acceptable detailed consideration of the matters outlined in the policy. Consider adding shadow flicker to residential amenity and have a separate criterion for highway safety. The policy needs to include a proviso that the development must be acceptable in planning terms in terms of design, access, residential amenity, impact on visual amenity, drainage, ecology etc.</p> <p>8.111 - an EIA may not necessarily be required for a Turbine application.</p> <p>8.113 - an application at Sheraton is also under consideration. The paragraph also states locations where new turbines would be acceptable, consider putting this information within the policy and possibly delineating areas on the proposals map.</p> <p>8.117 community benefits can derive via money secured from section 106 legal agreements or via community agreements with the energy provider. The latter is not a material consideration in planning application, for clarity; consider making this clear in the paragraph of in the glossary.</p>	<p>Agree to addition of shadow flicker to Policy at 1b and add highway safety as new point 1d.</p> <p>Agree to addition of proviso. Consider adding to considerations – job creation, along the lines of ‘unless sustainable long term job provision’ included as part of opening overriding policy along with local finance consideration.</p> <p>Agree – remove last sentence of 8.111</p> <p>Agree – add Sheraton which crosses Durham/Hartlepool boundary to 8.113</p> <p>Agree – copy in for clarity</p>

HBC are producing a renewable energy strategy and once endorsed it may be of use to the rural plan group.

Noted

POLICY BE1 ENHANCEMENT OF HERITAGE ASSETS

Synopsis

- monies should be spent wisely for any enhancements where really necessary
- heritage is an undervalued asset - more detail required
- In Elwick existing dwellings and other properties have a mixture of designs, what is considered appropriate and a priority
- Why reduce traffic signs which are in place to help the safety of the villages?
- who is the final arbitrator of good taste and decides on the 'appropriately designed windows, doors, boundary features and other domestic features'?
- the villages are a huge asset to the Borough. They should be more aware of their importance and support their conservation.

Comment	Response
HRPS1 HIGHWAYS AGENCY No comment	Noted
HRPS2 THIRTEEN GROUP Agree	Noted
HRPS6 FENS RESIDENTS ASSOCIATION Strongly Agree	Noted

<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Agree</p> <p>New development can help contribute to enhancing heritage assets, including the identified Scheduled Ancient Monument (Fishpond, Enclosures and Section of Field System 165m North West of Elwick Hall) adjacent to the proposed site.</p>	<p>Noted</p>
<p>HRPS25 CLEVELAND INDUSTRIAL ARCHAEOLOGY SOCIETY</p> <p>Strongly Agree</p> <p>It is important that our heritage is not lost</p>	<p>Noted</p>
<p>HRPS29 TEES ARCHAEOLOGY</p> <p>Agree</p> <p>I support this policy and would be happy to advise on interpretation of Scheduled Monuments etc. I am please that ridge and furrow landscapes are recognised but they have very little protection. For example the proposed housing at North Farm, Elwick will destroy several hectares or ridge and furrow.</p> <p>8.125 This paragraph again explicitly mentions archaeological evaluation at the RHM site. I have no problem with this but worry that developers will pick up on this and say the document doesn't say that the 15 High Street, Greatham housing site should be evaluated.</p>	<p>Noted – planning approval already made regarding North Farm, Elwick which makes surviving ridge & furrow all the more valuable. Add explanation of importance of ridge & furrow.</p> <p>Agree archaeological assessment important in all historic villages – include mention of this</p>
<p>HRPS30 HISTORIC ENGLAND</p> <p>Policy BEI as drafted is less a policy and more an action list. Whilst welcome in itself as a pro-active strategy for the historic environment, it does not provide developers and decision-takers with the guidance and clarity they need to allow them to test and decide on the acceptability or</p>	<p>Agreed – policy to be re-written. Heritage Assets are of significant importance in the rural area.</p>

<p>otherwise of a proposal in policy terms. This policy should be substantially redrafted.</p> <p>Paragraph 8.126 - here, and elsewhere, references to 'English Heritage' should now be amended to read 'Historic England'.</p>	<p>Agreed – references to English Heritage to be changed to Historic England</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>HBC are producing a heritage strategy and once endorsed it may be of use to the rural plan group.</p> <p>The Article 4 Direction in Greatham covers restrictions on the use of a building for farming, a whole new Article 4 Direction is required.</p> <p>The list that has been provided is not exhaustive and interested parties should be encouraged to check the Historic Environment Record that is held by Tees Archeology and is available online.</p>	<p>Noted</p> <p>Noted & agree. Add new justification para outlining good practice eg. houses in Front Street, Greatham that have replaced windows in period style and material. Need to encourage and continue these improvements and ensure they do not revert to inappropriate style and materials</p> <p>Noted –reference to Historic Environment Record to be included.</p>

POLICY INF1 CONTRIBUTIONS TOWARDS MEETING COMMUNITY INFRASTRUCTURE PRIORITIES

Synopsis

- Interesting ideas as to how developers can support rural life
- Developers will struggle to be able to provide new facilities if nowhere to build houses and make the necessary profit
- General feeling that it is important to support present facilities through Developer contribution
- Grant funding

Comment	Response
<p>HRPS2 THIRTEEN GROUP</p> <p>Agree Thirteen Group will be able to support community initiatives and enhancement of certain projects.</p>	<p>Noted</p>
<p>HRPS5 GREATHAM COMMUNITY ASSOCIATION</p> <p>The Trustees of Greatham Community Association along with the users of the building are constantly engaged in fund raising to ensure the doors of the hall remain open. The Association took over the lease of the building knowing it required major refurbishment and have sought grant funding to assist in this work. Any support of source of income is greatly welcomed. The Association also supports policy INF1 especially as it highlights the need of rural facilities which can be overlooked in an area dominated by a large urban area.</p>	<p>Noted</p>

