



# Hartlepool Local Planning Framework

## Local Plan

## Regulation 22 Consultation Statement



March 2017



**Hartlepool Local Plan Publication Stage**

**Regulation 22 Consultation Statement**

**March 2017**

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## 1.0 INTRODUCTION

- 1.1 In accordance with the requirements of Regulation 22(c) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 this statement sets out the consultation undertaken following the preparation of the Publication stage of the Council's Draft Local Plan and provides details on:
- i) which bodies and persons the local planning authority invited to make representations,
  - ii) how those bodies and persons were invited to make representations
  - iii) a summary of the main issues raised
  - iv) the number of representations made and taken into account
  - v) how any representations have been taken into account;
- 1.2 Consultation Statements were also produced at the previous Issues and Options stage (2014) and the Preferred Options Stage (2016) to help fully record the representations made through the development of the Local Plan. These documents will form part of the Local Plan Examination Library. At the Issues and Options Stage a total of 45 representations were made. At the Preferred Options Stage a total of 240 responses were received. At the Publication Consultation Stage a total of 2,059 representations were received, however a total of 16 representations were withdrawn related to the wind turbines meaning there are a total of 2,043 valid representations within the consultation database.
- 1.3 In the interests of providing a clear and transparent process and in order to meet the requirements set out within the 2012 Town and Country Planning (Local Development) (England) (Amendment) Regulations, this statement outlines the extent of the consultation carried out with stakeholders and the public during the 8 week consultation on the Publication Stage of the Draft Local Plan which took place between 9<sup>th</sup> December 2016 and the 3<sup>rd</sup> February 2017.
- 1.4 This statement includes, as an appendix (Appendix 4), information relating to the representations received at Publication stage and how those representations will be considered.
- 1.5 Further detail on the interaction that has take place with organisations listed in Regulation 4 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, with regard to the Duty to Co-operate is also covered within this document.
- 1.6 A copy of this document can be found on the Council's website at [www.hartlepool.gov.uk](http://www.hartlepool.gov.uk) or a copy can be obtained by contacting the Planning Policy Team on 01429 284084. The Consultation Statement will form part of the Local Plan Examination Library.

## 2.0 CONSULTATION RELATING TO THE PUBLICATION STAGE

2.1 To engage with stakeholders and residents, inform them of proposed allocations at the Publication stage (which is the plan the local authority will Submit to the Secretary of State under regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012) and to illustrate the steps that need to be taken to progress the Local Plan to adoption, a formal consultation period began took place between 9<sup>th</sup> December 2016 and the 3<sup>rd</sup> February 2017, a total of eight weeks. The Statement of Representations Procedure which was available for the duration of the consultation is set out at Appendix 1.

### Advertisement of the Public Consultation period

2.2 The Publication Stage public consultation period was advertised in the following ways:

- Letters were originally sent out to all households and businesses within Seaton Carew due to the levels of objection to the wind turbines proposed within Policy INF7 at the Preferred Options Stage
- Letters were then sent out to all addresses within Hartlepool to ensure everyone was aware of the consultation
- Letters / emails sent out to all consultees on business / organisations database (appendix 3 lists who was consulted)
- Letters / emails sent out to all consultees on community organisations / residents database (appendix 3 lists who was consulted)
- Information was posted on the Council's web site
- A series of press releases were published in the Hartlepool Mail
- Information was published in Heartbeat which is distributed to every household in the Borough (December 2016)
- Information was posted on Hartlepool's twitter account.
- Information sheets were put in notice boards around the town and rural villages.

2.3 Copies of the Publication Stage consultation document and draft proposals map along with the Sustainability Appraisal and Habitats Regulations Assessment were available at (other evidence base documents were all made available online and were sent out to anyone who requested a hard copy):

- The Civic Centre;
- The Borough's libraries;
- The Hartlepool Art Gallery/Tourist information Centre; and on
- The Council's website

### Public Consultation Meetings

2.4 A range of public consultation events took place during the consultation period. They were:

- **Tuesday 13 December 2016, 2pm–7pm, Baltic Suite** - National Museum of the Royal Navy Hartlepool (formerly Hartlepool's Maritime Experience)
- **Thursday 15 December 2016, 2pm-5pm** - Seaton Carew Library
- **Thursday 5 January 2017, 10am-12noon & 2pm-4pm** - Central Library, York Road
- **Monday 9 January 2017, 4pm-7pm** - Seaton Carew Golf Club
- **Tuesday 10 January 2017, 4pm-7pm** - Place in the Park
- **Wednesday 11 January 2017, 4pm-7pm** - Hart Village Hall
- **Thursday 12 January 2017, 4pm-7pm** - Centre of Excellence for Teaching and Learning (CETL), Brierton Lane

- **Tuesday 17 January 2017, 2pm-7pm** - Baltic Suite, National Museum of the Royal Navy Hartlepool (formerly Hartlepool's Maritime Experience)
- **Wednesday 18 January 2017, 4pm-7pm** - Greatham Community Centre
- **Thursday 19 January 2017, 4pm-7pm** - Wynyard Golf Club
- **Tuesday 24 January 2017, 4pm-7pm** - Hartfields Retirement & Extra Care Village
- **Thursday 26 January 2017, 4pm-7pm** - Elwick WI Hall

2.5 The events were generally well attended with the two events in Seaton Carew (Library and Golf Club) and the Place in the Park being extremely well attended. Copies of the attendance lists from the events are held by the Council but are not included within this document as they include personal information such as email addresses.

2.6 To disseminate information and ensure the Duty to Co-operate was met Planning Policy officers attended a wide variety of meetings both in the preparation of the Publication Local Plan and during the consultation period. The meetings undertaken as part of the Preferred Options and Issues and Options are set out in the Consultation Statements relating to those elements of the production of the plan. The Duty to Co-Operate paper at the time of the Publication consultation was also available for interested parties to view and was available at the Councils offices and on the website. The meetings which took place from the end of the Preferred Options Stage through to the completion of this Consultation period are set out below:

- 26<sup>th</sup> July 2016 – Internal meeting between Planning, Estates and Highway to discuss the Elwick bypass and Grade Separated Junction.
- 28<sup>th</sup> July 2016 – Meeting between Council officers and Historic England
- 11<sup>th</sup> August 2016 – Internal meeting with the Education team to discuss Education provision at Wynyard
- 22<sup>nd</sup> August 2016 – Planning Managers / Development Plan Officers Tees Valley Meeting
- 24<sup>th</sup> August 2016 – Meeting with developer of High Tunstall
- 2<sup>nd</sup> September 2016 – Meeting with Leader of the Council and Policy Chairs
- 7<sup>th</sup> September 2016 – Meeting with Combined Authority and Highways England considering highway impacts of the Local Plan
- 9<sup>th</sup> September 2016 – Meeting with Northern Gas Networks
- 13<sup>th</sup> September 2016 – Internal meeting regarding Coronation Drive
- 23<sup>rd</sup> September 2016 – Internal meeting with Economic Development regarding employment targets within the Local Plan
- 28<sup>th</sup> September 2016 – Meeting with Michael Bullock of Arc4 and statistician from the Combined Authority regarding the SHMA/Addendum
- 5<sup>th</sup> October 2016 – Internal meeting with engineers regarding Coronation Drive
- 7<sup>th</sup> October 2016 – Internal Meeting to discuss the programme timetable for the delivery of the Grade Separated Junction and Bypass Scheme in light of the Growing Places Funding
- 11<sup>th</sup> October 2016 – Meeting between Council officers and Wynyard and their consultants regarding highway issues and mitigation for housing proposals.
- 1<sup>st</sup> November 2016 – Meeting with Hartlepool Water and Council Officers regarding Local Plan proposals and water infrastructure
- 9<sup>th</sup> November 2016 – Meeting between Planning Policy and Education regarding capacity in schools and need within Local Plan period.
- 18<sup>th</sup> November 2016 – Meeting between Council departments and Sport England and the national governing bodies for Rugby Union and Football to discuss the scope for work on producing an updated Playing Pitch Strategy and Indoor Facilities Study to replace the 2012 studies.

- 23<sup>rd</sup> November 2016 – Meeting with Sabic regarding gas pipelines and impact on development
- 24<sup>th</sup> November 2016 – Meeting with developers of High Tunstall and Quarry and their highway consultants with Highways England and the police from Hartlepool and Durham regarding proposals for the grade separated junction and closure of central reserves at Elwick and Dalton Piercy.
- 2<sup>nd</sup> December 2016 – Regeneration Services Committee seeking approval to consult on the Publication version of the Local Plan.
- 24<sup>th</sup> January 2017 – Duty to Co-operate Meeting between Tees Valley authorities at Middlesbrough
- 25<sup>th</sup> January 2017 – Duty to Co-operate meeting with Durham County Council
- 25<sup>th</sup> January 2017 – Duty to Co-operate meeting with Stockton Borough Council
- 13<sup>th</sup> February 2017 – Meeting with Wynyard Park Ltd to discuss community infrastructure needs
- 28<sup>th</sup> February 2017 – Tees Valley Planning Managers Meeting
- 2<sup>nd</sup> March 2017 – Meeting with Neil Allen and Council officers regarding Playing Pitch Strategy and Indoor Sports Facilities Strategy
- 7<sup>th</sup> March 2017 – Meeting between Council Officers and the Education Funding Agency regarding the Local Plan and proposed education improvements
- 7<sup>th</sup> March – Meeting with officers from Stockton-on-Tees Borough Council to discuss options for a Masterplan for Wynyard.
- 10<sup>th</sup> March 2017 – Regeneration Services Committee seeking approval to send Local Plan to Full Council for permission to Submit to the Secretary of State
- 16<sup>th</sup> March 2017 – Meeting with Education Funding Agency regarding proposals for Secondary Education in relation to the proposals within the Local Plan
- 16<sup>th</sup> March 2017 – Full Council Meeting where permission to Submit the Local Plan to the Secretary of State was given.

2.6 During meetings minutes and/or notes were taken and if necessary, further correspondence such as e-mails took place.

2.7 At the Publication Consultation Stage a total of 2,059 representations were received. However, a total of 16 representations were withdrawn related to the wind turbines where individuals contacted the Planning Policy Team to say they did not make the representation or no longer wanted it including. This means there are a total of 2,043 valid representations within the consultation database.

2.8 All comments/representations received are recorded verbatim within Appendix 4. Council officer responses to the representations to help illustrate where the Council believes a change to the plan may be appropriate in light of the comments made. The ultimate decision will however be made by an independent Planning Inspector appointed by the Secretary of State to examine the Local Plan. A summary of the main issues raised is provided below:

- ***Minimising and Adapting to Climate Change*** – This section sets out the way in which Hartlepool will seek to minimise any impacts development will have on climate change and to reduce the likelihood of flooding through providing mitigation where necessary. At present there is an objection to the soundness of the plan from the Environment Agency (EA) due to the fact that the Strategic Flood Risk Assessment (SFRA) and Sequential Approach to sites based on an updated SFRA has not been concluded – Consultants, JBA, are currently working on an new SFRA to replace the 2010 document which will then enable a Sequential Test to be applied to sites. The

draft SFRA has highlighted 12 sites (The hospital and a range of employment and retail sites – most of which are existing uses) which will need the exception test to be undertaken. Officers are continuing to liaise with the EA on the issue.

The chapter also includes the policies relating to renewable energy generation. Within the Publication Consultation the issue which generated the most representations by far was the proposal for four smaller wind turbines in the Brenda Road area to the south of Seaton Carew. This allocation had been reduced in response to the opposition at Preferred Options with the Publication version of the plan redrawing the boundary for the wind turbines to move the area away from residential areas within Seaton to the west of Brenda Road and also reduced the maximum amount of wind turbines from 6 to 4 with a maximum tip height of 99m. However, despite these changes there were 1,227 letters of objection received in response to this proposal from residents predominantly within the Seaton area. There were however also 726 letters of support received in response to the policy voicing their support for wind power as a green form of energy. This is an issue which will need to be considered by the Inspector examining the Local Plan in light of the ministerial statement on wind energy.

- **Infrastructure** – This section includes policies for a range of key infrastructure including Strategic transport and connectivity (including the safeguarding of land for future road improvements), community facilities and services, hospital and health provision, telecommunications and utilities.

At Publication Stage Highways England commented on the plan with regards to highway infrastructure and capacity to support the growth of the plan. They have highlighted some additional work which is needed to draw the evidence base together into one document to enable the plan to be sound from their perspective but did note they are confident the information is there, but just not in one document. This will be produced prior to the examination to ensure their concerns are overcome.

One of the key proposals within this section is a proposal for a bypass to the north of Elwick Village and the construction of a new grade separated junction on the A19 at the northern Elwick entrance. The need for this highway improvement has become apparent over recent years as both the A689 and the A179 have continued to become more and more congested. Through implementing these infrastructure improvements many benefits will be experienced including reduced congestion on other roads, increased safety in the Elwick Village, increased safety on the A19 at the Elwick junctions. The cost of these works is circa £18million and initial work including land surveys and meetings with landowners is currently being funded through £600k which was secured through the Growing Places fund which will also pay for the detailed design which is currently being drawn up prior to land discussions and purchase taking place. The Council is currently working with the Tees Valley Combined Authority and other funding bodies such as the Homes and Communities Agency as well as looking at its own capacity to secure funding via a loan or grant to fund the infrastructure works up front to allow development to come forward as soon as possible. The loan or grant funding would be then repaid on a pro rata and incremental basis by the developers/landowners at Elwick Road as the housing is delivered over the plan period. During the Publication consultation there was a good level of support for the proposed bypass and grade separated junction, however there were also concerns with respect to the impact this junction, and the development at High Tunstall and Quarry Farm, will have on the internal road



network in the West Park area. The Local Infrastructure Plan recognises these issues, highlighting the key concerns in terms of junctions and possible mitigations which developments will need to implement.

Representation was also received from the Education Funding Agency (EFA) regarding the proposals under INF4 (Community Facilities) with regard to the proposals for new primary schools and the policy only requiring one form entry schools – the EFA have stated that they would only fund two form entry schools. A meeting has since taken place with the EFA which was productive and informative to both parties.

- **Quality of Place** – this section includes a range of policies which will help to guide the quality and design of new developments in the Borough. Where new development has an impact on the existing infrastructure, policies will require mitigation and improvements to be made where appropriate. These will be secured via developer contributions and delivered through S106 legal agreements. The section also includes a policy on Compulsory Purchase Powers. There were a number of representations which related to the policies within this chapter, with the most notable being concerns from housing developers over Policy QP7 which relates to Energy Efficiency. This is an issue where a change to the wording in the policy may overcome the issues and this can be resolved at examination.
- **Housing** – This section sets out policies to guide housing development over the plan period to help meet the housing need identified within the Strategic Housing Market Assessment (SHMA) and SHMA Addendum. The housing section also includes a range of other policies covering issues such as Affordable Homes, Housing Market Renewal, Extensions and Residential Annexes. There is no allocation for a dedicated Gypsy & Traveller site as there is no need to provide one. However there is a Gypsy & Traveller criteria based policy included in case the very small, theoretical need which was identified in the Gypsy and Traveller Accommodation Needs Assessment ever materialises into a demand for pitches.

The House Builders Federation again made comments on the Publication version of the plan, raising a number of issues which have been commented on as part of this Consultation statement and which will need to be considered at the examination. Most of these issues relate to the way in which the Objectively Assessed Need (OAN) and the housing requirement were arrived at and also regarding the level of affordable housing and the viability of delivering that. Other house builders have again made submissions regarding their sites and their suitability for inclusion within the plan. Again these will be considered as the plan progresses and will be debated at the examination.

The Homes and Communities Agency made representations seeking to have land allocated for a housing led mixed development on their land at North Burn and also housing development on their land at Oakesway. They made the request at Preferred Options as well but it was considered other proposed housing sites were more suitable and deliverable for a variety of reasons set out in the consultation statement. Those reasons are still considered to apply and will be discussed at the examination.

A representation was also made by a representative of the Park Residents Association which considered that the plan had over-estimated the housing requirement as it had included the backlog from the 2006 Local Plan when the SHMA

had noted there was no pent up demand and therefore argued there was no need for the backlog to be included. This will be considered at examination stage.

There was also a strong level of public opposition to the development at Coronation Drive, both from residents concerned with the loss of the green space and also from the Environment Agency who were concerned with development on the former tip site. This will be considered at examination stage.

- ***Strengthening the Local Economy*** - This section sets out a number of policies to guide the development of employment sites across Hartlepool to meet the identified jobs growth over the plan period including the Prestige Employment Site at Wynyard Park, the High Quality Queen Meadow Business Park, General Employment Land and Specialist Industries amongst other policies which will be crucial in providing employment over the plan period.
- ***Managing and Enhancing the Rural Area*** – This section seeks to protect the rural area whilst also permitting development which is necessary to support the rural economy. The section includes policies on Development in the Rural Area, New Dwellings outside of Development Limits, Farm Diversification, Equestrian Development and Rural Tourism. Comments received relating to this section mainly related to the village envelopes and proposals to expand the villages, in particular at Hart. The National Farmers Union commented on the plan, making a few comments and suggestions but also supporting changes made since the Preferred Options. The comments will be considered at examination stage.
- ***Retail and Commercial Development*** – This section aims to protect and enhance the town centre as the main retail area of the town and sets a sequential approach to areas deemed acceptable for retail and commercial developments. The sequential hierarchy sets the town centre at the top, followed by edge of centre locations and Retail and Leisure Parks as the next sequentially preferable sites for large scale developments. Local Centres are deemed appropriate for a range of smaller scale shops which are not deemed likely to have an impact on the town centre. Where proposals within a local centre are over 300sqm, the policy sets out the steps which are necessary to illustrate that they will not take business away from the town centre. The section also includes policies on late night uses, hot food takeaways and other policies to help guide commercial developments to appropriate locations. A range of comments were received requesting changes to wording of the policies, with one raising concerns over the limitations of A5 hot food takeaways proposed within the local centres. The comments will be considered at examination stage.

There were also a number of representations received in relation to the allocation of the Hartlepool United Football Club site as an edge of town centre area (RC8: Mill House Edge of Town Centre Area) rather than being allocated as a leisure or green infrastructure/playing pitch site. The Council has recommended that the designation is changed so that the green infrastructure – outdoors sport including playing fields policy applies. This will need to be considered at examination stage.

- ***Leisure and Tourism Development*** – This section includes policies to help guide the development in the leisure and tourism sectors over the plan period to help build on successes over recent years. The section recognises the importance the Marina, the Headland, Seaton Carew and the Town Centre all play in the development of leisure and tourism which will bring significant benefit to Hartlepool's economy. The section also includes policies on tourist accommodation, camping and caravanning,

business tourism and conferencing. The policies within the chapter were generally well received with the LT3 allocation receiving support from Sport England in relation to the inclusion of the sports domes area for further sports development.

- **Historic Environment** – This section recognises the importance of heritage assets within Hartlepool and provides a range of policies to help to protect and enhance these assets, which include archaeology, conservation areas, listed and locally listed buildings and historic shopping parades. Historic England is the main statutory consultee in relation to the historic environment. Their comments in relation to the plan and supporting evidence were very supportive with only relatively minor comments made in relation to strengthening policies. The comments will be considered at examination stage.
- **Natural Environment** – The natural environment makes up a significant proportion of the Borough of Hartlepool and it is crucial it is protected and enhanced in line with development over the plan period. The section includes policies on the natural environment, green infrastructure, green wedges, ecological networks, playing pitches and incidental open space.

Natural England is one of the main statutory consultees in relation to the natural environment. Their main concerns relate to the potential impact of the developments associated with the plan on the designated environmental areas along the coast – they are particularly concerned that where a development may have an adverse impact on the designated areas that appropriate mitigation is agreed. They have also commented on the Habitats Regulations Assessment which accompanies the plan suggesting some further cross boundary work is needed. Officers will continue to work with Natural England to ensure these concerns are addressed and any subsequent comments will be considered at examination stage

Sport England is another statutory consultee with a responsibility for ensuring that the recreational and leisure policies are sound. They have noted that they do not consider the 2012 Playing Pitch Strategy to be up-to-date and have therefore questioned the soundness of the plan. They do however note within their representation that the Council is in the process of updating the Playing Pitch Strategy and Indoor Facilities Study and are working with the Council to produce these. If through the discussions any further issues are raised these and any subsequent comments will be considered at examination stage.

# APPENDIX 1 – COPY OF STATEMENT OF REPRESENTATIONS PROCEDURE FROM THE PUBLICATION STAGE CONSULTATION



## Statement of Representations Procedure and Availability of Documents

### Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 19

#### Hartlepool Local Plan – Publication

##### Title of Document

Hartlepool Local Plan – Publication Draft, December 2016.

##### Subject matter and area covered

Hartlepool Borough Council has prepared the Publication version of the Local Plan for submission to the Secretary of State for Communities and Local Government. The Local Plan sets out a spatial planning and policy framework for the Borough of Hartlepool for a period of fifteen years from 2016-2031. The Local Plan sets out a vision for how the Borough should be in 2031 and sets out a strategy for growth, identifying appropriate areas and sites for development, as well as the necessary infrastructure to support this growth. The Local Plan will also be used to make decisions on future planning applications.

##### Period of publication for representations

Representations are invited on the Hartlepool Publication Draft for a period of eight weeks, **from 9<sup>th</sup> December 2016 until 4.30pm on 3<sup>rd</sup> February 2017.**

##### Availability of Documents

The Publication Version of the Hartlepool Local Plan, its accompanying documents and evidence base will be available to view on the Council's website at [www.hartlepool.gov.uk/localplan](http://www.hartlepool.gov.uk/localplan)

The documents will also be available to view in the following venues:

- Civic Centre, Victoria Road, Hartlepool, TS24 8AY
- Central Library, York Road, Hartlepool, TS26 9DE
- The Headland Branch Library, Middlegate, Hartlepool, TS24 0JD
- Seaton Library, Station Lane, Seaton Carew, Hartlepool, TS25 1BN
- Owton Manor Library, Wynyard Road, Hartlepool, TS25 3LQ
- Throston Grange Library, Glamorgan Grove, Hartlepool, TS26 0XR
- Summerhill Visitor Centre, Summerhill Lane, Hartlepool

The opening hours of individual branch libraries are available on the Council's website.

##### Representations

Representations on the Local Plan Publication version **must be received by 4.30pm on the 3<sup>rd</sup> February.** Comments may be sent in the post to:

Planning Policy Team  
Level 1  
Civic Centre  
Victoria Road  
Hartlepool  
TS24 8AY

Or by email to [planningpolicy@hartlepool.gov.uk](mailto:planningpolicy@hartlepool.gov.uk)

All comments received will be submitted to the Secretary of State and considered as part of a public examination by an independent Planning Inspector. Representations at this stage should only relate to matters of legal compliance and/or soundness and/or meeting the Duty to Co-operate.

### **Receiving notification of the progress of the Local**

If you wish to be notified at a specific address of the following:

- The submission of the local plan for independent examination under section 20 of the Act,
- The publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act
- The adoption of the local plan.

Please note this within your representation.

Further information can be obtained by contacting the Planning Policy Team on [planningpolicy@hartlepool.gov.uk](mailto:planningpolicy@hartlepool.gov.uk) or by telephoning 01429 284084.

## APPENDIX 2 - LISTS OF ATTENDEES AT CONSULTATION EVENTS

### Museum of the Royal Navy – 13<sup>TH</sup> December 2016

Name	Organisation
Andy Smith	Anglian Water
Brian Coates	Resident
D Miller	Resident
Fiona Riley	HBC
Gillian Smith	Resident – Fens Residents Association
Ian Briggs	Park Residents Association / Friends H'Pool Wild Green Space / Friends of Summerhill
J Miller	
Josh Mitchell	Anglian Water
Keith Riley	Resident
M Lowe	Resident
Monica Vaughan	Resident
Mrs Briggs	Park Residents Association / Friends H'Pool Wild Green Space / Friends of Summerhill
Pauline Hallums	Resident
Robert Smith	Resident – Fens Residents Association
Ryan Cowley	HBC
Sarah Bowman	HBC
W Stapylton	Resident

### Seaton Carew Library – 15<sup>th</sup> December 2016

Name	Organisation
A Rae-Farmer	Resident
A Speleoto	Resident
Alan Haining	Resident
Ann Waller	Resident
C Harris	Resident
Colin Hayes	Resident
Colin Spoons	Resident
D Boagey	Resident
David Waller	Resident
Derek Hodgson	Resident
Dian Palvert	Resident
E Lyth	Resident
E McKay	Resident
Emma Crowe	Resident
Eric Welsh	Resident
F Lyth	Resident
G Sargeant	Resident
Gordon James	Resident
Ian Anderson	Resident
J Cordiner	Resident
J Geeson	Resident
J Grange	Resident
J Griffiths	Resident

J Scott	Resident
K Wates	Resident
L Pedersen	Resident
Michael Leck	Resident
Mrs Oliver	Resident
N Sumpter	Resident
N Wates	Resident
P Pederson	Resident
P Screeton	Resident
R L Nichols	Resident
Ray Arnold	Resident
Richard Lee	Resident
Susan Haining	Resident
Teresa Arnold	Resident
Tony Oliver	Resident
Wayne Fleet	Resident

### Hartlepool Central Library – 5<sup>th</sup> January 2017

<b>Name</b>	<b>Organisation</b>
A Pickering	Resident
C Pickering	Resident
Christine Austwick	Resident
D Hawes	Resident
D Jackson	Resident
David Shaw	Resident
E Montgomery	Resident
E W Welch	Resident
Eric Parkes	Resident
Fehmi Tan	Resident
H McWilliam	Resident
Irene Hogg	Resident
J Parker	Resident
J Rennie	Resident
JM Turner	Resident
Joanna Bellery	Resident
John Fuller	Resident
M A Strange	Resident
M A Taylerson	Resident
M Green	Resident
M Howard	Resident
Maggie Vigor	Resident
Mick Herbert	Resident
Miq Bae	Visitor
Mr Close	Resident
NC Turner	Resident
Pam Holton	Resident
Paul Allen	Resident
Pauline Shaw	Resident

Phil Holton	Resident
R Norman	Resident
R Smyth	Resident
Russel McAndrew	Hartlepool Natural History Society
S Kell	Resident
Shirley French	Resident
Shirley Fuller	Resident
Usha Bansal	Park Residents Association
V Walker	Resident

### Seaton Carew Golf Club – 9<sup>th</sup> January 2017

Name	Organisation
A Fleming	Resident
A Hancock	Resident
A Hughes	Resident
A Pearson	Resident
A Waller	Resident
Anne Dale	Resident
B Crossman	Resident
B Rowland	Resident
C Pearson	Resident
Celia Lister	Resident
D A Waller	Resident
D Beaumont	Resident
David Gregory	Resident
David Laughton	Resident
Doroty Warden	Resident
E Bunting	Resident
Elaine Baker	Resident
G Lister	Resident
Gavin Musgrave	Resident
Helen Gregory	Resident
Ian Cook	Resident
Iris Ryder	Friends of Hartlepool
J Beckenkraeger	Resident
J Hughes	Resident
J Markwell	Resident
Jean Laughton	Resident
Jennifer Guttridge	Resident
John Baker	Resident
Jonathon Owens	Resident
June Markwell	Resident
K Rowland	Resident
Karl Brown	Resident
Kay Brown	Resident
L Sanders	Resident
Lorraine Pederson	Resident
Margaret Fraser	Resident



Margaret Hector	Resident
Mr Mccltire	Resident
Mrs D Beaumont	Resident
Mrs Mccltire	Resident
P Bennett	Resident
P Fleming	Resident
P Hancock	Resident
P Lindley	Resident
P Wilson	Resident
Paul Thompson	Resident
Peter Pederson	Resident
R Arnold	Resident
S Wilson	Resident
Sharon Wright	Resident
Sheila Irvin	Resident
T Arnold	Resident
T Bennett	Resident
Tony Dale	Resident
Vikki Owens	Resident
Yvonne Fisher	Resident

**Place in the Park – 10<sup>th</sup> January 2017**

<b>Name</b>	<b>Organisation</b>
A Synott	Resident
B Coates	Park Residents Association
B Smith	Resident
Bernard Povey	Resident
C Parkash	Resident
Christine Glenn	Resident
Colin Reid	Resident
D & J Crowther	Resident
D Smith	Resident
D Synott	Resident
Daphne Reid	Resident
F Wallace	Resident
Fran Johnson	Park Residents Association
I Matthews	Resident
Ian Briggs	Park Residents Association
Ian Ferguson	Resident
Jenny King	Resident
June Dormand	Resident
K Johnson	Resident
K Riley	Resident
Kathleen Povey	Resident
Kaye Wilkinson	Resident
Kevin Monaghan	Resident
L Cartwright	Resident
M A Green	Resident

M Dickinson	Resident
M Sanger	Park Residents Association
Martin Baines	Resident
Mr A Wright	Resident
Mr C Atkinson	Resident
Mr Parker	Resident
Mrs Parker	Resident
Mrs S Wright	Resident
R Parkash	Resident
S Clark	Resident
SE Akhurst	Resident
Susan Coates	Resident
T R Sanger	Park Residents Association

### Hart Village Hall – 11<sup>th</sup> January 2017

Name	Organisation
B Clayton	Resident
C Mason	Resident
G M Sandles	Resident
J & c Beedle	Resident
J Nicholson	Resident
J Nicholson	Resident
J P Vasey	Resident
J R Littlefair	Hart PC & Resident
J R Ord	Resident
J Taylor	Resident
K R Brown	Parish Council
K Readhead	Resident
M Mountford	Resident
M Vasey	Resident
Mr & Mrs Kelly	Resident
S Ferguson	Resident
S Mountford	Resident
T Jacobs	Resident
Tom Britcliffe	Resident
William Mason	Resident

### Centre of Excellence for Teaching and Learning (CETL) – 12<sup>th</sup> January 2017

Name	Organisation
J Tones	Resident
K Riley	Resident
M Tones	Resident
P Docherty	Resident
P Ridley	Resident
Wm J Docherty	Resident

**National Museum of the Royal Navy Hartlepool – 17<sup>th</sup> January 2017**

<b>Name</b>	<b>Organisation</b>
Anthony Williams	Resident
Claire Proudlock	Home Group
D Byron	Resident
E Briggs	Resident
E Horsley	Resident
E Sharp	Resident
G Ashley	Resident
G Gorton	Resident
Gary Wilkinson	Resident
J D Watson	Resident
J Herbert	Resident
J Mitchell	Resident
J P Repton	Resident
K Gorton	Resident
L Sharp	Resident
M Byron	Resident
Mark Rycroft	Middleton Grange
Michael Herbert	Brierton
Mr & Mrs R Harnish	Hartlepool
Mr F Halliums	Resident
Mr M McNeill	Resident
Mrs A Temple	Resident
Mrs P Halliums	Resident
Mrs P McNeill	Resident
P Williamson	Brierton
T Ashley	Resident
W Horsley	Resident

**Greatham Community Centre – 18<sup>th</sup> January 2017**

<b>Name</b>	<b>Organisation</b>
A Matthews	Greatham
A Merifield	Greatham
B R Walker	Greatham
C Wilkinson	Hart
D Johnson	Resident
D Wardle	Greatham
J Shaw	Seaton
M Urwin	Greatham
Mr Wilkinson	Hart Valley

### Wynyard Golf Club – 19<sup>th</sup> January 2017

Name	Organisation
A Kippax	Resident
A Thurland	Resident
Caroline Newsome	Resident
David Carr	Resident
Diane Atkins	Resident
G Honeyman	Resident
Jim Smith	Resident
John Hall	Resident
Judith Newsome	Resident
K R Mather	Resident
Kit Lofthouse	Resident
M Errington	Resident
Matt Johnson	Wynyard Park
Muriel Reynard	Resident
Paul Newsome	Resident
Paul Oliver	Resident
Rebecca Royds-Gosney	Resident
S & L Eccles	Resident
Stephen Mulpetre	Resident

### Hartfields Retirement and Extra Care Village – 24<sup>th</sup> January 2017

Name	Organisation
Cath Torley	CEMO
Dave Lyth	Resident
G Curry	Resident
Gill Lyth	Resident
Ian Magson	Resident
Jane Leak	Non Resident
Kate Thompson	JRHT
M Curry	Resident
Marian Lowe	Resident

### Elwick WI Hall – 26<sup>th</sup> January 2017

Name	Organisation
A Ross	Resident
B Irving	Resident
C Carter	Resident
Dee Picken	Resident
J Corrigan	Resident
J E Bradbury	Resident
J Nelson	Resident
J Sturrock	Resident
Jo Grylls	Resident
John Haze	Resident

John Proudlock	Resident
K Bellerby	Resident
L Thompson	Resident
Lesley-Anne Bland	Resident
M Booth	Resident
M Harrison	Resident
Minna West	Resident
N Pagdin	Resident
O Ross	Resident
P & J Taylor	Resident
P Heslop	Resident
P Hutchinson	Resident
P Olsen	Resident
R Pocklington	Resident
W & E Bannister	Resident

### APPENDIX 3 – LIST OF THOSE CONSULTED AT PUBLICATION STAGE

Letters were sent to every household. The following tables are those residents, local groups and organisations which Hartlepool Borough Council holds on its planning consultees databases some of whom have participated in previous stages of the plan preparation.

#### Residents Groups and Individuals on Database

A & A Deathers	Residents
A & C Siddell	Residents
A & H McKenna	Resident
A & M Bushnell	Fens Residents Association
A Henderson	Resident
Adam Robson	Resident
Alan & Christine Hepple	Residents
Alan Haining	Resident
Alex Sedgwick	Friends of Belle Vue Centre
Alexander Matthews	Resident
Allan Barnes	Resident
Andrew Bassett	Resident
Andrew Easter	Resident
Andrew Simpson	Resident
Ann Battison	Resident
Anne Brown	Friends of Hartlepool Wild Green Spaces
Anthony & Hannah Speleoto	Resident
B & E Paylor	Residents
B & TA Bird	Resident
Barbara Stalley	Resident
Barker family	Residents
Barry Wilkinson	Resident
Bill and Linda Dickinson	Residents
Bill Spowart	Friends of Rossmere Park
Bob Steel	Hartlepool Heritage & Green Spaces Group-formerly North Linear Park Steering Group
Brian Coates	Resident
Brian W Warnes	Resident
C & C Calvert	Residents
C & SM Spoors	Residents
C Glenn	Resident
C Richmond	Resident
C Spence	Resident
Carol Laud	Burn Valley North Residents Association
Cath & Liz Torley	Friends of Spion Kop
Charlene Twidale	Central Correctors
Chris McLoughlin	Resident
Chris Walker	Haswell Avenue Allotment Association

Christine Szary	St Cuthbert's Friendship Group
Christopher Akers-Blecher	Rift House East residents Association
Claire & Soren Serginson	Residents
Clive & Helen Wall	Resident
Colin Banyer	Resident
Councillor C Akers-Belcher	Councillor
J Ainslie	Resident
Councillor S J Akers-Belcher	Councillor
CW & LS Elener	Resident
D & B Loynes	Resident
D Jinks	Resident
D Redwood	Resident
D Saughton	Resident
D Young	Resident
DA & A Waller	Residents
Daniel Wright	Resident
David Barker	Resident
David Bentham	Hutton Avenue Resident Association
David Braithwaite	Resident
David Hooks	Bishop Cuthbert Residents Association
David Owens	Resident
Debbie Wilks	Queen's Meadow Residents
Deborah Taylor	Resident
Dee Stevens & Steven Whiting	Residents
Demi Crowther	Resident
Denis Palmer	Resident
Desmond Dongo	Asylum Seeker & Refugee Group
Diane Atkins	Wynyard Residents Group
Dorothy Cole	Resident
Dr & Mrs Parkash	Resident
Dr Pickens	Resident
Dr Pickens	Briarfields Allotments
E & J Baker	Residents
E & W Horsley	Resident
E & WE Bannister	Resident
E B Egan	Resident
E G Bunting	Resident
E Plews	Resident
ED & K Waller	Residents
Edith Harrison	Resident
Elizabeth McKay	Resident
Evelyn Leck	Stockton Road Area Residents Association
F A Patterson	Resident
Fr A Tuckwell	St Patrick/St Teresa RC Church

Fr Buttery	St Oswald's
Fr L Rogers	St Aidan and St Columba
Fr M Griffiths	St Joseph's/St Cuthbert's RC Church
Fr N Jennings	St John Vianney/St Mary RC Church
Fran Johnson	Park Resident Association
G & A Doughty	Resident
G & J Parker	Resident
G & S Oliver	Resident
G Bilton & L Purdy	Resident
G Wilkinson	Resident
Geoff Bulmer	Resident
Glenys Thompson	ORCEL (Owton Rossmere Community Enterprise Limited)
Gordon Veart	Resident
GR Gledden	Resident
Graham and Susana Sargeant	Resident
H Morgan	Resident
H Sands	Resident
Henry & Felicity Ashton	Resident
I & D McMillan	Resident
I Mitchell	Resident
I Warren	Resident
Ian Briggs	Park Residents Association & Friends of Hartlepool Wild Green Spaces
J & D Lees	Residents
J & E Hansen	Residents
J Collin	Resident
J Corrigan	Resident
J Hogg	Resident
J Iveston	Resident
J Moriarty	Resident
J P Vasey	Resident
J Ward	Resident
JA & RA Hinks	Resident
Jack Millican/Lucy Green	Residents
James Spence	Resident
Jan Bennett	Resident
Jane and Ian Rollo	Resident
Jane Rollo	Friends of Ward Jackson park
Jean Dawking	Cobden Area
Jean Laughton	Resident
Jenny Haring	Resident
Jill & Dave Whitfield	Resident
Jill Shields	Resident
Jo Collins	Friends of Teesmouth and Seaton Common
Joan Hall	Resident



Joan Smith	Resident
Joanne Fairless	Hart Gables
Joanne Shaw	Resident
John Blakey	Resident
John Herbert	Resident
John Lauderdale	Oxford Road Resident Association
John Littlefair	TM Darling and Son
John O'Connor	Resident
Josh Slater	Resident
Julia Chard	Resident
Julie Healey	Resident
Julie Hetherington	Addison/Belk/Cameron (ABC)
Julie Rudge	Dent/Derwent Residents
Julie Rudge	Friends of North Cemetery
June Dormand	Resident
K & C Young	Residents
Karl & Kay Brown	Residents
Kath and Malcolm Ayre	Residents
Kath McCluskey	Brierton Allotment Association
Kay Keats	Resident
Keith Gorton	Resident
Keith Park	Resident
Keith Riley	Resident
Ken Rowland	Resident
Ken Turnbull	Resident
Kerr family	Residents
Kevin Bolton & Susan Walker	Residents
L & K Leslie	Residents
L & P Lee	Residents
L Cartwright & S Clark	Resident
Laura Wild	Deanery Youth Worker and St Hild's School Chaplain
Laurence Wilson	Resident
Lea Hanlon	Resident
Leisa Smith	Resident
Leslea Jackson	Community Hub
Leslea Jackson	Owton Fens Community Association
Linda Dempsey	Greatham Resident Association
Linda Dickinson	Resident
Linda Thompson	Resident
Liz Torley	Central Estate Management Organisation (CEMO)
M & G Reay	Resident
M & K Hodgeman	Fens Residents Association
M Green	Resident
M Morgan	Resident
M Self	Resident

Malcolm and Kathleen Ayre	Resident
Marcia & Michael Hanley	Residents
Margaret Donovan	Resident
Margaret Hall	St Cuthbert's Area Residents Association
Margaret Palmer	Resident
Marie Starling	Hartwell Residents Association
Martin Errington	Resident
McGrath family	Residents
Melissa Jacobs	Resident
Messrs Herbert	Resident
Messrs Brown & Howell	Residents
Michael Flower	Resident
Michael Ward	Resident
Monica Vaughan	Resident
Moss Boddy	Resident
Mr & Mrs Dee	Residents
Mr & Mrs Houtley	Residents
Mr & Mrs Mallabar	Residents
Mr & Mrs Ogle	Residents
Mr & Mrs P A Wood	Residents
Mr & Mrs W L Spedding	Residents
Mr A Hall	Headland Christian Fellowship
Mr Brahim	Resident
Mr C Smith	Oak & Pine Residents Association
Mr D Geen	Headland Local History Group
Mr DR Mrs C Carr	Residents
Mr F Sturrock	Resident
Mr Gillen	Resident
Mr G Weegram & Ms A Graham	Residents
Mr J Cambridge	Friends of Croft Gardens
Mr J McDonnell	Hartfields Resident Association
Mr J W Dickinson	Resident
Mr K Kelly	Headland Local History Group
Mr M Moran	Resident
Mr Measor	Friends of Seaton Park
Mr Morrish	Burbank Older Persons Group
Mr Mrs Green	Residents
Mr Mrs Halliday	Residents
Mr Mrs K Stockdale	Resident
Mr Mrs Pederson	Residents
Mr Mrs Sarnacki	Residents
Mr Mrs Sirrell	Residents
Mr P Jenkins	Resident
Mr R A Greig	Resident
Mr R Breustedt	Browning Avenue Baptist Church
Mr R Dixon	Resident

Mr R Tansley	Resident
Mr SM Burniston	Resident
Mr Southcott	Heugh Gun Battery
MR W & Mrs C Mason	Residents
Mrs Barker	West View Friendship Group
Mrs C Harris	Resident
Mrs C Thompson	Church of the Nazarene
Mrs G Smith	Resident
Mrs H Parker	Resident
Mrs I Ryder	Resident
Mrs J Fraser	Residents
Mrs J Markwell	Resident
Mrs J Tansley	Resident
Mrs L Wright	Resident
Mrs M Hammond	Resident
Mrs M McGrath	Resident
Mrs Mostert	Bridge Community Association
Mrs N Totty	Resident
Mrs Norman	3R's
Mrs P & Mr F P Hallums	Resident
Mrs P Harkness	Resident
Mrs Proud/Mr Watson	Resident
Mrs Shields	Dyke House Residents Association
Mrs Steel	Residents Association of Clavering and Hart Station (RACHS)
Mrs Young	Headland Carnival Committee
Ms Bailey	Elmtree Community Association
Ms Glew	Tweedies Residents Association
Ms H Woodward	Dyke House Jackson Parents Group
Ms Jarvis	Friends of Gibb Square
N Appleyard	Resident
N Shaw	Resident
Nicholas Bennett	Resident
Nick Barrett	Resident
Nicola Harman	Friends of Rossmere School
Norma Venis	Resident
Norman Bell	U3A
Norman Thompson	Resident
Owens family	Residents
P & L Welch	Residents
P & P Heslop	Residents
P & R Dobson	Residents
P & T Campbell	Residents
P & V Bradley	Residents
P & W Surrell	Residents
Pastor C Sawtell	Elim 'Living Waters' Pentecostal Fellowship

Pastor R Proud	New Life Fellowship
Pastor T Hyde	West View Baptist Church
Pat Harrison	Resident
Pat Hays	Burn Valley Allotment Association
Patricia Rayner	Resident
Patricia Watson	Resident
Paul Bennett	Resident
Paul Mitchinson	Resident
Peggy Mordout	St Mary's Partnership
Peter & Theresa Campbell	3 Hillston Close
Peter Gowland	Friends of Seaton Station
Peter Lithgo	Resident
Peter Zacharias	Derwent Grange Residents Association
Phil Holbrook	Resident
Phil Howie	Resident
Phyl Jenkins	Resident
R & R Nuttall	Residents
R A Johnson	Resident
Ray Laverick	Resident
Rev B Morris	Hartlepool Methodist Churches
Rev K Banks	Headland Baptist Church
Rev M Mathison	Owton Manor Baptist Church
Rev R Hetherington	Oxford Road Baptist Church
Revd C Collison	St Hilda's Church
Revd Captain Allinson	St John's Greatham/Holy Trinity Seaton Carew
Revd G Buttery	St Oswald's Church
Revd J Burbury	St Mary Magdalene Hart/St Peter Elwick
Revd L Butler	St Luke's
Revd R Masshedar	St Paul's
Revd Roz Hall	Holy Trinity and St Marks
Revd S Locke	St James the Apostle
Revd Verity Brown	St Hilda's Church
Richard & Frances Wilson	Residents
Richard Streeting	Resident
Riley family	Residents
Robert Haresnape	Resident
Robert Smith	Fens Residents Association
Roni Farrow	Belle Vue Residents Association
Roy Tozer	Resident
S & G Johnson	Resident
S & W Kell	Residents
S Harrison	Resident
S Stokes	Resident
SA &G Brown	Residents
Sally Ringwood	St Joseph's Social Group
Sandra Chow	Chinese Association

Sandra Leonard	Resident
Sarah & Joan Lattaway	Residents
Sheila Bewick	Resident
Sheila Coulson	Friends of Laurel Gardens
Stanley Evans	Resident
Stephen Akers-Belcher	Rift House Community Action Team
Stephen Taylor	Resident
Steve & Pam Gooderham	Resident
Steven Allison	Headland Residents Association
Steven Crannage	Resident
Stuart Blackett & Rachel Humble	Residents
Stuart Brookes	Resident
Sue Wilson	Resident
T & G Ashley	Resident
T & L Hauttery	Residents
Terence Deighton	Resident
TM & JR Arnold	Residents
Tom Stewart	Rossmere Residents Group
Tracey Brown	Resident
Tracey Crone	Resident
Tracey Rutherford	Resident
Tracy Greig	Resident
Val Woodward	Friends of Regent Square
Vanessa Lord	Resident
W & R Kellett	Residents
W Dickinson	Resident
Wendy Hay	Marmion Estate
	All Saints Stranton
	Headland Neighbourhood Plan Working Group
	Kilmarnock Road Family Centre
	Lancaster Court Residents Association
	St Thomas More RC Church
	Dyke House Residents Association
	St George's United Reformed Church
	Salvation Army Citadel
	Lynnfield Area Residents Association

**Organisations on Database (these were consulted by email if email address present or by post if no email)**

Ian Thurlbeck	@ retail
	Able UK Ltd
	Accent North East
	Airport Planning and Development
	Ambulance HQ

	Amec UK
	Anchor Housing Association
	Ancient Monuments Society
	Andrew McCarthy Associates
John Wilson	Appletons
Janine Laver	Arcus Consultancy Services
	Area Commissioning Group
Vicki Neal	Arup
Mike McNamara	Asda
David Loughrey	ASP Associates
	Association of North East Councils
	Avant Homes
	Avondale Centre
	B3 Architects
	Banks
Mr L Walker	Barnard Grove Primary School
	Barratt Homes (David Wilson Homes)
	Barton Wilmore
James Hall	Barton Wilmore
Duncan Mackay	BDP
	BDP Planning
	Bellway Homes
	Berkeley De Vere
	Big Tree Planning
Jo-Anne Garrick	Bilfinger GVA
Mrs D Rickaby	Billingham Town Council
Peter Marshall	Biz Space
	BNP Paribas Real Estate UK
Antonia Murillo	Bond Dickinson
	BREEAM
AAD Limited	Brenda Road Holdings
	British Butterfly Conservation Society
	British Telecommunications plc
	British Wind Energy
Mrs J Thomas	Brougham Primary School
	Camping and Caravan Club
	CAMRA
Charles Hardcastle	Carter Jonas
Ms J Collins	Castle Eden Parish Council
Mr A Chapman	Catcote Academy
	CBRE
	Cemex UK Operations Ltd
Liz Torley	Central Estate Management
	CETL (Centre for Excellence in Teaching and Learning)
Graham Alton	Changing Futures North East
	Citizens Advice Bureau
K Riensema	Civil Aviation Authority

Miss H O'Brien	Clavering Primary School
	Cleveland College of Art and Design
	Cleveland Cycling Campaign
	Cleveland Emergency Planning Unit
	Cleveland Fire Brigade HQ
Mr R Cains	Cleveland Industrial Archaeology Society
Shared Service Centre	Cleveland Police
	Closing the Gap
E Yuill	CMY
	Colliers CRE International
	Compassion in World Farming
R Panday	Consultant
M Twynham	Consultant
	Council for British Archaeology
	Council for the Protectionj of Rural England
Jane Harrison	Country Landowners Association
Mrs G Gibson	CPRE
Richard Cowen	CPRE
	Crown Estate
	Cunnane Planning
David Brocklehurst	Cussins (North East) Ltd
Sophie Chapman	Dalton Parish Council
Valerie Adams	Darlington Borough Council
David Stovell	David Stovell and Millwater
	Davis Planning Partnership
Mr H J Williams	Dean and Chapter of Durham Cathedral
Mr M J Means	Defence Land Agent
	DEFRA
Jim Hutchison	Defra Flood Management Division
	Deloitte
	Dennis Downen Associates
	Department for Transport
Jen Beardsall	DePol Associates
Faith Folley	Development Planning Partnership
Nic Allen	Devereux Architects
Alan Hopwood	Director in Charge
Diana Bowyer	DPDS
Mark Dransfield	Dransfield Properties Ltd
	Dunlop Heywood
Noel Jackson	Durham Bat Group
Richard Cowen	Durham Bird Club
N Benson	Durham Heritage Coast
	Durham Tees Valley Airport
Mr A Jordon	Dyke House Sports and Technology College
Paul Newman	EDF British Energy
Christine Blythe	EDF Energy
	EDF energy

Alex Jackman	EE
Mrs C Bradley	Eldon Grove Academy
Minna West	Elwick Parish Council
Mrs Jobson	Elwick Women's Institute
Mr C Hughes	Endeavour Housing Association
Dr P Surman	Energy Workshop
Paul Lynn	Engineering Consultant
Ian Lyle	England & Lyle
	English Golf
Mr S Hammond	English Martyrs RC School & Sixth Form College
	Environment Agency
Mrs E Killeen	Eskdale Academy
George Woodward	EWS
	Fairhurst
Mr P Cornforth	Fens Primary School
Mr J F Irvine	Fishburn Parish Council
	Forestry Commission
	Four Housing
	Friends, Families and Travellers
	G L Hearn
Caitlin Morton	Galliford Try
	Garden History Society
Shaun Cuggy	Gentoo
Stephanie Linnell	George F White
	Georgian Group
Philip King	Gerald Eve
	Gladman Developments
Chris Dodds	Gleeson Homes (North East Teesside)
Mrs S Sharpe	Golden Flatts Primary School
	Grand Central Railway
	Grand Hotel
Mrs L Yates	Grange Primary School
Mrs N Dunn	Greatham C of E Primary School
Mr John Cunliffe	Greatham Parish Council
	Greig Cavey
Mrs Johnson	Grindon Parish Council
Daniel Robinson	Gus Robinson
James Barr	GVA
Neil Morton	GVA Grimley (for Wynyard Park)
Will Parker	H & H Land and Property Limited
	Halcrow Group Limited
Kieran Power	Hallam Land Management
	Hammond Suddards
Christopher McGough	Hansteen Holdings PLC (Sovereign Park)
Mrs J Heaton	Hart Community School
Mr R Gray	Hart Parish Council
Mrs Lawson	Hart Station Women's Institute



	Hartlepool Ahmadiyya Muslim Association
Mrs M Smith	Hartlepool Archaeological Society
Jack Hanlon	Hartlepool Boys Brigade
	Hartlepool Centre for the Deaf
Mrs V Lister	Hartlepool Civic Society
Mr D Hankey	Hartlepool College of Further Education
	Hartlepool Countryside Volunteers
	Hartlepool Cricket Club
Alan Walker	Hartlepool Crime Prevention Panel
Mr D A Herbert	Hartlepool Cycle Club
Paul Thompson	Hartlepool Families First
Mrs A Swift	Hartlepool Girl Guides Association
	Hartlepool Golf Club
	Hartlepool Heritage and Green Spaces Group
The Editor	Hartlepool Mail
	Hartlepool Marina
	Hartlepool People Limited
Ms Zeba Alam	Hartlepool Salaam Community Centre
	Hartlepool Sixth Form College
Mr J Rodgers	Hartlepool Sports Council
Mr K J Ensell	Hartlepool Water
Ms M Starling	Hartwell Residents Association
Tracey Bell	Haswell Parish Council
Gillian Elliston	Headland Parish Council
Allison Chippendale	Health and Safety Executive
John Moran	Health and Safety Executive
Carol Johnson	Healthwatch
Sean Hedley	Hedley Planning Services
	Helios Real Estate
Mr M Tilling	High Tunstall College of Science
Chris Bell	Highways England
	Historic England
	HM Inspector of Nuclear Installation
Mr D McKnight	HMS Trincomall Trust
Mrs A Baines	Holy Trinity C of E Primary School
	Home Group Limited
	Homes and Communities Agency
	Housing 21
Suzanne Crispin	Husband and Brown Limited
Mrs J Collins	Hutton Henry Parish Council
	HVDA
	Hyams & Brownlee
Mr P S Gill	ICI
Andrew Windress	ID Planning
	INCA
Mr S Grundy	Indigo Planning
Stephen Carnaby	Intelligent Plans and Examinations (IPE) Ltd

Ian Butler	J & B Fuels
A Pailor	J J Hardy & Sons Ltd
Ted Jackson	JacksonPlan Limited
Steve Parfit	JDR Cables
Mrs J Loomes	Jesmond Gardens Primary School
	Jomast Construction Limited
	Jones Day
	Jones, Lang & Laselles
	JWPC
	Kebbell Developments
	Keepmoat NE
Ian Prescott	Keepmoat Partnership
Mrs A Darby	Kingsley Primary School
Michael Wellock	Kirkwells Planning and Sustainability Consultants
	La Farge Aggregates
	Lambert Smith Hampton
	Lambert Smith Hampton
	Landmark Information Group
	LARA Motor Recreation
	Leebell Developments Limited
	Legato Properties
	Lidl
	Limes Development
	Linden Homes
	Local Dialogue
	Lorne Stewart PLC
Simon Medler	Lovell
Mrs M Fairley	Lynnfield Primary School
	Mandale Properties
	Manners & Harrison
Mrs A Malcolm	Manor Community Academy
	Marine Planning Team
Mr Christopher McGough	McGough Consultants
	McInally Associates
	McNicholas Bros
	Mecca Bingo
Sarah Fotheringham	Met Office
	Middlesbrough Borough Council
Mark Rycraft	Middleton Grange Shopping Centre
	Miller Homes
	Mineral Products Association
	Ministry of Defence
Mrs L A Wardle	Monk Heselden Parish Council
	NACRO
	Nathaniel Lichfield and Partners
Samantha Marlow	Nathaniel Lichfield and Partners
	National Farmers Union

	National Federation of Gypsy Liaison Groups
	National Grid
	National Planning Casework Unit
	Natural England
Frances Cunningham	Network Rail
	Network Space
	New Deals for Communities Truct
Mrs C Nowell	Newton Bewley Parish Meeting
	NHS Hartlepool and Stockton-on-Tees
	NHS Property Services North
	NHS Property Services North East
	Niromax
Michael Hepburn	NLP
	North East Chamber of Commerce
	North East Inshore Fisheries and Conservation Authority
	North of England Civic Trust
	North Star Housing Group
The Editor	Northern Echo
	Northern Gas Networks Ltd
	Northern Powergrid
Daniel Woodward	Northumbrian Water
Mike Leech	Nuclear Generation - EDF
Catherine Draper	NuLeAF
	Office for Nuclear Regulation
	Peacock & Smith
George Gandy	Penningtons Manches
Neil Foster	Persimmon Homes
G L Glover	Pipeline Manager
David Smith -Milne	Place First
	PlanInfo
Matthew Good	Planning Manager- Locals Plan
	Planning Potential
Gary Baker	Planning Strategy Officer
Ben Fox	Planware Ltd
	Posford Duvivier
Alison Baines	Prism Planning
	Railway Housing Association
	Rapleys LLP
	Raymond Barnes
Rebecca Wren	Redcar and Cleveland Borough Council
	Regeneris Consulting Limited
Mr Alan Hardwick	rg+p LTD
	RIBA North East
Christopher Akers-Belcher	Rift House East Residents Association
Mr D Turner	Rift House Primary School
	River Green Developments PLC
Steve Biddle	Road Haulage Association

	Robert Turley Associates
	Roger Etchells & Co
	Rokeyby Developments
	Ron Greig Estate Agency
Mrs L Pawley	Rossmere Primary School
	Royal Mail Group
	RPS
	RSPB
	Rural Housing Trust
Brian Walker	Rural Neighbourhood Plan Group
Mr J Cook	Sacred Heart RC Primary School
	Safe in Tees Valley
Mrs Zeba Alam	Salaam Community Centre
	Sanderson Weatherall
Trevor Adey	Savills
	Savills
	Sean McLean Design
	Seaton Carew Golf Club
	Seaton Carew Sports and Social Club
Dr J Ayre	Sedgefield Town Council
David Randall	Senior Policy Officer
	Signet Planning
Andrew Hird	SLR Consulting Ltd
	Smiths Gore
	Society for the Protection of Ancient Buildings
Michelle Robinson	Spatial Planning Team Leader
	Spawforths
	Sport England
Mrs Z Westley	Springwell School
Christine Doel	SQW
Mark McGovern	SSA Planning Limited
Mrs L Scott	St Aidan's C of E Aided Memorial Primary School
Mr M Cooney	St Bega's RC Primary School
Mrs J Wilson	St Cuthbert's RC Primary School
Ms Carole Bradley	St Helen's Primary School
Ms T Gibson	St Hilds Church of England Secondary School
Mr J Hardy	St John Vianney RC Primary School
Mrs R Williams	St Joseph's RC Primary School
Mrs J Heaton	St Peter's Elwick C of E VA Primary School
Miss M Frain	St Teresa's RC School
Richard Stephenson	Stephenson Johnson Riley
Laura Ross	Stewart Ross Associates
Economis Regeneration and Transport	Stockton Borough Council
	Stonham
Nick McLellan	Story Homes
Bradley Stovell	Stovell & Millwater Ltd
Mr N Nottingham	Stranton Academy

	Stratus Environmental
	Strutt & Parker
Mr K Sharpe	Student Support Centre
	Sustrans
	Taylor Wimpey North East
	Taylor Wimpey North Yorkshire
Robin Daniels	Tees Archaeology
	Tees Heritage Trust
	Tees Valley Arts
Beryl Bird	Tees Valley Local Access Forum
Dr S Antrobus	Tees Valley Nature Partnership
Mr D Clarke	Tees Valley North District Scouts
	Tees Valley Rural Community Council
	Tees Valley Unlimited
Rachel Murtagh	Tees Valley Wildlife Trust
Dr A McLee	Teesmouth Bird Club
	Teesmouth Field Centre
	Terence O'Rourke PLC
	Tesco
	Tetlow King Planning
	The Coal Authority
Annette Elliott	The Co-operative Group
	The Crown Estate
	The Crown Estate
The Guinness Trust	The Guinness Trust
David Granath	The Hospital of God at Greatham
	The House Builders Federation
	The Marine Conservation Society
	The Planning Bureau
Steve Carnaby	The Planning Inspectorate
D Leyshon	The Ramblers Association
J. C. Culine MBE	The Showmen's Guild of Great Britain - Northern
Ross Anthony	The Theatres Trust
Matthew Brindley	The Traveller Movement
	The Victorian Society
Mr S Bedding	The Wharton Trust
Nick Sandford	The Woodland Trust
	Thirteen Group
Jane Evans	Three
Mr M Atkinson	Throston Primary School
	Tony Thorpe Associates
Mr J Robinson	Trimdon Foundry Parish Council
Mrs A Delandre	Trimdon Parish Council
Barry Miller	Tunstall Homes
Bethany McQue	Turley Associates
Rebecca Robson	Turley Associates
	Twentieth Century Society

	UNITE
	URS Infrastructure & Environment UK LTD
	Valuation Office Agency
	Vodafone and O2
	Walsingham Planning
Robert Atkin	Ward Hadaway
Mrs J Brough	Ward Jackson C of E Primary School
Jon Horsfall	Waterway Manager
	Wates Development
Miss A Hall	West Park Primary School
Ms V Evens	West View Advice and Resource Centre
Mrs C Haylock	West View Primary School and Sports Academy
Mr D Wise	West View Project
	White Young Green
Mr G Reid	Wingate Parish Council
C M Evenson	WM Morrison Supermarkets plc
Mr P Healey	Wolviston Parish Council
	Woolerton Dodwell
	WSP Development
Ms L Russell	WYG
	WYG (for C Yuill, Quarry Farm & Southbrooke Farm)
Chris Musgrave	Wynyard Park Limited
Mr Iain Wright MP	

## **APPENDIX 4 – Consultation Statement - Summary of Representations to Publication and HBC Response**

The comments and responses are set out in the following sections, these detail the comments received on each of the policies and response including any suggested amendments from Hartlepool Borough Council.

A list of policies covered is included at the beginning of each chapter.

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**Section 1 of the Consultation Statement, covering:**

- Introduction
- The Local Plan in Context
- The Borough of Hartlepool
- Spatial Vision, Themes and Objectives
- Policy SUS1: The Presumption in Favour of Sustainable Development
- Policy LS1 Locational Strategy

**Introduction**

Company	Unique Ref	Pub Ref	Introduction	Introduction HBC
Resident	LP0082	Pub0067	In your quote "Hartlepool will be a thriving, respectful, inclusive, healthy, ambitious and outward-looking community, in an attractive and safe environment, where everyone is able to realise their potential." I wish to say that this effectively contradicts the outcome of the proposed intent to create a wind farm on the edge of Seaton Carew village. Industrial windfarms (due to their impact on the local residents' skyline) do not render a locality attractive in any sense and thereby conflict with the aims of the HBC statement. Residents close to High Volts already suffer from noise problems that disturb their sleep.	See aggregated response under Policy CC4 to Pub0003 regarding wind turbine development.



Company	Unique Ref	Pub Ref	Introduction	Introduction HBC
Homes and Communities Agency	LP0063	Pub0084	<p>This Statement sets out the Homes and Communities Agency's (HCA) response to the Hartlepool Local Plan Publication Stage Consultation Document (December 2016) with regard to the North Burn, Hartlepool site. BDP have been instructed by the HCA, to make representations to this document on their behalf.</p> <p>This report states:</p> <ul style="list-style-type: none"> <li>• The grounds for the HCA's objection to the Hartlepool Local Plan Publication Stage Consultation Document;</li> <li>• The planning context and merits of the HCA promoted site at North Burn, Wynyard;</li> <li>• The potential constraints upon delivery of the High Tunstall strategic housing allocation; and</li> <li>• The HCA's concerns over the strategic policies within the plan.</li> </ul> <p>The HCA seeks the opportunity to input into the emerging Local Plan proposed by Hartlepool Borough Council. In addition, the HCA welcomes the opportunity for further engagement and the opportunity to appear at any future hearing sessions for the Local Plan.</p> <p>The Homes and Communities Agency (HCA) object to the Hartlepool Local Plan Consultation Draft. The HCA's objections are twofold and linked:</p> <ul style="list-style-type: none"> <li>• The proposed de-allocation of employment site at North Burn, Wynyard; and</li> <li>• The proposed allocation of High Tunstall as a strategic housing site.</li> </ul>	<p>Note basis for response and that concerns are two-fold relating to North Burn and High Tunstall. Also note request to be kept informed on the progress of the plan.</p>
Natural England	LP0043	Pub0129	<p>Natural England has a number a number of concerns with the Plan which should, in our view, be addressed in order that it be considered sound and legally compliant.</p>	<p>HBC will address the issues raised by NE in order to make the LP sound and legally compliant.</p>

## Local Plan Context

Company	Unique Ref	Pub Ref	Local Plan in Context	Local Plan in Context HBC
HCA (Oakesway)	LP0086	Pub0068	<p>Paragraph 3.9 of the Hartlepool Local Plan Preferred Options consultation document stated that there is a shortage of affordable and executive housing in the borough and a need to provide new homes to meet the demands of growth in household formation and to support economic growth. It outlines that sites are available within the existing built up area of the town to meet some of this demand; however, there is a need for some development on greenfield land to meet these requirements and to support the economic growth ambitions of the Borough.</p> <p>The HCA disagrees with this statement. Underused sites such as Oakesway, within the conurbation are available for the development of housing. The development of such sites would reduce the amount of greenfield land lost to development. The delivery of affordable and market residential development would help assist to meet the aims of the Hartlepool Local Plan by delivering much needed housing and supporting the local construction industry.</p>	<p>It would appear that the HCA's comments are somewhat contradictory. On one hand they disagree with the statement that some Greenfield land is needed to meet the housing need, and suggests that Oakesway would be suitable, however then also submits that a previously undeveloped Greenfield site at North Burn should be allocated for a housing led mixed use site. Whilst the Council notes that there are areas at Oakesway which are undeveloped and have been for a number of years, it forms part of an industrial allocation and also part of an Enterprise Zone. Whilst it is appreciated that national guidance guards against the long term protection of employment sites, the concern of the Economic Development section and the Planning Policy team is that there are approximately 800 jobs at businesses at Oakesway, many of which have 24 hour operations and do create some noise – the likelihood would be that if residential developments were to be permitted next to these businesses, then complaints over the noise would likely arise - the Economic Development team would not like to see these existing businesses looking to re-locate as a response to any complaints as they provide valuable industrial jobs within the northern part of Hartlepool. As such the decision was made to leave the land as employment land.</p>
Resident	LP0320	Pub0077	<p>Looking Ahead</p> <p>p.10 — s.3.9 Although Hartlepool is served by a good range of housing provision, there are specific issues relating to an oversupply of poor quality, low demand, terraced housing, particularly surrounding the town centre.</p> <p>More so, since moving here, we have had reason to voice concerns to HBC (Anti-Social Behaviour Unit) concerning problem families residing locally. The latter seemingly related to a gradual decline of some properties within the surrounding area. Properties which, either be it in respect of age, vandalism, 'failure to repair', or a combination of these have ceased to be desirable residences. The issue being compounded by the fact that once these properties fall below a perceived 'desirability threshold' they are sold at prices which reflect their troubled location. Add to this mix the fact that the new landlords: (i) do not live in the area, (ii) have little, if any, regard to the structural integrity of the properties, (iii) are disinclined to act in a regulatory capacity as concerns their tenants behaviour, and you have a recipe for</p>	<p>Comments noted.</p>

Company	Unique Ref	Pub Ref	Local Plan in Context	Local Plan in Context HBC
			<p>urban decay. Admittedly there are mechanisms in place to combat anti-social behaviour sadly, and the police freely acknowledge this, many complainants are fearful to come forwards.</p> <p>Accountability (Landlords)            Although the White Paper Respect and Responsibility — Taking a Stand Against Anti-Social Behaviour’ set out the Governments’ position on housing-related behaviour:            As with everything in tackling anti-social behaviour, it is vital that perpetrators understand that keeping their home is dependent on their behaviour not ruining whole communities... We intend to take action to make the perpetrators deal with their behaviour or they will be evicted themselves. Proper contractual agreements * * should be put in place as with good social or private sector landlords, which makes it the norm whatever the tenure for landlords and tenants to behave in a civilised fashion.            To this end it was proposed that: all social landlords should be obliged to publish their policies and procedures on anti-social behaviour;</p> <p>the scope of the s 152 injunction should be extended and made available to other social landlords; anti-social tenants should lose their security of tenure; 1 0 JAN 2017 courts should have to consider in anti-social behaviour cases, the impact of such behaviour on the victim, witnesses and the community;</p> <p>the working between the various agencies involved in dealing with such behaviour (including housing and social service departments, the police and private sector landlords) should be improved, there should be consultation on whether those who behave anti-socially should suffer ‘housing benefit sanctions’, i.e., have payments of their housing benefit withheld.</p> <p>Insofar as it requires landlords to “prepare and publish policies on anti-social behaviour” (See Note *). for those committed to restoring tranquillity to their neighbourhoods this remains a grey area appearing to promise much but delivering little in terms of proofs supportive of their existence. Manifestly, if landlords are to be held accountable for the actions of their tenants its seems reasonable that copies of the above should be readily available and that “Proper contractual agreements**”, clearly defining a code of acceptable behaviour (re tenants) be produced and enforced.</p>	

## The Borough of Hartlepool

Company	Unique Ref	Pub Ref	The Borough of Hartlepool	The Borough of Hartlepool HBC
Resident	LP0050	Pub0018	<p>Some of the data recorded is out of date such as crime figures at 2008 is 8 years old, No of households is over 3 year old, Population ages over 3 years old, Health figures are over 2 years old, surely this information should be updated as it impacts on the proposals within the document. If there is a reason for 'old' data being used then this should be explained.</p> <p>Is there not an opportunity to re-develop the unused industrial estates along Brenda Road (for tourist/leisure type facilities that could include, swimming pool, athletics track – caravan park and noisy sports).</p>	<p>The Council will audit all of the data used. Where more up-to-date data is available this will be incorporated in the final document as a minor modification.</p> <p>The old industrial estates are allocated for employment use in the 2006 Local Plan and the Council considers that it is appropriate to carry this allocation forward.</p>
Resident	LP0308	Pub0055	<p>As we are part of Tees Valley it would have been interesting to see how our statistics (page 11) compare to our neighbours (Redcar, Stockton, Middlesbrough and Darlington). Similarly it might have been interesting to see the statistics compared to our North East neighbours (Tyne and Wear, County Durham).</p>	<p>It is agreed that comparative statistics would have been of interest. However, the document cannot cover all related matters of interest without becoming unwieldy.</p>

## Spatial Vision

Company	Unique Ref	Pub Ref	Spatial Vision	Spatial Vision HBC
Home Builders Federation	LP0005	Pub0108	<p>The overarching messages within the plan vision are generally supported, particularly the reference to;</p> <p>“...maximised quality housing choices and health opportunities to meet, in full, the current and future needs of all residents...”</p> <p>The vision and objectives are considered to lack spatial dimension. It is recommended they be amended to reflect the growth locations identified in other parts of the plan.</p>	<p>General support for the vision noted. Suggestion that the Vision needs to be amended to reflect growth locations is not agreed as this is covered in Policy LS1 (Locational Strategy) and it is not considered necessary to duplicate the information.</p>
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>The Spatial Vision, Themes and Objectives are generally supported and provide a positive framework for the plan policies. We are pleased to note the amendments to the Council’s Vision, Themes and Objectives following our earlier comments to the Hartlepool Local Plan Preferred Options Consultation Document.</p>	<p>Comment welcomed.</p>
Resident	LP0247	Pub0116	<p>We fully support the vision and objectives identified for the Borough over the Plan period, particularly with reference to the delivery of a more sustainable community together with the protection, management and enhancement of the natural environment. We welcome that this element is reinforced within Spatial Objective 11 as an overarching principle that the Local Plan seeks to promote. We further support Spatial Objective 13, which aims to reduce the causes of climate change and mitigate associated impacts. Sustainable water management can play a key role in ensuring that the impacts of climate change are minimised, particularly with regard to the more frequent and intense rainfall events that are forecast into the future. Spatial Objective 14 is also welcomed by Northumbrian Water, as the redevelopment of brownfield sites can offer the opportunity to provide betterment in terms of surface water management and associated flood risk.</p>	<p>Comments welcomed.</p>

Company	Unique Ref	Pub Ref	Spatial Vision	Spatial Vision HBC
Gladman Developments	LP0351	Pub0118	<p>Gladman broadly support the Spatial Vision and objectives for Hartlepool that are contained in Section 4 of the Publication Plan. In particular, the strong ambition to increase job opportunities through developing a strong, diverse and thriving local economy which contributes positively to the sub-regional economy. The aspiration to maximise quality housing choices and health opportunities to meet, in full, the current and future needs of all residents is also of fundamental importance. Furthermore, the ambition to integrate communities within the Tees Valley City Region and beyond is crucial and goes to the heart of the Council's Sustainable Community Strategy's ambition to develop an outward looking community.</p> <p>To achieve these laudable ambitions, it is vital that the proportionate evidence base that supports local plan production has been prepared in this context, recognising that the borough sits within functional economic and housing market areas that extend beyond its administrative boundaries. Indeed, if the Plan is to be successfully steer towards the achievement of its vision, these interrelationships will need to grow over the duration of the plan period. There are already positive signs of the change needed to improve the economic prospects of the borough. In this regard, the Publication Stage Plan's foreword already highlights the success that has been achieved at the Queens Meadow Enterprise Zone by virtue of it being the most successful in the Tees Valley.</p>	Comments welcomed.

## Themes and Objectives

Company	Unique Ref	Pub Ref	Themes and Objectives	Themes and Objectives HBC
HCA (Oakesway)	LP0086	Pub0068	<p>The HCA agrees with the themes, particularly with housing provision and strengthening the local economy. The HCA also agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. It is considered that in order to achieve economic growth it is imperative that a range of appropriate development sites is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level.</p> <p>The assessments of the site undertaken by the HCA indicate that the site is unviable for employment development in addition to the fact that no development has taken place on the site for around 30 years. This being despite that the site has been marketed as a Local Enterprise Zone site since 1st April 2012 and prior to this as an allocated employment site.</p>	<p>Note support for themes and the principle of the ambition of the Council. It is considered that the plan allocates a range of sites for a variety of types of development to help achieve economic development over the plan period. The representation states that the overall housing requirement should be identified as a minimum. Policy HSG1 includes the following text ‘as a minimum, meet the housing need’. This is intended to demonstrate that the Council has a flexible approach to the housing requirement and does not intend to apply it as a rigid ceiling for sites that are consistent with the Locational Strategy and which will deliver sustainable development. To make this clearer the Council proposes to amend as follows to draw reference to the housing requirement:</p> <p><b>“...and sites elsewhere in the borough to, as a minimum, meet the housing requirement set below”</b></p> <p>In relation to comment over the viability of Oakesway as an employment site, refer to response under the Local Plan in context.</p>
Homes and Communities Agency	LP0063	Pub0084	<p>The HCA agrees with the themes of the Local Plan Consultation report, particularly with regards to housing provision and strengthening the local economy. The HCA also agrees in principle with the Council’s ambition for growth and economic development in Hartlepool. We consider that to achieve economic growth it is imperative that a range of appropriate development is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level.</p>	<p>Note support for the themes contained within the Local Plan. Note support for the ambition for growth and economic development. Targets for growth are seen as a minimum and this is reflected within the wording within Policy Hsg1. It is considered the plan has set out a range of appropriate development in sustainable locations which will see economic growth over the plan period.</p>

Company	Unique Ref	Pub Ref	Themes and Objectives	Themes and Objectives HBC
Sport England	LP0079	Pub0089	Sport England's new strategy widens our scope and influence beyond sport to include physical activity. Sport England notes that the plan's spatial vision and objectives includes an aspiration to enable the Borough's residents to lead healthy lifestyles. Sport England commends this aspiration, but would ask the Council to note that the influencing the built environment can actually have a significant influence on people's physical activity. Some residents are not 'sport' orientated and whilst wishing to achieve a healthy lifestyle they are more likely to do so through physical activities such as walking and cycling.	Note support for reference to residents leading healthier lifestyles. Agree with Sport England's view that the built environment can encourage healthier lifestyles through design. Greater reference to this will be made in the emerging Residential Design SPD (which will be called Spaces and Places Design SPD).
Persimmon Homes (Teesside)	LP0045	Pub0115	The Spatial Vision, Themes and Objectives are generally supported and provide a positive framework for the plan policies. We are pleased to note the amendments to the Council's Vision, Themes and Objectives following our earlier comments to the Hartlepool Local Plan Preferred Options Consultation Document.	Comment welcomed.
Resident	LP0247	Pub0116	We fully support the vision and objectives identified for the Borough over the Plan period, particularly with reference to the delivery of a more sustainable community together with the protection, management and enhancement of the natural environment. We welcome that this element is reinforced within Spatial Objective 11 as an overarching principle that the Local Plan seeks to promote. We further support Spatial Objective 13, which aims to reduce the causes of climate change and mitigate associated impacts. Sustainable water management can play a key role in ensuring that the impacts of climate change are minimised, particularly with regard to the more frequent and intense rainfall events that are forecast into the future. Spatial Objective 14 is also welcomed by Northumbrian Water, as the redevelopment of brownfield sites can offer the opportunity to provide betterment in terms of surface water management and associated flood risk.	Comments welcomed.



Company	Unique Ref	Pub Ref	Themes and Objectives	Themes and Objectives HBC
Natural England	LP0043	Pub0129	<p>Natural England welcome the spatial objectives contained within this version of the Local Plan, which seek to promote the conservation and enhancement of the natural environment through the entire policy framework. The Local Plan recognises the importance of nature conservation issues within the district, but goes further in promoting sustainable development through development delivery as a key factor in policy. The importance of the role of nature conservation is established within the document as a key issue in promoting and considering development and is entirely in accordance with the National Planning Policy Framework (NPPF). Natural England advocates specific policy such as NE2, which seeks to ensure that green wedges are provided through the district and the importance of Green Infrastructure, delivered through Supplementary Planning Guidance is also welcomed by Natural England. It is evident from policy text that the provision of sustainable development is key throughout policy frameworks and this is entirely in accordance with the remit of the NPPF.</p>	Comments welcomed.

**Policy SUS1: Presumption in Favour of Sustainable Development**

Company	Unique Ref	Pub Ref	SUS1 Sustainable Development	SUS1 Sustainable Development HBC
HCA (Oakesway)	LP0086	Pub0068	<p>The HCA agrees with statement that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The presumption strongly encourages planning authorities to allow development, without delay, which meets the development needs of the area. The Council cannot demonstrate a 5 year land supply; therefore the provision of housing should be viewed as a key development need of the area which supports the sustainable development of Hartlepool.</p> <p>Oakesway is currently unsustainable due to the lack of development on the site over the past 30 years. Not developing the site, which is located within the conurbation, is forcing greenfield sites to be developed, which is unsustainable. The development of a proportion of affordable homes on the site further adds to the sites sustainability by delivering much needed homes for lower income households and young people.</p>	<p>This Policy wording is taken from the example policy on PINS website. It is considered appropriate. It is not considered the comments made against this policy are relevant under this policy and relate more to other policies within the Local Plan.</p> <p>It would appear that the HCA's comments are somewhat contradictory. On one hand they disagree with the statement that some Greenfield land is needed to meet the housing need, and suggests that Oakesway would be suitable, however then also submits that a previously undeveloped Greenfield site at North Burn should be allocated for a housing led mixed use site. Whilst the Council notes that there are areas at Oakesway which are undeveloped and have been for a number of years, it forms part of an industrial allocation and also part of an Enterprise Zone. Whilst it is appreciated that national guidance guards against the long term protection of employment sites, the concern of the Economic Development section and the Planning Policy team is that there are approximately 800 jobs at businesses at Oakesway, many of which have 24 hour operations and do create some noise – the likelihood would be that if residential developments were to be permitted next to these businesses, then complaints over the noise would likely arise - the Economic Development team would not like to see these existing businesses looking to re-locate as a response to any complaints as they provide valuable industrial jobs within the northern part of Hartlepool. As such the decision was made to leave the land as employment land.</p>

Company	Unique Ref	Pub Ref	SUS1 Sustainable Development	SUS1 Sustainable Development HBC
Galliford Try	LP0349	Pub0114	<p>Policy SUS1 reflects the approach to decision-taking outlined at paragraph 14 of the NPPF. The policy wording is considered to be generally appropriate, however the following excerpt is noted:  “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” (our emphasis)</p> <p>Paragraph 14 does not include this text, indicating simply that development in accordance with an up-to-date development plan should be approved without delay. It is therefore considered that the text outlined in bold above should be removed, as the wording of this policy as currently drafted is not consistent with national policy and therefore unsound, in accordance with paragraph 182 of the NPPF. Our Client would therefore object to the wording of the policy as currently drafted.</p>	Disagree. NPPF paragraph 150 states that ‘Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise’. The wording of the policy is fully consistent with national guidance.
Persimmon Homes (Teesside)	LP0045	Pub0115	We welcome the approach detailed within Policy SUS1 and consider the Council’s approach to the ‘presumption in favour of sustainable development’ to be consistent with the principles of the National Planning Policy Framework (NPPF).	Comment welcomed.
Gladman Developments	LP0351	Pub0118	Gladman support Policy SD1, which reflects the presumption in favour of sustainable development. It is however vitally important that this positive policy approach is fully reflected through the other policies of the Plan as a whole, ensuring that this remains the golden thread running through both plan-making and decision-taking as required by paragraphs 14 and 49 of the Framework. It will become clear from comments set out elsewhere in these representations that this is not the case in respect of several of the plan’s policies in the manner that they are currently drafted.	Support for the policy is welcomed. HBC consider that the plan as a whole reflects a positive policy approach.

## LS1: The Locational Strategy

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
Resident	LP0050	Pub0018	Better foot/cycle links with Church Square, Town Centre, Marina and visitor attraction sites to develop tourist culture – also need a clearer vision as to the types of shops, bars, cafes and facilities that these areas should attract and how Church Street could be revamped to link in with these areas. When arriving by train in to Hartlepool the first thing that greets visitors is a run-down area which could be made back into an old market area with high quality merchandise, many people go out of town to shop for something different.	The Council will audit all of the data used. Where more up-to-date data is available this will be incorporated in the final document as a minor modification. The old industrial estates are allocated for employment use in the 2006 Local Plan and the Council considers that it is appropriate to carry this allocation forward.
Landowner (Southbrook Farm)	LP0278	Pub0019	I hope you remember me from the meeting on Thursday Matthew where we discussed the boundary line on Summerhill Lane. As you suggested this is a representation to you and your team to have the boundary line moved to include our land so going forward with our planning application it aids all involved parties.	Note that respondent attended consultation meeting to discuss his extant permission at Summerhill Lane. It is noted that the extant permission will expire in March 2017 should there not be a start on site. As the site sits within the green wedge the removal of the allocation to leave a thin white area is not considered to be appropriate, and as such the proposed green allocation should remain. This would mean that, if adopted it is unlikely that the new application for a greater number of dwellings on site would be supported.
HCA (Oakesway)	LP0086	Pub0068	The HCA supports the locational strategy for housing provision which seeks to prioritise economically viable, brownfield land and other suitable and available sites inside the existing urban areas for new housing. This will ensure that the development of greenfield sites is reduced.  Oakesway is a key example of an accessible, suitable and available brownfield site, located within the existing urban area which could accommodate housing development. Not developing the site which is located within the conurbation is forcing greenfield to be developed which is unsustainable.	Note support for Locational Strategy however, would again note that the HCA's comments are somewhat contradictory. On one hand they disagree with the statement that some Greenfield land is needed to meet the housing need, and suggests that Oakesway would be suitable, however then also submits that a previously undeveloped Greenfield site at North Burn should be allocated for a housing led mixed use site. Whilst the Council notes that there are areas at Oakesway which are undeveloped and have been for a number of years, it forms part of an industrial allocation and also part of an Enterprise Zone. Whilst it is appreciated that national guidance guards against the long term protection of employment sites, the concern of the Economic Development section and the Planning Policy team is that there are approximately 800 jobs at businesses at Oakesway, many of which have 24 hour operations and do create some noise – the likelihood would be that if residential developments were to be permitted next to these businesses, then complaints over the noise would likely arise - the Economic Development team would not like to see these existing businesses looking to re-locate as a response to any complaints as they provide valuable industrial jobs within the northern part of Hartlepool. As such the decision was made to leave the land as employment land.