<p>HRPS6 FENS RESIDENTS ASSOCIATION</p> <p>Strongly Agree</p>	<p>Noted</p>
<p>HRTPS16 HEDLEY PLANNING SERVICES (FOR HOME FARM, HART)</p> <p>Agree</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY</p> <p>We would recommend that environmental infrastructure, including habitat enhancements, water storage areas and the provision of green spaces are taken into account when looking to fund local infrastructure.</p>	<p>Priorities to be listed as appendix & noted in policy</p>
<p>HRPS22 ID PLANNING (FOR DARNHAM LTD)</p> <p>Agree</p> <p>In accordance with adopted policy, the development of the RHM site for housing would deliver significant financial contributions that could help deliver the community benefits referenced above.</p>	<p>Noted</p>
<p>HRPS24 GEORGE F WHITE (ELWICK)</p> <p>Agree</p> <p>New development can help contribute to delivering community infrastructure, including the new car park in Elwick.</p>	<p>Noted</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>To assist in making the plan clear for those who wish to develop in the plan area it may be beneficial to amend the title of the policy to `Planning obligation` as developers often want to know what is required of them at an early stage and having clear policy tiles may assist in this.</p>	<p>Agree – amend title as suggested</p>

<p>It may also be prudent to put this policy towards the front of the plan as these obligations are often necessary to make development acceptable so would be better places with infrastructure requirements.</p> <p>HBC are producing a planning obligations SPD - once endorsed it may be useful to draw reference to it.</p> <p>There is no mention of affordable housing, is that intentional?</p> <p>INF1 - No community hall or improvements to existing community facilities is mentioned for Hart. In light of the recent application for the Church in which the need for the additional facility was stated consider drawing reference to any such need or intentions of the existing community centre and/or church.</p>	<p>Noted</p> <p>Noted</p> <p>Reference to housing policies (check affordable is on site because right to buy could reduce already limited availability in rural area) – add to monitoring and implementation</p> <p>Hart has a very vibrant village hall that is in excellent condition but at high capacity with limited room for expansion. Improvements or facilities being suggested at Hart Church would be supported.</p>
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GENERAL COMMENTS

Comment	Response
<p>HRPS3 NORTHUMBRIA WATER</p> <p>Thank you for the opportunity to provide a consultation response to the Hartlepool rural plan at this pre submission consultation stage. As a statutory consultee, Northumbrian Water (NW) offers a considered response to various elements of the Plan.</p> <p>We have reviewed the Plan in detail and we have set out comments below on a range of topics which we feel are of relevance or have an impact on us, as the statutory sewerage undertaker.</p> <p>Throughout the plan preparation process we have worked closely with the Hartlepool rural plan working group in order to give advice on NW infrastructure in the area and give support to the process where required. It is encouraging to see that the working group have taken into account the infrastructure in the area when developing the plan and how the infrastructure may impact upon future development within the community.</p> <p>The plan is comprehensive in nature and NW are pleased to see how the management of surface water is integrated throughout the document as a key principle. In particular Policy GEN2- Design Principles which also in its justification outlines surface water management goals which will assist in the prevention of flooding in line with the aims of the National Planning Policy Framework. Surface water discharge to the public sewer should always be the last resort after all other options have been explored through the hierarchy of preference (Part H, Building</p>	<p>Noted</p> <p>Noted</p> <p>Add sentence to policy document (page 18, 8.11) to reinforce that surface water discharge to public sewer should always be last resort.</p>

<p>Regulations).</p> <p>It is also pleasing to see Surface water management projects as an indicator as part of the monitoring of the rural plan.</p> <p>We thank you for the opportunity to respond to the plan and look forward to working with you in the future.</p>	<p>Noted</p>
<p>HRPS4 ASSOCIATION OF NORTH EAST COUNCILS</p> <p>As you are aware, the Association of North East Councils is a representative body for all 12 local authorities in the region. As such, we are not well placed to comment on individual area plans.</p> <p>Can I thank you once again for contacting us, and my best wishes for your future endeavours.</p>	<p>Noted</p>
<p>HRPS5 GREATHAM COMMUNITY ASSOCIATION</p> <p>Greatham Community Association wishes to thank and support Hartlepool Rural Plan Neighbourhood Plan for acknowledging the importance of buildings such as Greatham Community Centre to their communities.</p>	<p>Noted</p>
<p>HRPS7 TEES VALLEY UNLIMITED</p> <p>Thanks very much for sending this across, we'll certainly have a look through. From a quick flick through:</p> <ul style="list-style-type: none"> • Very pedantic point, but the sources and data on p8 of the consultation would be via Tees Valley Unlimited (rather than the Joint Strategy Unit, which became TVU) 	<p>Noted but title of organisation which produced data retained</p>

<p>TVU and the Tees Valley authorities agreed to drop the Tees Valley 'Metro' project label some time ago. This was to avoid any confusion that the project was about delivering trams or a new light rail system. The Tees Valley Rail Vision is about providing a step-change in quality and provision of local rail services on the existing network, much of which will now be delivered through the new Northern franchise. This is in addition to the significant investment in station improvements at all local stations funded recently by TVU. The most high profile was the opening of the new James Cook station. This was developed from the previous TV Metro work as it had a good business case and support from the rail operator. Greatham Station was never taken forward in the previous work as presumably no economic case could be made and the focus for the Durham Coast line is now on service frequency improvements and reduced journey times.</p> <p>More than happy to discuss further.</p>	<p>Noted - amend references to Tees Valley Metro unless being referred to in an historical context.</p> <p>Reopening of Greatham Station remains an aspiration.</p>
<p>HRPS8 GREATHAM RESIDENTS ASSOCIATION</p> <p>I have forwarded your message and attachments on to GRA members in advance of Saturdays meeting to allow time to digest the information prior to our (GRA) discussion.</p>	<p>Noted</p>
<p>HRPS9 TEES VALLEY BIODIVERSITY PARTNERSHIP</p> <p>Hi Brain , I have moved jobs now and working on community projects, I have forwarded your email to Jeremy Garside, who will be the contact person until a new officer is employed. Hope the plan goes well</p> <p>Sue</p>	<p>Noted</p>

<p>HRPS10 TEES VALLEY LOCAL ACCESS FORUM</p> <p>Hello again, I've asked the members to forward their views on to me by your deadline. I will then forward them on. Best wishes Beryl</p>	<p>Noted</p>
<p>HRPS11 HERITAGE & COUNTRISIDE MANGER H.B.C. & CONSERVATION AREA ADVISORY COMMITTEE</p> <p>Thanks for sending this information through – I will feedback on the plan through the formal channels when the request comes through. It would be useful if you could do an update at the next CAAC meeting? It might encourage people to read the full document and feedback to the group.</p>	<p>Agree - Conservation Area Advisory Committee engaged and kept up to date.</p>
<p>HRPS12 UNITED UTILITIES WATER LIMITED</p> <p>Thank you for your consultation and seeking the views of United Utilities Water Limited in this process. The Hartlepool Rural Neighbourhood Plan is outside our operational area; we therefore have no comments to make and no longer need to be included in future consultations</p>	<p>Noted</p>
<p>HRPS13 GENTOO</p> <p>We will look at your request and respond to you within 5 working days.</p>	<p>Noted</p>

<p>HRPS14 COUNCIL FOR THE PROTECTION OF RURAL ENGLAND</p> <p>Thank you for contacting CPRE. We are dealing with your enquiry and will reply as soon as possible.</p>	<p>Noted</p>
<p>HRPS15 MARINE MANAGEMENT ORGANISATION</p> <p>Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.</p>	<p>Noted</p>
<p>HRPS17 ENVIRONMENT AGENCY</p> <p>Water Framework Directive</p> <p>The Neighbourhood Plan must have regard to the objectives of the Water Framework Directive (WFD).</p> <p>The WFD is an European Legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology.</p> <p>The overall aim of the WFD is to ensure that all waterbodies achieve ‘good status’ by 2021 and to prevent the deterioration in the status of the waterbodies. This must be reflected within the Neighbourhood Plan.</p> <p>The Environment Agency is the lead authority on WFD and we are required to deliver actions that will improve our water environment through the Northumbria River Basin Management Plan. We are currently in the process of updating cycle 2 of the Northumbria River Basin Management Plan, which will be published in December 2015.</p> <p>The actions detailed in the Northumbria River Basin Management Plan should be taken into account within your Neighbourhood Plan. These actions are detailed in Annexe C of the Northumbrian River Basin</p>	

Management Plan and is available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297476/gene0910bsry-e-e.pdf

Land Contamination and Groundwater

The Neighbourhood Plan should seek to ensure that any proposed development considers the risks posed to controlled waters from any potential land contamination present. Any risks identified should be suitably mitigated.

Hartlepool Water operates a number of strategic public water supply groundwater abstractions within the plan area, particularly within the vicinity of Dalton Piercy. The Neighbourhood Plan should seek to minimise the risks of impacting these supplies (quality and flows). Further information on our policies to protect groundwater can be found in 'GP3: Groundwater Policies and Practice'. This is available at www.gov.uk/government/organisations/environment-agency

Flood Risk

Greatham Beck and Claxton Beck (main rivers) are located within the plan area. As a result, part of the plan area is at risk from fluvial flooding. It is vital that the Neighbourhood Plan takes into consideration the issue of flood risk and seeks to manage and reduce flooding from all sources.

Vision and Objectives

We welcome the inclusion of objectives which seek to enhance the network of biodiversity habitats; contribute towards meeting the challenge of climate change and the use of sustainable drainage solutions.

We would welcome the inclusion of an objective which seeks to ensure that development is directed away from areas at risk from flooding.

Agree add suitable text

Agree add suitable text

Agree add suitable text

Agree to add to vision and objectives

<p>Plan Strategy</p> <p>With respect to page 15 (presumption in favour of sustainable development), and bullet point 12, it is recommended that this sentence is amended to the following</p> <p>‘natural habitats and geological sites are safeguarded and new areas of tree planting and habitats <i>including wetlands</i> are created’.</p>	<p>Agree to amend sentence</p>
<p>HRPS18 NATURAL ENGLAND</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Designated sites</p> <p>The rural neighbourhood plan falls partly within the Durham Heritage Coast.</p> <p>The following Sites of Special Scientific Interest (SSSIs) are triggered by Natural England’s Impact Risk Zones (IRZs). Therefore an assessment to clarify whether there are any potential impacts on this SSSI’s interest features is recommended. The IRZs can be viewed on the MAGIC website (http://magic.defra.gov.uk/). Further information on the SSSIs can be found using the following link (http://www.sssi.naturalengland.org.uk/special/sssi/search.cfm)</p> <p>☒ Hart Bog SSSI – An impact risk has been identified for any development within 50m and any residential development of 10 or more houses outside existing settlements within 200m of this nature conservation site.</p> <p>☒ Durham Coast SSSI – An impact risk has been identified for any development within 50m, any residential developments outside of existing settlements with a total net gain in residential units within 500m and any</p>	<p>Directional information to resource welcomed</p>

residential development of 10 or more houses and large non-residential developments where net additional gross internal floorspace is 1,000m² or footprint exceeds 0.2Ha outside existing settlements within 1km of this nature conservation site. This site is also part of Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar.

☒ Tees & Hartlepool Foreshore & Wetlands SSSI – An impact risk has been identified for any development within 50m, any residential developments outside of existing settlements with a total net gain in residential units within 500m and any residential development of 10 or more houses and large non-residential developments where net additional gross internal floorspace is 1,000m² or footprint exceeds 0.2Ha outside existing settlements within 1km of this nature conservation site. This site is also part of Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar.

☒ Cowpen Marsh SSSI – An impact risk has been identified for any development within 50m, any residential developments outside of existing settlements with a total net gain in residential units within 500m and any residential development of 10 or more houses and large non-residential developments where net additional gross internal floorspace is 1,000m² or footprint exceeds 0.2Ha outside existing settlements within 1km of this nature conservation site. This site is also part of Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar.

☒ Seal Sands SSSI – An impact risk has been identified for any residential development of 10 or more houses and large non-residential developments where net additional gross internal floorspace is 1,000m² or footprint exceeds 0.2Ha outside existing settlements within 1km of this nature conservation site. This site is also part of Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar.

Hesledon Crimdon Dene Complex, Thorpe Bulmer Dene, Hart to Haswell Railway, Hart-Haswell Walkway, Crimdon Road Verge, Hartville Meadow,

Bellows Burn Fen, Butts Lane, Hart Quarry, Whelly Hill Quarry, Tilery Gill Grassland, Craddon Bank, Elwick Hall extension, Elwick Hall Grassland/Fishpond, Beacon Hill Marsh, Pawton Hill Gill, Crookfoot Reservoir, Char Beck Grassland, The Howls, Dalton Batts, Brierton Quarry, High Stotfold Gill, Black Wood Marsh, Gunnersvale Marsh, Amerston Gill, Close Wood Complex, North Burn Marsh, Cowpen Bewley Woodland Park, Greatham Beck, Queen's Meadow and Greatham North West Local Wildlife Sites (LWSs) are located within the rural neighbourhood plan boundary. You should ensure you have sufficient information to fully understand the impact of the plan on the LWSs. Hartlepool Borough Council and Tees Valley Wildlife Trust may be able to provide further information in relation to these sites. Local environmental record centres also hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

We advise that the rural neighbourhood plan includes criteria based policies for the protection and enhancement of the international, national and locally designated sites present. This is in line with para 113 of the NPPF which makes it clear that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological network. The rural neighbourhood plan should always seek to avoid environmental impacts by directing development away from the most sensitive areas with mitigation considered only when this is not possible.