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our comments to the Locational Strategy at the Preferred Options Stage, we commented that there is no strategic green belt around Hartlepool and gave a reason for designating land as green belt as opposed to green wedge.</p> <p>Green belt is a recognised land designation and is afforded protection under the National Planning Policy Framework. Green Wedge does not have this protection.</p> <p>The Publication Stage of the Plan does not address this issue but gives reasons for protecting existing green wedge and indeed designating other areas as green wedge for reasons that are associated with green belt designation.</p> <p>We represent that if the Plan fails to address this issue, it cannot be considered sound.</p> <p>Further, the proposed Policy also addresses potential wind farm sites and states “Areas suitable for wind turbine development are identified in Policy CC4 and on the Proposals Map.” We will address this in greater detail when considering Policy CC4 but at present must question whether these areas can be specifically stated to be “suitable”. Given the requirements for the acceptability of wind turbines, we represent that this proposed part of Policy LS1 is not legally compliant.</p>	<p>Disagree. Whilst it is accepted that section 9 of the NPPF does give the opportunity to designate green belt land within a Local Plan, there is no requirement to do so and the NPPF at other sections, such as paragraph 73, 74, and paragraphs within section 11 of the NPPF including 109, 113 and 114 all offer the opportunity to designate land for other types of green designation. Not having green belt is not a reason for a plan to be found unsound.</p> <p>It is considered in locational and technical terms the proposals for wind turbines are acceptable within the two areas identified within Policy LS1.</p>
Resident	LP0202	Pub0078	<p>We have very little countryside near Hartlepool. I thought part of your job was to protect it. Not just the villages.</p>	<p>One role of the Local Plan is to protect the countryside and other forms of green space within the Borough – other roles are to allocate sites for development of different use types such as housing or employment. This has to be done through the use of evidence to inform on the need over the plan period. A range of sites were considered in coming up with the proposals within the plan, taking account of national guidance and local circumstances. The plan goes through a range of consultation before the plan is examined by an independent Planning Inspector, prior to finally being adopted.</p>

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
Homes and Communities Agency	LP0063	Pub0084	<p>The HCA has been actively promoting North Burn as a strategic housing allocation for inclusion within the Hartlepool Local Plan, and presented the work to date in Preferred Options Consultation response ref. LP0063/DP0020 submitted in July 2016. The work completed on North Burn includes the outline design of a new grade separated site access from the A19 to Design Manual for Roads and Bridges standards.</p> <p>North Burn forms part of the wider Wynyard Park, itself with a mix of employment and housing sites that lie to the north of the A689. The North Burn and Wynyard Park are illustrated below. North Burn lies close to the boundaries of a number of local authorities. The North Burn itself forms the boundary between Hartlepool Borough Council and Stockton Borough Council. To the north west of the site is the boundary with Durham County Council.</p> <p>The North Burn site is 87.4 hectares in area and is bounded by agricultural land to the north and west. To the east the site adjoins the A19 and the southern boundary of the site is close to Wynyard Park. There is a scheduled ancient monument situated in the north west corner of North Burn. This constraint upon development and the steep topography along the western edge of the sites means that we have assumed a developable area at North Burn of 66.7 hectares. A site plan for North Burn is included in Appendix A of this report.</p> <p>North Burn is currently agricultural land and is not serviced. Access to the site is via a private access from the A19 serving Sunderland Lodge and High Burntoft Farm. The site topography generally falls away to the south with a steep slope on the western boundary of the site down to the burn.</p> <p>North Burn is an allocated employment site in the Hartlepool Local Plan 2006. The relevant saved policies for North Burn are IND2: North Burn Electronics Park, RUR2: Wynyard Limits to Development and TRA11: Strategic Road Schemes. These policies allocate North Burn as a suitable site for the development of an electronic components park comprising a mix of B1, B2 and B8 units. Policy TRA11 safeguards land for the development of the 'A19 Wolviston Second Samsung Access'.</p> <p>Preparation of the Local Plan commenced in 2014. Consultation on</p>	<p>Note that representations were received at Preferred Options Stage putting the site for a housing led mixed use development.</p> <p>Note also that you have completed an outline design for a new grade separated access onto the A19, but would note that no consultation has taken place with Highways England or the local highway authority about the suitability of the junction.</p> <p>North Burn, although adjacent to Wynyard Park, does not form part of Wynyard Park. Wynyard Park is all accessed from the A689 which then links to the A19. North Burn is a standalone site which would require a new access onto the A19.</p> <p>Note and agree with the assumption that the Scheduled Ancient monument can't be included as part of the developable area.</p> <p>Note and agree that the relevant policies from the 2006 Hartlepool Local Plan are referenced.</p> <p>Note reference to the Employment Land Review and reference to the NPPF seeking to avoid the long term protection of employment sites – officers would note that we have proposed to de-allocate the North Burn site due to the quantum of employment sites in the Borough and given that this site requires a major new road junction solely to serve that development. Other housing proposals contained within the Local Plan are in more sustainable locations and where infrastructure is needed to support those sites, the benefits would be far wider than supporting just one site – for example the new grade separated junction and bypass at Elwick will not only support the housing development, it was also improve highway safety at Elwick by closing the central reserves, it will take large amounts of traffic out of Elwick village making it far safer for residents and it will help to provide a third route into Hartlepool from the A19 thus helping to re-profile traffic movements and reducing some of the congestion on the A689 and the A179. Spending £18million on the grade separated junction and bypass to the benefit of a large proportion of the Borough is considered far more appropriate than spending £25m to provide access to North Burn on its own.</p> <p>The Council considers that, given the stage in production of the Local</p>

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			<p>the Issues and Options stage 2015 considered the following options for allocated employment sites in Hartlepool with specific regard to North Burn:</p> <ul style="list-style-type: none"> <li>• Make existing employment land more attractive for investment.</li> <li>• Reduce the overall amount of employment land.</li> <li>• Consider de-allocation of part of Wynyard Business Park to allow mixed use development.</li> <li>• Consider alternative uses for North Burn or de-allocate the site and treat it once again as part of the open countryside.</li> </ul> <p>The Issues and Options Report was informed by the Employment Land Review (2014), which identified that there is an oversupply of allocated employment land in Hartlepool and that North Burn should be deallocated unless there is clear evidence of funds being available for the infrastructure required to deliver the site.</p> <p>The Hartlepool Local Plan Publication Stage Consultation Document does not include North Burn either as an employment or mixed use site.</p> <p>The NPPF sets the overarching planning policy for England. The NPPF considers allocation and delivery of employment sites and paragraph 22 states:</p> <p>Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</p> <p>The Employment Land Review published in 2014 identified that any development likely to occur at North Burn would be linked to the proposed new hospital. The review also recommended the de-allocation of North Burn unless it could be demonstrated that funds are available to address the infrastructure shortcomings during the plan period.</p> <p>Since the Employment Land Review was published, the North Tees</p>	<p>Plan, it can currently demonstrate a 5 year supply. The Council is currently updating the October 2015 Planning Framework Document to update the position in relation to the 5 year supply and the weighting which can be given to the emerging policies in light of the recent consultation on the Publication version of the Local Plan.</p> <p>The Council does not consider there to be a deficit of housing sites, and despite discounting a number of existing planning permissions, where there are doubts over delivery, still considers that the proposed sites within the Local Plan along with other extant permissions enable the Council to be in a position to demonstrate a five year supply even when 20% is frontloaded from the back end of the plan period. This is set out within Table 7 within the Publication Local Plan and further detail will be set out in the updated Planning Framework document.</p> <p>The Council prepared both a SHMA (and subsequent SHMA Addendum) and a SHLAA to inform the development of policies within the plan. It is also noted that the HCA is quoting the annual requirement from the 2015 SHMA rather than the Addendum which was prepared to support the development of the Publication Local Plan. We are confident that the sites proposed are available, suitable and viable, including our key strategic site, High Tunstall.</p> <p>Another point to note is that whilst the HCA has submitted a viability assessment to support their representation it does not include any educational contribution; It is likely that a development of over 1000 dwellings would require a single form primary school to provided as part of the development – the Council assumes that for ever 100 dwellings, 21.5 primary pupils will be generated. Therefore a 1000 home scheme would generate 215 pupils with a single form school comprising 210 pupils. A single form school would cost in the region of £5 million which would need to be factored into the viability with approx 1.5 hectares of land set aside.</p> <p>To suggest that the North Burn site is more suitable in sustainability terms than a similar scale development directly adjacent to the main conurbation is something that is not agreed. For example there are existing public transport routes within the urban area, easier access to shops and services such as doctors, secondary schools with ability to increase capacity if needed. Ultimately the local authority has agreed to</p>

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			<p>and Hartlepool NHS Trust has relinquished its option on Wynyard Park and is no longer proposing a new hospital at Wynyard. In this context it is considered unlikely that significant employment opportunities will be forthcoming at North Burn and in line with paragraph 22 of the NPPF alternative uses should be considered for the site.</p> <p>The HCA accept that North Burn will not be viable in current or foreseeable market conditions as an employment site. This is the basis for the proposed re-allocation of North Burn as a housing led mixed use development as we understand that HBC cannot demonstrate a 5 year supply of deliverable housing sites. It is our understanding that the local authority needs to deliver in excess of 6,000 units between 2016 and 2031. The SHMA (2015) states that an appropriate housing target would be approximately 325 net additional dwellings per annum. The Local Plan publication draft acknowledges the previous undersupply of housing and proposes an uplift to 400 dwellings per annum. This is a recognition of the requirement for housing provision over the first five years of the plan timescale has increased by an additional 20%. This essentially means that the Council needs to demonstrate a 6 year supply. In addition to the 20% buffer the publication draft Local Plan also makes allowances for replacing dwellings lost to demolitions to give a total target of 6135 over the life of the plan with an annualised figure of 409 dwelling per annum.</p> <p>Paragraph 159 of the NPPF states the need for local planning authorities to have a clear understanding of the housing needs in their area. HBC has completed an appropriate Strategic Housing Market Assessment (SHMA) which has informed the overall growth targets for the borough. The NPPF also requires a Strategic Housing Land Availability Assessment (SHLAA) which must be informed by realistic assumptions about the availability, suitability and viability of land to meet identified housing demand over the plan period. We set out the reasons below that North Burn is available, suitable and viable. We have reservations over the availability, suitability and viability of High Tunstall which are explored in section 1.3 of this report.</p> <p>The HCA believe that North Burn could make a valuable contribution to the delivery of housing for Hartlepool as a deliverable site in a single ownership. Further to the comments in the introduction to this report, we view the housing numbers calculated by Hartlepool</p>	<p>prudential borrow to pay for the bypass and grade separated junction if other options for funding the bypass prove unsuccessful and as such we are confident that the infrastructure is deliverable at High Tunstall.</p>



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			<p>Borough Council to be a minimum to achieve the sustainable growth of Hartlepool. A greater variety of sites available for housing development and a consequent move away from an over reliance on single strategic sites will make the minimum housing growth targets (and therefore the sustainable growth of Hartlepool) easier to achieve. The HCA contend that North Burn is deliverable in the short to medium term as it is in a single ownership and has relatively advanced plans for the delivery of enabling infrastructure. Therefore, North Burn could start contributing to sustainable growth of Hartlepool in the early stages of the new Local Plan.</p> <p>The preferred masterplan for North Burn provides in excess of 1,000 dwellings, up to 22,000 sqm of employment floorspace and in excess of 7,000 sqm of retail floorspace.</p> <p>An initial viability assessment of this masterplan, using a residual land value methodology, and including the cost of providing the required infrastructure and new access from the A19 demonstrates that North Burn is a viable development site. The preferred masterplan for North Burn is appended to this consultation response.</p> <p>The HCA will be able to fund the required infrastructure for North Burn. The current estimate for the provision of the new grade separated junction, phase 1 site access road and distributor roundabout is estimated at circa £25 million. Utilising existing available funding models, the HCA will be able to fund the initial infrastructure required to deliver North Burn. The HCA will fund the enabling infrastructure at North Burn via the Single Land Programme which will give ready access to the funding required to deliver the site.</p> <p>North Burn, as a site which is deliverable in the short to medium term, conforms to the objectives of the Tees Valley: Opportunity Unlimited report (2016) providing for the fast-track delivery of Starter Homes for Young and First Time Buyers. The Housing White Paper, which is expected to be published imminently is expected to further emphasise the importance of housing delivery across a wide range of sites and the desperate need for Starter Homes and equivalent affordable housing types.</p>	

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Story Homes	LP0219	Pub0090	<p>Story Homes broadly supports the Local Plans aim to ensure that Hartlepool receives sustainable growth over the next plan period. However, in accordance with our previous representations we consider that the Plan should include additional detail in relation to its preferred spatial strategy for new housing provision and their general locations. We agree with future growth being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth, however, we consider that that Policy LS1 should make reference to Hartlepool’s Towns and Villages in the rural area. We recommend that the Council should give further consideration and include a spatial hierarchy for these settlements which do not currently feature in Policy LS1 to provide more certainty and transparency regarding the Council’s approach to growth in the entire borough. Moreover, we also urge the Council to allocate more housing land in the rural area in order to promote sustainable development where it would enhance or maintain the vitality of rural communities. This approach would ensure that the Plans locational strategy is consistent with national policy and paragraph 55 of the NPPF in particular.</p>	<p>Note broad support for sustainable growth. It is not considered necessary to have a spatial hierarchy of settlements within the Local Plan. The plan has allocated sites (including existing planning permissions) for over 6,000 dwellings. As we are meeting our housing need and allocating sites to do this there is no need for a hierarchy. If there are windfall developments during the plan period these will be expected to be within the Urban area or Village Limits to Developments but there is no need to specify a hierarchy between the villages and the urban area.</p>
RSPB - Northern England Region	LP0253	Pub0091	<p>The HRA (Page 45) states that “HBC has taken advice from the RSPB following consultation on version 1 (Draft HRA) of this report and has taken the emphasis off this policy for mitigating likely significant effect and has embedded mitigation within the appropriate policies. In version 1 there was a general presumption that mitigation would be sought via the HRA process at the detailed development control planning application stage – this has been changed.” The RSPB is pleased to see that HBC has considered our advice against significant reliance on LS1 to conclude that individual policies will avoid a LSE upon European sites and welcome amendments to individual policies to this effect. However, we do not agree that the general presumption that mitigation would be sought via the HRA process at the detailed development control application stage has been sufficiently changed – in particular with regards to employment policies. Please see our further comments on this matter below.</p>	<p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.  <b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

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Gentoo Homes	LP0335	Pub0092	<p>These representations are made with specific regard to Gentoo Homes land interests at Hart Village. The Site has previously been granted planning permission for the development of 22 family homes in December 2015. As such, these representations seek to promote the Site for residential development as an allocated development site within the Local Plan.</p> <p>Site Location, Context and Policy Background - The Site lies to the east of Millbank Close on the eastern edge of Hart Village and measures approximately 0.85 hectares in size and comprises moderate quality open agricultural land. The Site can be accessed via the existing access point on the southern boundary leading from The Fens road. A small beck runs along the northern edge of the site.</p> <p>Planning permission was granted for the development of 15 family homes in 2015 (application ref: H/2015/0209), therefore demonstrating that the Site is sustainable and suitable for residential development.</p> <p>The key policies in the emerging Local Plan which relate to our land interests are LS1, HSG1, HSG8, RUR1 and RUR2 which look to restrict the development of sites that fall outside of the identified 'Development Limits' in order to protect the countryside. Policy HSG1 'New Housing Provision' looks to deliver 6,199 new homes in the borough over the plan period.</p> <p>At present, the Site is not identified as an allocated housing site within Hart Village and also falls outside the Development Limits as identified under policy LSI on the proposals map.</p> <p>Whilst the Site has not been identified as a suitable location for residential development, despite the extant planning permission, it has been assessed and considered in the Strategic Housing Land Availability Assessment (SHLAA') 2015. The SHLAA identified the Site (SHLAA Ref: 9) as being suitable for delivering 22 new homes. The approved planning permission allows for the delivery of 15 new family homes, however it is intended that a new planning application may come forward which will seek permission for the delivery of 22 new homes, in accordance with the findings of the SHLAA.</p> <p>It is also noted that the Site is identified as one of the deliverable / developable sites within the SHLAA, providing 22 new homes in the first five years of the plan period. As such, the Site is identified as part of the 'Extant residential Planning Permissions' within the urban edge and rural village sites as set out under policy HSG1.</p>	<p>It is noted that the site was assessed as part of the SHLAA – the reason it was not included as a housing site was due to the site being a Local Wildlife Site which the Publication Version of the Local Plan had allocated the site under Policy NE1c. The Hartville Meadow Local Wildlife Site (LWS) went through due process when it was designated. Following survey, it was recommended for LWS designation to what is now the Tees Local Nature Partnership, Local Wildlife Sites Panel and was ratified. Final approval must come from the Local Authority and this was done following a report taken to the appropriate Hartlepool BC Committee. It is inevitable that some LWSs (and other nature conservation designated sites) are designated between published Local Plans and therefore do not appear in a Local Plan document. However, it is accepted that nature conservation designations are part of a rolling programme.</p> <p>Local Wildlife Sites have no legal protection but are 'protected' to some extent through the Local Plan. In this case the opportunity to retain all or part of the site and to mitigate any damage from development has been pre-empted by a deliberately damaging operation. The site was ploughed following an approach to the Council during the Publication Local Plan Consultation regarding its potential to be allocated for housing. HBC interprets this as a deliberate act of attempting to destroy a LWS.</p> <p>The idea of Voluntary Management Agreements between LWS owners and the Local Authority come from Defra in their guidance on how sites could be kept in favourable condition. This guidance also includes LWS owners entering into paid Environmental Stewardship Scheme agreements with Natural England. Voluntary Management Agreements are not mandatory and a lack of an agreement does not infer that the site is not a LWS. The Department of Communities and Local Government (DCLG) has an annual performance indicator which is the number of LWSs in favourable condition in the previous five years. HBC reports this figure annually to DCLG. If Hartville Meadow is de-designated then this will be reported as a loss to DCLG in 2017.</p> <p>Local Wildlife Sites can only be de-designated following re-survey at the appropriate time of year and a recommendation of de-designation being endorsed by the Tees Local Nature Partnership, Local Wildlife Sites Panel. Contrary to the statement that the botanical interest</p>

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			<p>It is considered that the Site is inherently suitable for residential development given the approved planning permission which in turn demonstrated that the site was available, suitable and achievable. The Site is within a highly sustainable location with access to local services and facilities in the village itself, whilst there are further facilities available at nearby Middle Warren. The Site and villages inherent sustainability credentials are acknowledged by the granting of planning permission for the development of 15 units on the Site, which was approved in accordance with the presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF).</p> <p>It has been demonstrated that the Site is well related to existing services, facilities and employment opportunities in the area and that the Development Limits should be extended accordingly, in accordance with other approved developments within the borough that have had the Development Limits extended around them. An appropriate and safe access can be delivered from The Fens on the southern boundary, whilst appropriate mitigation can be delivered to ensure there is no impact upon potential archaeological remains or risk from flooding.</p> <p>We thereby request that the Site is identified as a suitable housing site within the Development Limits. Until these changes are made we object to the current wording of policies LSI, HSGI, RURI and RUR2.</p> <p>Whilst Gentoo Homes are supportive of the emerging Local Plan, it is considered that the Site should be identified for residential development, given the current extant planning permission that is in place. Furthermore, the Development Limits around Hart Village should be amended to include the Site.</p>	<p>features of the site no longer exist following the ploughing of the site, the vegetation could re-establish itself. The soil will still contain roots, rhizomes, bulbs and seeds from the native plant species and these have the potential to regrow. Therefore a full re-survey is required. This should be undertaken from 1st May onwards once the growing season is underway. The damaging of this meadow is being investigated by Natural England (as the enforcing authority) under the Environment Impact Assessment (EIA) Agriculture Regulations 2006 which were introduced to prevent the loss of old meadows by farming practices. This has been necessitated by the loss of approximately 95% of lowland meadows in England since 1945, an issue picked up in the Government's Biodiversity 2020 strategy and the White paper 'Making Space for Nature' also known as the Lawton Report 2010. Under the EIA Agriculture Regs, Natural England has the power to order that the meadow is reinstated; therefore, it is the HBC view that the allocation of this site as NE1c remains sound until all investigations have been concluded.</p> <p>The local authority demonstrates through the housing chapter that it is meeting its full, objectively assessed need and this site is not needed as a housing site to meet our housing requirement identified within the plan.</p>

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Landowner (Hartville Meadow)	LP0337	Pub0094	<p>Our client objects to the failure of the Draft Local Plan to include his land, that lies east of the A1086 Easington Road on the northern edge of Hartlepool (see written representation for plan), within the proposed Limit to Development for Hartlepool as shown on the Policies Map. He would request that the proposed Limit of Development in this part of Hartlepool is redrawn to include this land. The land east of Easington Road extends to 2.2ha (5.4acres) gross. The site is bounded by the built up area of Hartlepool to the south, the railway line to the east and the A1086 Easington Road to the west, beyond which is Seaview Residential Caravan Park. To the north is a triangular agricultural field.</p> <p>The site is roughly rectangular in shape. It was previously used for horse grazing but has recently been ploughed. It slopes down from north to south. A small beck runs along the southern boundary. Vehicular access to the site can be obtained from the A 1086 Easington Road. It is likely that as part of development a further pedestrian / cycle link could be made to the public footpath to the east providing access to the coastal strip.</p> <p>It is estimated that the net developable area of this site is 1.8 ha (4.5 acres) suggesting an indicative capacity of up to approximately 55 dwellings whilst still retaining sufficient open space around the site's perimeter to provide on-site open space, landscaping, planting etc. It is envisaged however that a lower density of development might be more suitable on this site perhaps including an element of self-build. The adjacent housing areas contain a wide mix of predominantly family housing and it is anticipated that this site will deliver a similar mix of 2, 3, 4 &amp; 5 bed homes in an attractive modern housing environment.</p> <p>The land east of Easington Road occupies a sustainable location. It is within walking / cycling distance of local shops and services on King Oswy Drive, Clavering Road and Merlin Way, and Bernard Grove and Clavering Primary Schools. In addition there are bus stops on the site's main road frontage, providing access to a variety of local and longer distance services into Hartlepool to the south and to Easington and beyond to the north. There is also a Priority Bus, Route within easy walking distance, on King Oswy Drive.</p> <p>Subject to providing site specific supporting information on topics such as flood risk, drainage, topography, ecology, access etc. together with appropriate mitigation, it is considered that this land is an inherently suitable and sustainable location for housing development</p>	<p>It is noted that the site was assessed as part of the SHLAA – the reason it was not included as a housing site was due to the site being a Local Wildlife Site which the Publication Version of the Local Plan had allocated the site under Policy NE1c. The Ha</p>

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			<p>and has the potential to help to meet the Council’s objectively assessed housing needs for the next 15 years in a highly sustainable manner.</p> <p>It is noted however that the draft Plan proposes that the site is allocated as a Local Wildlife Site under Policy NE1c - Hartville Meadows. The justification for this draft allocation is identified as being the existence of a range of grasses and herbs on site. However as the site has been ploughed this ‘interest’ has largely be lost. The site potentially remains of some ecological interest around its perimeters which have remained undisturbed and it is anticipated that future development for housing would provide the opportunity to enhance the value of these retained areas, but the site as a whole would no longer merit a Local Wildlife Site designation. A separate representation has been prepared in connection with draft Policy NE1c seeking the site’s removal from the list of Local Wildlife Sites. It is noted that the site has been assessed for is suitability! deliverability for housing development through the Council’s Strategic housing Land Availability assessment (SHLAA). The site is identified as Site No. 19 in the SHLAA. The SHLAA concludes that the site is “Not deliverable” as a housing site as although it “Would be available in the first five years” it “Has an environmental designation”. Clearly in the light of the above this assessment no longer holds true and the site should be reclassified in the next SHLAA update as being Deliverable for housing within five years.</p> <p>Overall it is considered that the Local Plan Publication Draft cannot be considered sound without the inclusion of this site as a housing allocation under HSG1 and its inclusion within the Development Limits defined under Policy LS1 on the Policies Map. Without the Plan identifying this site as a housing allocation within the Development Limits the Plan will be ineffective and therefore unsound as it will fail to deliver sufficient housing to meet the correct OAN. It is also therefore not compliant with national guidance nor adequately justified against other alternatives.</p>	
Estates team	LP0340	Pub0098	The representation requests that Hart smallholdings are allocated for residential.	The Local Plan has allocated sufficient deliverable and developable housing sites to meet the housing requirement for the Borough, which includes a 20% flexibility buffer, over the plan period. The site requested for residential allocation in the representation currently forms part of the Strategic Gap, the maintenance of which contributes to the villages keeping their identities. Whilst the Borough Council attaches great importance to the delivery of housing, there is no need

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				to diminish the Strategic Gap in order to meet the Borough's housing requirement.
Greatham Parish Council	LP0018	Pub0102	<p>Greatham Parish Council strongly supports the stated aim of the policy to protect the rural area. Of particular importance and strongly supported are the strategic gaps as proposed.</p> <p>Greatham Parish Council supports the omission of the extension of the urban fence around the former "Centura Works" (previously RHM/Cerebos). The site is isolated from the rest of the urban area with no access from the urban area. The only access is via a long winding country lane which runs through Greatham village.</p>	Comment welcomed.
Hartlepool Civic Society	LP0013	Pub0107	<p>As much of the Oakesway Site has been 'static' for over 30 years, we are pleased that the Council has, at last, acknowledged that Housing on this sustainable sites is viable, as 50 dwellings are being considered. Indeed, the Society understands that the owners HCA are planning to sell 15 ha on this brownfield site for residential use. Despite there being limited commercial operations currently on this site, further consideration should be given for housing.</p> <p>The NPPF 22 states – planning policies should avoid the long-term protection of sites allocated for employment use, where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities.</p> <p>The Society strongly supports protection afforded by Strategic Gaps.</p>	<p>Whilst the Council notes that there are areas at Oakesway which are undeveloped and have been for a number of years, it forms part of an industrial allocation and also part of an Enterprise Zone. Whilst it is appreciated that national guidance guards against the long term protection of employment sites, the concern of the Economic Development section and the Planning Policy team is that there are approximately 800 jobs at businesses at Oakesway, many of which have 24 hour operations and do create some noise – the likelihood would be that if residential developments were to be permitted next to these businesses, then complaints over the noise would likely arise - the Economic Development team would not like to see these existing businesses looking to re-locate as a response to any complaints as they provide valuable industrial jobs within the northern part of Hartlepool. As such the decision was made to leave the land as employment land. The plan does not propose to allocate land for any residential although this option has been discussed as a possibility subject to there not being an impact on existing businesses.</p> <p>The Societies strong support for the Strategic Gaps is noted.</p>
HBF	LP0005	Pub0108	<p>he policy is considered unsound as it is not sufficiently justified. The policy includes reference to a 'Strategic Gap' where development will be strictly controlled. Whilst we accept the need to prevent coalescence between Hartlepool and the surrounding villages the extent of the gap must be justified on a credible evidence base. The policy and evidence base does not currently take any account of the relative importance of differing parcels of land in maintaining the gap and preventing coalescence.</p> <p>The HBF consider a more pragmatic response would be to provide a</p>	<p>The Council notes the HBF's ongoing concern with regard to the element of Policy LS1 which refers to the Strategic Gap. The Council is pleased to note that the HBF recognises the need to prevent the coalescence of Hartlepool and the Villages. In order to overcome the concerns of the HBF and some of your members the Council will undertake a piece of work prior to the examination to assess the parcels of land which are included within the Strategic Gap to ensure the policy is supported by evidence.</p>

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			<p>full assessment of the land parcels making up the gap. Those parcels of lesser importance could then be identified as contingency or safeguarded sites which could be released through policy criteria as the need arises. This approach would not only ensure that the essential elements of the gap are maintained but would also provide flexibility within the plan to deal with changing circumstances.</p>	
Galliford Try	LP0349	Pub0114	<p>Policy LS1 sets the broad strategy for distributing housing and employment development throughout the borough over the plan period. Policy LS1 identifies the key areas for delivering housing development, and includes: "Extensions of the villages of Elwick (HSG7 - approximately 35 dwellings) and Hart (HSG8 - approximately 50 dwellings)." The extension of Elwick refers to our Client's Site. Policy LS1 should be read in accordance with Section 10 of the HLP, which addresses the overall housing requirement. As such, whilst our Client welcomes the inclusion of the Site as an allocation for residential development, further consideration needs to be given to the housing numbers referenced and this issue will be addressed in further detail in the following sections.</p> <p>Policy LS1 identifies a number of key locations to deliver housing over the plan period, with three key locations for development identified to the south west of the town (1,250 units), High Tunstall (1,200 units) and Wynyard (732 units). 27048/A3/PS 3 3 February 2017 Paragraph 47 of the NPPF identifies that local planning authorities should: "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period."</p> <p>As one of only two sites identified by Policy LS1 for growth in villages, our Client's Site at Elwick represents a suitable option for a sustainable residential expansion. However, it is considered that these suitable sites have the potential to deliver a greater number of dwellings, and this possibility should be explored further as a means to meet the Borough's full objectively assessed needs as identified by the NPPF. This issue will be addressed further in the following sections.</p> <p>As such, whilst our Client welcomes the inclusion of their Site as an</p>	<p>Note your support for the inclusion of the site in Elwick Village as a housing allocation in principle.</p> <p>Note your client considers a higher yield is deliverable on the site. This is something that the local authority would not support. The proposal has been proposed following close liaison with village residents and those involved in the emerging Rural Neighbourhood Plan and is currently considered to be in general conformity with the emerging Rural Plan. The scale of the development proposed is considered to be in keeping with the surrounding densities within the village.</p> <p>The local authority would note that there are 3 sites within the rural villages, 2 at Hart Village and 1 at Elwick Village.</p> <p>The local authority also consider that a range of new allocations have been proposed alongside existing planning permissions which will meet the identified need over the plan period. The housing requirement has allowed for a 20% buffer on top of the OAN to meet the governments aspirations for housing growth identified at Paragraph 47 of the NPPF and to allow for the provision of a greater number of affordable units to be delivered as well as giving flexibility if sites stall. It is therefore considered that Policy LS1 is in line with paragraph 182 of the NPPF and has been positively prepared and goes significantly beyond meeting the objectively assessed need for the plan period.</p>



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			<p>allocation for development, policy LS1 should seek to specifically identify where a greater proportion of the housing requirement could be located throughout the plan period. As required by paragraph 182 of the NPPF, it is not considered that this policy is positively prepared as it does not fully explore the Borough's potential to deliver the housing needed over the plan period. It appears to be over-reliant on housing being delivered in the specific areas identified, and fails to identify suitable alternatives should there be barriers to delivery on these sites. As such, the policy is considered to be unsound. Whilst our Client supports the principle of including their Site as an allocation, they object to the policy as currently drafted.</p>	
<p>Persimmon Homes (Teesside)</p>	<p>LP0045</p>	<p>Pub0115</p>	<p>Persimmon Homes object to Policy LS1 as we do not consider the council's approach to be justified.</p> <p>To ensure sustainable growth to 2031 the policy identifies a strategy of "balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth but ensuring growth occurs in a controlled way and is delivered alongside infrastructure improvements which allow Hartlepool to grow in sustainable manner."</p> <p>This approach is generally supported however we have fundamental concerns the inclusion and reference to a blanket Strategic Gaps policy along the full western edge of the town. The Strategic Gaps are defined on the proposals map and aim to maintain the separation between the town and the surrounding villages, particularly in the vicinity of Hart and Greatham villages where the urban edge is in close proximity to the villages. The Policy subsequently looks to strictly control and limit development within the Strategic Gaps to that associated with farming and rural businesses only.</p> <p>Whilst we accept that it is important to maintain the separation between the town and the surrounding villages, we do not consider this to be the most appropriate strategy for controlling encroachment and coalescence. The extent of any gap must be justified and supported by a credible evidence base. The policy and evidence base does not currently take any account of the relative importance of differing parcels of land to maintaining the gap and preventing coalescence and therefore cannot be supported.</p>	<p>The Council notes the ongoing concern with regard to the element of Policy LS1 which refers to the Strategic Gap. The Council is pleased to note that Persimmon recognises the need to prevent the coalescence of Hartlepool and the Villages. In order to overcome the concerns the Council will undertake a piece of work prior to the examination to assess the parcels of land which are included within the Strategic Gap to ensure the policy is supported by evidence.</p>

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			<p>We are also concerned that the policy does not offer any additional protection over and above the defined Settlement Limits should the Council's five year land supply position falter, nor does not provide any flexibility within the plan for additional growth or the release of sites should the need increase or the allocations stall.</p> <p>To overcome these concerns, Persimmon Homes strongly consider that a more pragmatic, positive approach would be to provide a full assessment of the land parcels along the western edge of the town making up the gap. Those parcels considered of strategic importance to the long-term preservation of any gaps between settlements could then be maintained, whilst any parcels of lesser importance could then be identified as contingency or safeguarded land which could then be released through the plan should a need arise in the future. Safeguarded land would only be identified where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development. This would ensure that the long-term expansion of the town continues to be plan-led in accordance with the core principles of the planning system but also that any additional sites which do come forward are sustainable and contribute to the wider objectives of the plan, including maintaining a gap between settlements and avoiding coalescence.</p> <p>Persimmon Homes therefore suggest that all or at least the southern parcel of Phase 2 of the South West Extension should be identified as safeguarded land to overcome the above concerns. Given Persimmon Homes ongoing interests on the adjacent land, the site would naturally be something that if it were to come forward, it would do so later in the plan period, post 2025/26 when the adjacent first phase is expected to be complete. According to Table 7 and Graph 1 of the Publication Plan, this is also when any additional need for additional housing is likely to arise.</p> <p>The second phase formed part of the wider HSWE site which was previously draft-allocated and found to be a sustainable and sound location for approximately 2200 units by a government appointed inspector following the Public Examination in 2013. The site is now under the control of Persimmon Homes but work has continued</p>	

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			<p>refining a scheme with input from community groups, ward councillors and local residents to address such issues as flood risk, amenity and connectivity. The site therefore represents the only logical, strategically planned, and proven to be sound option for an expansion of the town beyond the western urban limits making it ideally suited to be identified as safeguarded land within this plan to ensure the long term growth of the town is not restricted.</p> <p>A Deliverability Statement detailing how the site is deliverable with no legal, policy or physical constraints which would prevent or inhibit development coming forward over the plan period was submitted to the Council in March 2015 for consideration. As a refresher the statement is again enclosed within this letter and Persimmon Homes would draw the Council's attention to the document. The statement demonstrates that the second phase is a suitable, available and achievable and should therefore be considered as a long term option for residential towards the latter stages of the plan period and beyond.</p>	

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Resident	LP0247	Pub0116	<p>This is an update statement to our previous submissions to the Local Plan as it relates to proposed housing sites at Hart Reservoir, Hartlepool and Glebe Farm, Hart. It needs to be read within the context of our previous submissions to the Local Plan Preferred Options (LPPO) which is attached as an Appendix to this Statement.</p> <p>Both sites have previously been subject to submissions under the SHLAA. Hart Reservoir is site 25 and Glebe Farm is site 2. In our LPPO submission the site for Glebe Farm (site 2) covers the farmstead and land immediately to the south and west of the farm. The site for Hart Reservoir (site 25) referred to all the land covered by Hart Reservoir. The Council have granted planning permission, subject to a S106 Agreement for land at Hart Reservoir since we submitted the site for consideration within the local plan.</p> <p>The Consultation Document (LPCD) has amended the development limits boundary at both sites to include land at Glebe Farm and Hart Reservoir within the urban area and exclude it from the Strategic Gap (policy LS1). Our client wishes to support these proposed alterations but believes that his other land at both sites should be excluded from the Strategic Gap and incorporated into the urban area for housing.</p> <p>The Council advises that representations about the Plan at this stage should only relate to matters of compliance and/or soundness and/or meeting the Duty to Cooperate. We have made no comment on compliance or Duty to Co-operate. We have made comment on the soundness of the housing allocation. We believe that the plan is overly reliant on large strategic allocations and the allocation at Wynyard is too distant to meet the needs of Hartlepool. We confirm that this is still our position with regard to the LPCD.</p> <p>In a discussion with the Council, an officer confirmed that they are interpreting comments on soundness flexibly. It was felt that an update on our representations to confirm our support for the amendments already made and to also confirm that we wish our representations on the remaining land on both sites to be carried forward. These relate to the same issues that we addressed in our LPPO submission and which appear to have been accepted by the</p>	<p>Note that previous representations on sites have been received at the Preferred Options Stage and during the call for sites on the SHLAA.</p> <p>As noted the Council the has approved outline planning permission for up to 52 dwellings at the Hart Reservoir site subject the signing of the s106 Legal Agreement. The proposed urban fence under Policy LS1 has been amended to reflect that permission and your support for that change is noted. The representation also seeks the field to the west is included within the urban fence. This is not considered necessary or appropriate – previous approaches seeking residential on this field were not considered acceptable from the Council’s Public Protection team due to the noise issues from the adjacent Quarry. The Quarry is shown as NE1c as a Local Wildlife as the site is a Local Wildlife Site as well as a quarry. The Plan does not cover Minerals and Waste and as such no other reference is needed.</p> <p>In relation to the field to the south west of Glebe Farm, this is not considered a site which the Council would want to include as a housing site. The fields to the south west of Hart Village form an important buffer between the residential properties and the A179 which is one of the busiest roads in the Borough and creates and significant level of noise. The plan has allocated sufficient sites to meet both the OAN and the proposed housing requirement and as such does not consider the allocation of any further sites is needed. The Council considers that the sites set out within the plan do not place an over-reliance on one particular site and has a range of site to deliver the housing need over the plan period.</p> <p>Note that comments made at the Preferred Options Stage may still be relevant.</p>

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			<p>Council in the amendments on both sites, incorporated into the LPCD. We believe for the same reason already accepted by the council the remaining land should also be excluded from the Strategic Gap (LS1) and included for housing.</p> <p>Hart Reservoir We have confirmed our support for the amendment to the development limits boundary to include the land approved (subject to a S106 Agreement) for housing at Hart Reservoir within the Hartlepool urban area and exclude it from the Strategic Gap. Our client considers that the development limits boundary should also include the field to the west which also forms part of the Hart Reservoir site, within the urban area. The land in question is illustrated on the attached plan. For assistance we also show the planning application boundary which relates to the land ownership of our client.</p> <p>The field was excluded from the site for housing since it falls within the area influenced by quarrying works from Hart Quarry. There was no strategic or sustainable planning reason for its exclusion.</p> <p>The Hart Quarry site is allocated under policy NE1c in the Proposals Map (somewhat confusing since in the document it is NE1 2c). This designates the site as a "Locally designated site" under "Natural Environment". We understand that there is an expectation that the quarry would cease to be economically viable and cease trading within the period of the plan in which case there should be no reason why the additional field could not be developed for an appropriate urban use. To that extent we feel the development limits boundary should be amended to include the site within the urban area and exclude it from the Strategic Gap.</p> <p>In approving (subject to S106 Agreement) the land for housing at Hart Reservoir the Council considered that the principle and sustainability of development; highways and pedestrian safety; character and appearance; landscaping and public space; amenity and privacy of neighbouring land users; ecology and nature conservation; heritage and archaeology; and flooding and drainage were all acceptable. This equally applies to the field which is now the subject of these representations. There would seem to be no reason why it should not be developed when the quarry closes and we ask that the development limits line is drawn to include the land within the urban</p>	

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			<p>area and exclude it from the Strategic Gap designation (LS1). Indeed if there was an appropriate urban use for the land now that would not be affected by the quarrying activities there would seem to be no reason why it could not proceed whilst the quarry is still active.</p> <p>Glebe Farm We have confirmed our support for the developments limit line to be amended to include the field south of the farmstead within the urban area and exclude it from the Strategic Gap. Our representation also included land to the west. We attach a plan on which we have indicated the area. We wish to amend the development limits to include this land within the urban area and exclude it from the Strategic Gap (LS1).</p> <p>We confirm that we are seeking to include this land as part of the housing provision for Hartlepool. In pursuing this site we repeat our view that more smaller housing sites are more robust in terms of meeting housing needs than a few large strategic sites that can only be developed by volume house builders.</p> <p>The land has natural defensible barriers with existing roads and can provide an attractive landscaping setting to the approach into the village from the west. However, the SHLAA has confirmed the acceptability of the site for housing. It makes the point that the land would deliver only “half yield” due to noise constraints, we assume from the road (A179). However, this would provide a large area of land to be landscaped to provide a setting for the village from the west. By incorporating all of our clients land would enable a more comprehensive scheme to be delivered. Existing community facilities would benefit from the planned increase in population. This is a desirable place to live with good road access into Hartlepool and west onto the A19. It would contribute more to the well being of the town than the large strategic sites particularly those at Wynyard.</p>	

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Gladman Developments	LP0351	Pub0118	<p>Gladman wish to raise a number of concerns relating to the Locational Strategy that is set out in paragraphs 6.1 ito 6.27 and proposed policy LS1.</p> <p>Gladman note the recognition that the continuation of the previous local plan strategy, prepared prior to the publication of the National Planning Policy Framework (The Framework), may severely constrain opportunities for economic growth and the provision of a wider choice of housing. The previous approach is described as ‘an urban fence’ that could lead to ‘town cramming’. The decision to move away from the previous strategy is therefore supported. It is however important that this shift in strategy is reflected through the policies contained within the Plan as a whole, including LS1.</p> <p>Limits to Development - Paragraph 6.11 of the Plan introduces the concept of ‘limits to development’. This would appear to be at odds with the strategy to reverse the previous ‘urban fence’ strategy described earlier.</p> <p>It is noted that the Local Plan intends to identify development limits around a number of settlements.</p> <p>Gladman object to this approach because it could be used to arbitrarily restrict sustainable development that is well related to a settlement and its services and facilities. This is particularly true where development limits are drawn tightly against the existing built form. If the approach to introduce settlement limits is to be taken forward into the adopted plan, it must better reflect the presumption in favour of sustainable development (and policy SUS1 of the Plan). At present, it is contrary to paragraphs 14 and 49 of the Framework.</p> <p>Additional flexibility is therefore required through suitable criteria based policy wording that will enable the consideration of sustainable opportunities for development, including housing. This should give recognition to the Framework’s approach to the protection of the countryside, which does not seek protection for ‘its own sake’ in the way that former government policy did. Gladman believe that modifications will be required to Policy LS1to address this and that flexibility will also need to be introduced into policies RUR1 and RUR2 (see 6.7 and 6.8 below).</p> <p>Strategic Gaps - Gladman note the intention to introduce ‘strategic gaps’ within the Local Plan. Again, this is an approach that seems to be at odds with the stated intention to move away from the previous ‘urban fence’ strategy. If an approach of this nature is to be brought</p>	<p>The reference to the ‘urban fence’ in the draft Local Plan at paragraph 6.2 is clearly in the context of the existing urban fence i.e. it is recognition that that a strategy of balanced urban growth will need to be pursued with the urban fence being flexed in order to accommodate the housing sites that are proposed to be allocated as urban extensions. This is clearly not as the representation implies a revocation of the concept of limits to development but rather a modification in the light of changed circumstances to its application. The proposed Limits to Development fully take into consideration the housing development needs of the Borough including the need for villages to have incremental growth in order to ensure a that a range of housing sites are available and to support the retention of services within the villages. It should be noted that the draft local Plan proposes the allocation of extensions to the villages of Elwick and Hart. The Council therefore disagrees that modifications will be required to Policy LS1.</p> <p>The Council notes the concern of Gladman Developments with regard to the element of Policy LS1 which refers to the Strategic Gap. The representation states ‘at this stage it is unclear how the strategic gap approach has been evidenced’. In order to overcome the concerns of Gladman Developments, and of the HBF and some of its members, the Council will undertake a piece of work prior to the examination to assess the parcels of land which are included within the Strategic Gap to ensure the policy is supported by evidence.</p> <p>The Council is confident that its approach to meeting housing needs is a flexible approach and that it is fully consistent with the NPPF.</p>

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			<p>forward, it should be done so in the context of the Framework. Crucially, it should not arbitrarily restrict sustainable development in countryside areas. At this stage it is unclear how the strategic gap approach has been evidenced. It appears from the proposals map that the intention is to protect large swathes of land, much of which may not necessarily be required to ensure the stated aim to prevent the coalescence of settlements over time. As currently proposed, the approach is contrary to paragraphs 14 and of the Framework.</p> <p>Additional flexibility is therefore required through either the removal of the strategic gap approach or the redrafting of its boundary to reflect evidence linked to its intended functions. In addition, suitable criteria based policy wording that will enable the consideration of sustainable opportunities for development, including housing, within strategic gaps should also be introduced. The Local Plan should not prevent sustainable greenfield development from coming forward and the strict control of development in the large areas that have been identified as 'strategic gaps' has not been robustly evidenced.</p> <p>Careful consideration also needs to be given to the locational strategy that forms the basis of the spatial distribution of growth across the borough. All sustainable settlements should be allowed to play their part in meeting housing and employment needs and restrictive policies should be robustly evidenced. A flexible approach to delivering the development needs of the borough will ensure the plan's ultimate deliverability and success. In light of the above issues, and the content of our submission, it is the conclusion of Gladman that in its current form, the Plan is contrary to national policy, not justified, effective or positively prepared and is as such unsound. These issues could be addressed through a number of modifications to the Plan.</p>	



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Cecil M Yuill Ltd (Quarry Farm)	LP0252	Pub0119	<p>Cecil M Yuill Ltd generally welcomes the Local Plan’s overall vision for the Borough up to 2031, and, in particular, the desire to ‘maximise quality housing choices and health opportunities to meet, in full, the current and future needs of all residents’.</p> <p>Also welcomed is the recognition that retaining future development within previously defined settlement limits would severely constrain the opportunities for providing economic growth and a wider choice of housing, including affordable and high-cost, low density housing. The recognition that the previous strategy, based on compact urban growth, through the development of mixed use regeneration areas and brownfield land is no longer attainable is supported, as is the sustainable growth strategy outlined at paragraph 6.8 of ‘balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area...delivered alongside infrastructure improvement which allow Hartlepool to grow in a sustainable manner’.</p> <p>Cecil M Yuill Ltd also welcomes the Council’s position, at paragraph 6.12, of identifying that the western extension of housing development beyond the existing limits can be developed in a sustainable manner, but importantly ensuring that strategic gaps between the town and surrounding villages are sufficiently maintained.</p> <p>Further, at paragraph 6.13, Cecil M Yuill Ltd also supports ‘the controlled western expansion of the town into greenfield land adjacent to the existing boundary of the built-up area;’</p> <p>However, whilst this overarching locational strategy for future development is broadly supported, there remain issues within the Local Plan Publication Draft which Cecil M Yuill Ltd considers need to be satisfactorily addressed if the Plan is to be found sound.</p> <p>It is considered that the Council’s strategy of prioritising brownfield land within the existing urban area for housing is contrary to the provisions of the NPPF and, specifically, paragraph 17, which merely ‘encourages’ effective use of (brownfield) land within urban areas. In addition, whilst Cecil M Yuill Ltd wish to reserve their position presently, they consider that there are sites within the town’s urban</p>	<p>The Council welcomes the support for the controlled western expansion of the town and the sustainable growth strategy of balanced urban growth.</p> <p>The Council’s strategy includes new housing development being located within the urban area on suitable and deliverable brownfield sites. It also includes extensions to the main urban area of Hartlepool on greenfield land, new sites at Wynyard and extensions to the villages of Hart and Elwick. The emphasis on developing brownfield land is demonstrably within the context of recognising that in order to meet the housing requirement and to ensure choice in the housing market, a range of greenfield sites have to be allocated for housing development. The Locational Strategy recognises that brownfield sites have a contribution to make to housing delivery but it also recognises that, in the context of the housing market in Hartlepool, it would not be a sound strategy to place undue reliance on brownfield sites to meet the housing requirement. The Council therefore disagrees with the contention of the representation that the urban / brownfield aspect of the Locational Strategy is inconsistent with the NPPF.</p> <p>The representation also includes the assertion that the housing requirement should be increased to 614 dpa. This is responded to under Policy HSG1.</p> <p>The representation states that the overall housing requirement should be identified as a minimum. Policy HSG1 includes the following text ‘as a minimum, meet the housing need’. This is intended to demonstrate that the Council has a flexible approach to the housing requirement and does not intend to apply it as a rigid ceiling for sites that are consistent with the Locational Strategy and which will deliver sustainable development. To make this clearer the Council proposes to amend as follows to draw reference to the housing requirement:</p> <p><b>“...and sites elsewhere in the borough to, as a minimum, meet the housing requirement set below”</b></p> <p>It is contended that as the affordable housing need of 36% is unviable, with the Council seeking 18% affordable housing on a site by site basis, the Local Planning Authority should allocate additional housing sites in order to allow a greater proportion of the affordable housing need to</p>