Ancient Woodland

Eastclose Wood, The Howls and Hesleden Dene are ancient woodland sites which have not been identified within the rural neighbourhood plan and should be considered as part of the rural neighbourhood plan process.

BAP (Biodiversity Action Plan) Priority Habitat

Noted and agreed

Reference made to the areas of Ancient Woodland within the plan area.

Natural England note that there is BAP Priority Habitat within the boundary of the rural neighbourhood plan. The value of these areas and their contribution to the ecological network of local, national and internationally protected sites should be considered when locating new development. The rural neighbourhood plan should, in accordance with paragraph 117 of the NPPF, encourage the preservation, enhancement and creation of priority habitats where these opportunities exist.

Green Infrastructure

The rural neighbourhood plan is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Natural England would encourage the incorporation of GI into the rural neighbourhood plan. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.

Protected species

You should consider whether your plan has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

Natural England Standing Advice

Opportunities for enhancing the natural environment

Rural neighbourhood plans may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built

BAP Priority Habitats have been considered as part of the HBC SHLAA.

The group consider that policy NE1 bullet points 2 and 3 as amended allow with the policy as a whole to encourage the preservation, enhancement and creation of priority habitats where these opportunities exist.

The RNPWG consider that they do this within the plan, the group seek to create new GI across the plan area through planning obligations contributions and/or alternative funding that comes available.

HRA Screening report undertakes this assessment and advice has been sought from the HBC ecologist.

Furthermore the RNPWG are aware that HBC will ensure the necessary assessments are undertaken at planning application stage.

Noted. This is one thing that the plan group would support as are other measures, it is not considered necessary to list all measures. RNPWG consider

<p>environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.</p> <p>Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.</p> <p>Strategic Environmental Assessment Screening</p> <p>Natural England agree with the conclusions of the screening that the plan would not result in significant environmental effects.</p> <p>Habitat Regulations Assessment Screening</p> <p>It is not clear whether the policies listed (LS1, LT1, TR1 and NE1) in the Habitat Regulations Assessment (HRA) refer to the adopted 2006 Local Plan or the withdrawn 2013 Local Plan or what the policies are. As the 2013 Local Plan was withdrawn then it is not possible to rely on the policies within it and so Natural England recommend that the rural neighbourhood plan refers to the policies within the adopted 2006 Local Plan if it does not do so already. Greater clarity as to what policies the references refer to is also recommended.</p> <p>Rural Neighbourhood Plan policies EC3 Former RHM site to the south of Greatham Station and T2 Improvements to Public Transport both refer to the fact that the HRA for the adopted 2006 Local Plan found that the sites referred to were unused by any species of SPA/Ramsar birds other than the possibility of a casual occurrence. As this was nine years ago there is a risk that the evidence gathered is now out of date.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Alastair Welch on 0300 0601148. For any new consultations, or to</p>	<p>that the policy, as amended, seeks to improve opportunities for wildlife.</p> <p>Noted. Confirmation on the SEA screening report conclusion is welcomed.</p> <p>Noted.</p> <p>HRA screening report to be amended, in liaison with HBC's ecologist. HRA screening report conclusion to be agreed with HBC prior to submission of the plan to HBC.</p> <p>Greatham station/Former HRM site</p> <p>The proposal is for small scale development.</p> <p>HBC ecologist carried out a site assessment to ascertain whether or not the land is functional land for the SPA in May 2016.</p> <p>HBC ecologist considered that the land was not functional land and that no further bird surveys need to be undertaken.</p>
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<p>provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>	
<p>HRPS19 SEDGEFIELD TOWN COUNCIL</p> <p>In response to your email of 18th May 2015 I can confirm that Sedgfield Town Councillors discussed your Hartlepool Rural Neighbourhood Plan (Consultation Draft May 2015) at their Monthly Meeting on Monday 8th June 2015. Councillors considered your Plan to be an excellent document covering the rural side of Hartlepool. Sedgfield Town Council wishes you well with the further progression of this Plan.</p>	<p>Noted</p>
<p>HRPS21 WYNYARD RESIDENTS ASSOCIATION</p> <p>8.77 As WRA we support the highways improvements planned. 4 of these will have benefit for Wynyard residents.</p> <p>8.94 last line has a typo 5 instead of a w in whilst.</p> <p>8.131 possibly add a monitor: traffic surveys. We did discuss this at the meeting and I appreciate your points on cost and ability to complete meaningfully. Perhaps explain this in the report or find out if HBC or highways agency could conduct one if you appear to get problems from development?</p>	<p>Noted</p> <p>Typing mistake to be corrected</p> <p>Formal monitoring not feasible for Rural Plan Group however Hartlepool Borough Council & Highways England do monitor traffic in the area</p>
<p>HRPS23 GVA GRIMLEY LIMITED (FOR WYNYARD)</p> <p>Hartlepool Rural Neighbourhood Plan: Consultation Draft May 2015</p> <p>Thank you for consulting our client Wynyard Park on the Consultation Draft Hartlepool Rural Neighbourhood Plan.</p>	