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			<p>area, with the benefit of both planning permission and draft allocations, which are not deliverable.</p> <p>In summary, Cecil M Yuill Ltd generally welcomes the Local Plan’s overall vision for the Borough up to 2031 and, in particular, the desire to:</p> <p>“Maximise quality Housing choices and health opportunities, to meet, in full, the current and future needs of our residents”.</p> <p>Also welcomed is the Council’s promotion of a sustainable growth strategy which comprises:</p> <p>“Balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area with growth delivered alongside infrastructure improvements which allow Hartlepool to grow in a sustainable manner with this comprising controlled western expansion of the town into greenfield land adjacent to the existing boundary of the built-up area”.</p> <p>However, whilst this overarching locational strategy for future development is broadly supported, the following changes need to be made to the Plan if it is to be found sound:</p> <ul style="list-style-type: none"> <li>• Replace the reference ‘prioritising’ to ‘encouraging’ brownfield land within the existing urban area;</li> <li>• In accordance with the Regeneris Consulting report entitled ‘Review of Hartlepool Borough Council’s updated OAN’, increase the overall housing requirement to 614dpa;</li> <li>• Emphasise within the Plan that the overall housing land requirement settled upon is a minimum over the Plan period in order to meet the aims and objectives of paragraph 47 the NPPF in seeking to significantly boost housing supply;</li> <li>• In accordance with the NPPF and NPPG, the Council to make a firm commitment in the Plan to meet, in full, their objectively assessed needs for both market and affordable housing over the Plan period. The Local Planning Authority concede that, at 36%, the threshold required for affordable housing per site is unviable, with the Council seeking a provision of 18% affordable housing on a site by site basis.</li> </ul> <p>This will further exacerbate the significant shortfall of 144 units per annum required across the Plan period. In line with the views of the HBF, Cecil M Yuill Ltd consider that the Local Planning Authority must address this clear deficiency within the Plan by allocating additional</p>	<p>be met. The Council has already added a 20% buffer to the housing requirement and one of the objectives behind this is to have more flexibility to meet affordable housing need. It is considered that the buffer should not be extended any further.</p> <p>It is also contended that the level of contribution required for the highway improvements necessary for the proposed allocations at High Tunstall, Elwick Village and Quarry Farm 2 will have serious viability issues for these sites and that additional sites need to be allocated in sustainable locations to the west of the existing built-up area in order to more effectively ‘spread the cost’ of the major infrastructure works critical to the Plan’s housing strategy. The Council considers that the proposed allocations are viable, cognisant of the infrastructure required and that additional allocations are not required. For further discussion, of this point see the HBC response to the comments recorded under Policy INF2. There is therefore no need for the inclusion of a new Policy HSG5b (Quarry Farm 3 Housing Site) as the Council does not intend to allocate this site.</p> <p>It is contended that criterion 3 within Policy HSG5a should be replicated within Policy HSG5 (High Tunstall Strategic Housing Site) and Policy HSG7 (Elwick Village Housing Site). Note comments – It is considered that Policy Hsg5 (Tunstall Farm) already requires each phase to contribute towards the infrastructure works on the A19 and the associated bypass. Consider it would be appropriate to alter wording within Hsg5 to reference Quarry Farm 2, Elwick Housing Site and Briarfields. Proposed alteration to the final paragraph of Hsg5 would read <b>“The Local Infrastructure Plan.....is paid back by each of the phases of the High Tunstall development, along with contributions from Quarry Farm 2 (Hsg5a), Elwick Village (Hsg7) and Briarfields (Hsg3(3)), on a pro rata basis.”</b> Agree reference to the bypass would also be appropriate in Policy Hsg7 – propose the inclusion of a criterion 6 to read <b>“The development will be expected to contribute, on a pro-rata basis with High Tunstall (Hsg5), Quarry Farm 2 (Hsg5a) and Briarfields (Hsg3(3), to the provision of the grade separated junction and bypass to the north of Elwick Village.”</b> It is not considered necessary for Policy Hsg7 to refer to contributions to the school on High Tunstall as the pupils from the site in Elwick would likely attend Elwick Village School – if additional capacity was required at the village school contributions would be sought via Policy QP1 (Planning Obligations).</p>

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			<p>sites for housing in order to allow a greater proportion of affordable housing to be delivered;</p> <ul style="list-style-type: none"> <li>• The overall housing strategy within the Plan is fully reliant on the delivery of a grade separated junction on the A19 and a bypass to the north of Elwick Village. It is proposed that this is funded by an £18m loan from the Local Growth Fund which will need to be paid back over the Plan period via financial contributions from new development. Through the proposed allocations at High Tunstall, Elwick Village and Quarry Farm 2, thereby relying on a quantum of only 1,455 units, which would equate to a pro-rata contribution of circa £12,400 per dwelling. This level of contribution required will have significant viability issues for each site with a serious knock-on effect of a reduction in the already deficient delivery rate of affordable housing across each site. In light of this, additional sites need to be allocated in sustainable locations to the west of the existing built-up area in order to more effectively ‘spread the cost’ of the major infrastructure works critical to the Plan’s housing strategy. <p>In order to address the issues listed above, and make sure that the Plan is made is sound, the following Plan revisions are required:</p> <ol style="list-style-type: none"> <li>1. Replace reference to ‘prioritising’ with ‘encouraging’ brownfield land within the existing urban areas at paragraph 6.3;</li> <li>2. Revise Table 6 to account for the uplift in the housing requirement identified by Regeneris Consulting (see Appendix 1) as follows: Annual Dwellings Total Dwellings over 15 Years;</li> <li>3. Reference to the overall housing land requirement settled upon to be a minimum over the Plan period;</li> <li>4. Inclusion of an additional housing allocation, to be known as Quarry Farm 3, in Table 8 (Future Housing Supply over the next 15 years) for a quantum of 450 dwellings;</li> <li>5. Inclusion of Quarry Farm 3 within Policy HSG1 (New Housing Provision) for a quantum of 450 dwellings;</li> <li>6. Inclusion of Quarry Farm 3 within Policy HSG2 (Overall Housing Mix) with existing reference to Quarry Farm to be amended to Quarry Farm 2;</li> <li>7. The inclusion of a new Policy HSG5b (Quarry Farm 3 Housing Site) which relates specifically to the additional housing allocation proposed, with the wording appropriate to the site-specific requirements to be agreed with the Local Planning Authority;</li> <li>8. Replication of Criterion 3 within Policy HSG5a (Quarry Farm Housing Site) within both Policies HSG5 (High Tunstall Strategic Housing Site)</li> </ol> </li></ul>	<p>The representation states that some/all of the 732 dwellings currently allocated to Wynyard should be reallocated to sites to the west of Hartlepool. Hartlepool and Stockton Borough Councils have a shared vision for development at Wynyard to create a sustainable community and the residential element is an essential catalyst to the delivery of the community facilities necessary to deliver this vision. The Quantum of housing proposed at Wynyard and at High Tunstall/Quarry Farm/Elwick Village/Briarfields will pay for necessary highway works in the vicinity of each development. Both sets of Highway improvements will improve the overall highway infrastructure within the Borough and will enable a range of sites to be delivered across the Borough, minimising reliance on particular sites, thus minimising the chances that the identified housing delivery will not be achieved. The Council does not therefore intend to reallocate any of the dwelling provision for Wynyard.</p>

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
			<p>and HSG7 (Elwick Village Housing Site), in order to clarify that both the High Tunstall and Elwick Village sites will make a financial contribution to the construction of both the grade separated junction and the Elwick bypass;</p> <p>9. Reallocation of some/all of the 732 dwellings currently allocated to Wynyard to sites to the west of Hartlepool, in line with the previous Inspector's conclusions, in order that they can make a more meaningful contribution towards the Council's overall housing strategy and the importance of the delivery of the grade separated junction and Elwick bypass.</p>	
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Noted.
Natural England	LP0043	Pub0129	<p>Natural England stress the importance of appropriate and acceptable mitigation strategies in avoiding recreational disturbance, especially where proposed developments are located close to access points to the coast and in proximity to designated sites. The current text of the Local Plan advocates the use of green recreational space within developments where appropriate and the use of Strategic Alternative Green Space (SANGS) where such spaces cannot be provided within a proposal design. Whilst Natural England welcome this approach we do not consider it to be capable of delivering all necessary mitigation on its own. It therefore needs to be considered in combination with other mitigation measures such as (for example) access management measures. Alternative methods include, but are not restricted to; the provision of land management planning, developer contributions to existing and proposed dog warden programmes and the alignment with current and proposed land management plans such as Access Management Plans (e.g. Strategic Access Management and</p>	<p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new leisure and tourism opportunities as well as from housing. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the</b></p>

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
			<p>Monitoring Strategy (SAMMS)). We advise that the following requirement is included in policy context: In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed and how costs have been identified for delivery. Applicants should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. The accompanying HRA assessment advocates the use of alternative mitigation strategies, but in order for such mitigation to be more than aspirational, it is essential that policy text and frameworks cross reference such mitigation diversity in order to ensure they are achievable in delivery. Natural England therefore advise that methods of mitigation, including those outlined above are included within the policy text to strengthen the ability to achieve this.</p>	<p><b>Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>
Highways England	LP0029	Pub0130	<p>There are a number of policies within the Plan which are of a strategic nature, which allocate development sites, or which identify specific infrastructure improvements. The relevant policies are:</p> <ul style="list-style-type: none"> <li>• Policy LS1: Locational Strategy</li> <li>· Policy INF2: Improving Connectivity in Hartlepool</li> <li>· Policy HSG1: New Housing Provision</li> <li>· Policy HSG3: Urban Local Plan Sites</li> <li>· Policy HSG4: The South West Extension Strategic Housing Site</li> <li>· Policy HSG5: High Tunstall Strategic Housing Site</li> <li>· Policy HSG5A: Quarry Farm Housing Site</li> <li>· Policy HSG6: Wynyard Housing Developments</li> <li>· Policy HSG7: Elwick Village Housing Developments</li> <li>· Policy HSG8: Hart Village Housing Developments</li> <li>· Policy EMP1: Prestige Employment Site Wynyard Business Park</li> <li>· Policy EMP2: Queens Meadow Business Park</li> <li>· Policy EMP3: General Employment Land</li> <li>· Policy EMP4: Specialist Industries</li> </ul> <p>The policies listed all rely on a complete and justified transport evidence base to demonstrate soundness. Having been directly involved in working through all the issues with the Council we are confident that such an evidence base exists, although it is not currently collated in a single source document which is available to others making representations to the Plan.</p> <p>In collating such an evidence base document, we would suggest that evidence of the following processes undertaken as part of its development is included which will demonstrate that policies,</p>	Comments noted.

Company	Unique Ref	Pub Ref	LS1 Locational Strategy	LS1 Locational Strategy HBC
			<p>proposals and supporting infrastructure measures have been appropriately assessed:</p> <ul style="list-style-type: none"> <li>· identification of the transport demands arising from the spatial aspirations of the plan;</li> <li>· assess the impacts of these spatial aspirations on the performance of the transport network (including the SRN);</li> <li>· identify policy responses / infrastructure measures in the Local Infrastructure Plan (LIP);</li> <li>· assess the adequacy of these policy responses / infrastructure measures; and</li> <li>· identify the phasing and funding requirements to ensure the infrastructure measures are viable and deliverable.</li> </ul> <p>I trust this response is helpful and sets out a way forward. If, however, you require any further information, please do not hesitate to contact me. I look forward to working with you to ensure the evidence base is collated to an appropriate timescale taking into account the rapidly changing context in Tees Valley, and to supporting the Council's proposals for the Plan at examination.</p>	

**Section 2 of the Consultation Statement, covering:**

**Minimising and Adapting to Climate Change**

- Policy CC1: Minimising and adapting to Climate Change
- Policy CC2: Reducing and Mitigating Flood Risk
- Policy CC3: Renewable and Low Carbon Energy Generation
- Policy CC4: Strategic Wind Turbine Development
- Policy CC5: Large Scale Solar Photovoltaic Developments

**Policy CC1: Minimising and adapting to Climate Change**

Company	Unique Ref	Pub Ref	CC1 Climate Change	CC1 Climate Change HBC
Resident	LP0316	Pub0065	With regard to 'minimising and adapting to climate change' - any wind turbine developments should have considerable support from the local community.	See Pub0003 for aggregated response regarding wind turbine development under Policy CC4.
HCA (Oakesway)	LP0086	Pub0068	<p>The HCA agrees with Policy CC1 which encourages development on suitable brownfield sites within the urban limits. It also encourages development in other areas that are, or have the potential to be, well served by sustainable forms of transport and encourages sustainable travel options such as enhancing public transport provision, cycle and pedestrian provision.</p> <p>Oakesway is a suitable brownfield site within urban limits which is well connected by sustainable transport. The site is located within an existing urban area, 2km from the town centre.</p>	Support for Policy CC1 welcomed. See response to comments submitted under Policy HSG1 regarding Oakesway.

Company	Unique Ref	Pub Ref	CC1 Climate Change	CC1 Climate Change HBC
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes considers that Policy CC1 is unsound as it is not justified and is not consistent with national policy. In particular, we consider that part 9 of Policy CC1 and the second paragraph of Policy QP7, which require housing development of 10 or more homes to provide (where viable) a minimum of 10% of their energy supply from decentralised and renewable or low carbon sources, to be inconsistent with national policy. We advise that the Council amends these policies to ensure that they reflect national policy otherwise the emerging Plan will be found unsound at examination. The Ministerial Statement dated 25/03/2015 set out that LPAs should not seek to set energy requirements from developments which are over and above Building Regulations. This statement follows the commencement of amendments to both the Planning and Energy Act 2008 in the Deregulation Bill 2015. Subsequently, a requirement of 10% of energy supplied from decentralised sources is both unjustified and inconsistent with national policy. In order to address this issue the Council must delete these stringent requirements and amend the policy wording accordingly.</p>	<p>With regards to the Ministerial Statement, it states the following:</p> <p>For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.</p> <p>With regards to the Planning and Energy Act 2008, the Deregulation Bill 2015 states the following: In the Planning and Energy Act 2008, in section 1 (energy policies), after subsection (1) insert – '(1A) subsection (1)(c) does not apply to development in England that consists of the construction or adoption of buildings to provide dwellings or the carrying out of any work on dwellings'.</p> <p>The Deregulation Bill 2015 does not amend subsections (1)(a) (renewable energy sources) or subsection (1) (b) (low carbon energy) of section 1 of the Planning and Energy Act 2008. Therefore, HBC consider that the first paragraph of Part 9 of Policy CC1 remains valid as it is purely concerned with energy supply from renewable or low carbon sources. This also accords with paragraphs 95 and 96 of the NPPF.</p> <p>With regards to 2nd bullet point of the policy, although it does require improving the building fabric or a combination of energy provision and energy saving measures, this is purely as a compensatory measure to achieve the equivalent energy saving where it can be demonstrated that it is not feasible to provide the energy generation measures on site that are required by the policy. It is therefore also consistent with the Planning and Energy Act 2008 and paragraphs 95 and 96 of the NPPF.</p>
Environment Agency	LP0031	Pub0101	<p>There is an opportunity within Section 7.8 of Chapter 7 (Minimising and adaptation to climate change) to promote the green roof initiative, in particular, for industrial units but also in new housing developments.</p>	<p>There are a number of initiatives in relation to climate change which the pre-ambles to the policy could reference but a balance needs to be maintained with each policy between providing sufficient explanatory text and not having the document become unwieldy.</p>



Company	Unique Ref	Pub Ref	CC1 Climate Change	CC1 Climate Change HBC
Home Builders Federation	LP0005	Pub0108	<p>The policies are considered unsound as they are not justified or consistent with national policy.</p> <p>Part 9 of Policy CC1 and the 2nd paragraph of Policy QP7 both require housing developments of 10 or more to provide, where viable, a minimum 10% of their energy supply from decentralised and renewable or low carbon sources. This policy requirement is not consistent with national policy and is therefore unsound.</p> <p>The Council will be aware of the ministerial statement dated 25th March 2015. This statement sets out that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. The requirement for 10% of energy supply from decentralised solutions for developments complying with the Building Regulations would therefore be unjustified.</p> <p>Similarly the requirement within Policy QP7 to; "...improve the fabric of the building 10% above what is required by the most up to date Building Regulations..." Would also be unjustified. The HBF recommends the deletion of these requirements.</p>	<p>With regards to the Ministerial Statement, it states the following:</p> <p>For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.</p> <p>With regards to the Planning and Energy Act 2008, the Deregulation Bill 2015 states the following:</p> <p>In the Planning and Energy Act 2008, in section 1 (energy policies), after subsection (1) insert –</p> <p>‘(1A) subsection (1)(c) does not apply to development in England that consists of the construction or adoption of buildings to provide dwellings or the carrying out of any work on dwellings’.</p> <p>The Deregulation Bill 2015 does not amend subsections (1)(a) (renewable energy sources) or subsection (1) (b) (low carbon energy) of section 1 of the Planning and Energy Act 2008. Therefore, HBC consider that the first paragraph of Pont 9 of Policy CC1 remains valid as it is purely concerned with energy supply from renewable or low carbon sources. This also accords with paragraphs 95 and 96 of the NPPF.</p>

Company	Unique Ref	Pub Ref	CC1 Climate Change	CC1 Climate Change HBC
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>Persimmon Homes fundamentally object to Policy CC1 as we do not consider the council's approach to be justified or compliant with national guidance.</p> <p>Firstly, part 7 of the policy aims to ensure that development is energy efficient in accordance with Policy QP7. As set out within the relevant section, Persimmon Homes have significant concerns with the justification behind this policy and therefore suggest that any reference to it within Policy CC1 is deleted. The policy is unsound and therefore any reference to it within Policy CC1 would result in this policy being found unsound also.</p> <p>Secondly, Part 9 of the policy requires that where viable, major developments must secure a minimum of 10% of their energy supply from decentralised and renewable or low carbon sources. Persimmon Homes refer to the Written Statement to Parliament on 25th March 2015 by Eric Pickles MP Secretary of State for Communities and Local Government. The statement states that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. The requirement for 10% of the energy supply from a new development to be from decentralised or renewable solutions is therefore be completely unjustified.</p>	<p>With regards to the Ministerial Statement, it states the following:</p> <p>For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.</p> <p>With regards to the Planning and Energy Act 2008, the Deregulation Bill 2015 states the following:</p> <p>In the Planning and Energy Act 2008, in section 1 (energy policies), after subsection (1) insert –</p> <p>'(1A) subsection (1)(c) does not apply to development in England that consists of the construction or adoption of buildings to provide dwellings or the carrying out of any work on dwellings'.</p> <p>The Deregulation Bill 2015 does not amend subsections (1)(a) (renewable energy sources) or subsection (1) (b) (low carbon energy) of section 1 of the Planning and Energy Act 2008. Therefore, HBC consider that the first paragraph of Pont 9 of Policy CC1 remains valid as it is purely concerned with energy supply from renewable or low carbon sources. This also accords with paragraphs 95 and 96 of the NPPF.</p> <p>With regards to 2nd bullet point of the policy, although it does require improving the building fabric or a combination of energy provision and energy saving measures, this is purely as a compensatory measure to achieve the equivalent energy saving where it can be demonstrated that it is not feasible to provide the energy generation measures on site that are required by the policy. It is therefore also consistent with the Planning and Energy Act 2008 and paragraphs 95 and 96 of the NPPF.</p>

Company	Unique Ref	Pub Ref	CC1 Climate Change	CC1 Climate Change HBC
Northumbrian Water	LP0241	Pub0117	<p>We are pleased to note support for sustainable drainage systems and water conservation initiatives within Policy CC1, both of which are key elements in preparing for climate change adaptation and resilience. Additionally, focus upon the re-development of brownfield sites is to be welcomed as an opportunity to provide multiple benefits, including the opportunity to improve surface water management and provide betterment to existing flood risk.</p>	Comments welcomed.
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach:  Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Comments welcomed.

**Policy CC2: Reducing and Mitigating Flood Risk**

Company	Unique Ref	Pub Ref	CC2 Flood Risk	CC2 Flood Risk HBC
NFU North East	LP0047	Pub0020	<p>I would welcome clarification of which outweighing social, economic and/or regeneration benefits make development acceptable within high flood risk areas. Whilst design solutions can be incorporated to minimise the impact of flooding, surely development which increases flood risk either on or off site should be avoided when suitable alternative land exists. Whether the development is necessary to meet the Borough’s strategic regeneration priorities should be secondary to whether an adverse impact will be caused to land or/or property elsewhere. As stated in CC2, flood risk in vulnerable areas elsewhere should not be caused.</p> <p>It is true that the natural environment can help reduce the rate of surface water run-off and this is increasingly being seen through Natural Flood Management schemes. Whilst NFM should be seen as a means to reduce the impacts of flood waters, it should not be seen as an alternative to more traditional hard engineering projects which still have a large part to play. Natural Flood management is often seen as a more cost effective method of flood defence where landowners are given more responsibility and through catchment sensitive farming option this is likely to encourage projects. It must however be considered that a NFM scheme requires maintenance over time and, furthermore, when a scheme ends liabilities must be considered, particularly if NFM measures are to be removed.</p> <p>Whilst continuing to invest in flood risk management schemes to protect strategic sites is important, presumably in more urban areas, it is also important to protect rural areas and therefore the contribution they make to the wider economy. Often the flood impact on rural areas is under represented at both national and local levels and therefore overlooked when flood alleviation schemes are devised.</p>	<p>The preamble to the policy states that developments in higher risk areas will only be supported where it is essential to meet the Borough’s strategic regeneration priorities and complies with the national sequential and exceptions tests. Therefore meeting the Borough’s strategic priorities is clearly balanced with national guidance regarding flood risk. It is not possible to be prescriptive regarding the social, economic and regeneration benefits as this clearly needs to be assessed on a case by case basis.</p> <p>The Borough Council considers that sustainable urban drainage is generally preferable to hard engineering schemes and that its use should be prioritised wherever it is practicable to do so. This does not preclude the use of hard engineering schemes where it is demonstrably not practicable.</p> <p>The Borough Council acknowledges that it is important to protect rural areas in the context of flood risk.</p>

Company	Unique Ref	Pub Ref	CC2 Flood Risk	CC2 Flood Risk HBC
Home Builders Federation	LP0005	Pub0108	<p>The policy is considered unsound as it is not justified or effective. The policy does not contain any economic viability clause, this is important in relation to part 8. The justification for the 50% reduction in run-off rates on previously developed sites is unclear. It does not appear to be based upon information contained within the Strategic Flood Risk Assessment or the Tees Valley Authorities Local Standards for Sustainable Drainage. Whilst a reduction in run-off rates is desirable this must be balanced against the desire to ensure that previously developed land is brought back into use and the economic viability implications of the requirement.</p>	<p>The non-statutory standards suggests that developments on previously developed land to should aim for a greenfield equivalent surface water runoff rate, however if the equivalent rate is not achievable a rate higher than greenfield can be considered. While there is no guidance provided regarding discharge rates from previously developed sites, the 50% is used as a starting point, as any reduction would be deemed an improvement. However, discharge rates from brownfield sites that do not have an existing connection or are connected to a surface water sewer that discharges to a water course, should be restricted to a much lower discharge rate because it is an increase to existing rates. However, if the developer can provide evidence to demonstrate that the existing rate is higher, the Council could then consider the rate suggested, as the National standards do not set a rate but only recommend that it should be limited to greenfield equivalent. Anything above greenfield is set by the Lead Local Flood Authority.</p>

Company	Unique Ref	Pub Ref	CC2 Flood Risk	CC2 Flood Risk HBC
Northumbrian Water	LP0241	Pub0117	<p>Moving on to Policy CC2, we support that all new development proposals must demonstrate how flood risk from all potential sources will be minimised, which would include flood risk from the public sewer network, and that the policy recognises the potential cumulative impact of smaller developments. We also welcome that point 3 of the policy requires the impact of the development proposal upon existing sewerage infrastructure to be assessed, and recommend that a pre-development enquiry is submitted to Northumbrian Water at the earliest possible stage to ascertain suitable connection points and discharge rates to the public sewer network for a proposed development.</p> <p>Equally, we support the 'separate, minimise and control' approach to surface water management contained within point 6, and welcome that sustainable drainage systems are identified as the preferred approach. The approach to surface water management in points 7 and 8 is also welcomed, particularly with regard to the hierarchy of preference for the disposal of surface water runoff and the requirement for development proposals to seek to achieve greenfield equivalent runoff rates, with a requirement for surface water runoff to be reduced by a minimum of 50 percent of the existing runoff rate if the greenfield equivalent rate is not achievable.</p>	Comments welcomed.

### Policy CC3: Renewable and Low Carbon Energy Generation

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0146	Pub0004	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0177	Pub0008	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0263	Pub0009	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0050	Pub0018	<p>There is a reference to Wave and Tidal technology developing but no mention of Hartlepool's intention to keep a watching brief, to support this development, as a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed. This could be something that would help put Hartlepool on the map.</p> <p>Makes statements re micro renewable energy and having micro turbines on roof tops surely this will be unsightly and potential damage and injury if micro turbines are not secured properly especially in high winds, also issues with topple distances</p> <p>Surely all developments for renewable and low carbon energy generation should be accompanied by environmental statements.</p>	See aggregated response to Pub0003 under Policy CC4.
Resident	LP0092	Pub0026	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0091	Pub0027	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0282	Pub0028	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0283	Pub0029	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0284	Pub0030	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0285	Pub0031	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0286	Pub0032	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003



Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0287	Pub0033	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0288	Pub0034	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0289	Pub0035	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0290	Pub0036	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0291	Pub0037	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0292	Pub0038	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0293	Pub0039	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0294	Pub0040	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0295	Pub0041	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0296	Pub0042	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0297	Pub0043	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0298	Pub0044	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0299	Pub0045	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0300	Pub0046	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0301	Pub0047	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0302	Pub0048	There is a reference to Wave and Tidal technology but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.	See aggregated response under CC4 at Pub0003
Resident	LP0066	Pub0063	Most of Seaton residents are sick and tired of your proposals for this area - monster Wind Turbines, smaller Wind Turbines, Parking Charges, and now this as well. We are SO tired of it.	See aggregated response under CC4 at Pub0003
Resident	LP0315	Pub0064	<p>I have lived in a small cul-de-sac in Seaton Carew for almost 35 years. My husband and ten other men joined together in a self-build scheme and worked for more than three years building our homes. All the men had a great deal of pride and an inestimable sense of purpose to produce a home in this way and means so much more to us than simply buying a house in the usual way. We all chose our 'plots' carefully and created wonderful homes in which to bring up our families and I suppose we are naturally possessive of our homes and environment. Our home is a lasting legacy to our children and testament to their father's hard work and commitment.</p> <p>I attended a consultation meeting on Thursday 15th December at Seaton Carew Library about the proposed Hartlepool plan. I was especially interested in the plans because land had been allocated for the future erection of wind turbines in the Brenda Road area. I had a word with one of the Planning Officers present asking if they would be happy if wind turbines were built so close to their home and did not receive an answer. If Planning Officers would not be happy then I think you can understand why I am not.</p> <p>It was made very clear when the last plans were submitted that very many, if not all, residents of Seaton Carew, Greatham and the Fens estate opposed having wind turbines built close to our homes. Even though the size of the turbines has been reduced, it makes no difference whatsoever as we do not want any.</p> <p>There is an article in the Daily Mail (Wednesday 25.01.17) from a</p>	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
			<p>resident in Wales entitled 'Wind power is out of puff' and quotes far more eloquently than I can that wind turbines do not effectively supply enough energy to cope with demand. I cannot understand why the Council is so keen to use this type of power when there is so much opposition against it and inconclusive data to support it. I would recommend you google the article and many other articles written in the Daily Mail over the last two years or so.</p> <p>In short, I do not and will not give my consent to wind turbines being put up near my home.</p>	
Resident	LP0082	Pub0067	See rep under Policy CC4.	See aggregated response under Policy CC4 to Pub0003.
Resident	LP0052	Pub0069	Generic Letter Received - See PUB0026.	See aggregated response under Policy CC4 to Pub0003.
Resident	LP0224	Pub0071	Generic Letter Received - See PUB0026.	See aggregated response under Policy CC4 to Pub0003.
Resident	LP0223	Pub0072	Generic Letter Received - See PUB0026.	See aggregated response under Policy CC4 to Pub0003.
Campaign to Protect Rural England	LP0015	Pub0074	<p>On behalf of CPRE Durham, a number of issues were raised in conjunction with this proposed Policy as it was then given at the Preferred Options stage. Since then of course, the Written Ministerial Statement of 18 June 2015 has been issued.</p> <p>That WMS gives a 2 pronged process that has to be satisfied before permission can be granted for a wind turbine development. First, the Plan must identify the area as suitable for such development and secondly, the proposal must have the backing of affected local communities.</p> <p>As far as the first point is concerned, we referred to the Arup study in our earlier representations. We represent that a Policy which identifies these areas as suitable is unsound for the following reasons</p> <p>1) We challenge whether the High Volts site is suitable for further development for the reasons we have previously outlined. We represent that the Arup study does not identify this site as being suitable for further development at least to this scale and the Council has not given reasons for determining otherwise</p>	See aggregated response under Policy CC4 to Pub0003

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
			<p>2) The Brenda Road site is not considered in the Arup study. We note that the number of turbines has been reduced from 6 to 4. We have noted the issues regarding this area and accept its industrial nature but the suitability should also fully consider the proximity of residential areas and the impact that such turbines may have upon them.</p> <p>Further we represent that the impact on people working within the industrial estate is also relevant.</p> <p>3) While we note that in Policy CC3, it is stated that the potential impact on heritage assets must be considered, we also note Policy LS1 which includes regeneration of Seaton Carew. We represent that any proposal in this area should also address the potential impact on any regeneration proposals under Policy LS1.</p> <p>While we accept that the Policy stipulates a number of criteria that need to be addressed before any turbine application can be approved, we represent that these are issues that should be determining the actual suitability of the area in the first place. It should not be a “fall back” situation that is determined at a later stage.</p> <p>As far as the second part of the WMS is concerned, we acknowledge that the Policy does specify a large number of criteria that have to be considered. While we remain of the view that these should be used to determine whether the areas are suitable in the first place, as outlined above, we represent that the following issues should also be considered</p> <p>1) Noise should be said to include amplitude modulation and low frequency noise.</p> <p>2) The potential impact on health of nearby residents should also be included. While we appreciate that this is a highly controversial topic and was not included as a topic by the former Secretary of State when he called in the recent applications for 3 wind turbines in this area, the evidence relating to adverse</p>	

Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
			<p>health impact is growing. There is a large population close to at least the Brenda Road area and, while the impact on even one person is important, the potential impact on such a large number of people should be considered as very important</p> <p>3) We also believe the health of people working in the vicinity of any proposed wind turbines should be taken into account and note the provisions of Policy EMP3 (General Employment Land) relating to potential future developments in the Brenda Road area.</p> <p>4) Air traffic operations should be specified to include the police helicopter and air ambulance.</p> <p>As a result, we represent that the Policy is not sound, may have a detrimental impact on the implementation of other policies such as EMP3 and may not comply with the legal requirements of the WMS.</p>	
Resident	LP0216	Pub0080	Generic Letter Received - See PUB0026.	See aggregated response under Policy CC4 to Pub0003
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach:</p> <p>Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Comments welcomed.
Resident	LP0350	Pub0127	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0355	Pub0131	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0356	PUB0132	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0357	PUB0133	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0358	PUB0134	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4













































































Company	Unique Ref	Pub Ref	CC3 Renewable and Low Carbon Energy Generation	CC3 Renewable and Low Carbon Energy Generation HBC
Resident	LP0154	PUB1303	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0159	PUB1304	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0185	PUB1305	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0132	PUB1306	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0183	PUB1307	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0184	PUB1308	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0133	PUB1309	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0061	PUB1310	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0188	PUB1311	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0134	PUB1312	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0108	PUB1313	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0087	PUB1314	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0098	PUB1315	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0162	PUB1316	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0167	PUB1317	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0072	PUB1318	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0117	PUB1319	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0173	PUB1320	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0195	PUB1321	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0198	PUB1322	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0118	PUB1323	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0169	PUB1324	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4

## Policy CC4: Strategic Wind Turbine Development

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0267	Pub0003	<p>I write to confirm my objection to the proposed 4 wind turbines mentioned in the plan that have been earmarked for construction along Brenda Road. Granted it is an industrial area but at almost one hundred metres tall these hideous turbines are a visual blight on the landscape already sadly lacking anything remotely described as picturesque. The council would like to invest in the re-generation of Seaton Carew and at the same time blight the landscape with wind turbines. Wind turbines are built with the aid of fossil fuels, and have a very large carbon footprint in their manufacture. If a 90 Mw produced energy every hour of every day which of course they do not, it would take 25 years to cancel out it's footprint. A 50 Mw would take close to 50 years, in no way shape or form can these machines be classed as clean and green with the legacy of it's manufacturing footprint and the duration of energy produced to cancel it out.</p> <p>We are a coastal town, bordering the North Sea, and yet the council has not explored the wave generation technologies, that are far more efficient in producing sustainable power without a blight on the landscape, being wave energy it is producing power 24 hours a day 7 days a week, unlike the wind turbine racket that only makes money for the operators regardless of how inefficient they may be.</p> <p>I am dubious of the global warming claims and the industry that has grown on the back of it, anything remotely green energy being given carte blanche approval with little or evaluation as to whole of life carbon footprint.</p> <p>PV is less of a blight on the landscape and offers less of a carbon intense manufacturing footprint and a more reliable supply of energy.</p> <p>If the council offered incentives to existing businesses to install PV installations on their roofs to supply the grid there would be no visual impact and no tearing up green field sites for their</p>	<p>There were a total of 1227 letters of objections received to the proposal for wind turbines at Seaton Carew. The proposals at High Volts only received a minimal number of responses. A majority of representations received from residents of Seaton Carew have objected to the proposed allocation of a strategic wind turbine site at the Brenda Road site. The local planning authority has had regard to the following written ministerial statement (WMS) of 18 June 2015:</p> <p>When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:</p> <p>The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan; and</p> <p>Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.</p> <p>In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a local or neighbourhood plan. Maps showing the wind resource as favourable to wind turbines, or similar, will not be sufficient. Whether a proposal has the backing of the affected local community is a planning judgment for the local planning authority.</p> <p>Where a valid planning application for a wind energy development has already been submitted to a local planning authority and the development plan does not identify suitable sites, the following transitional provision applies.</p> <p>In such instances, local planning authorities can find the proposal acceptable if, following consultation, they are satisfied it has addressed the planning impacts identified by affected local communities and therefore has their backing.</p> <p>The draft strategic wind turbine allocation at Brenda Road is in an area that the local planning authority has identified as suitable for wind energy development. The evidence behind this allocation is set out in an evidence paper entitled Renewable Energy Evidence Paper (September 2016) which was produced by the Council's Planning Policy team working in collaboration with the Council's Landscape</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>installation.</p> <p>I would ask the council to explore more alternatives for generating energy from wave and PV and abandon the near useless wind turbines as a source of energy supply</p>	<p>Architect.</p> <p>It has been suggested that the Brenda Road wind turbine allocation would have a negative impact on house prices. The impact of development on house prices is not a material planning consideration.</p> <p>It is acknowledged that there is a potential for a noise impact from a wind turbine proposal. However, any planning application to develop the site would have to be accompanied by a noise impact assessment which would have to demonstrate how the noise impact would be satisfactorily mitigated. Given that the proposed boundary within the Publication document has been moved to the west of Brenda Road in response to the concerns outlined at the Preferred Options Stage it is hoped that any noise issues will have been minimised, especially given the noise from the employment uses within the area, in particular the steel works.</p> <p>It has been suggested that the word “should” is not strong enough in the context of the policy. The Borough Council considers that should is sufficiently strong.</p> <p>A concern has been raised about the potential impact on migratory water birds. The Borough Council would respectfully point out that no concerns have been raised in this respect by Natural England or the Tees Valley Wildlife Trust.</p> <p>It has been commented that wind turbines will present a night hazard to police and air ambulance helicopter navigation. If a planning application were submitted for wind turbine development then Cleveland Police, the Tees Valley Emergency Planning Unit, the Health and Safety Executive and the Civil Aviation Authority would all be consulted. It has also been suggested that ‘air traffic operations’ in the policy should specify the police helicopter and the air ambulance. However, the Borough Council would respectfully point out that the operators of these services have not also made this request and that they are recognised by the Borough Council as being within the remit of air traffic operations.</p> <p>It is acknowledged that any ‘other voluntary benefits such as in-kind work’ (as referred to in paragraph 7.41 would have to be carefully managed.</p> <p>There have been various comments such as ‘visually over-bearing’</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				<p>and ‘visual blight on the landscape’ contending that the visual impact of wind turbine development at this location would be unacceptable. The Brenda Road area, along with much of south east Hartlepool, is a key industrial and employment location in the Borough and is dominated by industrial type structures and buildings of varying scale. The closest zone to this area considered as part of the Wind Farm Landscape Capacity Study is that between Billingham and Hartlepool (zone 27).</p> <p>This zone is considered to be a medium sensitivity and the Study noted that a ‘small-medium’ scale wind farm (up to 6 turbines) could potentially be accommodated, related to the industrial development of south east Hartlepool.</p> <p>Some respondents have stated that the Council should explore other sources of energy generation such as wave and tidal power. A number of responses express doubt as to the economic viability of on-shore wind energy development. It is acknowledged that a concern sometimes stated about onshore wind is that it is more expensive than fossil fuels for generating electricity. The economic viability of developing wind power is a rapidly developing area. Given the rapid rate of technological progress regarding different sources of energy generation it would seem reasonable to assume that the economic viability of wind development will improve significantly over time.</p> <p>One of the ambitions of the Tees Valley Strategic Economic Plan 2016 - 2026 is ‘Our ambition is for the Tees Valley to become a high value, low carbon, diverse and inclusive economy’. Consistent with this wave and tidal power is a type of energy generation for which the local planning authority has an ‘in principle’ support. However, no proposal for this type of scheme has been submitted to the Marine Management Organisation which is the organisation from whom a license would be required. Moreover, one type of energy generation does not preclude another.</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				<p>Whilst, it is acknowledged that it is not realistic to rely upon on-shore wind energy as the primary source of energy generation, the local planning authority is of the view that it does have a role in the mix of energy sources, subject to this being consistent with the WMS.</p> <p>It has been suggested that all houses should be fitted with solar panels as an alternative to allocating land for turbines. The local planning authority recognises the benefits of fitting houses with solar panels and is 'in principle' supportive of this but does not regard it as an alternative to other sources of energy generation. Nor does the authority itself have any practical means of delivering this suggestion.</p> <p>Reference has been made, in the context of the WMS, to the fact that the local planning authority carried forward the draft allocation in the Preferred Options document to the Publication Local Plan despite it being the case that there was demonstrably contrary to the wishes of the majority of local residents who responded to the consultation on the Preferred Options. However, the local planning authority did acknowledge the concerns of local residents when it carried forward the draft allocation by reducing the number of turbines from a maximum six to a maximum of four and also reducing the area allocated for this purpose. It was therefore considered to be appropriate to carry forward the draft allocation in order to test whether the changes made had addressed the concerns of the community.</p> <p>The view has been expressed that the wind turbines would impact negatively on the operation on the employment area by virtue of the effect on the working environment of employees and by acting as a barrier to investment. It is acknowledged that there may be an impact but it is considered that the two types of allocation can successfully work in tandem.</p> <p>There are no hard and fast rules about how suitable areas for renewable energy should be identified. The Brenda Road area, along with much of south east Hartlepool, is a key industrial and employment location in the Borough and is dominated by industrial type structures and buildings of varying scale. The closest zone to this area considered as part of the Wind Farm Landscape Capacity</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				<p>Study is that between Billingham and Hartlepool (zone 27). This zone is considered to be a medium sensitivity and the Study noted that a 'small-medium' scale wind farm (up to 6 turbines) could potentially be accommodated, related to the industrial development of south east Hartlepool. The Study also noted however that the potential in zone 27 could be limited by the number of constraints in the area. The Borough Council has to weigh carefully both the relative lack of visual sensitivity of an industrial location and the potential for an impact on regeneration aspirations, the quality of life of local residents and its economic growth aspirations for the employment allocation. In selecting this area at the Preferred Options stage the Borough Council took the view that, on balance, the draft allocation was valid.</p> <p>When moving forward to the Publication Local Plan, in deference to the concerns expressed by local residents, the number of turbines proposed was reduced from 6 to 4 and the area of the allocation reduced so that it was further away from the residential area. This means that 'topple' distances between the turbines and the residential area that are technically satisfactory (the length of the turbines plus 10%) could be achieved.</p> <p>The Brenda Road area has been the subject of three separate planning applications each to develop a single wind turbine. Comments from Natural England on each application included that 'it is considered that there would be no likely significant effect arising from collision or disturbance / displacement of SPA birds either alone or in-combination with other plans or projects' and 'We therefore advise your authority that thus SSSI does not represent a constraint in determining this application'. Natural England further commented 'The LPA should therefore consider the need for appropriate mitigation to address residual impacts on the local bird population through disturbance / displacement and would recommend that the views of the Local Authority ecologist are sought'. Comments from the HBC ecologist included 'As the three application sites are relatively large and the infrastructure associated with the turbines would take up a small proportion of those sites, then I consider it likely that habitat enhancements could be achieved on each of the sites such that they would increase the</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				<p>biodiversity of each site above its current level, including some measures that would benefit birds. Therefore there is the potential to achieve the requirements of NPPF and the Habitats Regulations by on-site mitigation.'</p> <p>When moving forward to the Publication Local Plan, in deference to the concerns expressed by local residents, the number of turbines proposed was reduced from 6 to 4 and the area of the allocation reduced so that it was further away from the residential area. This means that 'topple' distances between the turbines and the residential area that are technically satisfactory (the length of the turbines plus 10%) could be achieved.</p> <p>The Brenda Road area has been the subject of three separate planning applications each to develop a single wind turbine. Comments from Natural England on each application included that 'it is considered that there would be no likely significant effect arising from collision or disturbance / displacement of SPA birds either alone or in-combination with other plans or projects' and 'We therefore advise your authority that thus SSSI does not represent a constraint in determining this application'. Natural England further commented 'The LPA should therefore consider the need for appropriate mitigation to address residual impacts on the local bird population through disturbance / displacement and would recommend that the views of the Local Authority ecologist are sought'. Comments from the HBC ecologist included 'As the three application sites are relatively large and the infrastructure associated with the turbines would take up a small proportion of those sites, then I consider it likely that habitat enhancements could be achieved on each of the sites such that they would increase the biodiversity of each site above its current level, including some measures that would benefit birds. Therefore there is the potential to achieve the requirements of NPPF and the Habitats Regulations by on-site mitigation.'</p> <p>The Borough Council must take into account all of the representations received in relation to the proposed allocation of wind turbines to the south of Seaton Carew. The local planning authority has received 1227 representations opposing the Brenda</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				Road wind turbine allocation and 726 in support. The majority of the representations opposing the allocation are from residents of Seaton Carew whereas the representations supporting the allocation are from a variety of locations across the Borough. HBC consider that full consideration was given to the issue of whether the sites are technically suitable for wind turbine development through the process of determining the planning applications and there was no objection from Natural England or any other statutory consultee. The Inspector appointed by the Secretary of State for the Examination-in-Public for the Local Plan will need to take a view regarding the representations received in the context of the WMS.
Resident	LP0146	Pub0004	<p>Generic Letter Received - See PUB0026.</p> <p>Could we strongly object to the proposed location of the wind turbines at Seaton Carew, Hartlepool. We consider them to be too close to residential and commercial properties.</p>	See aggregated response to Pub0003 under Policy CC4
Resident	LP0177	Pub0008	<p>Generic Letter Received - See PUB0026.</p> <p>Dear Sir,both my Wife and I wish to protest in the strongest possible terms about the proposed wind turbines at Brenda Road.It has only been a short space of time since the government inspector threw out your previous application for these dreaded wind turbines.Why are you once again applying for permission for the building of these turbines when we the residents of Seaton Carew have clearly told you we do not want them.!!! Can you therefore listen to the residents ,and withdraw this application.!!</p>	See aggregated response to Pub0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0263	Pub0009	<p data-bbox="645 172 1077 196">Generic Letter Received - See PUB0026.</p> <p data-bbox="645 236 1346 360">I presume that you have my email address as I have recently shown particular interest in proposals for wind turbines in the Brenda Road area of Hartlepool and expressed my opposition to those plans.</p> <p data-bbox="645 400 1361 624">In fact, I am part of a group of Seaton Carew residents who opposed the proposed erection of the wind turbines in close proximity to our homes. As you are no doubt aware as a result of this, the Secretary of State became involved and appointed a Government Minister to head a Public Enquiry and it was deemed illegal, the locality far too close to local houses and against public approval and consent. The plans were justifiably thrown out.</p> <p data-bbox="645 663 1335 852">I'm now at a loss to understand why the Council has decided to allocate land in the same area for the erection of wind turbines again! Surely the Council should understand that NO wind turbines are acceptable in whatever shape, form or size and as local residents, we will fiercely oppose this as we did the last attempt.</p> <p data-bbox="645 892 1357 984">If the Council thinks wind turbines are a means of raising revenue then it is a very poor way of doing so and more focus should be placed upon improving and increasing our local amenities.</p>	See aggregated response to Pub0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0050	Pub0018	<p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the proposed plan.</p> <p>As stated above the community do not back the proposal for ANY wind turbines in the Brenda Road area for the following reasons:</p> <ul style="list-style-type: none"> <li>• Too close to residential property</li> <li>• Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</li> <li>• Visually - Over bearing</li> <li>• The infrastructure plan re electricity clearly states there is sufficient generation of electricity for all of the town plan developments.</li> <li>• There is no mention of wind turbines in the adopted or proposed infrastructure plan.</li> <li>• Turbines are not cost effective and indeed many countries are reviewing their position on this matter.</li> </ul> <p>Seaton Carew is earmarked as a tourist destination and significant investment has been made into the area and additional funds have also been allocated for upgrading the front. However if the town plan goes ahead visitors will be faced with huge wind turbines when they enter Seaton via Seaton Lane area or when visiting by train. This detracts from the attractiveness of the area, surely we should be trying to improve the landscape in the area.</p>	See aggregated response to Pub0003 under Policy CC4.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0092	Pub0026	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0091	Pub0027	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response under CC4 at Pub0003

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0282	Pub0028	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0283	Pub0029	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0284	Pub0030	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0285	Pub0031	<p>we are opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States 'and the proposal has the backing of the local community' the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:  Too close to residential property  Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)  Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons we would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p> <p>We strongly object to the proposed erection of these eyesores on Brenda Road. It is bad enough having them out at sea but to erect them on land so close to housing and wildlife is preposterous. We thought the "VISION" was to improve Seaton Carew not the opposite!!!</p>	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0286	Pub0032	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>*And the devaluing of our houses</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0287	Pub0033	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0288	Pub0034	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0289	Pub0035	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0290	Pub0036	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0291	Pub0037	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0292	Pub0038	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States 'and the proposal has the backing of the local community' the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0293	Pub0039	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan. In the event - AS PER</p>	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0294	Pub0040	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States 'and the proposal has the backing of the local community' the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017) Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p> <p>In the event that this installation/infrastructure ever affects the health of our or any occupant of these premises we/they reserve all our legal rights to pursure all &amp; every party who authorised the above, regardless of approval involvement</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0295	Pub0041	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0296	Pub0042	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0297	Pub0043	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0298	Pub0044	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0299	Pub0045	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0300	Pub0046	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0301	Pub0047	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <p>Too close to residential property</p> <p>Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)</p> <p>Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.</p> <p>For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0302	Pub0048	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017.</p> <p>States ‘and the proposal has the backing of the local community’ the council is aware that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:  Too close to residential property  Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues –one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017)  Visually Over-bearing. The size of wind Turbine structures is such that they will impact on visual amenity in residential areas since they backdrop against the sky.  For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	See aggregated response to PUB0003 under Policy CC4
Resident	LP0066	Pub0063	Most of Seaton residents are sick and tired of your proposals for this area - monster Wind Turbines, smaller Wind Turbines, Parking Charges, and now this as well. We are SO tired of it.	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0315	Pub0064	<p>I have lived in a small cul-de-sac in Seaton Carew for almost 35 years. My husband and ten other men joined together in a self-build scheme and worked for more than three years building our homes. All the men had a great deal of pride and an inestimable sense of purpose to produce a home in this way and means so much more to us than simply buying a house in the usual way. We all chose our 'plots' carefully and created wonderful homes in which to bring up our families and I suppose we are naturally possessive of our homes and environment. Our home is a lasting legacy to our children and testament to their father's hard work and commitment.</p> <p>I attended a consultation meeting on Thursday 15th December at Seaton Carew Library about the proposed Hartlepool plan. I was especially interested in the plans because land had been allocated for the future erection of wind turbines in the Brenda Road area. I had a word with one of the Planning Officers present asking if they would be happy if wind turbines were built so close to their home and did not receive an answer. If Planning Officers would not be happy then I think you can understand why I am not. It was made very clear when the last plans were submitted that very many, if not all, residents of Seaton Carew, Greatham and the Fens estate opposed having wind turbines built close to our homes. Even though the size of the turbines has been reduced, it makes no difference whatsoever as we do not want any.</p> <p>There is an article in the Daily Mail (Wednesday 25.01.17) from a resident in Wales entitled 'Wind power is out of puff' and quotes far more eloquently than I can that wind turbines do not effectively supply enough energy to cope with demand. I cannot understand why the Council is so keen to use this type of power when there is so much opposition against it and inconclusive data to support it. I would recommend you google the article and many other articles written in the Daily Mail over the last two years or so.</p> <p>In short, I do not and will not give my consent to wind turbines being put up near my home.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0082	Pub0067	<p>HBC state that 'Onshore and offshore wind turbines — both now well established and one of the most economically viable sources of renewable electricity' - not strictly true if subsidies are removed. Viable for the developer, too unreliable for base-load generation.</p> <p>Without current subsidies and levies on our bills, wind farms become an uneconomic technology. The government has already stated the subsidies are unsustainable and will cease in spring 2017 for onshore sites. The USA already has many wind farms abandoned due to loss of subsidies. See note 1.</p> <p>No Community Backing. Strategic Onshore Wind Turbine Developments Plan states 'permission should only be granted if the proposal is in an area identified as suitable for wind energy in a Local or Neighbourhood Plan, and the proposal has the backing of the local community'. The word 'should' is no guarantee of intention. It is clear that onshore wind turbines close to Seaton Carew DO NOT have the backing of the community based on both the number of objections to the last plan iteration, and the opinions polled during the last Wind Turbine planning applications. For this reason, I ask you to remove onshore wind turbine proposals from the Hartlepool Local Plan.</p> <p>Degraded Visual Amenity, Noise pollution, impediment of Police and Air - Ambulance. Whilst the Brenda Rd south area is surrounded by industrial estates, the size of Wind Turbine structures is such that they will impact on visual amenity and be seen as overbearing since they backdrop against the sky in nearby residential areas.</p> <p>The area is therefore unsuitable for wind turbines. See note 2. There is also the problem of amplitude modulated (AM) noise which carries considerable distances. See note 3</p> <p>Wind turbines will also present a night hazard to police and air ambulance helicopter navigation since the services are compelled by CAA regulations to fly by visual means only and navigate by established road routes. Police pilots state they are opposed to this type of development on their flight paths. See note 4. For the</p>	See aggregated response under Policy CC4 to Pub0003.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>above reasons, I ask you to remove onshore wind turbines proposals from the Hartlepool Local Plan.</p> <p>HBC must not sacrifice the welfare and quality of life of Seaton Carew and other impacted areas to the envisioned economic benefits to the council finances from [voluntary] community-fund payments, nor goods and services 'in kind' as the proposal document implies.</p> <p>Services provided 'in kind 'as suggested by the text in compensation for local wind farm siting, complicate proper control and accountability in the management of accounts and contracts. There will always be scope for conflict from disagreements in the perceived values by vendor and client of 'in kind' services/work carried out.</p> <p>1. Without current subsidies (like Contract-for-Difference payments guaranteeing an average of four times of the going rate per unit generated), small wind farms become an uneconomic technology. USA experience has been that thousands of wind turbines stand abandoned after loss of subsidies (just Google it and see for yourselves).</p> <p>The government has already stated the subsidies are unsustainable and will cease in 2017. The amount of energy available from the town plan proposals is insignificant compared to that from a modern power station. There is a perfectly adequate new 27 turbine 62MW large scale windfarm in the bay and a 1100MW zero carbon power station just along the road. So local generation is already well catered for.</p> <p>2. The impact on the skyline and size will project the industrial nature of the Tofts farm area into Seaton Carew residential areas. This will adversely affect visual amenity and detract from the residential ambience of the village. I do not believe that wind turbines should be in such close proximity to residential properties regardless of size. Seaton Carew is an urban village, not a remote rural area, and many homes would be at risk from carried noise and a significant impact on amenity.</p>	

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>3. The plan does not describe how it will compel developers to prevent transmitted noise arising from Amplitude Modulation which carries considerable distances depending on the wind direction and topology of the land. In close proximity areas to the Wind Turbines, working conditions in businesses downwind both indoor and outdoor will be adversely impacted by the noise generated by the blades.</p> <p>Noise propagation in turbulent shifting wind through a complex topology and structures (such as a housing estate) is almost impossible to predict.</p> <p>The nature of the Hartlepool bay concentrates sound transmission in south Seaton Carew, resulting in low level noise nuisance such as industrial H&amp;V fans, heavy machinery, metal recycling etc travelling from over 2 kilometres miles away.</p> <p>4. Police and air ambulance are only permitted to fly by visual recognition and use established road links to navigate. They must also maintain at least 60 seconds visual flying visibility. Wind turbine blade tips are not illuminated and are a moving hazard; they also cause upward turbulence to overhead low level aircraft. Police pilots oppose wind turbines in the proposed areas.</p>	
Resident	LP0052	Pub0069	<p>Generic Letter Received - See PUB0026.</p> <p>I wish to comment about something regarding the proposed windmill development at Seaton. There are two guys belonging to a Pro Windmill group collecting signatures in the shopping centre from people who will not be affected by the proposed development. Told them use have a fair fight and go to Seaton where the people will be affected not getting signatures from Westview or Clavering etc. Neither of them live in the town or Seaton for that matter. I sincerely hope when a decision is made you will look at the post code and consider only those signatories who geographically will be affected. For the record every household I visited (in Seaton) signed our petition against the development. As I told them we are not against windmills just to locate them far away from peoples homes.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0051	Pub0070	<p>I would like to reiterate my issue with the local plan around the siting of Wind Turbines in the Seaton Carew Ward.</p> <p>As per the previous planning proposal the Community do not back the proposal for any wind turbines in this area, regardless of size.</p> <p>I would question the local plan based upon the Governments own recommendation that Wind Turbines should be placed out at sea. I would also question why, yet again after the previous Wind Turbine planning application that the Council are continuing to push the issue when there is no requirement whatsoever to have Wind Turbines in the plan.</p> <p>Lastly, I find the method of consultation, 'if people don't vote against, then they are agreeing' to be absolutely shameful on the Council and should never ever be used.</p>	See aggregated response to PUB0003 under Policy CC4
Resident	LP0224	Pub0071	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0223	Pub0072	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Campaign to Protect Rural England	LP0015	Pub0074	See comments under Policy CC3.	<p>The East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study provided an objective technical assessment of the capacity of an area to accommodate wind farm development using an agreed and accepted methodology. One of the zones in the study included the existing wind farm development of 3 turbines at High Volts. The study concluded that there is some limited potential for wind turbine development associated with the existing turbine development provided that the cluster did not exceed more than 6 turbines.</p> <p>For response concerning the Brenda Road site see aggregated response to Pub0003.</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0216	Pub0080	<p>Generic Letter Received - See PUB0026.</p> <p>Objection to development of land on Brenda Road for wind turbine development I would like to object to the local plan at the above mentioned site on the following grounds.</p> <ol style="list-style-type: none"> <li>1. The site is in my opinion too close to well established housing estates, I believe they will have a dramatic effect on the view from our homes.</li> <li>2. The flicker effect has been proven to have issues on health including blackouts, epilepsy as well as having a massive effect on mental health.</li> <li>3. In the wider picture of wind turbines its also been proven that these (in my opinion) blots on our landscape are inefficient ways of producing energy. Our town has a coast and the sea could be used to harness wave energy.</li> <li>4. People who have these wind turbines on their doorstep also report that the noise from them is unbearable and as with the shadow flicker its 24 hours a day 7 days a week.</li> <li>5. The site at Brenda Road is also on track to Teesmouth a wildlife nature reserve where thousands of migratory water birds visit each year. The blades of wind turbines are killers to these birds.</li> <li>6. I know the council will probably laugh at this objection but it concerns me and my family home. so on them grounds i feel it is a just objection. The homes that will have these wind turbines on the doorstep, will devalue by 20% - 30%. This has been proven were other sites have been located close to housing estates.</li> </ol>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Friends of Rossmere (Residents' Group)	LP0233	Pub0085	<p>Wind Turbines</p> <p>I along with our members are totally against Wind Turbines in Hartlepool especially those planned at the side of Brenda Road which are close to both houses and schools.</p> <p>I am opposed to the proposed development of wind turbines in the Brenda Road area. Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>Page No 35/36, Item 7.28</p> <p>Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017. There is a reference to developing Wave and Tidal technology, but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.</p> <p>Page No 38, Item 7.36</p> <p>States 'and the proposal has the backing of the local community' the council is aware and I can confidently state that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>Page 387, item .40</p> <p>As stated above the community do NOT back the proposal for ANY wind turbines in the Brenda Road area, regardless of size, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Too close to residential property</li> <li>• Potential noise impact (recent cases have proven that wind turbines are noisy and cause health issues — one of the latest is in Co Cork, due to consider damages payable to people who have been affected by noise early in 2017).</li> <li>• Visually Over-bearing. The size of wind Turbine structures is</li> </ul>	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>such that they will impact on visual amenity in residential areas since they backdrop against the sky.  Page 73 Item 9.52  States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.  For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p>	
Resident	LP0204	Pub0088	<p>Wind turbines destroy visual outlook of countryside and close surrounding areas. Already see too many across countryside and are unsightly on skyline re: Elwick/Trimdon/Fishburn area.  Brenda road site 4 is too many and as yet wind turbines do not produce enough power to be sufficient and viable to have more only one who benefits is the landowner.  Impact on skyline and near communities unsightly. Have seen in areas where starts with one, more follow soon after there is a mini windfarm.</p>	See aggregated response to PUB0003 under Policy CC4
Resident	LP0347	Pub0111	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.  Having reviewed the proposed town plan I have the following comments based on soundness:  35/36 7.28 Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017. There is a reference to developing Wave and Tidal technology, but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.</p> <p>387.46 States 'and the proposal has the backing of the local community' the council is aware and I can confidently state that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>387.40 States 'and the proposal has the backing of the local community' the council is aware and I can confidently state that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>739.52 States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets. For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p> <p>As well as the above objections I have serious concerns about the use of land surrounding the proposed wind Turbines. This marked for industrial use. Situating of large turbines in this area will have the affect of sterilising these areas. The noise and flicker to surrounding industrial unit will make the working environment unbearable. As no other suitable location is available for many of these companies they will have no option but to move to other locations outside of the, removing employment for people of the town and reducing business rates returned to the council.</p> <p>Also as these proposed wind turbines will still be excessively large for the location any companies within the area affected by ice sheer from the blades and blade failure will put surrounding employees and the general public in danger, going against the councils duty of care when making planning decisions as well as leaving the council open to claims against them.</p>	

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0348	Pub0112	<p>I am opposed to the proposed development of wind turbines in the Brenda Road area.</p> <p>Having reviewed the proposed town plan I have the following comments based on soundness:</p> <p>35/36 7.28 Turbines will be less economically viable for commercial developers with the withdrawal of contract-for-difference payments in 2017. There is a reference to developing Wave and Tidal technology, but no mention of Hartlepool's intention to keep a watching brief, to support this development. As a coastal town surely this is a development that the council should pay attention to, be discussing with universities who are undertaking the research and be ready to react when the technology is developed.</p> <p>387.46 States 'and the proposal has the backing of the local community' the council is aware and I can confidently state that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>387.40 States 'and the proposal has the backing of the local community' the council is aware and I can confidently state that the majority of people in Seaton Carew do NOT back the building of the proposed wind turbines along Brenda Road as detailed in the plan. This is clearly shown by the number of objections to the last plan iteration and the opinions polled during the last Wind Turbine application.</p> <p>739.52 States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets. For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.</p> <p>As well as the above objections I have serious concerns about the use of land surrounding the proposed wind Turbines. This marked</p>	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>for industrial use. Situating of large turbines in this area will have the affect of sterilising these areas. The noise and flicker to surrounding industrial unit will make the working environment unbearable. As no other suitable location is available for many of these companies they will have no option but to move to other locations outside of the, removing employment for people of the town and reducing business rates returned to the council.</p> <p>Also as these proposed wind turbines will still be excessively large for the location any companies within the area affected by ice sheer from the blades and blade failure will put surrounding employees and the general public in danger, going against the councils duty of care when making planning decisions as well as leaving the council open to claims against them.</p>	
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Comments welcomed.
Resident	LP0350	Pub0127	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0355	Pub0131	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0356	PUB0132	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0357	PUB0133	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0358	PUB0134	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0359	PUB0135	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0360	PUB0136	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0391	PUB0167	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0392	PUB0168	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0393	PUB0169	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0394	PUB0170	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0395	PUB0171	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0396	PUB0172	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0397	PUB0173	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0398	PUB0174	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0399	PUB0175	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0400	PUB0176	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0401	PUB0177	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0403	PUB0179	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0405	PUB0181	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0406	PUB0182	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0407	PUB0183	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0408	PUB0184	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0409	PUB0185	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0410	PUB0186	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0411	PUB0187	Generic Letter Received - See PUB0026.  I am also concerned about the flicker effect.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0412	PUB0188	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0413	PUB0189	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0414	PUB0190	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0415	PUB0191	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0416	PUB0192	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0418	PUB0194	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0419	PUB0195	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0420	PUB0196	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0421	PUB0197	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0422	PUB0198	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4











Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0543	Pub0319	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0544	Pub0320	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0545	Pub0321	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0546	Pub0322	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0547	Pub0323	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0548	Pub0324	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0549	Pub0325	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0550	Pub0326	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0551	Pub0327	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0552	Pub0328	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0553	Pub0329	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0554	Pub0330	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0555	Pub0331	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0556	Pub0332	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0557	Pub0333	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0558	Pub0334	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0559	Pub0335	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0560	Pub0336	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0561	Pub0337	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0562	Pub0338	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0563	Pub0339	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0564	Pub0340	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0565	Pub0341	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0566	Pub0342	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0567	Pub0343	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0568	Pub0344	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0569	Pub0345	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0570	Pub0346	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0571	Pub0347	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Hydrochem Group	LP0572	Pub0348	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Hydrochem Group	LP0573	Pub0349	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0574	Pub0350	Generic Letter Received - See PUB0026.  Further to the above comments, Greatham Village already suffers with unwanted noise from surrounding industries. Allowing these wind turbines to be installed will only add further noise pollution Seaton and Greatham Village. For Hartlepool Council to allow this installation to happen is unthinkable.  For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0575	Pub0351	Generic Letter Received - See PUB0026.  Further to the above comments, Greatham Village already suffers with unwanted noise from surrounding industries. Allowing these wind turbines to be installed will only add further noise pollution Seaton and Greatham Village. For Hartlepool Council to allow this installation to happen is unthinkable.  For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0576	Pub0352	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0577	Pub0353	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0578	Pub0354	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0579	Pub0355	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0580	Pub0356	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0581	Pub0357	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0582	Pub0358	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0583	Pub0359	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0584	Pub0360	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0585	Pub0361	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0586	Pub0362	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0587	Pub0363	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0588	Pub0364	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0589	Pub0365	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0590	Pub0366	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0591	Pub0367	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0592	Pub0368	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0593	Pub0369	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0594	Pub0370	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0595	Pub0371	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0596	Pub0372	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0597	Pub0373	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0598	Pub0374	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0599	Pub0375	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0600	Pub0376	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0601	Pub0377	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0602	Pub0378	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0603	Pub0379	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0604	Pub0380	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0605	Pub0381	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0606	Pub0382	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0607	Pub0383	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0608	Pub0384	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0609	Pub0385	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0610	Pub0386	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0611	Pub0387	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0612	Pub0388	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0613	Pub0389	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0614	Pub0390	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0615	Pub0391	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0616	Pub0392	Generic Letter Received - See PUB0026.  What impact will this have on Golden Flatts school pupils?	See aggregated response to PUB0003 under Policy CC4
Resident	LP0617	Pub0393	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4



























Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0955	Pub0731	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0956	Pub0732	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0957	Pub0733	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0958	Pub0734	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0959	Pub0735	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0960	Pub0736	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0961	Pub0737	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0962	Pub0738	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0963	Pub0739	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0964	Pub0740	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0965	Pub0741	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0966	Pub0742	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0967	Pub0743	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0968	Pub0744	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0969	Pub0745	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0970	Pub0746	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0971	Pub0747	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0972	Pub0748	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0973	Pub0749	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0974	Pub0750	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0975	Pub0751	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0976	Pub0752	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0977	Pub0753	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0978	Pub0754	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0979	Pub0755	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0980	Pub0756	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0981	Pub0757	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0982	Pub0758	Generic Letter Received - See PUB0026.  Please note my personal concern is the noise but I do believe other options should be considered	See aggregated response to PUB0003 under Policy CC4





































Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1467	PUB1243	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP1468	PUB1244	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP1469	PUB1245	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP1470	PUB1246	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP1471	PUB1247	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP1472	Pub1248	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0181	Pub1249	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0182	Pub1250	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0249	Pub1251	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0144	Pub1252	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0131	Pub1253	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0145	Pub1254	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0147	Pub1255	Generic Letter Received - See PUB0026.  Could we strongly object to the proposed location of the wind turbines at Seaton Carew, Hartlepool. We consider them to be too close to residential and commercial properties.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0114	Pub1256	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0121	Pub1257	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0122	Pub1258	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0112	Pub1259	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0110	Pub1260	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0203	Pub1261	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0197	Pub1262	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0124	Pub1263	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0174	Pub1264	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0175	Pub1265	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0215	Pub1266	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0142	Pub1267	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0166	Pub1268	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0165	Pub1269	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP0168	PUB1300	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0065	PUB1301	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0097	PUB1302	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0154	PUB1303	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0159	PUB1304	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0185	PUB1305	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0132	PUB1306	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0183	PUB1307	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0184	PUB1308	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0133	PUB1309	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0061	PUB1310	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0188	PUB1311	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0134	PUB1312	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0108	PUB1313	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0087	PUB1314	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0098	PUB1315	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0162	PUB1316	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0167	PUB1317	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0072	PUB1318	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0117	PUB1319	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0173	PUB1320	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0195	PUB1321	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0198	PUB1322	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0118	PUB1323	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4
Resident	LP0169	PUB1324	Generic Letter Received - See PUB0026.	See aggregated response to PUB0003 under Policy CC4

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1473	Pub1325	<p>Generic Letter Received - See PUB1325. I would like to register my support for Policy CC4 in the Publication Local Plan. I have had an opportunity to review the policy and consider it to be both acceptable and desirable.</p> <p>I understand that...</p> <p>Policy CC4 would facilitate the development of up to seven onshore wind turbines, each with a potential installed capacity of 2MW which is enough to meet the equivalent demands of some 1200 homes each year, offsetting the release of up to 17,500 tonnes of CO2 each year over their 25 year lifespan (assuming the generation from the turbines replaces coal fired energy generation) and contributing to local and national renewable energy targets.</p> <p>Wind turbines in the UK are an essential part of our efforts to combat man-made climate change by offsetting carbon dioxide emissions that would otherwise be produced by fossil fuel power generation.</p> <p>Wind power must and will play a vital part in our energy mix alongside other renewables such as wave, tidal, solar and energy efficiency.</p> <p>A United Nations report on how to curb man-made climate change says the world must rapidly move away from carbon-intensive fuels and there must be a "massive shift" to renewable energy. The UN also warned that the impacts of global warming are to be "severe, pervasive and irreversible".</p> <p>Wind energy last year generated 1.5% of the UK's total electricity supply, enough to meet the equivalent demands of 9.8 million households (36% of UK homes).</p> <p>In December of last year, wind power in the UK generated 20% of the electricity mix in the week ending 25th December and on Christmas Day itself; a new daily record of 32% of UK electricity was generated by wind. For the first time last year, wind power outperformed coal which generated just 9.2% of UK's electricity mix. Overall, a quarter of our electricity came from renewable sources in 2016.</p> <p>The development of wind turbines in the areas identified by the policy would not affect my enjoyment of living in or visiting the</p>	<p>There were a total of 726 letters of support received to the proposal for wind turbines at Seaton Carew. The proposals at High Volts only received a minimal number of responses. A minority of the representations received from residents of Seaton Carew have supported the proposed allocation of a strategic wind turbine site at the Brenda Road site. The local planning authority has had regard to the following written ministerial statement (WMS) of 18 June 2015: When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:</p> <p>The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan; and</p> <p>Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.</p> <p>In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a local or neighbourhood plan. Maps showing the wind resource as favourable to wind turbines, or similar, will not be sufficient. Whether a proposal has the backing of the affected local community is a planning judgment for the local planning authority.</p> <p>Where a valid planning application for a wind energy development has already been submitted to a local planning authority and the development plan does not identify suitable sites, the following transitional provision applies.</p> <p>In such instances, local planning authorities can find the proposal acceptable if, following consultation, they are satisfied it has addressed the planning impacts identified by affected local communities and therefore has their backing.</p> <p>The draft strategic wind turbine allocation at Brenda Road is in an area that the local planning authority has identified as suitable for wind energy development. The evidence behind this allocation is set out in an evidence paper entitled Renewable Energy Evidence Paper (September 2016) which was produced by the Council's Planning Policy team working in collaboration with the Council's Landscape Architect.</p> <p>The representation sets out the benefits of renewable energy</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
			<p>area.</p> <p>Any perceived visual impact that wind turbines in the identified areas may have, must be put in context with the widespread environmental damage which climate change could cause in the area, and I accept that wind turbines in appropriate areas are a necessary feature on the skyline.</p> <p>The UK has a commitment to international legally-binding carbon emission and renewable energy targets and these must be taken seriously</p> <p>The publication of an Intergovernmental Panel on Climate Change (IPCC) report into climate change adds to the already compelling evidence that global warming is happening and the severity of the consequences we face if we do nothing to address the situation.</p> <p>In December of 2015 at the Paris COP21 meeting, an historic agreement to combat climate change and unleash actions and investment towards a low carbon, resilient and sustainable future was agreed by 195 nations, including the UK. The inclusion of Policy CC4 within the Local Plan will show that Hartlepool Borough Council takes the threat of man-made climate change seriously.</p>	<p>development such as the contribution it makes to combating man-made climate change and refers to ‘already compelling evidence that global warming is happening and the severity of the consequences we face if we do nothing to address the situation.’ One of the ambitions of the Tees Valley Strategic Economic Plan 2016 - 2026 is ‘Our ambition is for the Tees Valley to become a high value, low carbon, diverse and inclusive economy’. The Borough Council takes the threat of man-made change very seriously and is fully supportive of this ambition and is committed to exploring options to support its delivery.</p> <p>The Brenda Road area has been the subject of three separate planning applications each to develop a single wind turbine.</p> <p>Comments from Natural England on each application included that ‘it is considered that there would be no likely significant effect arising from collision or disturbance / displacement of SPA birds either alone or in-combination with other plans or projects’ and ‘We therefore advise your authority that thus SSSI does not represent a constraint in determining this application’. Natural England further commented ‘The LPA should therefore consider the need for appropriate mitigation to address residual impacts on the local bird population through disturbance / displacement and would recommend that the views of the Local Authority ecologist are sought’. Comments from the HBC ecologist included ‘As the three application sites are relatively large and the infrastructure associated with the turbines would take up a small proportion of those sites, then I consider it likely that habitat enhancements could be achieved on each of the sites such that they would increase the biodiversity of each site above its current level, including some measures that would benefit birds. Therefore there is the potential to achieve the requirements of NPPF and the Habitats Regulations by on-site mitigation.’</p> <p>The Borough Council must take into account all of the representations received in relation to the proposed allocation of wind turbines to the south of Seaton Carew. The local planning authority has received 1227 representations opposing the Brenda Road wind turbine allocation and 726 in support. The majority of the</p>

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
				representations opposing the allocation are from residents of Seaton Carew whereas the representations supporting the allocation are from a variety of locations across the Borough. HBC consider that full consideration was given to the issue of whether the sites are technically suitable for wind turbine development through the process of determining the planning applications and there was no objection from Natural England or any other statutory consultee. The Inspector appointed by the Secretary of State for the Examination-in-Public for the Local Plan will need to take a view regarding the representations received in the context of the WMS.
Resident	LP1474	Pub1326	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1475	Pub1327	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1476	Pub1328	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1477	Pub1329	Generic Letter Received - See PUB1325. Windpower is essential.	See response to Pub1325
Resident	LP1478	Pub1330	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1479	Pub1331	Generic Letter Received - See PUB1325. I love windturbines	See response to Pub1325
Resident	LP1480	Pub1332	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1481	Pub1333	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1482	Pub1334	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1483	Pub1335	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1484	Pub1336	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1485	Pub1337	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1486	Pub1338	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1487	Pub1339	Generic Letter Received - See PUB1325. Great work	See response to Pub1325
Resident	LP1488	Pub1340	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1489	Pub1341	Generic Letter Received - See PUB1325. Already here, doesn't need importing, no hazardous waste.	See response to Pub1325
Resident	LP1490	Pub1342	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1491	Pub1343	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1492	Pub1344	Generic Letter Received - See PUB1325.	See response to Pub1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1493	Pub1345	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1494	Pub1346	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1495	Pub1347	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1496	Pub1348	Generic Letter Received - See PUB1325. Yes to wind	See response to Pub1325
Resident	LP1497	Pub1349	Generic Letter Received - See PUB1325. I support renewable and sustainable energy.	See response to Pub1325
Resident	LP1498	Pub1350	Generic Letter Received - See PUB1325. Yes to wind in Hartlepool	See response to Pub1325
Resident	LP1499	Pub1351	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1500	Pub1352	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1501	Pub1353	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1502	Pub1354	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1503	Pub1355	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1504	Pub1356	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1505	Pub1357	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1506	Pub1358	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1507	Pub1359	Generic Letter Received - See PUB1325. Yes to wind no to fracking and UCG.	See response to Pub1325
Resident	LP1508	Pub1360	Generic Letter Received - See PUB1325.	See response to Pub1325
Resident	LP1509	Pub1361	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1510	Pub1362	Generic Letter Received - See PUB1325. I support windpower	See response to PUB1325
Resident	LP1511	Pub1363	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1512	Pub1364	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1513	Pub1365	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1514	Pub1366	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1515	Pub1367	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1516	Pub1368	Generic Letter Received - See PUB1325. windpower for our children	See response to PUB1325
Resident	LP1517	Pub1369	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1518	Pub1370	Generic Letter Received - See PUB1325.	See response to PUB1325



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1519	Pub1371	Generic Letter Received - See PUB1325. I support windpower in Hartlepool.	See response to PUB1325
Resident	LP1520	Pub1372	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1521	Pub1373	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1522	Pub1374	Generic Letter Received - See PUB1325. Yes to wind in Hartlepool	See response to PUB1325
Resident	LP1524	Pub1376	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1525	Pub1377	Generic Letter Received - See PUB1325. They are a good thing.	See response to PUB1325
Resident	LP1526	Pub1378	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1527	Pub1379	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1528	Pub1380	Generic Letter Received - See PUB1325. wind farms are needed for my children's future.	See response to PUB1325
Resident	LP1529	Pub1381	Generic Letter Received - See PUB1325. Yes to wind power	See response to PUB1325
Resident	LP1530	Pub1382	Generic Letter Received - See PUB1325. Definitely yes to wind power	See response to PUB1325
Resident	LP1531	Pub1383	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1532	Pub1384	Generic Letter Received - See PUB1325. Sooner the better	See response to PUB1325
Resident	LP1533	Pub1385	Generic Letter Received - See PUB1325. Love green energy, low carbon footprint and clean.	See response to PUB1325
Resident	LP1534	Pub1386	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1535	Pub1387	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1536	Pub1388	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1537	Pub1389	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1538	Pub1390	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1539	Pub1391	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1540	Pub1392	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1541	Pub1393	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1542	Pub1394	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1543	Pub1395	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1544	Pub1396	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1545	Pub1397	Generic Letter Received - See PUB1325. Go wind power	See response to PUB1325
Resident	LP1546	Pub1398	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1547	Pub1399	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1549	Pub1401	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1550	Pub1402	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1551	Pub1403	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1552	Pub1404	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1553	Pub1405	Generic Letter Received - See PUB1325. I agree with windpower an alternative natural energy source.	See response to PUB1325
Resident	LP1554	Pub1406	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1555	Pub1407	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1556	Pub1408	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1557	Pub1409	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1558	Pub1410	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1559	Pub1411	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1560	Pub1412	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1561	Pub1413	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1562	Pub1414	Generic Letter Received - See PUB1325. I support wind power	See response to PUB1325
Resident	LP1563	Pub1415	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1564	Pub1416	Generic Letter Received - See PUB1325. I support wind power	See response to PUB1325
Resident	LP1565	Pub1417	Generic Letter Received - See PUB1325. Sustainability and environmental protection are key to our future.	See response to PUB1325
Resident	LP1566	Pub1418	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1567	Pub1419	Generic Letter Received - See PUB1325. I support wind power	See response to PUB1325
Resident	LP1568	Pub1420	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1569	Pub1421	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1570	Pub1422	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1571	Pub1423	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1572	Pub1424	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1573	Pub1425	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1574	Pub1426	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1575	Pub1427	Generic Letter Received - See PUB1325.  I support windpower.	See response to PUB1325
Resident	LP1576	Pub1428	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1577	Pub1429	Generic Letter Received - See PUB1325.  Good for job, good for atmosphere.	See response to PUB1325
Resident	LP1578	Pub1430	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1579	Pub1431	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1580	Pub1432	Generic Letter Received - See PUB1325.  We need to think of the future and make sure we leave things as good as we can for our children	See response to PUB1325
Resident	LP1581	Pub1433	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1582	Pub1434	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1583	Pub1435	Generic Letter Received - See PUB1325.  I support wind power for our future.	See response to PUB1325
Resident	LP1584	Pub1436	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1585	Pub1437	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1586	Pub1438	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1587	Pub1439	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1588	Pub1440	Generic Letter Received - See PUB1325.  Totally agree.	See response to PUB1325
Resident	LP1589	Pub1441	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1590	Pub1442	Generic Letter Received - See PUB1325.  Wind power:- all pros'	See response to PUB1325
Resident	LP1591	Pub1443	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1592	Pub1444	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1593	Pub1445	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1594	Pub1446	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1595	Pub1447	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1596	Pub1448	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1597	Pub1449	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1598	Pub1450	Generic Letter Received - See PUB1325.  Good.	See response to PUB1325
Resident	LP1599	Pub1451	Generic Letter Received - See PUB1325.  Wind power is very good.	See response to PUB1325
Resident	LP1600	Pub1452	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1601	Pub1453	Generic Letter Received - See PUB1325.  I support wind power for our future.	See response to PUB1325
Resident	LP1602	Pub1454	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1603	Pub1455	Generic Letter Received - See PUB1325.	See response to PUB1325
	LP1604	Pub1456		
Resident	LP1605	Pub1457	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1606	Pub1458	Generic Letter Received - See PUB1325.  Go for it!	See response to PUB1325
Resident	LP1607	Pub1459	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1608	Pub1460	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1609	Pub1461	Generic Letter Received - See PUB1325.  Yes to more jobs.	See response to PUB1325
Resident	LP1610	Pub1462	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1611	Pub1463	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1612	Pub1464	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1613	Pub1465	Generic Letter Received - See PUB1325.  Very graceful. Love them.	See response to PUB1325
Resident	LP1614	Pub1466	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1615	Pub1467	Generic Letter Received - See PUB1325.  Get it done.	See response to PUB1325
Resident	LP1616	Pub1468	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1617	Pub1469	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1618	Pub1470	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1619	Pub1471	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1620	Pub1472	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1621	Pub1473	Generic Letter Received - See PUB1325.  Wind turbines are majestic.	See response to PUB1325
Resident	LP1622	Pub1474	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1623	Pub1475	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1624	Pub1476	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1625	Pub1477	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1626	Pub1478	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1627	Pub1479	Generic Letter Received - See PUB1325.  A brilliant renewable energy resource alternative (keep it up)	See response to PUB1325
Resident	LP1628	Pub1480	Generic Letter Received - See PUB1325.  Please support the research and development of renewable, sustainable, energy sources. They are the future.	See response to PUB1325
Resident	LP1629	Pub1481	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1630	Pub1482	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1631	Pub1483	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1632	Pub1484	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1633	Pub1485	Generic Letter Received - See PUB1325. Windfarms rock.	See response to PUB1325
Resident	LP1634	Pub1486	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1635	Pub1487	Generic Letter Received - See PUB1325. More turbines.	See response to PUB1325
Resident	LP1636	Pub1488	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1637	Pub1489	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1638	Pub1490	Generic Letter Received - See PUB1325. Win turbines are a good thing but should be off shore as too many are on land.	See response to PUB1325
Resident	LP1639	Pub1491	Generic Letter Received - See PUB1325. As a visitor I would not be put off visiting such a forward thinking Council. Wind power is essential.	See response to PUB1325
Resident	LP1640	Pub1492	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1641	Pub1493	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1642	Pub1494	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1643	Pub1495	Generic Letter Received - See PUB1325. Please can you turn off the nuclear power station thanks.	See response to Pub1325
Resident	LP1644	Pub1496	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1645	Pub1497	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1646	Pub1498	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1647	Pub1499	Generic Letter Received - See PUB1325.	See response to PUB1325
	LP1648	Pub1500		
Resident	LP1649	Pub1501	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1650	Pub1502	Generic Letter Received - See PUB1325. I support wind power.	See response to PUB1325
Resident	LP1651	Pub1503	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1652	Pub1504	Generic Letter Received - See PUB1325. Time to invest in renewable and sensible resources.	See response to PUB1325
Resident	LP1653	Pub1505	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1654	Pub1506	Generic Letter Received - See PUB1325. Wind farms rock.	See response to PUB1325
Resident	LP1655	Pub1507	Generic Letter Received - See PUB1325. Wind power is the future.	See response to PUB1325
Resident	LP1656	Pub1508	Generic Letter Received - See PUB1325. Great idea.	See response to PUB1325
Resident	LP1657	Pub1509	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1658	Pub1510	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1659	Pub1511	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1660	Pub1512	Generic Letter Received - See PUB1325. Go wind power.	See response to PUB1325
Resident	LP1661	Pub1513	Generic Letter Received - See PUB1325. Windpower generates power.	See response to PUB1325
Resident	LP1662	Pub1514	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1663	Pub1515	Generic Letter Received - See PUB1325. Go windpower.	See response to PUB1325
Resident	LP1664	Pub1516	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1665	Pub1517	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1666	Pub1518	Generic Letter Received - See PUB1325. Wind power.	See response to PUB1325
Resident	LP1667	Pub1519	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1668	Pub1520	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1669	Pub1521	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1670	Pub1522	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1671	Pub1523	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1672	Pub1524	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1673	PUB1525	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1674	PUB1526	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1675	PUB1527	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1676	PUB1528	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1677	PUB1529	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1678	PUB1530	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1679	PUB1531	Generic Letter Received - See PUB1325.  I support action to tackle climate change.	See response to PUB1325
Resident	LP1680	PUB1532	Generic Letter Received - See PUB1325.  I support action to tackle climate change.	See response to PUB1325
Resident	LP1681	PUB1533	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1682	PUB1534	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1683	PUB1535	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1684	PUB1536	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1685	PUB1537	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1686	Pub1538	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1687	Pub1539	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1688	PUB1540	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1689	PUB1541	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1690	PUB1542	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1691	PUB1543	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1692	Pub1544	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1693	PUB1545	Generic Letter Received - See PUB1325.	See response to PUB1325



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1694	Pub1546	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1695	PUB1547	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1696	Pub1548	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1697	PUB1549	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1698	PUB1550	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1699	PUB1551	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1700	Pub1552	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1701	Pub1553	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1702	PUB1554	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1704	PUB1556	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1705	Pub1557	Generic Letter Received - See PUB1325.  All of the above.	See response to PUB1325
Resident	LP1706	Pub1558	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1707	Pub1559	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1708	Pub1560	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1709	PUB1561	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1710	Pub1562	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1711	Pub1563	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1712	Pub1564	Generic Letter Received - See PUB1325.  Wind power is awesome.	See response to PUB1325
Resident	LP1713	PUB1565	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1714	Pub1566	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1715	Pub1567	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1716	Pub1568	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1717	Pub1569	Generic Letter Received - See PUB1325.  Go wind power.	See response to PUB1325
Resident	LP1719	Pub1571	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1720	Pub1572	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1721	Pub1573	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1722	Pub1574	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1724	Pub1576	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1725	Pub1577	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1727	Pub1579	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1728	Pub1580	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1729	Pub1581	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1730	PUB1582	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1731	PUB1583	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1732	PUB1584	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1733	PUB1585	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1734	PUB1586	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1735	PUB1587	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1736	PUB1588	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1737	Pub1589	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1738	PUB1590	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1739	PUB1591	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1740	PUB1592	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1741	PUB1593	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1742	PUB1594	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1743	PUB1595	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1744	PUB1596	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1745	PUB1597	Generic Letter Received - See PUB1325.  I support wind power - ensure a better world for our children.	See response to PUB1325
Resident	LP1746	PUB1598	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1747	PUB1599	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1748	PUB1600	Generic Letter Received - See PUB1325.  Totally agree with wind farms, we need more.	See response to PUB1325
Resident	LP1749	PUB1601	Generic Letter Received - See PUB1325.  Good for the planet.	See response to PUB1325
Resident	LP1750	PUB1602	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1751	PUB1603	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1752	PUB1604	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1753	PUB1605	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1754	PUB1606	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1755	PUB1607	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1756	PUB1608	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1757	PUB1609	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1758	PUB1610	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1759	PUB1611	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1760	PUB1612	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1761	PUB1613	Generic Letter Received - See PUB1325.  All for saving the planet.	See response to PUB1325
Resident	LP1762	PUB1614	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1763	PUB1615	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1764	PUB1616	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1765	PUB1617	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1766	PUB1618	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1768	PUB1620	Generic Letter Received - See PUB1325. Absolutely support windfarms.	See response to PUB1325
Resident	LP1769	Pub1621	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1770	PUB1622	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1771	PUB1623	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1772	PUB1624	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1773	Pub1625	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1774	Pub1626	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1775	Pub1627	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1776	Pub1628	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1777	Pub1629	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1778	Pub1630	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1779	Pub1631	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1780	Pub1632	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1781	Pub1633	Generic Letter Received - See PUB1325. No problem with them at all.	See response to PUB1325
Resident	LP1782	Pub1634	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1783	Pub1635	Generic Letter Received - See PUB1325. out your ivory tower support wind power	See response to PUB1325
Resident	LP1784	Pub1636	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1785	Pub1637	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1786	Pub1638	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1787	Pub1639	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1788	Pub1640	Generic Letter Received - See PUB1325. I support wind power	See response to PUB1325
Residential	LP1789	Pub1641	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1790	Pub1642	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1791	Pub1643	Generic Letter Received - See PUB1325. More wind jobs, more hydro energy jobs.	See response to PUB1325
Resident	LP1792	Pub1644	Generic Letter Received - See PUB1325. Green energy create some jobs.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1793	Pub1645	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1794	Pub1646	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1795	Pub1647	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1796	Pub1648	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1797	Pub1649	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1798	Pub1650	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1799	Pub1651	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1800	Pub1652	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1801	Pub1653	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1802	Pub1654	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1803	Pub1655	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1804	Pub1656	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1805	Pub1657	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1806	Pub1658	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1807	Pub1659	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1808	Pub1660	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1809	Pub1661	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1810	Pub1662	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1811	Pub1663	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1812	Pub1664	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1813	Pub1665	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1814	Pub1666	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1815	Pub1667	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1816	Pub1668	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1817	Pub1669	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1818	Pub1670	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1819	Pub1671	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1820	Pub1672	Generic Letter Received - See PUB1901.	See response to PUB1325
Resident	LP1821	Pub1673	Generic Letter Received - See PUB1901.	See response to PUB1325
Resident	LP1822	Pub1674	Generic Letter Received - See PUB1901.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1823	Pub1675	Generic Letter Received - See PUB1901.	See response to PUB1325
Resident	LP1824	Pub1676	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1825	Pub1677	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1826	Pub1678	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1827	Pub1679	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1828	Pub1680	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1829	Pub1681	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1830	Pub1682	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1831	Pub1683	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1832	Pub1684	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1833	Pub1685	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1834	Pub1686	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1835	Pub1687	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1836	Pub1688	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1837	Pub1689	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1838	Pub1690	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1839	Pub1691	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1840	Pub1692	Generic Letter Received - See PUB1325. Go wind power	See response to PUB1325
Resident	LP1841	Pub1693	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1842	Pub1694	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1843	Pub1695	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1844	Pub1696	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1845	Pub1697	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1846	Pub1698	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1847	Pub1699	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1848	Pub1700	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1849	Pub1701	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1850	Pub1702	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1851	Pub1703	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1852	Pub1704	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1853	Pub1705	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1854	Pub1706	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1855	Pub1707	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1856	Pub1708	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1857	Pub1709	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1858	Pub1710	Generic Letter Received - See PUB1325. Go wind power	See response to PUB1325
Overseas Resident	LP1859	Pub1711	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1860	Pub1712	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1861	Pub1713	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1862	Pub1714	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1863	Pub1715	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1864	Pub1716	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1865	Pub1717	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1866	Pub1718	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1867	Pub1719	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1868	Pub1720	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1869	Pub1721	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1870	Pub1722	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1871	Pub1723	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1872	Pub1724	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1873	Pub1725	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1874	Pub1726	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1875	Pub1727	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1876	Pub1728	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1878	Pub1730	Generic Letter Received - See PUB1325.  No to NIMBY'ISM.	See response to PUB1325
Resident	LP1879	Pub1731	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1880	Pub1732	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1881	Pub1733	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1882	Pub1734	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1883	Pub1735	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1884	Pub1736	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1885	Pub1737	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1886	Pub1738	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1887	Pub1739	Generic Letter Received - See PUB1325.  Please create more renewable energy sources!	See response to PUB1325
Resident	LP1888	Pub1740	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1889	Pub1741	Generic Letter Received - See PUB1325.  Go go windpower!	See response to PUB1325
Resident	LP1890	Pub1742	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1891	Pub1743	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1892	Pub1744	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1893	Pub1745	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1894	Pub1746	Generic Letter Received - See PUB1325.  We need renewable energy sources + I support wind turbines.	See response to PUB1325
Resident	LP1895	Pub1747	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1896	Pub1748	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1897	Pub1749	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1898	Pub1750	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1899	Pub1751	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1900	Pub1752	Generic Letter Received - See PUB1325.  Clean.	See response to PUB1325