<p>You will be aware that our client’s land at Wynyard Park is located outside of the RNP boundary. These representations are therefore provided for context and so that you are able to understand our client’s development aspirations for Wynyard Park when preparing the RNP.</p>	<p>Noted</p>
<p>Wynyard Park</p>	
<p>Our client’s aspiration for Wynyard Park is to create a sustainable mixed-use community at the site. This includes large-scale housing and employment development, community facilities alongside infrastructure and public transport improvements.</p>	<p>Noted</p>
<p>Wynyard Park is located within the administrative boundaries of Hartlepool and Stockton Borough Councils. The successful Wynyard Business Park is located at the site which employs circa 2,000 people and includes Huntsman, Clipper, BP and Hertel amongst its occupiers.</p>	<p>Noted</p>
<p>Within the Stockton area of the site, the current Stockton Borough Council Publication Draft Regeneration and Environment Local Plan (February 2015), allocated land within Wynyard Park for 800 houses over the plan period. Within that area, Stockton Borough Council has issued a ‘minded to grant’ outline planning permission for 400 houses (within which a detailed application to deliver 240 houses by Bett and Story Homes). A further application for 102 houses by Barratt Homes is currently submitted to Stockton Borough Council for determination.</p>	<p>Noted</p>
<p>Within the Hartlepool area of the site, 168 houses are currently under construction by Taylor Wimpey as part of the ‘Wynyard Manor’ development. Hartlepool Borough Council has also issued a ‘minded to grant’ outline planning permission for 200 houses and 101,858 m2 of office development. Further applications are submitted to the Council for determination for a total of 38 self-build houses.</p>	
<p>It is evident from the above that Wynyard Park is already a location for major housing and employment development established through the</p>	<p>Noted</p>

<p>decisions of the respective Council's and the proposals in the emerging Stockton Local Plan. Our client is contracted with housebuilders including, Taylor Wimpey, Barratt Homes, Bett Homes and Story Homes and so there is commitment to housing delivery in the short-term.</p> <p>You will also be aware that Hartlepool Borough Council is in the early stages of preparing a new Local Plan and consulted upon Issues and Options in May 2014.</p> <p>Hartlepool's existing Local Plan 2006 allocates North Burn as an employment site under Policy Ind2; however Hartlepool stated in their Issues and Options Consultation Document that the deliverability of North Burn could prove difficult in their view due to the high cost of accessing the site via a new junction from the A19. The Consultation Document looked at the option to consider alternative uses for North Burn or de-allocate the site.</p> <p>On behalf of Wynyard Park, we have submitted representations to Hartlepool Borough Council requesting an additional 732 houses to be allocated at Wynyard Park, beyond what has already been granted planning permission and those houses currently under construction (totalling 2000 dwellings).</p> <p>Wynyard Park's view is that the North Burn employment allocation should be retained. Development at the site could help facilitate an access form the A19.</p> <p>In terms of highways considerations and accessing the site, initial feasibility exercises have demonstrated that access to serve North Burn employment site is achievable, via a new access from the A19. A second access could also be taken from the existing established Wynyard Park Business Park located to the south of North Burn, which is within Wynyard Park's ownership and control.</p> <p>Given the feasibility work undertaken, we are confident that suitable</p>	<p>Noted rural plan group is in close consultation with Hartlepool Borough Council</p> <p>Noted</p> <p>Noted</p> <p>North Burn not allocated for any development in the Neighbourhood Plan – considered as open countryside. Green Field site detached from the urban area. There is an oversupply of employment land in Hartlepool. Business development should be directed to underused site within urban area of Hartlepool.</p> <p>Visual impact of developing North Burn would be considerable.</p> <p>New access to North Burn required from A19 would add to stress already being placed on this important regional route.</p> <p>Existing employment land within Wynyard has not been taken up and is being converted to housing. If there is a demand for employment land then the existing allocation should be used rather than expanding further into the open</p>
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<p>access to North Burn could be delivered to unlock the site for employment development. Wynyard Park would therefore request that an employment site at North Burn should be included within the RNP.</p> <p>Should you have any queries on the content of this letter or require any further information, please do not hesitate to contact Neil Morton on 0191 269 0528 or via email on n.morton@gva.co.uk.</p>	<p>countryside.</p>
<p>HRPS26 STOCKTON BOROUGH COUNCIL PLANNING SERVICES</p> <p>Stockton Borough Council's Economic Strategy & Spatial Planning team have no objection to this document and fully support the development of the Hartlepool Rural Neighbourhood Plan.</p>	<p>Noted</p>
<p>HRPS28 PERSIMMON HOMES</p> <p>As one of the largest housebuilders in the UK, Persimmon has traditionally been very active within the Borough of Hartlepool and with a number of land interests within the boundaries defined by the Neighbourhood Plan; we are a key stakeholder in the area. The Company has a keen interest in supporting and ensuring the delivery of a Neighbourhood Plan that provides opportunities for the sustainable growth of the rural area and the wider Hartlepool borough.</p> <p>This representation, duly made within the required timescales, subsequently follows previous representations submitted by Persimmon Homes in December 2014 during the earlier stages of consultation on the Hartlepool Rural Neighbourhood Plan and also the Company's ongoing participation in the on-going emerging Hartlepool Local Plan process.</p> <p><u>Home Builders Federation Representation</u></p> <p>First and foremost, Persimmon Homes would like to take this opportunity to fully endorse the Representation made by the Home Builders Federation (HBF) and request that the Neighbourhood Plan fully considers</p>	<p>Will give full consideration to all representations made</p>

the issues raised within their correspondence.

The HBF is the principal representative body of the housebuilding industry in England and Wales and their representations reflect the views of their membership which account for over 80% of all new housing built in England and Wales in any one year, including a large proportion of the new affordable housing stock. It is therefore important that the views of the HBF are given significant weight during this consultation process.

In addition to the issues raised by the HBF, Persimmon Homes would like to take this opportunity to re-emphasise our own concerns with the document whilst also reiterating our philosophy to work with the plan-makers to produce a sound and deliverable plan.

Policy & Legislative Context

The National Planning Policy Framework (NPPF) explains that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.

Paragraph 15 of NPPF states that plans should be based upon, and reflect, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Paragraph 16 further sets out that neighbourhoods should develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development and plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

This is further reinforced at paragraph 184 of NPPF which sets out that the ambitions of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area and must be in general conformity with the strategic policies of the Local Plan. It is also stated that Neighbourhood Plans should not promote less development

Neighbourhood Plan Group working closely with Hartlepool Borough Council to ensure in line with Local Plan and national policy

Rural Neighbourhood Plan delegates majority of Borough's housing need to Hartlepool Borough Council (see 8.49)

Rural Neighbourhood Plan does not undermine strategic Policy of 2006 Local Plan

Rural Neighbourhood Plan does promote sustainable growth

<p>than set out in the Local Plan, nor undermine the strategic policies of the Local Plan.</p>	
<p>Once adopted, where there is conflict, policies of the Neighbourhood Plan take precedence over existing non-strategic policies in the Local Plan for that neighbourhood. It is therefore essential for a draft Neighbourhood Plan to meet each of the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p>	
<p>a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p>	Noted
<p>b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p>	Noted
<p>c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p>	Noted
<p>d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p>	Noted
<p>e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p>	Rural Neighbourhood Plan Group liaising with Hartlepool Borough Council to ensure conformity
<p>f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p>	Noted
<p>g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the</p>	Noted