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1901	Pub1753	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1902	Pub1754	Generic Letter Received - See PUB1325.  I love windpower.	See response to PUB1325
Resident	LP1903	Pub1755	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1904	Pub1756	Generic Letter Received - See PUB1325.  Go for windmill. Brill Idea.	See response to PUB1325
Resident	LP1905	Pub1757	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1906	Pub1758	Generic Letter Received - See PUB1325.  Wind farm's are great.	See response to PUB1325
Resident	LP1907	Pub1759	Generic Letter Received - See PUB1325.  Windfarms Rock!	See response to PUB1325
Resident	LP1908	Pub1760	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1909	Pub1761	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1910	Pub1762	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1911	Pub1763	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1912	Pub1764	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1913	Pub1765	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1914	Pub1766	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1915	Pub1767	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1916	Pub1768	Generic Letter Received - See PUB1325.  Wind turbines are beautiful, we need more.	See response to PUB1325
Resident	LP1917	Pub1769	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1918	Pub1770	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1919	Pub1771	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1920	Pub1772	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1921	Pub1773	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1922	Pub1774	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1923	Pub1775	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1924	Pub1776	Generic Letter Received - See PUB1325.  I fully support wind power.	See response to PUB1325
Resident	LP1925	Pub1777	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1926	Pub1778	Generic Letter Received - See PUB1325.  Go for it.	See response to PUB1325
Resident	LP1927	Pub1779	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1928	Pub1780	Generic Letter Received - See PUB1325.  Nuclear power is evil.	See response to PUB1325
Resident	LP1929	Pub1781	Generic Letter Received - See PUB1325.  Go for wind power.	See response to PUB1325
Resident	LP1930	Pub1782	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1931	Pub1783	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1932	Pub1784	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1933	Pub1785	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1934	Pub1786	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1935	Pub1787	Generic Letter Received - See PUB1325.  Nuclear power = evil.	See response to PUB1325
Resident	LP1936	Pub1788	Generic Letter Received - See PUB1325.  Go for wind power!	See response to PUB1325
Resident	LP1937	Pub1789	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1938	Pub1790	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1939	Pub1791	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1940	Pub1792	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1941	Pub1793	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1942	Pub1794	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1943	Pub1795	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1944	Pub1796	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1945	Pub1797	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1946	Pub1798	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1947	Pub1799	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1948	Pub1800	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1949	Pub1801	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1950	Pub1802	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1951	Pub1803	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1952	Pub1804	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1953	Pub1805	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1954	Pub1806	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1955	Pub1807	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1956	Pub1808	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1957	Pub1809	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1958	Pub1810	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1959	Pub1811	Generic Letter Received - See PUB1325.  Wind power is fantastic.	See response to PUB1325
Resident	LP1961	Pub1813	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1962	Pub1814	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1963	Pub1815	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP1964	Pub1816	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1965	Pub1817	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1966	Pub1818	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1967	Pub1819	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1968	Pub1820	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1969	Pub1821	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1970	Pub1822	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1971	Pub1823	Generic Letter Received - See PUB1325. Wind power rocks my world.	See response to PUB1325
Resident	LP1972	Pub1824	Generic Letter Received - See PUB1325. I like windfarms, good for the environment.	See response to PUB1325
Resident	LP1973	Pub1825	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1974	Pub1826	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1975	Pub1827	Generic Letter Received - See PUB1325. Wind power is cleaner + more economical.	See response to PUB1325
Resident	LP1976	Pub1828	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1977	Pub1829	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1978	Pub1830	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1979	Pub1831	Generic Letter Received - See PUB1325. We need more clean energy to help keep our world clean.	See response to PUB1325
Resident	LP1980	Pub1832	Generic Letter Received - See PUB1325. Wind turbines are beautiful. Move with the times. Try counting your money while holding your breath.	See response to PUB1325
Resident	LP1981	Pub1833	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1982	Pub1834	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1983	Pub1835	Generic Letter Received - See PUB1325. Go for it- Step in to future. Save the earth.	See response to PUB1325
Resident	LP1984	Pub1836	Generic Letter Received - See PUB1325. Wind power is awesome.	See response to PUB1325
Resident	LP1985	Pub1837	Generic Letter Received - See PUB1325. Go for wind power.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP1986	Pub1838	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1987	Pub1839	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1988	Pub1840	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1989	Pub1841	Generic Letter Received - See PUB1325.	See response to PUB1325
	LP1990	Pub1842		See response to PUB1325
Resident	LP1991	Pub1843	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1992	Pub1844	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1993	Pub1845	Generic Letter Received - See PUB1325.  Continue progress not move backwards.	See response to PUB1325
Resident	LP1994	Pub1846	Generic Letter Received - See PUB1325.  Wind power all the way!	See response to PUB1325
Resident	LP1995	Pub1847	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1996	Pub1848	Generic Letter Received - See PUB1325.  Green energy for a greener future.	See response to PUB1325
Resident	LP1997	Pub1849	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1998	Pub1850	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP1999	Pub1851	Generic Letter Received - See PUB1325.  As a visitor to this area I fully support both wind and solar power.	See response to PUB1325
Resident	LP2000	Pub1852	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2001	Pub1853	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2002	Pub1854	Generic Letter Received - See PUB1325.  Praise Jesus.	See response to PUB1325
Resident	LP2003	Pub1855	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2004	Pub1856	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2005	Pub1857	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2006	Pub1858	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2007	Pub1859	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2008	Pub1860	Generic Letter Received - See PUB1325.  Look after our planet - It's the only one we have. Change is needed.	See response to PUB1325
Resident	LP2009	Pub1861	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2010	Pub1862	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2011	Pub1863	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2012	Pub1864	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2013	Pub1865	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2014	Pub1866	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2015	Pub1867	Generic Letter Received - See PUB1325.  I support wind power.	See response to PUB1325
Resident	LP2016	Pub1868	Generic Letter Received - See PUB1325.  Global warming will not go away!!	See response to PUB1325
Resident	LP2017	Pub1869	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2018	Pub1870	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2019	Pub1871	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2020	Pub1872	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2021	Pub1873	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2022	Pub1874	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2023	Pub1875	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2024	Pub1876	Generic Letter Received - See PUB1325.  Wind power the bomb.	See response to PUB1325
Resident	LP2025	Pub1877	Generic Letter Received - See PUB1325.  Go wind power.	See response to PUB1325
Resident	LP2026	Pub1878	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2027	Pub1879	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2028	Pub1880	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2029	Pub1881	Generic Letter Received - See PUB1325.  Goooo wind!!	See response to PUB1325
Resident	LP2030	Pub1882	Generic Letter Received - See PUB1325.  Build a dyson swarm.	See response to PUB1325
Resident	LP2031	Pub1883	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2032	Pub1884	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2033	Pub1885	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2034	Pub1886	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2035	Pub1887	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2036	Pub1888	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2037	Pub1889	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2038	Pub1890	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2039	Pub1891	Generic Letter Received - See PUB1325.  Beautiful to environment.	See response to PUB1325
Resident	LP2040	Pub1892	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2041	Pub1893	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2042	Pub1894	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2043	Pub1895	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2044	Pub1896	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2045	Pub1897	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2046	Pub1898	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2047	Pub1899	Generic Letter Received - See PUB1325.	See response to PUB1325
Resident	LP2048	Pub1900	Generic Letter Received - See PUB1325.	See response to PUB1325

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2049	PUB1901	<p>RE: Wind Turbine (CC4) policy in the Publication Plan</p> <p>I am writing to support the above policy in the emerging Development Plan, specifically where it relates to the Brenda Road area.</p> <p>Onshore wind projects command significant support amongst the general population and I note that the previous planning applications for wind energy schemes in the Brenda Road area received significantly more public support than opposition.</p> <p>Decarbonising our electricity generation is essential if we are to even begin to address the threat posed by climate change. Onshore wind energy is currently the most cost-effective form of renewable energy available to us and it is important that Hartlepool does its bit!</p> <p>The industrial area west of Brenda Road is particularly suited to onshore wind generation and there is considerable potential for local businesses to benefit both directly and indirectly from such projects. Any concerns about noise, shadow flicker and other effects can be fully addressed through careful siting and the use of planning conditions, even before the existing high background noise levels in the area are taken into account.</p> <p>With regard to potential visual effects, I note that the policy now proposes to limit turbine tip heights to 99m and the number of turbines in the area to 6. This is a significant reduction in comparison with the previous planning applications, and more than addresses and previous concerns regarding scale and visual impact.</p> <p>We need a rapid roll-out of low carbon generation to protect our planet for future generations and I therefore strongly support all proposals to develop renewable energy in appropriate locations. Policy CC4 therefore has my strongest support!</p>	See response to PUB1901.
Resident	LP2050	PUB1902	Generic Letter Received - See PUB1901.	See response to PUB1901.



Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2051	PUB1903	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2052	PUB1904	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2053	PUB1905	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2054	PUB1906	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2055	PUB1907	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2056	PUB1908	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2057	PUB1909	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2058	PUB1910	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2059	PUB1911	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2060	PUB1912	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2061	PUB1913	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2062	PUB1914	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2063	PUB1915	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2064	PUB1916	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2065	PUB1917	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2066	PUB1918	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2067	PUB1919	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2068	PUB1920	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2070	PUB1922	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2071	PUB1923	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2072	PUB1924	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2073	PUB1925	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2074	PUB1926	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2075	PUB1927	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2076	PUB1928	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2077	PUB1929	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2078	PUB1930	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2079	PUB1931	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2080	PUB1932	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2082	PUB1934	Generic Letter Received - See PUB1901.	See response to PUB1901.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2083	PUB1935	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2084	PUB1936	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2085	PUB1937	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2086	PUB1938	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2087	PUB1939	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2088	PUB1940	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2089	PUB1941	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2090	PUB1942	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2091	PUB1943	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2092	PUB1944	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2093	PUB1945	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2094	PUB1946	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2095	PUB1947	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2096	PUB1948	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2097	PUB1949	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2098	PUB1950	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2099	PUB1951	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2100	PUB1952	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2101	PUB1953	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2102	PUB1954	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2103	PUB1955	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2104	PUB1956	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2105	PUB1957	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2106	PUB1958	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2107	PUB1959	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2108	PUB1960	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2109	PUB1961	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2110	PUB1962	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2111	PUB1963	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2112	PUB1964	Generic Letter Received - See PUB1901.	See response to PUB1901.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2113	PUB1965	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2114	PUB1966	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2115	PUB1967	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2116	PUB1968	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2117	PUB1969	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2118	PUB1970	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2119	PUB1971	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2120	PUB1972	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2121	PUB1973	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2122	PUB1974	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2123	PUB1975	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2124	PUB1976	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2125	PUB1977	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2126	PUB1978	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2127	PUB1979	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2128	PUB1980	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2129	PUB1981	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2130	PUB1982	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2131	PUB1983	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2132	PUB1984	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2133	PUB1985	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2134	PUB1986	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2135	PUB1987	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2136	PUB1988	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2137	PUB1989	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2138	PUB1990	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2139	PUB1991	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2140	PUB1992	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2141	PUB1993	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2142	PUB1994	Generic Letter Received - See PUB1901.	See response to PUB1901.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2143	PUB1995	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2144	PUB1996	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2145	PUB1997	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2146	PUB1998	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2147	PUB1999	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2148	PUB2000	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2149	Pub2001	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2150	Pub2002	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2151	Pub2003	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2152	Pub2004	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2153	Pub2005	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2154	Pub2006	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2155	Pub2007	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2156	Pub2008	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2157	Pub2009	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2158	Pub2010	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2159	Pub2011	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2160	Pub2012	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2161	Pub2013	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2162	Pub2014	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2163	Pub2015	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2164	Pub2016	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2165	Pub2017	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2166	Pub2018	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2167	Pub2019	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2168	Pub2020	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2169	Pub2021	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2170	Pub2022	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2171	Pub2023	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2172	Pub2024	Generic Letter Received - See PUB1901.	See response to PUB1901.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2173	Pub2025	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2174	Pub2026	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2175	Pub2027	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2176	Pub2028	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2177	Pub2029	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2178	Pub2030	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2179	Pub2031	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2180	Pub2032	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2181	Pub2033	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2182	Pub2034	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2183	Pub2035	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2184	Pub2036	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2185	Pub2037	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2186	Pub2038	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2187	Pub2039	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2188	Pub2040	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2189	Pub2041	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2190	Pub2042	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2191	Pub2043	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2192	Pub2044	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2193	Pub2045	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2194	Pub2046	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2195	Pub2047	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2196	Pub2048	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2197	Pub2049	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2198	Pub2050	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2199	Pub2051	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2200	Pub2052	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2201	Pub2053	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2202	Pub2054	Generic Letter Received - See PUB1901.	See response to PUB1901.

Company	Unique Ref	Pub Ref	CC4 Strategic Wind Turbine Development	CC4 Strategic Wind Turbine Development HBC
Resident	LP2203	Pub2055	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2204	Pub2056	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2205	Pub2057	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2206	Pub2058	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2207	Pub2059	Generic Letter Received - See PUB1901.	See response to PUB1901.
Resident	LP2208	Pub2060	Generic Letter Received - See PUB1901.	See response to PUB1901.

## Policy CC5: Large Scale Solar Photovoltaic Developments

Company	Unique Ref	Pub Ref	CC5 Large Scale Solar Photovoltaic Developments	CC5 Large Scale Solar Photovoltaic Developments HBC
Resident	LP0082	Pub0067	<p>In five or more particular places the document refers to precautions or assurances sought by way of the phrase 'should be provided'. That is not sound specification because the phrase is open to interpretation. Those requirements would be more robustly defined by using the word 'must' instead of 'should'. Unless HBC is reserving a right to dispense with the requirements for assurances as it sees fit?</p>	'Should be provided' is considered to be sufficiently robust
Campaign to Protect Rural England	LP0015	Pub0074	<p>While CPRE Durham did not comment on any proposal for solar development at the Preferred Options stage, it is considered that we should comment on this proposed Policy.</p> <p>CPRE encourages the use of roofs for future solar arrays. This is consistent with the Written Ministerial Statement dated 25 March 2015 and referred to in paragraph 013 Reference ID: 5-013-20150327 of the National Planning Guidance. CPRE and BRE National Solar Centre have agreed a policy in relation to such proposals "ENSURING PLACE-RESPONSIVE DESIGN FOR SOLAR PHOTOVOLTAICS ON BUILDINGS" – see <a href="http://www.cpre.org.uk/resources/energy-and-waste/climate-change-and-energy/item/download/4687">http://www.cpre.org.uk/resources/energy-and-waste/climate-change-and-energy/item/download/4687</a>.</p> <p>While the wording of the proposed Policy relates only to ground based solar arrays, the title of the Policy appears to relate to all large scale proposals. We represent that</p> <p>the Policy must be unsound if it does not also address roof based solar array developments.</p>	Roof based solar development is covered by Point 9 of Policy CC1.

Company	Unique Ref	Pub Ref	CC5 Large Scale Solar Photovoltaic Developments	CC5 Large Scale Solar Photovoltaic Developments HBC
Resident	LP0204	Pub0088	Large scale solar development. Small ones may be ok but too many and too large would be unsightly and bad impact on landscape. Would take up too much green land seems everyone building only wants Greenland sites and soon countryside would disappear. Too much glint and glare would have adverse impact on highway and aircraft safety.	The Council recognises that the desirability of development that contributes towards the achievement of national energy renewable targets has to be balanced with minimising the impact of built development on the open countryside. The policy requires that proposals are accompanied by a Landscape and Visual Assessment and this requirement, together with reading the plan as a whole (Policy RUR1 is relevant in this context) acknowledge the Council's regard for this issue.
Historic England	LP0044	Pub0125	The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.	Comments welcomed.



### Section 3 of the Consultation Statement, covering:

#### Infrastructure

- Policy INF1: Sustainable Transport Network
- Policy INF2: Improving Connectivity in Hartlepool
- Policy INF3: University Hospital of Hartlepool
- Policy INF4: Community Facilities
- Policy INF5: Telecommunications

#### Policy INF1: Sustainable Transport Network

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Resident	LP0273	Pub0014	<p>Bus Network</p> <p>With the Buses Bill currently going through Parliament, there is likely to be scope for the Council or Combined Authority to be more prescriptive about bus services including serving new developments and using the Transport Interchange. There is no mention of this in the Plan</p> <p>Rail Network</p> <p>Section 8.15 doesn't adequately address the case for improved connections to the rest of the UK. I would suggest the following should be included.</p> <p>Opportunities for changing at Darlington are limited by the lack of through train or bus services except for two services on Sundays only. We should instead be pressing for better connections at Thornaby onto Trans-Pennine services, at Newcastle for Scottish services and making the Grand Central service to York /London (for connections to the Midlands &amp; South) two hourly all day by adding a service at around 1100 south , returning from London around 1500.</p> <p>We should also be pressing Network Rail for increasing the line speed Stockton/Northallerton/York to improve journey times to the south.</p>	<p>The Buses Bill is still progressing through parliament and is not a legal act, however the policy does support the provision of an effective, efficient and sustainable transport network linked to the wider Tees Valley as well as developing and improving facilities at the interchange, and particularly the quality and reliability of the bus service. The policy is also supportive of development of the rail network for both passenger and freight transport. The preamble to this policy refers to the Tees Valley Strategic Infrastructure Plan, the policy is supportive of cross boundary working to improve the Sustainable Transport Network across the Tees Valley, this Tees Valley document is currently being reviewed, as a result <b>the policy preamble could be updated to reference the emerging Tees Valley Combined Authority Strategic Transport Plan.</b></p>
Resident	LP0274	Pub0015	<p>Main complaint is traffic congestion and traffic at park road Elwick road junction.</p>	<p>Noted.</p>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Resident	LP0050	Pub0018	<p>Seaton Carew has had 3 major housing sites developed in the past 3 years yet there is no evening bus service in our out of Seaton Carew.</p> <p>How are teenagers supposed to get to sporting facilities in the evening, such as swimming pool in Brierton, when there is no public transport available?</p>	<p>Noted. Both INF1 and INF2 support the improvement of sustainable modes of transport and routes. This policy does support the provision of effective, efficient and sustainable transport networks linked to the wider Tees Valley as well as developing and improving facilities at the interchange, and particularly the quality and reliability of the bus service.</p> <p>Policy LT1 sets out that major leisure and tourism provision should be within the Town Centre and Marina Area, with regard to development of a swimming pool at Brierton, it is envisaged that this would be in addition to provision in the town centre; the policies within the plan support such development within the key urban area to ensure connectivity.</p> <p>With regard to public transport, there is a bus service (No.36) which runs between Catcote Road and the Town Centre until 23:10 (every 30mins), whilst bus services between Hartlepool and Seaton Carew run until 18:24, a rail service runs between Hartlepool and Seaton Carew until 22:03.</p>
Network Rail	LP0250	Pub0054	See comments under Policy QP3	See Policy QP3 for aggregated response.

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>I refer to this proposed Policy in the Hartlepool Plan.</p> <p>In our representations regarding the Infrastructure Section at the Preferred Options stage, we supported the proposals for sustainable transport. We acknowledge that Policy INF1 is welcome as it provides a framework for such transport.</p> <p>However, as far as cycling and walking are concerned, we represent that there should be some indication at least in the text as to the standard for the design of such routes. Clearly, there is already a considerable amount of expertise in some continental countries and the government has proposed a Walking and Cycling strategy. There is for example the London Cycling Design Standards. The Active Travel Wales Act 2013 may not specifically refer to design standards but again shows the importance given to this topic in Wales with maps being an important feature.</p> <p>We represent that there should be some reference at least in that part of the text to this Policy that relates to walking and cycling that better defines how such routes will be designed to ensure that there is “the provision of a high standard, attractive and safe network of footpaths and cycleways” as mentioned in paragraph 8.17 of the text,</p>	<p>Noted. Having consulted further with relevant officers it is considered that taking forward the suggestion from CPRE would result in the policy being too prescriptive with regards to design standards for walking and cycling routes.</p> <p>The required standard depends on the location of where the route is to be placed; if in an urban or housing development site/location then you would expect the surfacing to be of a standard that complies with surrounding/linking routes. For example if the surrounding infrastructure is of a ‘Tarmac’ type construction then the path would be of a similar design standard. When considering the urban fringe then a less ‘formal’ surface type might suffice and so an aggregate construction with a compacted dust surface could be the appropriate path design. For truly rural settings it may be that the more natural surface is the correct one to consider.</p> <p>Therefore the way policy is written in the Local Plan is sufficient for our purposes and broad enough to encompass whatever design standard required in whatever location considered.</p>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Sport England	LP0079	Pub0089	<p>Sport England believes that it is possible for the planning system to shape existing and proposed physical environments to promote physical activity. If the achievement of healthy lifestyles is an inclusive aspiration Sport England would recommend that the Council has regard to Sport England’s design guidance document ‘Active Design’</p> <p>Active Design sets out 10 key design principles which we consider create a physical environment that promotes physical activity. Local Authorities can use Active Design in a number of ways. There is a model (local plan) policy within there that could be used by Local Authorities. Alternatively Local Authorities may wish to subsume the key planning orientated design principles within their plans and make cross reference to Active Design. Sport England notes that there is synergy to a number of Active Design’s principles within Policies INF1, INF2 and INF4, but we consider that this angle could be made more explicit. We would welcome both policies being ‘tweaked’ in this way if the Council wished to Active Design embedded within the plan.</p> <p>Active Design can be viewed at the following location on our website;</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p>	<p>Noted. Sport England commented at the preferred option stage referring to active design principles in relation to Policy QP3, it was considered that Hartlepool Council seeks to ensure that environments are conducive to an active and healthy physical lifestyle. However HBC are seeking to limit direct reference to specific design principles or guidance as such literature can often be updated/superseded or deleted. Whilst HBC is supportive in principle of the ten principles of active design in the design guidance developed by Sport England, they are considered to be too prescriptive to wholly incorporate in the Local Plan. However, the inclusion of Sport England Active Design principles will be considered within the emerging Residential Design Supplementary Planning Document.</p>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes broadly supports the general aims and principles set out in Section 8 and Policies INF1, INF2 and INF4, however, we consider Policy INF1, INF2 and INF4 to be unsound as they are currently drafted as they are not effective. We remain concerned that the aforementioned policies do not have due regard to the economic viability of new developments. Policies relating to infrastructure delivery must be fully compliant with paragraph 173 of the NPPF which requires that the sites and scales of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. We have noted that the Council have now prepared a Draft Local Infrastructure Delivery Plan (June, 2016), however, we remain concerned that this has not been subject to area wide viability testing to ensure that the infrastructure policies are viable for the duration of the plan period. The approach to financial contributions towards infrastructure should be consistent with national guidance and CIL regulations which state that policy requirements should be relevant; necessary; directly and fairly related to development schemes. We therefore consider that the Council need to ensure that all proposed contributions fully satisfy the CIL regulations. We would also expect the level of infrastructure delivery to be subject to an area wide viability assessment to ensure deliverability over the plan period and to take account of other policy requirements such as affordable housing.</p> <p>In summary, viability testing is a crucial element of the Plan-making process which will ensure that the Council's approach to seeking new infrastructure is fully compliant with paragraph 173 of the NPPF which requires that the sites and scale of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p>	<p>The Council's approach to financial obligations/planning obligations is set out in Local Plan policy QP1. This policy includes 'highway infrastructure and sustainable transport measures'. The Council will only seek planning obligations where these are necessary to make a development proposal acceptable in planning terms. Where appropriate viability will be taken into account through a viability assessment.</p>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Greatham Parish Council	LP0018	Pub0102	<p>Serious concerns remain regarding the proposed new access from the A689 to the proposed South West Extension. This will add a new junction on the A689. The lack of consideration to improving the safety of the existing staggered junction nearby which provides access to Greatham Village and Dalton Back Lane is unacceptable. The extra flow of traffic from the large new development can only serve to exacerbate the already accepted dangers. Dalton Back Lane will become a rat run linking to the A19 via an equally if not more dangerous junction near Dalton Piercy. It is a most unfortunate wasted opportunity for the new South West Extension development not to use the existing junction for access thus improving safety for new and existing residents and users. Should the new access remain then improvements must be sought for the existing staggered junction which is essential to the village of Greatham. The junction forms part of the main bus route between Hartlepool and Teesside. Greatham is extremely fortunate to be served by this route which is greatly valued and enhances the sustainability of the village. The route relies on access via the junction with Dalton Back Lane. Key is the concern that the new development should not have an adverse impact on the sustainable future of Greatham Village.</p> <p>The Parish Council continues to seek a cycle and foot bridge at Sappers Corner (part of national cycle route 14) providing a secure and safe crossing between the village and South Fens.</p> <p>Any improvement at the suggested new junction for the SWE would be too distant from the Sappers Corner junction to have any effect and would only serve the emerging population on the new estate not the majority of residents of the Borough. A bridge at Sappers Corner would support the stated aim of improving the non-vehicular access routes (INF2) to employment sites at Queens Meadow, Seal Sands and Billingham and nature sites at the mouth of the Tees. The Parish Council believes with reference to the SWE the policy fails to meet NPPF 22 that development should improve the character and quality of an area and the way it functions, in this case emphasis on the way it functions.</p>	<p>Noted. The provision of improved cycle infrastructure is a priority and the Council has an ambition to provide a cycle route between Sappers Corner and Wolviston. There is currently a signalised crossing at the Sappers Corner junction allowing safe pedestrian and cyclist crossing of the dual carriageway at this point. The SWE planning application assessed the development against national and local policy as well as all other material considerations, the application has been approved. HSG4 sets a masterplanning policy which will be used in the assessment of reserved matter applications for the development of the SWE, this policy is in line with NPPF para 64 which states "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions".</p>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
Resident	LP0343	Pub0103	<p>We have major concerns that the plan, whilst providing for significant new housing developments, does not adequately address routes inward into Hartlepool from these new developments. Though not specifically stated in the text (as far as I can see), the assumption seems to be that 4 current routes into Hart Lane, Elwick Road, (and later) Macrae Road and Brierton Lane will cope with the additional traffic generated.</p> <p>Some 1440 new homes are planned, without counting Elwick and Hart developments and the current development near Elwick Rise. A conservative estimate would suggest this will introduce some 3000 additional vehicles trying to access Hartlepool Centre.</p> <p>This dwarfs the HE modelling (plan 8.11) "greater than 30 two-way trips" to a ridiculous extent.</p> <p>Whist the planned Elwick bypass and A19 interchange are to be welcomed, in no way do they mitigate traffic flows into Hartlepool itself, which will naturally converge on 2 of those 4 inward routes which include 20mph limits, pedestrian crossings and "log jam" junctions at several points.</p> <p>Whist the emphasis on sustainable transport is admirable, we do not believe that is a realistic solution to the problems outlined above - people in these new developments will choose to use their cars for the school run, for shopping and for leisure activities, even if (as seems unlikely) they use only sustainable means to commute to and from work.</p> <p>The plan should consider whether the new roads from the new developments ought to funnel the new traffic to the A179 and the A689 respectively.</p> <p>The plan should also determine what internal road improvements are needed to address the current choke points (eg. dualling the road between Powlett Roundabout and Marina Way roundabout).</p>	<ol style="list-style-type: none"> <li>1) Developers are required to provide a Transport Assessment For any development greater than 80 properties. These assessments need to take into consideration the local road network and carry out assessments on whether these roads can accommodate the extra traffic generated. The roads which are assessed are determined by the Hartlepool Council Highways Section. If it is considered that the traffic generated by a development would lead to a particular road / junction being over capacity or unsafe the developer would be required to carry out improvement works to allow it to operate within capacity. If the developer does not propose mitigation which is considered acceptable to the Council then this may lead to an objection being raised. It is considered that all the developments in the local plan can be delivered with suitable mitigation being put in place on the local Highway Network together with the creation of the Elwick By-pass. It is a longer term aspiration of the Council to connect all the new developments on the Western fringe with a Distributor type Road between the A689 and Elwick Road, this will deliver significant relief to Catcote Road.</li> <li>2) It is generally accepted that during peak hours each property would generate 0.7 vehicular trips; of course not all trips would be to the town centre. Existing estates can be surveyed to determine an approximate traffic distribution, these figures can then be used in the junction modelling carried out in the Transport Assessment mentioned above.</li> <li>3) The 30 two way trips relates to the number of extra movements at the A19 junction for the High Tunstall development only.</li> <li>4) See first paragraph.</li> <li>5) Sustainable Transport is an important element and suitable measures should be put in place to encourage their use. Of course residents will continue to use their cars and these trips outlined will be taken into account in the Transport Assessments.</li> <li>6) The Transport Assessments for each development will assess the most likely routes traffic will use and deliver</li> </ol>

Company	Unique Ref	Pub Ref	INF1 Sustainable Transport Network	INF1 Sustainable Transport Network HBC
				<p>the mitigation required on each route.</p> <p>7) The westbound carriageway between these roundabouts is already two lanes, there are plans already in place to widen the eastbound approach to the Cleveland Road Roundabout as part of the Upper Warren Development. Dualling the carriageway, i.e. separating the carriageways with a central island would not be physically possible on most sections unless the number of lanes was reduced.</p>
Hartlepool Civic Society	LP0013	Pub0107	<p>Throughout the Publication Document, it is asserted that much depends upon the proposed Elwick by-pass, ie the traffic problems will be alleviated. Even now, there are huge congestion problems which will be much worse if developments go ahead. The by-pass will obviously reduce the large amount of traffic, even now, going through Elwick village. However, the effect this will have if the proposed developments take place, will only exacerbate the already congested and often gridlocked road network within the town, ie. Elwick Road, Hart Lane, Dunston Road, Wooler Road, Catcote Road, etc, etc.</p> <p>We strongly believe the proposed by-pass should be for local traffic only – not to create a third entrance to the town centre areas and the A19. The A179 could be widened and the existing A179/A19 junctions improved.</p>	<p>Noted. Concern regarding the local road network at the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made in relation to the wider housing development proposals. The new bypass and route into Hartlepool from the A19 at Elwick will have a weight limit placed on it to prevent the use by HGV's other than for work traffic to the development sites.</p>



## Policy INF2: Improving Connectivity in Hartlepool

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0263	Pub0009	We do have The Domes in Tees Road but it is not the easiest venues to access, again without public transport being available on an evening.	The plan refers to the Domes site within LT3 (Development of Seaton Carew), this also specifically refers to the provision of enhanced pedestrian and cycle routes as part of any further development of the site. Whilst policies INF1 and INF2 support and encourage sustainable transport and enhanced connectivity, the extent and timetabling of public transport is dependent on the commercial operator.
Resident	LP0273	Pub0014	<p>Road Network</p> <p>What connections are intended between the South West &amp; High Tunstall interlink and the rest of the road network (eg A689, Fens Estate, Rift House &amp; Elwick Road?)</p> <p>What assessment has been done of traffic flows at various stages of these developments?</p> <p>Emphasis has been given to traffic flows from these developments to the A19/A689, but not between these developments and the town centre – eg Elwick Road/Wooler Road/Park Road junctions. Can I propose that consideration be given to putting in mini roundabouts at both the Elwick Road/Park Avenue &amp; Elwick Road/Wooler Road junctions.</p> <p>Your thoughts on this would be appreciated.</p>	<p>In terms of the road connections between The South West Extension Strategic Housing Site (policy HSG4) and the High Tunstall Strategic Housing Site (policy HSG5), policy INF2 (Improving Connectivity in Hartlepool) stipulates that no permanent development will be permitted within the land corridor (shown on the Proposals Map as a yellow line between the two sites) that is reserved for a link road between the approved housing development at the South West Extension and proposed development at High Tunstall. This is an aspirational route that the Local Authority wishes to see developed towards the latter half of the 15 year plan period which would provide a link through the sites from Elwick Road to the A689, as they build out. However, this is predicated on the development of the two sites coming forward and funding being secured to implement the scheme in future.</p> <p>With respect to access to the wider road network, the High Tunstall development is proposed to have a single access onto Elwick Road to the north of the site. An outline planning application has been submitted to the Local Planning Authority for the High Tunstall site, pending determination. Further details of the proposed accesses and traffic assessments can be found within the application documents. These are available to view on the Council's website at: <a href="http://eforms.hartlepool.gov.uk:7777/portal/servlets/ApplicationSearchServlet?PKID=102311">http://eforms.hartlepool.gov.uk:7777/portal/servlets/ApplicationSearchServlet?PKID=102311</a></p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
				<p>The South West Extension site is to feature an access onto the A689 to the south and Brierton Lane to the north of the site, with a potential bus only/pedestrian link at Moffat Road. Further details of proposed accesses and traffic assessments with respect to the South West Extension site are available as part of the outline planning approval for this site, which can be viewed on the Council's website at:  <a href="http://eforms.hartlepool.gov.uk:7777/portal/servlets/ApplicationSearchServlet?PKID=102061">http://eforms.hartlepool.gov.uk:7777/portal/servlets/ApplicationSearchServlet?PKID=102061</a></p> <p>The Council's Local Infrastructure Plan, which provides a framework within which detailed future infrastructure projects can be identified and prepared at a local level, taking into account the proposed site allocations within the emerging Local Plan, can be viewed on the Council's website at:  <a href="https://www.hartlepool.gov.uk/downloads/file/2022/local_infrastructure_plan_-_may_2016">https://www.hartlepool.gov.uk/downloads/file/2022/local_infrastructure_plan_-_may_2016</a></p> <p>Table 2 of the Local Infrastructure Plan sets out highway schemes required for delivery of Local Plan proposals/policies. This makes reference to the Elwick Road/Park Road/Wooler Road junction and the Council's Highways team are currently investigating options to address both the existing and future capacity issues at this junction. Developers of the proposed housing sites will be required to contribute towards any highways improvements that are deemed necessary to make the proposed developments acceptable in terms of highway safety.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Wynyard Residents Association	LP0277	Pub0022	<p>Highways England (as the Highways Agency) placed a cap on development at Wynyard because the infrastructure could not cope and the planned improvements will not alleviate this, just move the problem further south. Once all proposed development is complete the A19 will still be at a standstill from the A689 south. Unless and until the Tees Viaduct is improved or further bridges provided (that will carry through traffic not local traffic) then the A689 / A19 will remain a bottleneck.</p> <p>The A689 and housing with outline planning permission (139) south of A689.</p> <p>This is shown as a complete block with no exit road to the A689. Whilst this development in itself will not seriously add to the congestion at the Wynyard west gate roundabout, when coupled with;</p> <ul style="list-style-type: none"> <li>1 Development North of the A689 approved</li> <li>2 Development North of the A689 proposed and</li> <li>3 500 homes planned for Stockton south of the A689</li> </ul> <p>This gives a further 639 homes on a secondary loop road around Wynyard Woods, over the 500 already extant emptying onto the Wynard Woods loop road and the 2 very close together, junctions with The Wynd.</p> <p>Given the average car ownership of 3.4 per household, this will create a significant flow of traffic. The new 2 form primary school will also use this junction as it will lie off the secondary (outer) loop. This traffic will back up from the west gate A689 roundabout in the mornings into Wynyard and also make it difficult for the large number of properties North of the A689 to gain access.</p> <p>The A689 itself will back up in the evenings as traffic is not able to make the right turn onto the Wynyard Woods loop. (Map of proposed Stockton development Appendix 2). The Wynyard Neighbourhood Plan, at the request of residents during consultation, proposes a new roundabout on the A689 towards the Castle Eden walkway bridge, directly from the outer loop road to provide relief on the Wynyard woods loop with The Wynd and the A689 west gate junction.</p>	<p>The Department for Transport has announced funding to assist the further development of a business case, from the large local major projects fund, to provide an additional crossing of the River Tees. Actual flows on the viaduct are significantly above the theoretical and practical capacity which results in significant operational issues. Funding has already been found by Highways England to widen the A19 between Norton and Wynyard to three lanes in each direction which will give additional capacity along this section but will not, without the new Tees crossing, resolve the current problems. It is hoped that once the business case for the crossing has been completed the next stage will be to source funding to build it in whatever is the chosen location to hopefully follow on to the widen works between Norton and Wynyard as quickly as possible.</p> <p>A base traffic model has recently been completed for the area which accurately reflects the current traffic situation of the A689 and at its junction with the A19. Local Growth Fund money has already been secured to provide signalisation to the 5 roundabouts on the A689 between Wolviston and Wynyard which will mitigate the traffic generated by the construction of 1100 properties in the Wynyard area. The Pinch Point works recently undertaken by Highways England to the A689/A19 interchange have also gone towards the mitigation of the additional traffic generated by this quantum of development.</p> <p>The base model will now be used to determine the impact of traffic generated by any additional development that may be proposed in the area and thus any additional improvement works that will required as a condition of any future planning permission. In principal the current levels of congestion should not increase as a result of future development in the Wynyard area both north and south of the A689.</p> <p>The signalisation of this junction as part of the Local Growth Fund works mentioned above will resolve this issue.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
			<p>This could be funded from the money (£2.2m) already lodged with Stockton and Hartlepool councils by developers for the proposed footbridge over the A689 at the Huntsman roundabout. This is a bridge from nowhere to nowhere and an Atgrade crossing would be adequate here for eg cycle access once the roundabout has been traffic lit. People will not walk 10 minutes or more through an industrial estate to cross the A689 on a high walkway, to then walk another 45 minutes to the shops at the village (and another 10 minutes to the primary school) in summer, let alone in rain, high winds, snow or ice. People will take cars. Save the eye sore and make better use of the money.</p> <p>Atgrade crossing at Wynyard west gate. The Wynyard Park development north of the A689 has a footpath laid in to the A689. People are crossing the A689 here. There is no central reservation and no footpath on the south side. There is a provision for an Atgrade crossing at this roundabout.</p> <p>This should be implemented as soon as possible and the speed limit on the A689 from the A19 to beyond the Wynyard west gates should be reduced to 50 mph maximum, immediately, lower if Highways England will allow.</p> <p>For further information on this and the Wynyard Woods loop relief road, Mr P Frost, Borough Engineer, has been taken to view these junction by Wynyard Residents Association and has been fully appraised of the situation.</p>	

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0281	Pub0025	<p>This proposal will substantially increase traffic flow in both directions along Park, Catcote, Wooler and Elwick roads. This will compound travel issues around the West Park Estate Roads as increased traffic will restrict flow. The additional “normal” traffic may also hinder any emergency services. This is a major concern with this plan which does not indicate any proposal to deal with traffic flow through the town.</p> <p>In particular the traffic lights at the top of Park Road are a bottle neck; any additional traffic will increase queues heading both ways on Elwick Road, more specifically turning right to approach the Park Road traffic lights. Any proposal to build in the area of High Tunstall, Quarry Farm etc. should negate the need to travel through the West Park Estate and address the access problems in this area.</p>	Comments noted.
Network Rail	LP0250	Pub0054	<p>Network Rail have submitted comments to the policies which do not include reference to Policy INF2. However, the Council considers that part of the representation is also relevant to Policy INF2. The relevant part has been recorded under Policy QP3.</p>	See Policy QP3 for aggregated response.