<p>non-allocated sites can be delivered where appropriate.</p> <ul style="list-style-type: none"> • The ‘Green Gap’ and ‘Village Envelope’ designations illustrated on the Proposal Map currently overlap to the north east of Elwick Village. This causes confusion and inconsistency within the document with prevents the plan from conforming to national planning policy. Persimmon Homes therefore recommend that the boundaries of the green gap are amended so as not to interfere with the village envelopes. • The references to Building for Life and Energy Efficiency within Policy Gen2 Design Principles should be removed to order to promote a flexible approach to good design and ensure that the application accords with national design standards. • The current number of allocations and commitments contained within Policy H1 Housing Development does not meet the level of development necessary to achieve the housing requirement. The matter is worsened due to the current wording of Policy Gen1 as detailed above. To overcome this issue, North Farm Elwick should be reassessed for an increased level of development inline with Persimmon Homes’ previous representations to the Local Plan, Neighbourhood Plan and the SHLAA. • The third column of the table contained within Policy H1 should be amended to read ‘Indicative Yield’ rather than ‘No Allocated’ so as not to act as a constraint to development. • It is unclear how the housing requirement of 170 units over the plan period as detailed within Policy H1 has been calculated. Further evidence should be provided to demonstrate that the Neighbourhood Plan addresses the objectively assessed housing needs of its area rather than simply propose to repeat past housing delivery trends. • Policy H2 does not identify an affordable housing requirement within the plan area, and nor does the proposed threshold before which affordable housing is delivered accord with government guidance. 	<p>Agree – map to be adjusted</p> <p>Will review Building for Life criteria, consider using suitable wording rather than reference Building for Life.</p> <p>Energy efficiency is encouraged by NPPF para. 96</p> <p>Policy H1 – housing figure will be updated</p> <p>North Farm, Elwick was reviewed bearing in mind para. 8.16 in policy document and seeking limited incremental growth of high quality reflecting density of village.</p> <p>Number of sites allocated sufficient for plan period and to deliver limited incremental growth suited to the village situation. Wording to be adjusted to Max.number allocated to allow for smaller yield.</p> <p>Housing figure reassessed in light of housing needs survey carried out by HRNP Group while considering absorption of limited number required by strategic need of Borough. Neighbourhood plan is also allowing for some expansion sites on edge of urban area.</p> <p>Lead being taken from Hartlepool Borough Council (2015 SHLAA)</p>
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<ul style="list-style-type: none"> • Policy H5 Housing Development on the edge of Hartlepool does not distinguish between large-scale, strategic site and smaller sites in its requirements. A distinction should be made and the policy amended accordingly inline with Persimmon Homes' recommendations. <p>We trust that the document reflects the company position and wish to place on record our desire to be kept informed of the progress of the Neighbourhood Plan in the future. If there is anything we can help you with, please do not hesitate to contact us.</p>	<p>Noted – were appropriate to be added to first sentence of policy. Size at which community facilities should be required to be based on size of Greatham which is supporting such facilities.</p> <p>Noted</p>
<p>HRPS29 TEES ARCHAEOLOGY</p> <p>Firstly congratulations on such a well presented and thorough document. I set out below some comments with regard to archaeology:-</p> <p>2.3 & 5.1 It is good to see a historical background to the rural area and villages set out early in the document.</p> <p>5.1 I support the consideration of the safeguarding and enhancement of heritage assets and conservation areas.</p> <p>5.1 Newton Bewley and the A689 – there are several important archaeological sites surrounding the village of Newton Bewley. Any plans for a bypass or similar supported by housing would need to consider the impact on these sites.</p> <p>6.1 I support the vision that includes retention of 'historic and environmental assets' with support from 6.2 that states 'we will.... protect and enhance the character of the local built and historic environment'.</p>	<p>Noted</p> <p>Noted</p> <p>Bypass for Newton Bewley supported by housing not put forward by Neighbourhood Plan</p> <p>Noted</p>
<p>HRPS30 HISTORIC ENGLAND</p> <p>The difficulties arising from the absence of a Local Plan adopted post-National Planning Policy Framework (NPPF) during this process should not</p>	

<p>pass without acknowledgement. It should also be borne in mind that depending upon the eventual content of the Local Plan upon adoption there may be a reduced need for the Neighbourhood Plan itself to be so inclusive and broad- ranging in terms of policies and actions.</p> <p>1. <u>General observations</u></p> <p>Following publication of the NPPF in March 2012, the government's position on plan-making and the historic environment is clear. Although much of the advice it contains relates to local authority plan-making, it is nevertheless important to bear in mind that the Neighbourhood Plan will be a part of the statutory Development Plan when adopted, and in this respect it is perhaps helpful to judge it in relation to what the government seeks to achieve through the planning system as a whole.</p> <p>The NPPF requires (Local) Plans to enable the delivery of sustainable development, one of the core dimensions of which is the protection and enhancement of the historic environment (NPPF paragraph 7).</p> <p>In order to satisfy the NPPF, Development Plans are required, in summary, to -</p> <ol style="list-style-type: none"> 1. identify the historic environment as a strategic priority (paragraph 156), 2. contain policy for the conservation, enhancement and enjoyment of the historic environment that is clearly identified as strategic (paragraph 156) 3. contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment (paragraph 126), 4. demonstrate that they have been informed by a proper assessment of the significance of the heritage assets in the area, including their settings, and of the potential for finding new sites of archaeological or historic 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
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<p>interest (paragraph 163),and there has been a proper assessment to identify land where development would be inappropriate because of its historic significance (paragraphs 129 and 157),</p> <p>Where it fails to address these matters it may be considered unsound.</p> <p>1. A strategic priority for the historic environment</p> <p>Paragraph 156 of the NPPF requires local authorities to set out strategic priorities for the area in their Local Plan. There is an expectation that included with them should be the conservation and enhancement of the historic environment, including landscape.</p> <p>The Vision and Aims for the Neighbourhood Plan, together with specific and cross-cutting policies, make welcome reference to the importance of heritage conservation and design quality, and the value of strengthening both a sense of place and local distinctiveness.</p> <p><i>Taken together, these statements and commitments amount to recognition that the historic environment and its heritage assets are to be regarded as a strategic priority for the Plan, thereby satisfying that part of NPPF paragraph 156.</i></p> <p>2. Strategic policies for the conservation of the historic environment.</p> <p>Local Authority development plans are required to include strategic policies to conserve and enhance the historic environment of the area (NPPF paragraph 156) and to guide how the presumption in favour of sustainable development should be applied locally (NPPF paragraph 15). I would expect the Local Plan to contain such policies in respect of which the Neighbourhood Plan would need to demonstrate conformity.</p> <p>I note that the Plan contains a number of statements and policies the purpose of which is to conserve and enhance where appropriate the historic environment and its heritage assets.</p> <p><i>Historic England is satisfied that were Policy BE1 to be strengthened the</i></p>	<p>Noted</p> <p>Noted</p> <p>Agree to strengthen policy with addition of specific Heritage Policies contained in the Plan.</p>
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<p><i>Plan would contain a clearer intent to help bring about the conservation, enhancement and enjoyment the historic environment which responds to the presumption in favour of sustainable development as it relates to NPPF Core Principle10 and paragraph156.</i></p> <p>3. A positive strategy for conservation of the historic environment.</p> <p>The Local Plan should include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF paragraph 126). It should be a response to the issues set out in the evidence base. The strategy should also seek improvements in the quality of the historic environment in the pursuit of sustainable development (NPPF paragraph 9).</p> <p>One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (paragraph17). Conservation means maintaining what is important about a place and improving it where this is desirable. It is not a passive exercise. It requires a plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness. A positive strategy will address most, if not all, the necessary means of achieving that end, the consequences of which may stretch into many other areas of land use planning, such as transport, design, infrastructure and natural environment policies. Conservation is not a stand-alone exercise satisfied simply by stand-alone policies that repeat the NPPF objectives.</p> <p>The Plan contains much that is positive as regards the historic environment, but I would suggest that it could be strengthened and improved.</p>	<p>Noted</p> <p>Noted</p>
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<p><i>Historic England is of the opinion that the Plan amounts to a positive strategy for the historic environment, but could be improved were it to address directly, for example, the issue of heritage at risk as advised in paragraph 126 of the NPPF.</i></p> <p>4 Gathering evidence</p> <p>Without an understanding of the historic environment of the area and an assessment of the extent to which the significance or value of its heritage assets may be harmed or lost by proposals in the Plan, the Working Group cannot demonstrate that the objectives for sustainable development will be met (NPPF paragraph 14).</p> <p>To be found sound the Plan should be based on adequate up-to-date evidence about the historic environment, used to assess the significance of heritage assets (designated and non-designated) and the contribution they make to the local area (NPPF paragraphs 158 and 169). It should also entail an assessment of historic landscape character. In practice, this means ensuring enough information is available to enable decisions to be made in the site selection process in order to:</p> <ul style="list-style-type: none"> • support the inclusion of sites which could enhance the historic environment, or; • justify the avoidance of sites where there is identified harm, or; • set out clear parameters within which sites can be appropriately accommodated within a historic settlement or within the setting of a heritage asset- for example, in relation to size, design, or density. <p>The Working Group should factor-in the <i>significance</i> of heritage assets, rather than just their proximity and presence; take into account the advice of appropriate professional expertise; include proportionate information on both designated and non-designated heritage assets; include additional studies where a need is identified. This will help provide appropriate and useful information for use in any SA/SEA accompanying the Plan.</p>	<p>Rural Neighbourhood Plan will look at drawing reference to Heritage at Risk</p> <p>Noted</p> <p>Neighbourhood Plan to liaise with and take advice from Hartlepool Borough Council.</p>
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<p>The Plan proposes a number of sites where development for housing would be acceptable. It is not clear, however, what consideration has been given to protection of the historic environment and the safeguarding of landscape, design quality, local vernacular, sense of place and local distinctiveness in proposing them.</p> <p>When identifying land for development it is necessary to firstly understand which, if any, heritage assets may be affected by that development, identify what is significant about those heritage assets, assess how that development might harm or destroy that significance (or enhance it), establish what mitigation measures, if any, should be put in place, then be satisfied that any harm or loss is necessary to achieve public benefits that cannot be met in any other way.</p>	<p>Assessment of historic environment was undertaken via Hartlepool Borough Council 2015 SHLAA</p> <p>Noted</p>
<p><i>Historic England remains to be satisfied that the Plan has given sufficient consideration to the likely/ possible effects of development upon affected heritage assets. As such the Plan cannot demonstrate that such development would be sustainable.</i></p> <p>2. Specific observations</p> <p>Foreword - Historic England welcomes the stated intention to build the Plan around the local distinctiveness of the area, and it is reassuring to note [paragraph 3.6] that this is the strong view of the local community. Paragraph 5.1 sets out the key issues for the Plan to address. Again, it is reassuring to observe that matters of local character and distinctiveness feature strongly.</p> <p>Paragraph 6.1 sets out the Vision for Rural Hartlepool. Just as it is the intention to enhance the quality of life of all who have a stake in the area, so too should it be the intention to <i>enhance</i>, wherever possible and appropriate, the historic component of its environment. Paragraph 137 of the NPPF urges [plan-makers] to look for opportunities to enhance and better reveal the significance of heritage assets. I am pleased to see this</p>	<p>Assessment of historic environment was undertaken via Hartlepool Borough Council 2015 SHLAA – only chosen housing sites deemed appropriate by SHLAA. Only site not included is that in garden of 15 High Street, Greatham which is in Greatham Conservation Area. Group felt this site could be developed as there it was within the village envelope and there was a history of housing and a bus depot on this site. Subject to conforming to Heritage policies filling in this ‘gap ‘ in the High Street could even have a positive impact on the Conservation Area.</p> <p>Noted</p> <p>Noted</p>