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0316	Pub0065	<p>With regard to 'infrastructure' - the additional volume of traffic which new housing brings has been considered with regard to Elwick. However there is no mention of the A689. During peak times this main route out of Hartlepool has been getting increasingly worse. I have frequently been caught up in lengthy traffic tailbacks right back from the first roundabout at the end of the A689, resulting in traffic queues back to Greatham. When I have reached the first roundabout, I have found that the road on the other side of the roundabout, leading past the Wolviston turn off and up to the A19, are running smoothly. It appears that the flow of traffic leading along the A689 is significantly delayed at this first roundabout (which has roads leading to Seal Sands, Billingham and a road leading towards Wolviston /Wynyard Services). I believe this is because it is difficult (when approaching along A689 from Hartlepool) to see oncoming traffic coming around the roundabout and so drivers are very cautious when pulling out. This hesitancy from each driver creates a compound effect of tail backs, creating much lengthier delays than necessary (as there is no specific incident such as an accident or breakdown or even tail back from the A19). We suggest that the traffic flow around this roundabout should be looked at, as an improvement intervention such as adding traffic lights or something similar may considerably help the flow of the traffic, without significant structural road improvements being required. This would then also ease the addition of more traffic, particularly at peak times, and making Hartlepool a more desirable and practical place to live and for businesses to invest.</p>	<p>Noted. Funding has been secured through the Local Growth Fund for the signalisation of 5 roundabouts between Wolviston and Wynyard in order to mitigate the anticipated increase in traffic flows generated by both developments at Wynyard and at the South West Extension. Signalisation of this roundabout will facilitate traffic heading west on the A689 from Hartlepool and reduce queues and travel time accordingly. The works to signalise the roundabout will take place in advance of the construction of the proposed properties and will be recovered through legal agreements with the developers.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0202	Pub0078	<p>All Hartlepool Borough Council is concerned about is the contributions the various builders would give for the by-pass road it wants. If they were more careful with people's money they wouldn't have to rely on other organisations to bail them out.</p> <p>How will this by-pass solve anything. It won't reduce the amount of traffic on the A19 which is already up to capacity. There is already a by-pass near Hart Village. Why not build some of the houses there.</p>	<p>Noted. In relation to funds secured through planning obligations, these are carefully monitored by HBC to ensure they are directed as intended, planning obligations are only sought where the three tests in the CIL Regulations are met. The proposed Elwick by-pass and grade separated junction on the A19 will help to improve traffic flows west for Hartlepool and will relieve congestion at the A179 and A689 junctions on the A19, this will enhance road safety across the local network particularly eradicating right-hand turns across the A19. This is in addition to facilitating housing development to the western edge of Hartlepool, areas identified within the Local Plan for strategic housing growth. There is clearly a capacity issue on the Tees crossing at certain times which causes queuing on the A19. The Tees Valley Combined Authority and the local authorities are actively looking at ways to address this problem which may include a new crossing of the R. Tees. In the shorter term Highways England has secured approval to widen the A19 to 3 lanes in each direction between Wynyard (A689 junction) and Norton. In addition a signalised scheme is to be introduced at the A19/A179 junction to improve capacity and traffic flow.</p> <p>The local plan does identify two housing sites within Hart Village, see policy HSG8 (Hart Village Housing Developments).</p>
Resident	LP0322	Pub0081	<p>3. Although a by-pass is proposed for Elwick Village, there will still be only minor roads bringing traffic into Hartlepool and causing extra congestion on already busy roads such as Hart Lane, Elwick Road, Wooler Road, Dunston Road and some of the minor connecting roads.</p>	<p>Concern regarding potential traffic issues around High Tunstall and the Elwick Road/Wooler Road junction is noted. The Local Infrastructure Plan also assesses the impact of developments at existing junctions around the town and where possible improvements will be secured. In terms of the Wooler Road/Elwick Road junction some improvements have been secured as part of the Tunstall Farm planning permission. These include clearer/improved road markings to prevent waiting vehicles from hindering other vehicle movements, the provision of sensors at the pedestrian crossing and an additional pedestrian crossing at the White House hotel. Further work is ongoing to assess whether further improvements can be made.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0324	Pub0083	<p>I understand “Highways England” are advising Hartlepool Council to put a ‘hold’ on some proposed housing developments until the Elwick by-pass (and its associated new flyover) is completed. This must not be ‘watered-down’</p> <p>The existing flyover (A19/A179) is inadequate (tail backs onto A19 and vehicles turning ‘west’ and then doing u-turns on A179 to go east into town, demonstrate this). Any additional traffic (imposed by closure of Elwick turn-off’s, housing development etc.) would make the junction significantly hazardous. The new Elwick flyover will prevent this, but must be in place first – the proper sequence is “essential”, anything else is “dangerous”.</p>	<p>Noted. The Elwick bypass and new junction on the A19 will need to be complete in advance of any housing completions on sites at the edge of the urban area unless otherwise agreed with HBC and Highways England, this is referenced in policies HSG5 (High Tunstall housing development) and HSG5a (Quarry Farm Housing development).</p> <p>In addition a signalised scheme is to be introduced at the A19/A179 junction to improve capacity and traffic flow.</p>
Sport England	LP0079	Pub0089	<p>Sport England believes that it is possible for the planning system to shape existing and proposed physical environments to promote physical activity. If the achievement of healthy lifestyles is an inclusive aspiration Sport England would recommend that the Council has regard to Sport England’s design guidance document ‘Active Design’</p> <p>Active Design sets out 10 key design principles which we consider create a physical environment that promotes physical activity. Local Authorities can use Active Design in a number of ways. There is a model (local plan) policy within there that could be used by Local Authorities. Alternatively Local Authorities may wish to subsume the key planning orientated design principles within their plans and make cross reference to Active Design. Sport England notes that there is synergy to a number of Active Design’s principles within Policies INF1, INF2 and INF4, but we consider that this angle could be made more explicit. We would welcome both policies being ‘tweaked’ in this way if the Council wished to Active Design embedded within the plan.</p> <p>Active Design can be viewed at the following location on our website;...<a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p>	<p>Noted. Sport England commented at the preferred option stage referring to active design principles in relation to Policy QP3, it was considered that Hartlepool Council seeks to ensure that environments are conducive to an active and healthy physical lifestyle. However HBC are seeking to limit direct reference to specific design principles or guidance as such literature can often be updated/superseded or deleted. Whilst HBC is supportive in principle of the ten principles of active design in the design guidance developed by Sport England, they are considered to be too prescriptive to wholly incorporate in the Local Plan. However the inclusion of Sport England Active Design principles will be considered within the emerging Residential Design Supplementary Planning Document.</p>



Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes broadly supports the general aims and principles set out in Section 8 and Policies INF1, INF2 and INF4, however, we consider Policy INF1, INF2 and INF4 to be unsound as they are currently drafted as they are not effective. We remain concerned that the aforementioned policies do not have due regard to the economic viability of new developments. Policies relating to infrastructure delivery must be fully compliant with paragraph 173 of the NPPF which requires that the sites and scales of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. We have noted that the Council have now prepared a Draft Local Infrastructure Delivery Plan (June, 2016), however, we remain concerned that this has not been subject to area wide viability testing to ensure that the infrastructure policies are viable for the duration of the plan period. The approach to financial contributions towards infrastructure should be consistent with national guidance and CIL regulations which state that policy requirements should be relevant; necessary; directly and fairly related to development schemes. We therefore consider that the Council need to ensure that all proposed contributions fully satisfy the CIL regulations. We would also expect the level of infrastructure delivery to be subject to an area wide viability assessment to ensure deliverability over the plan period and to take account of other policy requirements such as affordable housing.</p> <p>In summary, viability testing is a crucial element of the Plan-making process which will ensure that the Council's approach to seeking new infrastructure is fully compliant with paragraph 173 of the NPPF which requires that the sites and scale of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p>	<p>The Council's approach to financial obligations/planning obligations is set out in Local Plan policy QP1. This policy includes 'highway infrastructure and sustainable transport measures'. The Council will only seek planning obligations where these are necessary to make a development proposal acceptable in planning terms. Where appropriate viability will be taken into account through a viability assessment.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0339	Pub0097	<p>With regard to transport links, there is no public transport that regularly services the outlying villages, therefore the proposed development would significantly increase the use of cars for essential transport and hence increase pollution.</p> <p>Whilst the proposed Elwick bypass ostensibly resolves the transport issues in reality the reverse is true, residents of the proposed development will use the minor road to Dalton Percy particularly to access the A19. This will result in totally inappropriate numbers of vehicles using what is already little more than an historical single track rural road that is only appropriate to service the needs of local residents.</p> <p>A development of 1200 houses would mean an increase in overall traffic of circa 2400+ cars and a significant proportion of these would simply use the quickest route to the A19 that would be via Dalton Percy or Elwick.</p>	<p>Noted. Public transport is limited to the villages and across the wider area. Whilst the policy aims to support sustainable transport and improve connectivity across Hartlepool, decisions relating to bus routes and timetabling are commercial decisions made by the bus companies.</p> <p>The provision of the bypass will be undertaken in conjunction with closing the central reservation along this section of the A19, this will prevent right turns across the A19. As a result all traffic heading northbound will be forced to use the grade separated junction at Elwick, an increase in traffic in Dalton Percy is not envisaged as a result of the High Tunstall development. This is a requirement for the infrastructure being in situ prior to the development to these strategic housing sites; as such much of the traffic would use the new junction. The Council will monitor traffic flow through the village.</p>
Greatham Parish Council	LP0018	Pub0102	See comments under INF1	See response under INF1

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Resident	LP0345	Pub0106	<p>Am concerned about the junction at Elwick Road/Catcote/Wooler Road and Park Road.</p> <p>Under existing conditions traffic is gridlocked daily during the early morning rush hour and evening between 4.30 and 6.00 pm.</p> <p>With all the new homes being built at Tunstall Farm and Quarry Farm there has not been a plan proposed to solve this problem.</p>	<p>Concern regarding the local road network at the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made in relation to the wider housing development proposals.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Cecil M Yuill Ltd (Quarry Farm)	LP0252	PUB0119	<p>As highlighted at paragraph 6.18 of the Council's Local Infrastructure Plan (November 2016) and Policy LS1 (Locational Strategy) and paragraph 6.18 of the Local Plan, key infrastructure works need to be delivered to enable the Council to implement their growth strategy over the Plan period. Critically, this includes a new bypass to the north of Elwick Village and a new grade separated junction on the A19 to create a third main access point into Hartlepool. These works are identified as a priority in the Council's Local Infrastructure Plan in order to relieve the pressure of congestion from the A689 and the A179 respectively, together with continued use of the Elwick road and Dalton Piercy A19 junctions, and allow the key strategic housing sites on the western edge of Hartlepool to be delivered.</p> <p>The Council have estimated the cost of these works to be in the region of £18m, which includes contingencies to allow for unexpected abnormalities. A bid has been made to the Local Enterprise Partnership for £18m of Local Growth Fund (LGF) money. This LGF money is effectively a loan which would need to be repaid through Section 106 contributions from new development over the Plan period, with those sites recognised by the Council as benefitting from the road improvements to the west of Hartlepool to be expected to contribute towards the cost of repaying this LGF funding on a pro-rata basis.</p> <p>Within the Local Plan Publication Draft the Council identify the proposed housing allocations at High Tunstall, (1,200 units), Quarry Farm 2 (220 units) and Elwick Village (35 units) as being required to collectively fund the infrastructure works. The Council propose to pro-rata financial contributions against the number of dwellings per site which, in total, will meet the £18m cost for the GSJ and Elwick bypass. In light of this, and on the basis of an overall housing delivery of 1,455 on these three sites identified as benefitting from the major infrastructure works, this equates to circa £12,400 per dwelling. This would effectively mean that the following contributions to the infrastructure works would be broken down as follows:</p>	<p>The issues regarding deliverability are noted. The Council believes that there is the development value within the site to enable these sites to be delivered and deliver the bypass and grade separated junction. The Council is currently developed a detailed design for the Grade Separated Junction and the Bypass. This work is funded through the Growing Places Fund and is well progressed. Following meetings on site with landowners, site survey work has been completed and the scheme is currently being designed by the Council's Highway Section. This final design will then be consulted on with the landowners/agents prior to discussions regarding land acquisition taking place. It could be that the price comes in lower than the expected £18m as £14m of that was based on a detailed design option for the Grade Separated Junction developed by Highways England which included a significant contingency element within the cost. The exact funding method for the bypass is still to be decided however, on top of the other options outlined within the Local Infrastructure Strategy, Highways England may also now be able to access funding through the Housing Infrastructure Fund (HIF) for which this infrastructure scheme may qualify.</p> <p>Affordable housing is covered by QP1 (Planning Obligations), this is a target of 18% of homes onsite being affordable, as with the assessment of all planning obligations they are only deemed necessary when the three tests set out in the CIL regulations have been met. In addition there is scope within the plan to consider the impact of planning obligations on deliverability of sites with the submission of a viability assessment.</p> <p>In relation to the redirection of a proportion of development from Wynyard to land adjacent to High Tunstall and Quarry Farm to support the deliverability to the bypass and grade separated junction. The Council is satisfied that the locations and quantum of housing development as identified by the strategic sites enables sustainable development of both location and allows for the provision of required infrastructure at both locations. Both sets of Highway improvements will improve the overall highway infrastructure within the Borough and will enable a range of</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
			<p>Site Units Contribution  High Tunstall 1,200 £14,880,000  Quarry Farm 2 220 £2,728,000  Elwick Village 35 £434,000</p> <p>The proposed financial contributions highlighted above are extremely significant and it is considered that such levels will, inevitably result in viability issues for each site which will not only bring into question each sites deliverability, but also impact upon the ability of each site to deliver affordable housing which is already considered to be a significant issue within the Draft Plan, as already highlighted.</p> <p>In light of the above, it is the view of Cecil M Yuill Ltd that, in order to provide comfort on the part of the Council that £18m of Local Growth Fund monies can actually be repaid over the Plan period, whilst still being able to deliver the market and affordable housing numbers required, additional housing sites need to be allocated which can bring forward development in a sustainable manner which will contribute to the overall cost of the infrastructure works. This will assist in reducing the level of contributions required from the other allocations by spreading the financial commitment more widely, thereby improving site viability and the ability to deliver both market and affordable housing.</p> <p>It is worth noting that the Council have included a further 200 units to Wynyard, as part of the Submission Draft, to the 500 dwellings already allocated in the Local Plan Preferred Options. Given the key role that the construction of the GSI and Elwick bypass plays to the overall housing strategy for the Borough, Cecil M Yuill Ltd are of the view that these numbers should be apportioned to sites that would make a financial contribution to the infrastructure works. This is particularly the case given the previous Inspector's conclusion that, in order to make the former Plan sound, (it was ultimately withdrawn) one of the principal Main Modifications recommended was the reallocation of housing numbers allocated to Wynyard to sites adjoining Hartlepool itself.</p>	<p>sites to be delivered across the Borough, minimising reliance on particular sites, thus minimising the chances that the identified housing delivery will not be achieved.</p>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
Wynyard Park	LP0027	Pub0124	<p>The Wynyard Park Housing Allocation - Highways</p> <p>The previous representations to the Preferred Options consultation document in July 2016 were accompanied by a detailed technical note prepared by Aecom. This note has been updated and enclosed to reflect the developments with Stockton Borough Local Plan and the proposed allocation for an additional 1,100 dwellings at Wynyard Park within the neighbouring Borough. The note contains details of the modelling that was undertaken to assess the impact upon the A689 and A19 and identifies the mitigation works that are required to facilitate further development. This note concluded that:</p> <p>The proposed allocation of a total of 732 additional dwellings over the plan period can be accommodated on the highway network, subject to the introduction of deliverable highway mitigation measures at the A19 (T) / A689 Interchange;</p> <ul style="list-style-type: none"> <li>• These measures would include the widening of the A689 overbridge above the A19 to three lanes, the inclusion of a new footbridge, the provision of a dedicated left turn slip lane from the A689 eastbound to the A19 northbound and the widening of the A19 to the south of the A689 to improve the merging and diverging capacity to and from the A19. With regard to the proposed widening works to the A19, Highways England have confirmed and sanctioned these works in the Autumn Statement of 2016.</li> </ul> <p>At present, the modelling work is being developed further and discussions between Hartlepool Borough Council, Stockton Borough Council, Highways England and Wynyard Park's consultants remain on-going. Nonetheless, there are no suggestions that there will be any changes to the conclusions of the note and the identified mitigation ahead of the Examination in Public.</p> <p>Please note that Wynyard Park are also operating a subsidised bus service for existing residents wishing to travel from Wynyard to neighbouring locations</p> <p>With regard to the consultation document, it is noted that</p>	<p>Noted.</p> <p>The Local Infrastructure Plan (November 2016) sets out the current position, this refers to the information submitted by Wynyard Park in July and updated in September. The council still consider that whilst in principle there is agreement for a way forward, the modelling and testing needs completing to verify the proposed mitigation is acceptable.</p> <p>The Local Infrastructure Plan (November 2016) states; Local Plan policy HSG6 allocates land for 730 dwellings at Wynyard. Of these the North Pentagon site (approx. 100 dwellings) was included within the modelling for the committed scheme referred to above.</p> <p>Further mitigation/capacity improvements will be required to enable the remaining sites for 630 dwellings allocated in policy HSG6 to be acceptable in highway terms and deliverable over the local plan period.</p> <p>Some transport modelling and assessment work has been put forward by the landowner (Wynyard Park) and agreed in principle by officers from Hartlepool and Stockton-on-Tees Borough Councils and Highways England – the additional capacity improvements in the 'Infrastructure required' column.</p> <p>However further evidence/submissions will be required from Wynyard Park including:</p> <ul style="list-style-type: none"> <li>• Detailed designs and land take assessment</li> <li>• Compatibility with Highways England A19 widening (see below)</li> <li>• Transport modelling to demonstrate that the proposed works will provide the required capacity to serve proposed developments</li> <li>• Trigger points for when works should be completed</li> <li>• Costs and funding</li> </ul> <p>No public funds or grants are currently identified for these additional capacity works. The developer will need to demonstrate potential funding sources.</p> <p>The level of infrastructure required is;</p> <p>A689 Improvements:</p> <ol style="list-style-type: none"> <li>1. Committed scheme: capacity improvements at 5 roundabouts along the A689:</li> </ol>

Company	Unique Ref	Pub Ref	INF2 Improving Connectivity	INF2 Improving Connectivity HBC
			<p>these proposed improvement works are cited in paragraph 10.38 of the draft plan, however, there is no mention of these works within the earlier transport section (paragraphs 8.9-8.12). As works to the A689 and A19 form an objective of the Local Transport Plan, we would suggest that a paragraph is added here for clarity regarding the proposed mitigation works, in the same manner as the description for High Tunstall. This will make it clear within the document that both of the major allocations at High Tunstall and Wynyard Park are justified and can deliver the necessary transport works required to ensure that the plan is effective.</p>	<ul style="list-style-type: none"> <li>• A1185 Seal Sands Link Road</li> <li>• Wolviston Services</li> <li>• Wynyard Park Business Park</li> <li>• Wynyard East</li> <li>• Wynyard West</li> </ul> <p>2. Additional capacity improvements, likely to include:</p> <ul style="list-style-type: none"> <li>• dedicated northbound slip road from eastbound A689 onto A19</li> <li>• widening of northern part of A689/A19 roundabout to provide 3 traffic lanes</li> <li>• footbridge over A19 to replace existing footpath</li> </ul> <p><b>Following wording is proposed to be added to the end of paragraph 8.11 within the plan. “ ... In relation to housing development at Wynyard, the A689 committed scheme complements the Highways England Pinch Point Programme scheme at the A689/A19 junction allowing a number of residential schemes at Wynyard to be implemented without further highway capacity improvements however further capacity improvements will be required to enable further development at Wynyard to be acceptable in highway terms and deliverable over the local plan period.”</b></p>
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See response to LS1.

**Policy INF3: University Hospital of Hartlepool**

Company	Unique Ref	Pub Ref	INF3 Hospital of Hartlepool	INF3 Hospital of Hartlepool HBC
Resident	LP0307	Pub0053	<p>Page 53 of the Document states that HBC will seek to retain the services of the existing hospital and hospice</p> <p>1 Due to the delay/cancellation of the proposed hospital at Wynyard, how does the two sites compare with respect to available building area?</p> <p>2 Due to the age of the current hospital building has HBC considered the implications of demolition of the current hospital and the building of any new structure and the subsequent provision of adequate medical cover that will be required, bearing in mind the required levels of cleanliness?</p> <p>3 Does HBC agree the principal that an alternative site would be an easier prospect to manage, and if so in the absence of a large enough site with town would the HBC revert to the site proposed at Wynyard which was effectively deemed a non starter?</p>	<p>Noted. The Council through this policy has made a commitment to retaining the hospital site for health related services in terms of land use. The continuation of hospital services on the site is a matter for the North Tees and Hartlepool NHS Foundation Trust. As set out in the Local Infrastructure Plan; The local NHS Trust (Tees, Esk and Wear Valley NHS Trust), together with the North Tees and Hartlepool NHS Foundation Trust, have been strategically planning investment within the health system in the Hartlepool area. Under the 'Momentum: pathways to healthcare' programme published in 2008, the strategy in Hartlepool, Stockton-on-Tees, and parts of County Durham is to provide health facilities as close to home as possible, with only services which need to be provided in hospital taking place there. The strategy looks at a network of facilities located where care can be provided through a home visit, at health centres, at an integrated care centre, community hubs, and in hospitals. The proposed new hospital, which was to be located on part of Wynyard Business Park, received planning permission in 2010. However government funding was subsequently withdrawn and this has left the Trust in the position of having to look at the potential for scaling back the proposed plan to reduce costs and identify alternative funding sources. However, while delivery mechanisms are still being investigated for a new hospital, it is currently anticipated that the existing University Hospital of Hartlepool will remain open, providing a valuable facility for the local community.</p> <p>The former hospital site as Wynyard is being proposed to for community facilities uses and Wynyard.</p>



Company	Unique Ref	Pub Ref	INF3 Hospital of Hartlepool	INF3 Hospital of Hartlepool HBC
Resident	LP0204	Pub0088	University Hospital of Hartlepool should have A&E back and other services back not good for people of Hartlepool and outlying areas to travel to North Tees as not all have cars and not good enough bus service. Would have to change at Stockton would have lengthy journey there & back. It would take hours to get to James Cook which often congested and not enough parking at visiting times. Also travel by car A19 gets too congested and too many times traffic at standstill due to too many accidents Danger of people not surviving before reaching hospital. Invariably more & more accidents and road works blocking roads.	Noted. The Council fully supports measures to increase the range of services provided at Hartlepool Hospital.

## Policy INF4: Community Facilities

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
High Tunstall Homes	LP0060	Pub0002	<p>I refer to the above and write to make representations on behalf of our clients, Tunstall Homes Ltd, in respect of the proposed allocation of land at High Tunstall as a 'Strategic Housing Site'.</p> <p>I would confirm that we fully support Policy HSG5, 'High Tunstall Strategic Housing Site' and the associated Policies INF4, 'Community Facilities', NE2i 'Green Infrastructure' (amenity open space), and NE3, 'Green Wedges', insofar as they relate to the allocation of land at High Tunstall as a strategic housing site and the proposed development as illustrated on the masterplan (dwg ref: 14.039 P101 K) that has previously been submitted to the Council. Black &amp; white and coloured copies of the masterplan are attached for your convenience.</p> <p>In this regard we consider that the aforementioned Local Plan Policies are legally compliant and sound.</p>	Comments noted in relation to the support for community facilities.
Resident	LP0263	Pub0009	<p>If the Council thinks wind turbines are a means of raising revenue then it is a very poor way of doing so and more focus should be placed upon improving and increasing our local amenities.</p> <p>Seaton Carew lost its long standing Youth Centre without those amenities being relocated and available elsewhere. The young people in the village only seem to have the seafront to socialise as our local bus service has also been curtailed.</p>	The Council support the development of community facilities through INF4. Review of community facilities across the Borough, which has in the past led to the closure of facilities, is related to decisions beyond the remit of the Local Plan process. In relation to the provision of public transport, again whilst policies INF1 and INF2 support and encourage sustainable transport and enhanced connectivity, the extent and timetabling of public transport is dependent on the commercial operator.
Resident	LP0050	Pub0018	<p>Seaton Carew has expanded considerably yet there are fewer local community facilities available, the youth club was knocked down some time ago, there is very little in this local plan that meets the growing needs of the community. This paragraph states that the provision of major facilities will be in the town centre, how are people from Seaton who don't</p>	Noted. The policy in terms of leisure and tourism provision is that major development is focused to the town centre, as well as being best connected in terms of transport links this will also bring additional footfall to the central urban area. Whilst not in the village centre there is an accessible train station within Seaton Carew with good pedestrian routes to

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
			<p>own a car expected to get there in the evening? Whilst there is a train service it is on the outskirts of Seaton so is not easily accessible.</p> <p>Bullet point 1 states the replacement of Mill House Leisure Centre with comparable facilities either on Mill House site or another equally accessible and sustainable town centre/fringe town centre location.</p> <p>Surely the Brenda Road site is an ideal spot for the development of a state of the art Sports Facility rather than just something comparable to what is currently in place, as a minimum any new facility should have a double sports hall with sprung floors, squash courts, 50 metre swimming pool and sufficient car parking.</p> <p>Bullet point 3 re new swimming pool at Brierton would surely increase traffic flow in an already congested area. How can those without a car in Seaton Carew access evening swimming at Brierton?</p> <p>Heavy industry is dying Hartlepool needs a clear vision on the types of activity and employment that they want to attract to improve the living standards.</p> <p>What consideration has been given for the redevelopment of Brenda Road to make this a central leisure / sports facility?</p> <p>The facility could include 50 metre swimming pool, athletics track, double hall sport facility with sprung floors, this area also has space to include a touring caravan park, noisy sports area, additional car parking. Cycle links could be improved for visitors to leave their cars/caravans at the site and cycle around the area. Currently children involved in athletics have to travel to Middlesbrough to experience running on a 'proper' athletics track, I believe that Hartlepool should aim to have much better sporting facilities that will provide employment and the opportunity for a healthier lifestyle.</p>	<p>the wider area. With regard to development of a swimming pool at Brierton, it is envisaged that this would be in addition to provision in the town centre; the policies within the plan support such development within the key urban area to ensure connectivity.</p> <p>In addition there has been significant investment in the promenade between Seaton Carew and Hartlepool in recent years providing well lit pedestrian and cycle links. There have also been a number of developments, both publically and privately funded in Seaton Carew in recent years improving the community, leisure and tourism facilities in the area, such as investment in the park, development of the Sports Domes and new commercial bowling alley, in addition to INF4, LT3 supports the development of Seaton Carew for Leisure and Tourism development.</p> <p>Brenda Road area is allocated for employment uses and a site for onshore wind turbines. The allocation of such uses is based on evidence set out in the Employment Land Review and consideration of appropriate sites for wind turbine development.</p> <p>Previously it has been deemed acceptable that noisy sports are appropriate in this area due to the area being away from residential development. With regard to the development of leisure facilities the policies in the plan support a sequentially preferable approach focusing such development within firstly within the town centre.</p>

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
Wynyard Residents Association	LP0277	Pub0022	<p>Provision for a primary school at Wynyard in area INF4. The basis for this provision is that 21 primary age children will require schooling per 100 households.</p> <p>This may be the statistical average but, due to house prices in Wynyard, the Wynyard demographic is not statistically average. From the NP evidence 59% of residents are in the 40 years and over category and these tend not to have primary age children. (see attached demographic data Appendix 1).</p> <p>Whilst I understand the need for Hartlepool to have a provision for primary school children (other than that provided at Wynyard by Stockton Borough Council with a 2 form entry primary school south of the A689), the concern is that there will be overprovision in Stockton Wynyard and to fill this there will be more car journeys into Wynyard at times of the day when the transport infrastructure will already be heavily overstretched. The temporary school extant in Wynyard has over 50% of pupils from outside of Wynyard and the school has spare capacity still. Very careful consideration should be given to this provision.</p> <p>Appendix 1 Demographic data for Wynyard.</p> <p>Mid 2014 population estimates by sex and quinary age [see representation attachments]</p> <p>SOURCE: Estimates calculated by TVU by applying a residential address weighted method to ONS mid-2014 population estimates for output areas.</p>	<p>Noted. In relation to the points raised regarding primary education. The information held by HBC educations is that there are currently 98 pupils attending the primary school, the capacity limited by the current planning approval for the site is 100 pupils. Whilst the information is not available for where every pupil resides, the admissions team believe that many are from within Wynyard as Stockton have had a lot of in-year transfer requests into the school from families moving into housing at Wynyard. Given the level of housing development expected in Wynyard over the next 15years, HBC is working closely with SBC, developers and education providers and funders to ensure that adequate school infrastructure is in place.</p>
Resident	LP0082	Pub0067	<p>There are no leisure facilities other than the sports domes for young people in Seaton Carew since the local youth club and site was raised and the land sold off to a private house builder.</p>	<p>Noted. The Council previously made decisions in relation to management of facilities at Seaton Carew; part of the capital receipt from the land sale was directed to the regeneration on Seaton Carew. In addition the Local Plan prioritises Seaton Carew for leisure and tourism development, set out in Policy LT3.</p>

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
Sport England	LP0079	Pub0089	<p>Sport England believes that it is possible for the planning system to shape existing and proposed physical environments to promote physical activity. If the achievement of healthy lifestyles is an inclusive aspiration Sport England would recommend that the Council has regard to Sport England's design guidance document 'Active Design'</p> <p>Active Design sets out 10 key design principles which we consider create a physical environment that promotes physical activity. Local Authorities can use Active Design in a number of ways. There is a model (local plan) policy within there that could be used by Local Authorities. Alternatively Local Authorities may wish to subsume the key planning orientated design principles within their plans and make cross reference to Active Design. Sport England notes that there is synergy to a number of Active Design's principles within Policies INF1, INF2 and INF4, but we consider that this angle could be made more explicit. We would welcome both policies being 'tweaked' in this way if the Council wished to Active Design embedded within the plan.</p> <p>Active Design can be viewed at the following location on our website; <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a></p>	See response to INF1.
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes broadly supports the general aims and principles set out in Section 8 and Policies INF1, INF2 and INF4, however, we consider Policy INF1, INF2 and INF4 to be unsound as they are currently drafted as they are not effective. We remain concerned that the aforementioned policies do not have due regard to the economic viability of new developments. Policies relating to infrastructure delivery must be fully compliant with paragraph 173 of the NPPF which requires that the sites and scales of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. We have noted</p>	See response to INF2.

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
			<p>that the Council have now prepared a Draft Local Infrastructure Delivery Plan (June, 2016), however, we remain concerned that this has not been subject to area wide viability testing to ensure that the infrastructure policies are viable for the duration of the plan period.</p> <p>The approach to financial contributions towards infrastructure should be consistent with national guidance and CIL regulations which state that policy requirements should be relevant; necessary; directly and fairly related to development schemes. We therefore consider that the Council need to ensure that all proposed contributions fully satisfy the CIL regulations. We would also expect the level of infrastructure delivery to be subject to an area wide viability assessment to ensure deliverability over the plan period and to take account of other policy requirements such as affordable housing. In summary, viability testing is a crucial element of the Plan-making process which will ensure that the Council's approach to seeking new infrastructure is fully compliant with paragraph 173 of the NPPF which requires that the sites and scale of development identified in plans are not subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.</p>	
Wynyard Park	LP0027	Pub0124	Draft Policy INF4 – As above, the need to safeguard land for appropriate community facilities is welcome and agreed. A flexible approach to the siting of these facilities will be required, mindful of the siting of a specific location as shown on the proposals map.	Noted. The allocation of INF4 allows for flexibility of location for development within the site. Allocation of the site will support a centralised hub for community infrastructure supporting the future sustainable development of housing at Wynyard.

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
Education Funding Agency	LP0352	Pub0126	<p>Local Plan Approach to New Schools</p> <p>4. The EFA welcomes the support in the draft Hartlepool Local Plan to schools as necessary infrastructure required to help deliver sustainable growth in the district. The EFA note that the planned growth 2406 homes between 2016 and 2031 will place some pressure on social infrastructure such as education facilities. The EFA supports the recognition given to the need to provide new primary schools to support both the High Tunstall, South West Extension and the Wynyard housing allocations, and the safeguarding of land for this purpose. We note the intention is to seek one form entry schools in the first instance, we would encourage the provision of two form entry schools, from the start, as these provide the most cost effective way of meeting the long term need for school places. The EFA would be unlikely to fund a one form entry primary school, therefore, this would limit the options available for sites where a one form entry is prescribed. Further guidance is available on the setting up of free schools at:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/579906/Info-How_to_apply_to_set_up_a_free_school_guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/579906/Info-How_to_apply_to_set_up_a_free_school_guidance.pdf</a></p> <p>5. Paragraph 8.22 would seem to contain some contradictions as it states that: ‘..the Local Education Authority is confident that the existing secondary school sites can cater for the expected growth..’ whilst also stating that: ‘..some developments may be required to contribute towards school enhancements or extra provision..’. It would be helpful if this paragraph were amended to clarify what the level of need is, and how this will be met.</p> <p>6. The text within paragraph 8.23 should be amended to state that the Wynyard Village school (on the permanent site) will be a two form entry school with a nursery - the text currently refers to the provision of a one form entry school.</p> <p>7. We are concerned that Policy INF4: Community Facilities, is too inflexible as currently drafted. Whilst we do encourage Trusts to support community use of school buildings wherever practicable and affordable this needs to take account of local circumstances. We suggest this is an issue we could discuss further when we meet at our forthcoming</p>	<p>4. Noted. Reference in plan under 8.23 to be revised to refer to the provision of two form entry primary schools.</p> <p>5. Noted. <b>Suggested that 8.22 is updated to “Based on current pupil projections the Local Education Authority is confident that the number of existing secondary school sites can cater for the expected growth from new housing development over the plan period. However some developments may be required to contribute towards school enhancements or extra provision (such as additional classrooms) at these sites on the basis of the cumulative impact that the development may have on schools in that locality.”</b></p> <p>7. Noted.</p> <p>8. Noted.</p> <p>9-15. Noted. The provision of community infrastructure including education is key to the future strategic sustainable development of Hartlepool. Where appropriate Planning Obligations are secured from developers towards the delivery and enhancement of school provision, this is secured through S106 legal agreements. Planning Obligations are covered by Policy QP1 and the Planning Obligations Supplementary Planning Document.</p>

Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
			<p>meeting.</p> <p>8. The EFA would be interested in early discussions with the local planning authority in order to establish the broad parameters of the site requirements.</p> <p>9. Specific policy support for new schools within the local plan is particularly welcomed. You will have no doubt taken account of the key strategic policies to reiterate this position, including securing developer contributions through s106 and CIL, but it would be helpful if they were explicitly referenced within the document. In particular:</p> <p>10. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).</p> <p>11. The EFA support the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers through the Community Infrastructure Levy are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.</p> <p>12. Hartlepool should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>13. In light of the above, the EFA encourages local authorities to work closely with us during all stages of planning policy development to help guide the development of new school</p>	



Company	Unique Ref	Pub Ref	INF4 Community Facilities	INF4 Community Facilities HBC
			<p>infrastructure and to meet the predicted demand for primary and secondary school places. As such and in line with the Duty to Cooperate please add the EFA to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>14. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Hartlepool Council can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the district over the plan period.</p> <p>15. Finally, I hope the above comments are helpful in shaping the Hartlepool Local Plan, with particular regard to the provision of land for new schools. Please advise the EFA of any proposed changes to local plan policies, supporting text, site allocations or evidence base arising from these comments.</p>	

## Policy INF5: Telecommunications

Company	Unique Ref	Pub Ref	INF5 Telecommunications	INF5 Telecommunications HBC
NFU North East	LP0047	Pub0020	Delivery of high speed broadband is a major priority for rural businesses who are often placed at an economic disadvantage due to their location. Whilst urban areas are pushing towards 5g capability, some rural businesses struggle to achieve even a basic connection speed.	It is acknowledged within the plan that the main gaps in the high speed broadband network are industrial estates and business parks, the town centre, and the villages and rural parts of the Borough. Paragraph 8.36 of the Local Plan indicates that, in order to address gaps in high speed broadband, the Borough Council, along with the other local authorities in the Tees Valley, will seek to meet and exceed the UK Government's target for 95% of all premises having access to superfast broadband by December 2017, through the 'Digital Durham' initiative. In November 2016, additional funding was agreed between the Tees Valley Combined Authority and Broadband Delivery UK (BDUK) to improve superfast broadband coverage. At a Tees Valley level this aims to exceed 98% coverage by the end of 2018 and it should help Hartlepool to achieve coverage beyond its current 95% level. Proposals for the improvement and expansion of telecommunication networks, including high speed broadband, will be supported and applications for infrastructure will be supported subject to the proposal addressing the criteria set out within emerging Local Plan policy INF5 (Telecommunications).
Greatham Parish Council	LP0018	Pub0102	The highlighting of protection for listed buildings and conservation areas in respect of broadband infrastructure is strongly supported.	Noted.

**Section 4 of the Consultation Statement, covering:**

**Quality of Place**

Policy QP1: Planning Obligations

Policy QP2: Compulsory Purchase Orders

Policy QP3: Location, Accessibility, Highway Safety and Parking

Policy QP4: Layout and Design of Development

Policy QP5: Safety and Security

Policy QP6: Technical Matters

Policy QP7: Energy Efficiency

Policy QP8: Advertisements

**Policy QP1: Planning Obligations**

Company	Unique Ref	Pub Ref	QP1 Planning Obligations	QP1 Planning Obligations HBC
Resident	LP0050	Pub0018	Where has all the money gone that has been raised from all the house building undertaken in the past 3 years in Seaton Carew?	All planning obligations are monitored by Hartlepool Borough Council to ensure that funds are directed and spent to the projects set out in S106 legal agreements. As part of the development agreement with Esh, some of the money from the land sale is to be reinvested in the regeneration planned for Seaton Carew.
NFU North East	LP0047	Pub0020	It our firm belief that the Community Infrastructure Levy should remain at 0 for agricultural and related buildings. Development within farm holdings is often done to help strengthen the existing farm business, with the existing business often operating on low margins. Any addition costs for development can effectively make growth unachievable. 9.6 – Any requirements to impose energy efficiency conditions upon development may be difficult for agricultural conversions. Whilst new builds will be able to use suitable modern building materials, older agricultural buildings are often poor in terms of energy efficiency. This needs to be recognised and not result in conditions which hamper development.	Noted – Hartlepool does not have a Community Infrastructure Levy; planning obligations are dealt with using S106 legal agreements. There is the flexibility within the policy and the Planning Obligations Supplementary Planning Document for developers to submit a viability assessments. As part of the development agreement with Esh, some of the money from the land sale is to be reinvested in the regeneration planned for Seaton Carew. Planning obligations are only placed on a development where they meet the three tests set out in the CIL Regulations. Energy efficiency can also be assessed on a case by case basis as part of any planning obligation and is subject to viability.

Company	Unique Ref	Pub Ref	QP1 Planning Obligations	QP1 Planning Obligations HBC
Network Rail	LP0250	Pub0054	See comments under Policy QP3	See Policy QP3 for aggregated response
Sport England	LP0079	Pub0089	Sport England would like to offer its support to the following policies; Policy QP1 – Planning Obligations Policy LT3 – Seaton Carew Sports Domes	Noted.
Story Homes	LP0219	Pub0090	In accordance with our previous representations to the preferred options consultation, Story Homes considers that Policy QP1 is currently unsound as it is not consistent with national policy. As a responsible developer Story Homes support the delivery of essential infrastructure to ensure that new sites can be delivered and to ensure that development is sustainable and acceptable, however, we must reaffirm that the Council should ensure that economic viability is taken into consideration when seeking planning obligations. In conformity with national policy, we recommend that the Council should include further wording which demonstrates that planning obligations should be sought where practical, viable and related in size and scale to development proposals. In particular, the policy should meet the following three tests which are set out within paragraph 204 of the NPPF: · “necessary to make the development acceptable in planning terms; · directly related to the development; and · fairly and reasonably related in scale and kind to the development.” This approach will also help to ensure that future development proposals are not threatened by disproportionate obligations and will ensure that new development is viable and deliverable in accordance with Paragraph 173 of the NPPF. We also note the Council’s reference to planning obligation requirements being set out in their Planning Obligations SPD (November 2015).	Noted. HBC disagree that the policy is unsound. There is clear reference to the three tests set out in the CIL regulations within the preamble to the policy. In addition the policy states that the ‘Borough Council will seek planning obligations where viable and deemed to be required to address the impacts arising from a development’, the potential for submission of viability assessments is set out in detail in the Planning Obligations SPD.

Company	Unique Ref	Pub Ref	QP1 Planning Obligations	QP1 Planning Obligations HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>We welcome the policy wording and inclusion within the list of Planning Obligations that reflects the requirement of developers to mitigate for adverse effects arising from individual developments. Whilst our position on SANGS remains (see 3.2), we agree that the inclusion of green space within housing policies may be effective amongst a suite of measures designed to avoid or reduce recreational pressure upon the SPA if they are based upon sound evidence and appropriately designed/located. On this basis, we agree that HBC has gone some way in putting the required mitigation on a strategic footing. However, we consider that HBC can go further by producing a strategic mitigation plan. Please see our further advice on this below.</p> <p>AND</p> <p>The HRA states (7.4 page 84) that “housing developments of a significant size will need to provide and/or fund mitigation in the form of (at least) on-site SANGS provision and a financial developer contribution. A supplementary Planning Document (SPD) is being prepared on Planning Obligations including developer contributions. This will include the need for financial contribution to mitigate for recreational disturbance.”</p> <p>The above statement is ambiguous in that it does not sufficiently specify which developments would be required to provide mitigation or whether that contribution would be financial or SANGS creation. This would cause difficulties for HBC in accurately assessing whether the mitigation strategy proposed can be sufficiently funded: without confidence on funding it is not possible to conclude that the mitigation will be delivered, and consequently it cannot be relied upon in the Appropriate Assessment. The SPD should provide that further detail.</p> <p>AND</p> <p>Funding. The Plan states that mitigation measures will be funded via developer contributions through planning obligations (to be detailed in a separate Supplementary Planning Document). HBC should re-assess whether the scope of developments required to contribute should be widened to include employment and tourism-related development. The</p>	<p>Comments welcomed.</p> <p>AND</p> <p>Policy QP1 Planning Obligation, flags up that all housing developers need to be aware that there may be a requirement for recreational disturbance mitigation measures. This will be reinforced in a SPD.</p> <p>A number of housing developments already have planning approvals, based on HRAs (approved by Natural England) that did not require financial contributions to ensure mitigation. The majority of new housing covered in the housing policies is further away from the SPA than these. HBC believes that promoting a menu of options for mitigation is a proportionate response.</p> <p>AND</p> <p>HBC agrees and has added suitable words to LS1 to make this clear.</p>

Company	Unique Ref	Pub Ref	QP1 Planning Obligations	QP1 Planning Obligations HBC
			Council will need to evaluate the cost of providing mitigation measures over the lifetime that the adverse effects will occur and provide evidence that it can secure the source of that funding before the deliverability of the Plan can be assessed.	
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>Persimmon Homes object to Policy QP1 as we do not consider the council’s approach to be sufficiently justified by an appropriate evidence base.</p> <p>We welcome the reference within the policy stating that “the Borough Council will seek planning obligations from developers, where viable and deemed to be required...” However it is imperative that the cumulative impact of all the policies within the plan does not threaten the viability of sites. It is also important that the scale of obligations is not set on the threshold of viability to provide flexibility within the plan for changing economic conditions.</p> <p>The Council’s viability evidence is set out within the appendix to the 2015 Planning Obligations SPD. Its relevancy to current development costs is queried and the study lacks transparency as many of the costs are identified as estimates with no clear indication of how they were derived. We subsequently have a number of concerns with the inputs, particularly with developer profit which at 16.4% of Gross Development Value is considered too low and contrary to the profit level endorsed by the Manor appeal decision in Shinfield (Ref APP/X0360/A/12/2179141, 8 January 2013).</p> <p>We therefore recommend that further robust viability testing is undertaken as part of the plan-making process to support and inform the progression of the Local Plan. We are committed to assisting the council where we can in this regard.</p>	<p>Whilst the concern is noted, it is considered that the approach to viability testing as set out the in Planning Obligations SPD and policy is sound. This was based on the following:</p> <ul style="list-style-type: none"> <li>• The most likely development types likely to come forward in Hartlepool in the future; i.e. medium to high quality Greenfield residential schemes.</li> <li>• A representative sample of the development costs/values set out in submitted economic viability assessments which have been submitted to the Council over the last few years.</li> <li>• Local development cost/value indicators.</li> <li>• Standard development costs in the local area as represented in the Building Cost Information Service (BCIS).</li> <li>• Advice from Council officers including Highways, Engineers, Parks &amp; Countryside, Education etc.</li> </ul> <p>This is based on evidence which had come forward over the previous two years. It should be noted that the sales values that are being achieved on site (particularly in Wynyard and Quarry Farm) are in excess of the levels anticipated at the planning application stage. Given that the majority of the housing sites set out in the Local Plan are Greenfield, the level of development costs in relation to site issues are anticipated on site to be minimal in relation to site issues. It is also of note that for planning obligations to be applied they must meet the three tests set out in the CIL regulations and there is the opportunity for the submission of a viability assessments by a developer should it considered that the planning obligations required render the development unviable.</p>

Company	Unique Ref	Pub Ref	QP1 Planning Obligations	QP1 Planning Obligations HBC
Gladman Developments	LP0351	Pub0118	<p>Gladman note the overarching intention of Policy QP1 which sets the context for the Council’s approach to securing planning obligations. The policy adds little additional information to that contained in the associated regulations, but does clarify a range of infrastructure typologies for which contributions might be sought through the development management process. It is assumed at this stage that the Council is not intending to progress a Community Infrastructure Levy alongside this Local Plan, but Gladman would wish to be consulted on any process to introduce such a regime in due course.</p> <p>Gladman note the intended use of a Planning Obligations Supplementary Planning Document (SPD) and would like to take this opportunity to remind the Council that SPDs should not be used to place an unnecessary financial burden on development (NPPF, Paragraph 153). It is important that the deliverability and viability of the Local Plan has been correctly tested and therefore the likely financial burden from the list of obligations must be accurately factored into the whole plan viability evidence. In addition, the use of planning obligations must meet the tests set out in the Community Infrastructure Levy Regulations 2010.</p>	<p>Noted. The preamble to QP1 clearly references that the Council may develop a CIL charging schedule should the economic situation change and this is seen as a more appropriate approach than the current method. Any changes would be subject to statutory consultation in line with the regulations. It is also of note that for planning obligations to be applied they must meet the three tests set out in the CIL regulations and there is the opportunity for the submission of a viability assessments by a developer should it considered that the planning obligations required render the development unviable, this is clearly referenced within the Local Plan and Planning Obligations SPD.</p>
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	<p>Noted.</p>

**Policy QP2: Compulsory Purchase Orders**

No Comments received.



**Policy QP3: Location, Accessibility, Highway Safety and Parking**

Company	Unique Ref	Pub Ref	QP3 Location, Accessibility, Highway Safety and Parking	QP3 Location, Accessibility, Highway Safety and Parking HBC
Network Rail	LP0250	Pub0054	<p>The Hartlepool Local Plan Infrastructure plan (November 2016) sets out the priorities for improvements to rail facilities and where rail use fits into the overall hierarchy of transport facilities within Hartlepool area. Network Rail is satisfied that the infrastructure plan and local plan provide a good background for assessing planning applications and proposals.</p> <p>However Network Rail would like to clarify that the level of land allocations for employment, housing and retail/tourist development is such that there is significant potential for increased rail usage. Many stations and rail routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, cycle facilities, improved access arrangements, ticketing facilities or platform extensions. Rail priorities in the Hartlepool Local Infrastructure plan (November 2016) indicate improvements will be needed in the Hartlepool area to achieve the objectives of the local plan. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. Policy QP3 which addresses the matters to be considered when designing development should include a specific bullet point that requires developers to consider as part of design principles the potential to improve connectivity between rail/ bus interchangers and development sites.</p> <p>Funding to support appropriate connectivity should be sought via developer contributions (in accordance with policy QP1).</p> <p>There are a number of level crossings within the Hartlepool local plan area.</p> <p>The safety, reliability and efficiency of the rail infrastructure are of paramount importance to Network Rail and we cannot agree to any proposals which jeopardise the safety of level crossings. Network Rail is committed to reducing the risk at level crossings where reasonably practicable and will seek to</p>	<p>The Council acknowledges the utility of including a bullet point as suggested in the representation in Policy QP3 but considers that it should be more succinct. <b>The following new bullet point in Policy QP3 is therefore recommended ‘Recognises the wider benefits that safety improvements at level crossings can bring about’.</b></p> <p>The Council also acknowledges the utility of including reference to consideration being given to the upgrade of the Church Street level crossing. However, it is considered that the appropriate policy for this reference is Policy INF2: Improving Connectivity in Hartlepool. <b>Therefore the following insertion is recommended into Policy INF2 ‘Development proposals which would require the upgrading of the Church Street level crossing in order to achieve pedestrian and / or vehicular access will be expected to contribute accordingly.’</b> It is recommended that this is inserted following the paragraph which reads ‘All schemes identified in the Local Infrastructure Plan will be delivered to conform to policy LS1’.</p>

Company	Unique Ref	Pub Ref	QP3 Location, Accessibility, Highway Safety and Parking	QP3 Location, Accessibility, Highway Safety and Parking HBC
			<p>close and/or divert crossings or enhance their safety through the provision of improved safety features or equipment. We will work with local councils to take a holistic approach to reducing level crossing risk and will encourage planning authorities to co-operate in securing level crossing closures or improvements in connection with new developments. Only in exceptional circumstances will we permit new crossings to be introduced onto the network.</p> <p>The Church Street level crossing is likely to see increased usage as a result of the proposed local plan allocations. Consideration will need to be given to the upgrade of this crossing to facilitate development.</p> <p>Generally Network Rail is satisfied that the proposed policies in the local plan (INF1, QP1, RC12) would be able to secure the relevant information and funding through the planning process. However policies RC 12 to RC14 and LT2 should acknowledge the presence of the level crossing and the potential need for upgrading as part of providing safe pedestrian and vehicular access to development sites.</p> <p>A second crossing which may be affected by development proposals is at Greatham (the former station). Representations were made to the Hartlepool Rural Neighbourhood Plan seeking support for the elimination for the crossing and diversion of the right of way over a nearby bridge and this is something we would support taking forward as the Local Plan develops.</p> <p>We would further encourage the inclusion of a policy statement which makes it clear to developers that no new crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will be required to be provided at the developers expense.</p>	

Company	Unique Ref	Pub Ref	QP3 Location, Accessibility, Highway Safety and Parking	QP3 Location, Accessibility, Highway Safety and Parking HBC
			<p>We would ask that the council includes within design Policy QP3 a bullet point which says ‘recognise the wider benefits that safety improvements at level crossings (for example, replacing them with bridges) can bring about, particularly for road users ensuring development near railway crossings provides appropriate funding for improvements where there is a material increase in their usage’ This suggested wording is considered to be consistent with ORR guidance, Network Rails own policy objectives and consistent with advice in the NPPF.</p> <p>Please note that the council has a statutory responsibility under the Town and Country Planning (General Permitted Development Procedure) Order 2015 (GPDO) to consult statutory rail undertakers where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway or impact upon rail infrastructure. The GPDO also requires authorities to consult on all developments within 10m of the railway.</p> <p>Transport assessments which consider rail infrastructure must support all applications near railways. Developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured. CIL documents should ensure that rail infrastructure is specifically mentioned in the charging schedule.</p> <p>We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail’s remit.</p>	
Resident	LP0204	Pub0088	<p>Accessibility on to Highway and Safety. Residents need to be able to have access safely to get to/from places.</p> <p>Traffic needs to acknowledge red traffic light and not go through them and that should include cyclists. Cyclists should not wear earphones covering both ears and should look when leaving cycle track and also signal.</p>	Comments noted but these are not Local Plan issues.