<p>better reflected in paragraph 6.2.</p> <p>Paragraph 8.92- it should be recognised that some community facilities might be heritage assets in their own right.</p> <p>Built Environment - the heading of this chapter should include overt reference to the 'historic' environment.</p> <p>Paragraph 8.118 - for clarification:</p> <p>'.....the rural area contains a number of heritage assets, <i>including</i> listed buildings.....'</p> <p>'It is crucial that new development respects <i>and enhances</i> this character.....'</p> <p>Paragraph 8.119(2)- heritage assets should be preserved <i>conserved</i> (in a manner appropriate to their significance). The use of the word 'conserve' is more consistent with the terminology in the NPPF and is taken to include preservation where necessary and appropriate. The word also conveys better the notion that much of our heritage can be adapted respectfully and constructively to meet the contemporary needs of society.</p> <p>'English Heritage' should now be amended to read 'Historic England'.</p>	<p>Noted</p> <p>Change heading to Heritage Assets</p> <p>Agree – reword as suggested</p> <p>Agree – reword as suggested</p> <p>Agree – reword as suggested</p> <p>Agree – reword as suggested</p>
<p>HRPS32 HARTLEPOOL BOROUGH COUNCIL</p> <p>HBC would encourage the inclusion of a strategic/locational strategy policy at the beginning of the plan, such a policy would set out what the key strategic vision is and what the priorities are for development and where development may or may not be located.</p> <p>A strategic policy could make reference to sites protected under EU legislation, the following wording may be of use:- New development should be located or designed so as not to have either directly or indirectly an adverse impact on the integrity of Internationally designated nature conservation sites. The impact of a development must be considered both</p>	<p>Strategic policy not necessary additional text to be added to Vision & Objectives</p> <p>Noted -wording to remain in environment policy</p>

<p>alone as well as in combination with other plans and programs. Where impacts would otherwise have an adverse effect, mitigation measures will be required in advance that meet the Habitats Regulations.</p> <p>Foreward – no comments</p> <p>Introduction – no comments</p> <p>2.4 – this only mentions the stream, which becomes Greatham Beck. However the Claxton Beck is an equally prominent feature on the landscape, more so in fact if you consider that the other two main watercourses in the plan area, North Burn and Cowbridge Beck are ultimately its tributaries. Consider updating the text to reflect this.</p> <p>3.7 - reference to a community hub on all developments should be altered as not all urban extension will require a community hub. An example of this would be a development of 40 dwellings on the urban edge.</p> <p>Consultation on the Rural Plan – no comment</p> <p>5.1 Terminology - listed buildings, scheduled monument, locally listed buildings etc. This has been superseded by the use of heritage assets, consider updating the terminology and defining the term in the glossary.</p> <p>Vision & objectives. Consider drawing reference to accommodating the strategic needs of Hartlepool and if reference is made then it should also be set out in para.6.2.</p> <p>Plan strategy – no comments</p> <p>Housing.</p> <p>8.16 bullet point 4 – HBC consider that the most significant areas of housing growth will be in the urban area and on sites directly adjacent to the urban area and the bullet point should reflect this.</p> <p>8.17 Hartlepool SHMA was endorsed in March 2015 and information from that paper should be reflected in the amended plan.</p> <p>8.18 The term heritage assets should be used as this is more in line with</p>	<p>Agree to update text to include other watercourses</p> <p>Agree to define large scale as about 450 houses which is the approximate size of Greatham village which is able to support community facilities – add to glossary. Please see update to policy H5 for reference,</p> <p>Agree – adjust wording to include heritage assets</p> <p>Have regard to the strategic role of the local plan (emerging) and evidence base</p> <p>Agree – adjust wording</p> <p>Agree to update</p>
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<p>the current policy in the NPPF.</p> <p>Rural economy</p> <p>8.57 Should this be objective 4?</p> <p>Built Environment</p> <p>8.118 as stated earlier the term heritage assets should be used as this is more in line with the current policy in the NPPF.</p> <p>8.119 consider including the Historic Environment Record in the Built Environment Objectives.</p> <p>There should be a sentiment to reinforce townscape character. This should not only be reserved for those areas where there is an appraisal in place. There seems to be a reliance on the production of Village Design Statements etc. HBC has concerns regarding the deliverability of such village statements. It may be appropriate to set out a time frame for village statement delivery or to include them, as an appendix to the rural plan or to provide further guidance within this chapter.</p> <p>Monitoring and Implementation</p> <p>HBC would like further clarity on how bullet points 4, 5, 14 and 15 can be monitored. For example with regards to point 4 and 5 do the plan group intend to set out design criteria in which development can be assessed against?</p> <p>Given that the rural plan group seek to increase tree coverage across the plan area, could an additional monitoring point be added with regard to the number (or additional areas) of additional trees planted?</p> <p>Criterion 18 - consider monitoring large surface water management projects as it may prove difficult to monitor all of them.</p> <p>Appendix 1 – Glossary of Terms</p> <p>Possibly include additional clarification on the following words/terms: -</p>	<p>Agree to update terminology throughout</p> <p>Agree</p> <p>Noted – bullet point 3 as defined – encourage use of Historic Environment Records. Add Historic Environment Records to glossary.</p> <p>Village Design Statements are progressing – will be provided at examination</p> <p>Use Building for Life for guidance to provide list for checking. Add a back of policy document as appendix – design policy, village design statement, scale massing, density.</p> <p>Parish Councils well placed for on ground intelligence</p> <p>Noted and agree</p> <p>Agree to look at additional clarification in glossary. For ‘made’ see Neighbourhood Planning Regs. Community Hub = focus for community activity</p>
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<p>Made, Social needs, community HUB, rural area and rural plan area.</p> <p>Appendix 2 – list of evidence base documents.</p> <p>Consider reviewing and if appropriate citing:-</p> <p>The Playing Pitch Strategy 2012,</p> <p>The Open Space assessment 2015.</p> <p>Indoor Facilities Strategy 2013</p> <p>HBC local list?</p> <p>Appendix 3 plan of best and most versatile agricultural land.</p> <p>The inclusion of the plan is noted. However there is no mention of best and most versatile agricultural land within the plan, consider removing the map or explaining the relevance within the plan.</p> <p>Proposals map</p> <p>Many of the Local Wildlife Sites/Local Geological Sites are missing from the map, as are all of the statutory sites. Is this intentional? If so please provide clarity, if not then HBC can assist in providing further information.</p> <p>Miscellaneous</p> <p>Consider drawing reference permissive routes, e.g. around Hart Moor Farm, this could be on the proposals map or via separate appendices</p>	<p>Noted and agree to look at doing if appropriate</p> <p>Agree Neighbourhood Plan updated with regard DEFRA agricultural gradings</p> <p>Agree improve map</p> <p>Noted</p>
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