Company	Unique Ref	Pub Ref	QP3 Location, Accessibility, Highway Safety and Parking	QP3 Location, Accessibility, Highway Safety and Parking HBC
Story Homes	LP0219	Pub0090	<p>Policy QP3 'Location, Accessibility, Highway Safety and Parking' also makes reference to a Residential Design SPD, however, we were unable to locate this within the Council's 'Document Downloads – Local Plan' section of Hartlepool's website. Although we appreciate that SPDs are useful for providing further guidance for development on specific sites or in relation to specific issues, we must emphasise that the Council should not use SPDs as a mechanism for introducing policy requirements and burdens outside of the formal plan-making process. As set out in paragraph 153 of the NPPF:</p> <p>"...Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."</p> <p>We urge the Council to review their SPDs following Local Plan adoption to ensure that they are still in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p>	<p>It is noted that whilst SPDs may need updating, the Borough Council will not use these to add financially onerous requirements to development.</p>
Wynyard Park	LP0027	Pub0124	<p>Draft Policy QP3 – It is agreed that the policy should allow for new accesses onto the primary road network for allocated sites where appropriate. However, the policy wording should also permit the intensification of existing access points for allocated sites for completeness.</p>	<p>The policy does allow for the intensification of existing access points for allocated sites.</p>

## Policy QP4: Layout and Design of Development

Company	Unique Ref	Pub Ref	QP4 Layout and Design of Development	QP4 Layout and Design of Development HBC
Greatham Parish Council	LP0018	Pub0102	Greatham Parish Council strongly supports the aims of this policy that developments should respect and reflect the distinctive character and history of the vicinity in which they are built.	Comment welcomed.
Galliford Try	LP0349	Pub0114	<p>Policy QP4 sets a number of criteria that all developments should meet. The criteria for the most part are fairly generic and seem appropriate in setting general requirements that developments should meet. However our Client does have some minor comments to make on the wording of the policy. Criterion 9 states that development should “not negatively impact upon the relationship with existing and proposed neighbouring land uses and the amenity of occupiers of adjoining or nearby properties by way of general disturbance, overlooking and loss of privacy, overshadowing and visual intrusion particularly relating to poor outlook”. In accordance with the NPPF, proposals should be resisted where any adverse impacts would significantly and demonstrably outweigh the benefits they would deliver. It is therefore considered that this aspect of the policy should be reworded to this effect. The policy also refers to development that would impact on infrastructure, and outlines when proposals will be required to provide new infrastructure. Paragraph 173 of the NPPF states that the scale of obligations and policy burdens should not threaten the viability of development. To ensure consistency with the NPPF, a caveat should be added to require these obligations only where it is viable to do so. The policy also refers to the Residential Design SPD, which is currently in the stages of preparation, and states that proposals relating to residential development should be in accordance with this.</p> <p>To ensure that the SPD accords with the provisions of the NPPF, our Client reserves the right to submit comments when it is published for consultation.</p> <p>In all, whilst our Client does not object to the ethos of Policy QP4, the detailed wording is currently unsound and requires revision to ensure full consistency with paragraph 182 NPPF. As such, our Client objects to the policy as currently drafted.</p>	<p>The NPPF text that is referred to in the representation is from NPPF paragraph 14. NPPF paragraph 14 is an overview paragraph that sets out the broad guiding framework in which the presumption in favour of sustainable development should be viewed in respect of both plan-making and decision-taking. NPPF paragraph 14 includes the following text: ‘any adverse impacts would significantly and demonstrably outweigh the benefit when assessed against the policies taken in this Framework as a whole’. One of the core planning principles stated at paragraph 17 of the NPPF is ‘always seek to ensure high quality design and good standards of amenity for all existing and future occupants of land and buildings’. Point 9 of Policy QP4 is clearly consistent with the NPPF when read as a whole.</p> <p>The representation contends also that the policy is inconsistent with the NPPF because it does not state that obligations will be required where only where it is viable to do so. The policy cross-references to Policy QP1: Planning Obligations which in turn references the Planning Obligations SPD. Policy QP1 includes the following text ‘The Borough Council will seek planning obligations where viable’. This aspect of the policy is therefore clearly consistent with the NPPF.</p> <p>Regarding the emerging Residential Design SPD, the Council fully acknowledges the right of the respondent to comment on this document when it is published for consultation.</p>

Company	Unique Ref	Pub Ref	QP4 Layout and Design of Development	QP4 Layout and Design of Development HBC
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach:</p> <p>Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Comments welcomed.

**Policy QP5: Safety and Security**

No Comments received.

## Policy QP6: Technical Matters

Company	Unique Ref	Pub Ref	QP6 Technical Matters	QP6 Technical Matters HBC
Home Builders Federation	LP0005	Pub0108	<p>The policy is considered unsound as it is not justified or effective.</p> <p>This policy reads like a validation checklist and the need purpose for the policy is questioned. Whilst the issues identified are likely to be relevant to many applications it is unlikely all of the identified matters will require investigation on every occasion.</p> <p>If the Council considers it necessary to retain this policy it is recommended that the following amendments are made; “Where appropriate, All proposals should ensure that the following matters are investigated...”</p>	<p>The change of wording was also requested in response tom the consultation on the Preferred Options document and has already been incorporated into the Publication Local Plan as ‘Where appropriate, All proposals should ensure that the following matters are investigated and satisfactorily addressed’.</p>
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>As set out within our previous representations to the Preferred Options, whilst we do not necessarily agree with the need for the policy as it reads similar to a validation checklist, should the Council consider it necessary to continue with the policy, we would strongly support the suggested amendment outlined within the HBF representations to ensure that the policy is both justified and effective.</p> <p>“Where appropriate, All proposals should ensure that the following matters are investigated...”</p>	<p>The change of wording was also requested in response tom the consultation on the Preferred Options document and has already been incorporated into the Publication Local Plan as ‘Where appropriate, All proposals should ensure that the following matters are investigated and satisfactorily addressed’.</p>



Company	Unique Ref	Pub Ref	QP6 Technical Matters	QP6 Technical Matters HBC
Northumbrian Water	LP0241	Pub0117	<p>With regard to site constraints and opportunities, we welcome that paragraph 9.43 states that development must have regard to any existing constraints on a site, which would include water mains and sewers, and that this is reflected within Policy QP6. Northumbrian Water will raise the presence of assets on a proposed development site through the planning process and will liaise with the developer to ensure any necessary diversion or protection works. We also support points 3 and 9 within Policy QP6, which address flood risk, sustainable drainage and adequate water supply. Within the Quality of Place chapter, we recommend that the Local Plan includes provision to ensure that an appropriate distance is maintained between sensitive land users and existing wastewater treatment facilities to ensure adverse impacts upon amenity are avoided, whilst also enabling Northumbrian Water to perform its statutory duties. We suggest that Policy QP6 could be an appropriate location within the Local Plan to include this requirement, following discussion in paragraph 9.48 around protecting residents from pollution including odour and noise. We recommend that the Defra Code of Practice on Odour Nuisance from Sewerage Treatment Works (2006) is adhered to in these instances.</p>	<p>Comments supporting Policy QP6 welcomed. Regarding the suggestion that the Local Plan includes provision to ensure that an appropriate distance is maintained between sensitive land users and existing wastewater treatment facilities to ensure adverse impacts upon amenity are avoided; HBC consider that this is adequately covered by Point 8 of the policy.</p>
Historic England	LP0044	Pub0125	<p>While we welcome and support the reference to heritage assets in part (5), the wording of this section appears to be slightly unclear. We would suggest amending this to read 'The presence of any heritage assets, including any impact upon their significance and setting.'</p>	<p><b>Agreed. It is recommended that the wording of Point 5 is changed to 'The presence of any heritage assets, including any impact upon their significance and setting.'</b></p>

## Policy QP7: Energy Efficiency

Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
Resident	LP0146	Pub0004	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0177	Pub0008	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0263	Pub0009	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0050	Pub0018	States concern re fuel poverty for vulnerable residents, can planning obligations for any new social /affordable housing ensure that solar panels are utilised therefore supporting these vulnerable residents in reducing their utility bills.  States use of renewable energy, all new houses should have solar panels fitted, to assist with meeting these targets.	Point 8 of Policy CC1 encourages development that utilises technologies including solar panels.
NFU North East	LP0047	Pub0020	9.6 – Any requirements to impose energy efficiency conditions upon development may be difficult for agricultural conversions. Whilst new builds will be able to use suitable modern building materials, older agricultural buildings are often poor in terms of energy efficiency. This needs to be recognised and not result in conditions which hamper development.	It would be the responsibility of the applicant to demonstrate on a case-by-case basis if an exception to the policy should be made.
Resident	LP0092	Pub0026	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0091	Pub0027	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0282	Pub0028	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0283	Pub0029	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0284	Pub0030	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0285	Pub0031	States ‘use of renewable energy’. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4

Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
Resident	LP0286	Pub0032	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0287	Pub0033	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0288	Pub0034	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0289	Pub0035	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0290	Pub0036	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0291	Pub0037	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0292	Pub0038	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0293	Pub0039	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0294	Pub0040	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0295	Pub0041	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0296	Pub0042	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0297	Pub0043	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4

Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
Resident	LP0298	Pub0044	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0299	Pub0045	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0300	Pub0046	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0301	Pub0047	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0302	Pub0048	States 'use of renewable energy'. Rather than allocating land for unwanted turbines, all new houses should have solar panels fitted, to assist with meeting these targets.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0082	Pub0067	If HBC are serious about energy efficiency then perhaps they consider passing a bylaw requiring all new-build houses to be fitted with thermal and/or photovoltaic solar panels to provide cheap hot water, power or both, thus reducing fuel demand and increasing dwelling efficiency. If enough were installed, then servicing such installations would also boost a service industry and provide more local jobs.	Point 8 of Policy CC1 encourages development that utilises technologies including solar panels. This demonstrates that the Council takes this issue seriously.
Resident	LP0052	Pub0069	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0224	Pub0071	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0223	Pub0072	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Home Builders Federation	LP0234	Pub0108	Similarly the requirement within Policy QP7 to; "...improve the fabric of the building 10% above what is required by the most up to date Building Regulations..."  The policies are considered unsound as they are not justified or consistent with national policy. I refer to our response to Policy CC1 above.	The Borough Council acknowledges that this aspect of the policy should not be a requirement. <b>The following change of wording is recommended: 'If by virtue of the nature of the development it is not possible to satisfy the above criteria then the Borough Council would encourage an attempt to be made improve the fabric of the building 10% above what is required by the most up-to-date Building Regulations.'</b>

Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
HBF	LP0005	Pub0108	<p>Similarly the requirement within Policy QP7 to; "...improve the fabric of the building 10% above what is required by the most up to date Building Regulations..."</p> <p>The policies are considered unsound as they are not justified or consistent with national policy. I refer to our response to Policy CC1 above.</p>	<p>The Borough Council acknowledges that this aspect of the policy should not be a requirement. <b>The following change of wording is recommended: 'If by virtue of the nature of the development it is not possible to satisfy the above criteria then the Borough Council would encourage an attempt to be made improve the fabric of the building 10% above what is required by the most up-to-date Building Regulations.'</b></p>
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>Persimmon Homes fundamentally object to Policy QP7 as we do not consider the council's approach to be justified or compliant with national guidance.</p> <p>The second paragraph requires that where 'best use' of solar gain, passive heating and cooling, natural light and natural ventilation is not possible, an attempt must be made to improve the fabric of the building 10% above what is required by the most up to date Building Regulations. If due to viability this cannot be met then a full viability assessment must be submitted with the application. This policy requirement is not consistent with national policy and is therefore unsound.</p> <p>Persimmon Homes would again refer the Council to the Ministerial Statement of the 25th March 2015 in which it was made clear that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations.</p> <p>Persimmon Homes therefore have major concerns with the policy and believe that such an approach lacks any justification or consistency with national guidance. The policy is unsound and should therefore be deleted from the plan.</p>	<p>The Borough Council acknowledges that this aspect of the policy should not be a requirement. <b>The following change of wording is recommended: 'If by virtue of the nature of the development it is not possible to satisfy the above criteria then the Borough Council would encourage an attempt to be made improve the fabric of the building 10% above what is required by the most up-to-date Building Regulations.'</b></p>

Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
Gladman Developments	LP0351	Pub0118	Gladman note the intention to introduce sustainability standards that are above and beyond those prescribed in building regulations. Gladman has not been able to find any local evidence that justifies the introduction of these additional standards and would therefore request that the proposed requirements are deleted from the policy. Local Plan policies of this nature should only be introduced to address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.	The Borough Council acknowledges that this aspect of the policy should not be a requirement. <b>The following change of wording is recommended: 'If by virtue of the nature of the development it is not possible to satisfy the above criteria then the Borough Council would encourage an attempt to be made improve the fabric of the building 10% above what is required by the most up-to-date Building Regulations.'</b>
Resident	LP0350	Pub0127	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0355	Pub0131	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0356	PUB0132	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0357	PUB0133	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0358	PUB0134	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0359	PUB0135	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0360	PUB0136	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0361	PUB0137	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0362	PUB0138	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0363	PUB0139	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0364	PUB0140	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0365	PUB0141	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0366	PUB0142	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0367	PUB0143	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0368	PUB0144	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0369	PUB0145	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0370	PUB0146	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0371	PUB0147	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0372	PUB0148	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0373	PUB0149	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0374	PUB0150	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0375	PUB0151	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0376	PUB0152	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0377	PUB0153	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0378	PUB0154	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0379	PUB0155	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4
Resident	LP0380	PUB0156	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4









































































Company	Unique Ref	Pub Ref	QP7 Energy Efficiency	QP7 Energy Efficiency HBC
Resident	LP0169	PUB1324	Generic Letter Received - See PUB0026.	See aggregated response to Pub0003 under Policy CC4

**Policy QP8: Advertisements**

Company	Unique Ref	Pub Ref	QP8 Advertisements	QP8 Advertisements HBC
Resident	LP0204	Pub0088	Location of advertising on roundabouts and too many on side roads a distraction to drivers and is a safety hazard.	Point 2 of the policy addresses this issue.

**Section 5 of the Consultation Statement, covering:**

- Policy HSG1: New Housing Provision
- Policy HSG2: Overall Housing Mix
- Policy HSG3: Urban Local Plan Sites
- Policy HSG4: The South West Extension Strategic Housing Site
- Policy HSG5: High Tunstall Strategic Housing Site
- Policy HSG5a: Quarry Farm Strategic Housing Site
- Policy HSG6: Wynyard Housing Developments
- Policy HSG7: Elwick Village Housing Development
- Policy HSG8: Hart Village Housing Developments
- Policy HSG9: Affordable Housing
- Policy HSG10: Housing Market Renewal
- Policy HSG11: Extensions to Existing Dwellings
- Policy HSG12: Residential annexes
- Policy HSG13: Gypsy and Traveller Provision

**Policy HSG1: New Housing Provision**

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Fens Residents Association	LP0011	Pub0012	<p>Policy HSG1 New Housing Provision:</p> <p>FRA believes that the 15 year target of 6,199 houses is totally unrealistic, and that at the end of the Local Plan period a massive shortfall in delivery will have occurred. We do not dispute the need for bungalows for an aging population or affordable housing for the many who wish to buy or rent within a limited budget. The forecasted 5.5% increase in population, if correct, will be largely made up of aging residents. Both bungalows and affordable housing should be built within the present urban limits to facilitate easy access to essential services. Any demand driven by economic growth will be easily accommodated by the ongoing ample availability of good quality private housing and a limited number of small developments on green field land. Most certainly, very large developments on green field land (such as the Claxton end of the South West Extension) will turn out to be unviable for many decades to come, if ever.</p>	<p>Disagree that housing target is unrealistic. It is evidenced within the SHMA Addendum how the requirement has been reached. Whilst we agree that there is a need for bungalows and appropriate housing for the elderly population, there are considered to be a range of sites which already benefit from planning permission which will cater for over 55's provision and will also be opportunities within sites included within the plan. Many of these are within the main conurbation of Hartlepool, in areas which are served well by a range of facilities. New allocations will also contribute new homes which will be appropriate for the ageing population and affordable housing for those in need of social rented and intermediate tenure properties. It is not considered that the proposed allocations on the strategic sites will turn out to be unviable.</p>



Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
HCA (Oakesway)	LP0086	Pub0068	<p>The Committee system decided to follow the Coalition Governments National Planning Policy Framework, this decision allowed the Council to give outline planning permission for hundreds or should we say thousands of houses to be built on good agricultural land, developers are not interested in brownfield sites as it would not be as profitable and needed extra time and effort to develop such land. This policy claims to empower local people and to protect good agricultural land but in truth this is a get rich quick developers charter. The stages of the process of this current local plan show apathy from local people not surprising when you consider how long this process has been dragged out, also seeing the bulldozers already destroying good agricultural land and knowing that many other agricultural and Greenfield sites are to be condemned, trampling over local democracy.</p> <p>With all the redevelopment and new development of housing estates actively ongoing within the Town over the years together with the hundreds of houses for sale on the housing market the housing developments outside the urban boundary is nothing but greed and vandalism of the Town's countryside. After all the population of the Town has not dramatically increased over the years much less than in 1971 when the population was over 97,000. In a region of high unemployment how many people can afford a mortgage and exorbitant council tax that Hartlepool Council has demanded for years.</p>	<p>Note concerns – it must be noted that the Council refused the applications at High Tunstall and Quarry Farm – they were given planning permission by a planning inspector following appeals by the developers. The government has clearly set out its desire to see housing growth and given the lack of deliverable brownfield sites in the town and taking account of the Geography of Hartlepool the only direction for growth is to the west on Greenfield sites. The growth estimations have been formulated through national guidance in the form of a Strategic Housing Market Assessment (SHMA) which the authority is required to follow – this takes account of information from the Census and demographic, economic and household forecasts.</p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our response to the Preferred Options, we commented on the scale of the proposed housing provision within Hartlepool and questioned whether the Duty to Co-operate had, at least in this respect, been considered especially when proposed housing provision in neighbouring authorities was considered.</p> <p>We noted that the additional provision amounted to a 14% increase in the housing stock in the borough. We acknowledge that this may be an over-estimate as we had not fully taken into account that a number of houses were to replace existing housing stock. Where this applies, it appears that one new house will replace two in the existing stock and so we accept that the increase is now 12% rather than 14%. That remains however in our opinion an unacceptably high number and still means that the issues mentioned in the CPRE study “Set up to Fail” (referred to in our response to the Preferred Options) apply.</p> <p>For this reason, we represent that this proposed Policy is unsound. It also demonstrates a failure on the part of the council with respect to the Duty to Co-operate.</p> <p>We also note the imminent publication of a Government White Paper on this topic and understand that this is likely to have a significant impact on this subject.</p>	<p>The housing figures are based on the need as identified within the Strategic Housing Market Assessment (SHMA) Addendum November 2016. The allocations proposed link with the deliverable planning permissions to meet the need identified. The 2015 SHMA and the subsequent 2016 Addendum identified that Hartlepool has its own housing market area with a large percentage (80.2%) of moves in the year preceding the census being from within Hartlepool. Ongoing meetings and discussions with neighbouring authorities and those within the Tees Valley have formed an element of the ongoing duty to cooperate – these authorities have been consulted with during the formation of the SHMA and other meetings with regard to the Local Plan have also discussed the issue, with no objections being raised to the proposed housing figures or how they were formed or the assumptions on migration within them. On this basis the local authority believe that the objectively assessed need and housing requirement contained within the Publication Local Plan are both appropriate and sound and also that the ongoing work, meetings and liaison between neighbouring authorities, as well as the house builders and other statutory bodies, has ensured that the requirements under the Duty to Cooperate have been met.</p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Resident	LP0322	Pub0081	4. In general, I feel that too much green belt land is being released to developers when brownfield sites are still available and underdeveloped.	<p>The proposed developments at High Tunstall and Quarry Farm are on Greenfield land / open countryside – there is no land designated as green belt within the Tees Valley. The scale of the developments is required, not only to meet the identified housing need as set out within the SHMA Addendum (November 2016), but also as a result of the need to have a quantum of development which was able to fund the supporting infrastructure such as the bypass and grade separated junction and also to support the provision of the primary school which is needed given existing capacity issues at the primary level in the North West of the urban area.</p> <p>Note concerns in relation to highway capacity and safety. The Local Plan and associated Infrastructure Plan set out proposals for improvements to highway infrastructure to allow for the proposed developments. Not only will there be the provision of the bypass and grade separated junction at Elwick which will help to improve highway capacity and safety, along with the benefit of helping to distribute the flows of traffic more evenly, there will also be significant work at the A179/A19 junction to signalise and improve the junction. These major works will be accompanied by schemes to improve local road junctions as set out within the Local Infrastructure Plan which will help to improve the network to deal with the increase in traffic associated with the new developments. Where the Highways team deem it necessary to provide traffic calming measures or crossings to improve safety, these will be secured as part of the planning applications.</p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Resident	LP0010	Pub0086	<p>The Committee system decided to follow the Coalition Governments National Planning Policy Framework, this decision allowed the Council to give outline planning permission for hundreds or should we say thousands of houses to be built on good agricultural land, developers are not interested in brownfield sites as it would not be as profitable and needed extra time and effort to develop such land. This policy claims to empower local people and to protect good agricultural land but in truth this is a get rich quick developers charter. The stages of the process of this current local plan show apathy from local people not surprising when you consider how long this process has been dragged out, also seeing the bulldozers already destroying good agricultural land and knowing that many other agricultural and Greenfield sites are to be condemned, trampling over local democracy.</p> <p>With all the redevelopment and new development of housing estates actively ongoing within the Town over the years together with the hundreds of houses for sale on the housing market the housing developments outside the urban boundary is nothing but greed and vandalism of the Town's countryside. After all the population of the Town has not dramatically increased over the years much less than in 1971 when the population was over 97,000. In a region of high unemployment how many people can afford a mortgage and exorbitant council tax that Hartlepool Council has demanded for years.</p>	<p>Note concerns – it must be noted that the Council refused the applications at High Tunstall and Quarry Farm – they were given planning permission by a planning inspector following appeals by the developers. The government has clearly set out its desire to see housing growth and given the lack of deliverable brownfield sites in the town and taking account of the Geography of Hartlepool the only direction for growth is to the west on Greenfield sites. The growth estimations have been formulated through national guidance in the form of a Strategic Housing Market Assessment (SHMA) which the authority is required to follow – this takes account of information from the Census and demographic, economic and household forecasts.</p>
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes supports the emerging Local Plans approach to assist in addressing the national housing shortfall. We have reviewed the housing trajectory on page 84 of the Plan which identifies a baseline housing target of 410 dwellings per annum to achieve a total yield of 6,150 dwellings over the plan period. We consider that Policy HSG1's approach to new housing should express the housing requirement over the plan period to be expressed a minimum to ensure that the Local Plan meets the NPPFs requirements for positive plan-making and the need to significantly boost housing supply.</p>	<p>Note comments and support for the approach. Policy Hsg1 states "...and sites elsewhere in the borough to, as a minimum, meet the housing need" – Propose to amend wording to give greater clarity to state <b>"...and sites elsewhere in the borough to, as a minimum, meet the housing requirement set below"</b></p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Housing Policies. The RSPB agrees with HBC's assessment (page 49 – 51) that all the housing policies would result in LSE on the SPA due to increased recreational disturbance from new residents. These policies are further assessed in the AA.</p> <p>We note that Section 6 – HBC HRA Stage 2 Appropriate Assessment of Housing Policies refers to LSE throughout. The purpose of an AA is to ascertain that there are no adverse effects on integrity (AEOI), rather than LSE. HBC should ensure that it's assessment of potential impacts upon European sites (and subsequent conclusions within the AA) reflect this.</p> <p>AND</p> <p>The RSPB agrees that there is no AEOI arising from direct SPA habitat loss in relation to housing policies (6.1.2 page 62). We also agree that there is indirect AEOI on the Teesmouth and Cleveland Coast SPA/Ramsar which requires mitigation (6.3 page 80).</p> <p>Actions to avoid and mitigate recreational disturbance. HBC has committed to providing avoidance/mitigation through three pathways:</p> <p>Strategic guidance</p> <p>HBC day to day service provision</p> <p>Planning obligation developer contributions</p> <p>Strategic guidance. The HRA (7.2 page 81) states that “mitigation has been written into all relevant Hartlepool Local Plan policies including Quality of Place and Housing policies following consultation responses received to version 1 of this HRA. This puts mitigation onto a strategic basis”.</p> <p>The RSPB recommends the following wording changes: Section 9.10 of the Plan (page 59 – Quality of Place). “The Habitat Regulations Assessment (HRA) stage 1 2 (Appropriate Assessment) identified a likely significant adverse effect on the integrity of the Teesmouth and Cleveland Coast Special Protection Area and Ramsar European Protected Site. This adverse impact effect would be caused through recreational disturbance of birds which are the interest features of the site, including a breeding colony of little terns in the summer and shorebirds in the autumn, winter and spring. The HRA established that at least some new residents of housing developments would cause harm. Each housing development is responsible for mitigating potential harm and developers can ensure this through Planning Obligations by providing an adequate provision of Suitable Alternative Green Space (SANGS) to absorb new recreation such as daily dog walking, on site and/or by providing a financial contribution to be spent on managing recreational pressures on the European Protected site.”</p>	<p>HBC agrees and will re-write Section 6 of the HRA as per RSPB advice. HBC will re-assess the Appropriate Assessment of policies to check for no Adverse Effects On Integrity (AEOI). New text will be clearly marked.</p> <p>AND</p> <p>HBC agrees and will re-write p59 of the HRA as per RSPB advice. HBC will re-assess the Appropriate Assessment of policies to check for no Adverse Effects On Integrity (AEOI). New text will be clearly marked.</p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Gentoo Homes	LP0335	Pub0092	<p>Housing Need - A key policy requirement of the emerging Local Plan is to ensure that the boroughs housing requirement is met in full, as set out under policy HSG1. The identified housing requirement for the plan period is identified as being a minimum figure of 6,135 new homes with a large proportion of these new homes delivered through extant planning permissions.</p> <p>Whilst a detailed assessment of the Council's Objectively Assessed Housing Need and five-year housing land supply has not been undertaken at this stage, there are a number of concerns that need to be considered before the housing requirement can be identified and the Local Plan considered sound.</p> <p>We believe that both the Council's CAN and housing supply require further assessment and clarification. We therefore object to the current housing requirement and supply identified and reserve the right to further assess and comment on the Council's housing figures at future consultation stages.</p> <p>See also comments under LS1.</p>	<p>Agree that it is necessary to meet the housing need over the plan period. The local authority believe that the Publication Draft allocates sufficient housing to meet the housing need over the 15 years of the plan period, including meeting the need over the 1st 5 years even with 20% frontloaded for previous under delivery. This is indicated in table 7 in the Local Plan. Further detail of the 5 year supply will be outlined when the Planning Framework Document is updated in the coming weeks to reflect the weighting given to emerging policies following the Publication consultation.</p>
Landowner (Hartville Meadow)	LP0337	Pub0094	<p>Our client would support the overall intention of Policy HSG1 which is to: "ensure that new housing provision in the borough is delivered through housing sites that have already been permitted, newly identified sites both within the urban areas and on the edge of the urban area, villages in the rural area and sites elsewhere in the borough to, as a minimum, meet the housing need."</p> <p>Our client considers however that insufficient sites have been identified in Policy HSG1 to achieve this objective and seeks the inclusion of his land East of Easington Road, Hartlepool (Figure 1) as a housing allocation within Policy HSG1 in the category 'Urban Edge and Village Sites'. The site is capable of delivering up to approximately 55 dwellings on the edge of the Urban Area.</p> <p>The draft Plan states that there is a need to provide a minimum of 6135 dwellings in the Borough over the 15 year Plan period @ 409 dwellings per annum. We would support the representations proposed by the HBF on this matter which requires that this matter is the subject of further research to demonstrate soundness and robustness of the figures.</p> <p>We would also support the HBF's comments in relation to housing land supply proposed in the plan to meet the eventual requirement. The Draft Plan only identifies a supply of 6199 dwellings on commitments and allocated sites to meet the requirement of 6135 dwellings- a 1% buffer. This is wholly inadequate especially given the Plans over-reliance of a small number of very large sites to deliver their identified housing requirement. Experience in other authorities has demonstrated that the ability of very large sites to deliver housing within the timescales anticipated is almost without exception wholly unrealistic with most sites experiencing significant delays in delivery. A higher 'buffer' is therefore recommended and we would support the 20% buffer suggested by the HBF. This is in line with the recommendations of the Local Plan Expert Group and is also</p>	<p>See HBF response to overall housing requirement for the plan.</p> <p>In relation to the sites suitability for inclusion see comments to Policy LS1.</p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
			<p>consistent with the NPPF requirements for the plan to be positively prepared and flexible.</p> <p>Without such a buffer and additional housing allocations in Policy HSG1 it is considered that the Plan is unsound as it is not fully justified, will not be effective and is not compliant with national policy. A more robust buffer will ensure sufficient flexibility in the delivery of housing on allocated sites and to keep up rates of delivery to required levels.</p> <p>We consider that our client's site East of Easington Road, Hartlepool (see Figure 1) is sustainable site and highly suitable for housing development. It should be allocated for housing development under HSc51 in order to help address this issue and provide additional flexibility and choice in housing land supply.</p> <p>Site Description</p> <p>The land East of Easington Road extends to 2.2ha (5.4acres) gross. The site is bounded by the built up area of Hartlepool to the south, the railway line to the east and the A1086 Easington Road to the west, beyond which is Seaview Residential Caravan Park. To the north is a triangular agricultural field.</p> <p>The site is roughly rectangular in shape. It was previously used for horse grazing but is now in use for arable purposes. It slopes down from north to south. A small beck runs along the southern boundary. Vehicular access to the site can be obtained from the A 1086 Easington Road. It is likely that as part of development a further pedestrian / cycle link could be made to the public footpath to the east providing access to the coastal strip.</p> <p>It is estimated that the net developable are if this site is 1.8 ha (4.5 acres) suggesting an indicative capacity of up to approximately 55 dwellings whilst still retaining sufficient opens space around the sites perimeter to provide on-site open space, landscaping, planting etc. It is envisaged however that a lower density of development might be more suitable on this site perhaps including an element of self-build. The adjacent housing areas contain a wide mix of predominantly family housing and it is anticipated that this site will deliver a similar mix of 2, 3, 4 &amp; 5 bed homes in an attractive modern housing environment.</p> <p>The land east of Easington Road occupies a sustainable location. It within walking! cycling distance of local shops and services on King Oswy Drive, Clavering Road and Merlin Way, and Bernard Grove and Clavering Primary Schools. In addition there are bus stops on the site's main road frontage, providing access to a variety of local and longer distance services into Hartlepool to the south and to Easington and beyond to the north. There is also a Priority Bus, Route within easy walking distance, on King Oswy Drive.</p> <p>Subject to providing site specific supporting information on topics such as flood</p>	

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			<p>risk, drainage, topography, ecology, access etc. together with appropriate mitigation, it is considered that this land is an inherently suitable and sustainable location for housing development and has the potential to help to meet the Council's objectively assessed housing needs for the next 15 years in a highly sustainable manner.</p> <p>It is noted that the draft Plan proposes that the site is allocated as a Local Wildlife site under Policy NE1c - Hartville Meadows. The justification for this draft allocation is identified as being the existence of a range of grasses and herbs on site. However as the site has been ploughed this 'interest' has largely be lost. The site potentially remains of some ecological interest around its perimeters which have remained undisturbed and it is anticipated that future development for housing would provide the opportunity to enhance the value of these retained areas, but the site as a whole would no longer merit a Local Wildlife Site designation. A separate representation has been prepared in connection with draft Policy NE1c seeking the site's removal from the list of Local Wildlife Sites. It is also noted that the site has been assessed for is suitability/deliverability for housing development through the Council's Strategic housing Land Availability assessment (SHLAA). The site is identified as Site No. 19 in the SHLAA. The SHLAA concludes that the site is "Not deliverable" as a housing site as although it "Would be available in the first five years" it "Has an environmental designation".</p> <p>Clearly in the light of the above this assessment no longer holds true and the site should be re-classified in the next SHLAA update as being Deliverable for housing within five years.</p> <p>Overall it is considered that the Local Plan Publication Draft cannot be consider sound without the inclusion of this site as a housing allocation under HSG1 and its inclusion within the Development Limits defined on the Policies Map.</p>	



Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Resident	LP0339	Pub0097	<p>I would also question why the vast majority of the proposed new residential developments are on prime greenbelt/Greenfield sites when there is a wealth of Brownfield sites within the Borough of Hartlepool, Any sensible and environmentally sustainable plan would identify brown field sites for development and only use Greenfield sites in a very limited way as a last resort.</p> <p>Table 8 page 52 indicates that 75.5% of the planned new development will be on Greenfield sites, that amount is totally unacceptable and the idea that this is sustainable development is laughable.</p> <p>I would also seriously question the assumptions and forecasts that have been made in relation to future housing requirements within the Borough.</p> <p>It seems to me that HBC have used forecasts that might as well have been plucked out of thin air, they are in my view grossly optimistic given the unemployment rate within Hartlepool and the fact that large areas of town are disadvantaged.</p> <p>The projected demands have been extrapolated and assumptions have been made without any evidence to support them such as a 15% increase from migration and a further 15% from commuting (table 10.2). There are also sites currently being developed for residential housing such as adjacent Spion Kop that are not included in the plan although clearly they will contribute to the overall housing stock.</p> <p>Everybody I speak to about the Plan says the same thing “Where exactly are all the new jobs coming from to support this level of development?”</p> <p>There may be a National housing shortage but this is primarily in the affluent south and certainly not in Hartlepool. Clearly there are no evidence based reasons to indicate the need for residential development of this magnitude in the Hartlepool area.</p> <p>Given that the Hartlepool area is an employment “black spot” it seems totally perverse that significant areas of greenbelt are going to be permanently and irreversibly sacrificed to provide housing for people who will not actually work in the town but will work within the general area of Teesside an area that has vast amounts of low grade land that could be used for residential development.</p>	See HBC response to HSG5

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Park Residents Association	LP0341	Pub0099	<p>The table 6 “Housing Target Breakdown” page 78 shows the proposed Annual Housing Target over 15 years is 6,135 included in this calculation is a backlog estimate of 705 which has also had the buffer of 20% applied to it to give a total impact of 846 houses. I think this backlog maybe overstated and could be close to zero.</p> <p>The SHMA Addendum 2016 shows in table 3.3 page 15 the method use to estimate this backlog. It shows that over the ten years 2006/2016 completions were 3,691 and demolitions 1,295 giving a total net of 2,396. This is compared to the 2006 local plan target of 3,090 to calculate the backlog of 694. This calculation is comparing a net housing delivery to a gross housing requirement below I have suggested a more valid comparison by taking the 2006 local plan requirement less the clearances to give the net requirement.</p> <p>Going back to the 2006 plan table H1 page 101 highlights the 2002 / 2016 requirement of 4,634 based on a 15 year calculation this gives an average of 309 however I believe 2002 to 2016 is a 14 year period so this average would be 331. The table also shows the split between Net Requirement of 3,010 and Clearance of 1,624 to give the total of 4,634.</p> <p>TABLE BELOW IS A COPY OF 2006 PLAN (see written representation for table). The table shows the requirement for 2005/2011 and 2011/16 so these columns would be more relevant to calculate an average than the whole 15 year period when comparing to the actuals for 2006/2016.</p> <p>I have looked at the 2006 plan data and tried to work it backwards to split between completions and demolitions based on the 70% ratio to be consistent with the actuals reported i.e 1,624 clearance grossed up is 2,320 demolitions see table below. (See written representation for table)</p> <p>I have then restated in the table below (See written representation for table) the comparison highlighting the completions and demolitions this shows the backlog has been primarily demolitions (i.e. Clearance) if the demolitions have not happened they would not need replacing so I would suggest there is no backlog over the ten year period.</p> <p><u>10.6 NPPF Para 47 Buffer of 20%</u> As there is no backlog I would suggest that the NPPF Para 47 Buffer of 20% mentioned in paragraph 10.6 is not needed for the first five years as there is no under delivery.</p>	<p>Note concern that backlog is overstated.</p> <p>Consider that table 3.3 in the SHMA Addendum is a helpful tool in indicating what has actually happened on the ground. We note your concerns over the split that the 2006 Local Plan assumed in relation to net requirement and clearance to give a gross need of 4,634 and that given if demolitions haven’t occurred there is no need generated, however do not agree with your tables which attempt to “gross up” something which has already happened – ie we know that over the 10 year period of 2006/16 there were 1295 demolitions – your table assumes that there is a backlog of 777 of which 711 are demolitions – this is clearly inaccurate as 1295 demolitions have taken place of the 1,624 which were assumed within the 2006 Local Plan.</p> <p>The NPPF Para 47 Buffer relates to previous persistent under delivery – given we have only met our housing requirement in 2 of the last 5 years it is considered that we need to front load 20% from the back end of the plan.</p> <p>Given that there are still significant areas of old terraced stock within the central area of Hartlepool which is not meeting modern day standards and is in need of renewal, the Council will be continuing to investigate options for intervention in these areas and alternative options for funding given that Housing Market Renewal funding is no longer available.</p> <p>Whilst this is currently the case in terms of funding, and given the plan covers a period of 15 years, there are still significant areas across the country where intervention and renewal is needed, it is likely that funding pots will arise, perhaps through agencies such as the Homes and Communities Agency or through funding pots which may become available through the Combined Authority. The Council has not sought to include demolition areas on the proposals map as to do so at this time could cause blight within areas identified.</p>

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			<p><u>Demolitions</u></p> <p>I understand that you have looked back at the average demolitions over the past ten years (130 per year) and based the figure on that the forecast is 130 x 15 years = 1950. Replacements on site are assumed to be 50% which is 975 so the new demand is 1950 – 975 i.e. 975. The 1950 is significantly higher than the original 525 in the May 2016 local plan consultation document. Whilst I understand the logic of the calculation has a reasonableness check be made to assess whether there are 1,950 houses that would be considered for demolition?</p> <p>In the 2006 local plan there was reference to only 70% occupancy of houses to be cleared if this factor were applied the gross replacement required would be 1,365 (70% of 1950). Assuming 50% replacement on site of 975 the new demand would only be 390 i.e. 1365 – 975 a reduction of 585 on the 975 used. Is 100% occupancy a reasonable assumption?</p> <p>I believe that paragraph 10.4 should state clearly the assumptions used to calculate the Replacement of Demolitions (assuming 50% onsite windfall replacement) i.e. That demolitions are 1950 with 100% occupancy and replacements on site are assumed at 50% which is 975 so the new demand is 975.</p> <p><u>Measurement of Backlog</u></p> <p>The backlog has been calculated by reference to net requirement I believe you should declare the net requirement in the local plan. A suggested format is below (See written representation for format) based on your declared calculation of 1950 demolitions with 50% replacements on site.</p>	<p>At the time of the 2006 Local Plan there were areas which were in significant advanced decline where occupancy rates within areas were reduced which is why an occupancy rate was assumed of 70% - intervention was already underway leading to the demolition of the streets which now form the Headway site. Whilst there are areas where there are a small number of vacant numbers, these are nowhere near as low as an occupancy level of 70% - this is because the Council is keen not to currently identify areas at the risk of blighting them prior to there being funding available to look at appropriate redevelopment opportunities. As such it is necessary to currently assume a 100% occupancy level.</p> <p>Consider that Table 6 within the Publication Plan illustrates the housing requirement in an appropriate manner.</p>
HBF	LP0005	Pub0108	<p>The housing target and OAN are considered unsound as they are not justified. The policy and supporting text identify an objectively assessed need for housing (OAN) of 4,300 net additional dwellings over the plan period, or 290dpa. The HBF is disappointed to note that this figure is below the 325dpa (net) OAN identified within the Preferred Options consultation on the Local Plan.</p> <p>The 290dpa figure is then translated into a dwelling requirement of 409dpa (gross) by the inclusion of demolitions (65dpa) and a 20% buffer and affordable housing allowance (57dpa). This creates an overall housing requirement of 409dpa, which is marginally higher than the 400dpa identified at the Preferred Options stage.</p> <p>There is no explicit reference to the housing requirement within the policy. To aid clarity it is recommended that the housing requirement is included within Policy</p>	<p>Note concern with current wording of Policy Hsg1 and propose to amend as follows to draw reference to the housing requirement:  <b>“...and sites elsewhere in the borough to, as a minimum, meet the housing requirement set below”</b></p> <p>Note support for use of the 2014 Sub-national population and household projections as a starting point and also for the amendment based upon a 10 year migration trend.</p> <p>In regard to comments regarding an improved headship rate for 25 to 44 year olds as part of the demographic starting point for the OAN as stated within the SHMA Addendum the 2014 household formations have formed</p>

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			<p>HSG1 and that it be identified as a minimum requirement. The reference to a minimum requirement is to ensure that the plan is meeting the NPPF requirements for positive planning and the need to boost significantly housing supply.</p> <p>The key evidence base documents are the 2015 Strategic Housing Market Assessment (2015 SHMA) and a more recent 2016 SHMA addendum. The suggested 290dpa (net) OAN is based upon the 2016 SHMA addendum.</p> <p>Demographic trends The 2016 SHMA addendum utilises the 2014 based subnational population and household projections as its starting point. This is supported and considered to be compliant with the PPG (ID 2a-016). The projections are then amended based upon a 10 year migration trend assumption, raising the demographic starting point to 210dpa. Once again this is supported.</p> <p>The 2016 SHMA addendum also considers differing headship rates, table 4.1, and concludes that the headship rates used in the 2014 based subnational household projections are the most appropriate. Whilst the HBF does not advocate the return to the previous headship rates utilised in the 2008 and 2012 based subnational household projections it is unclear why the study has not considered an improvement in headship rates for the 25 to 44 year age group over the period of the plan.</p> <p>The headship rates within the 2014 based household projections are reliant upon recent trends from the last 10 years rather than those experienced over the longer term.</p> <p>The implication of this bias is that the latest projections continue to be affected by suppressed trends in headship rates associated with the impacts of the economic downturn, constrained mortgage finance, past housing undersupply and the preceding period of increasing unaffordability which particularly affected younger households (25 to 44). There is also evidence to show that headship rates for these groups are likely to recover as the economy improves (see Town &amp; Country Planning Tomorrow Series Paper 16, “New estimates of housing demand and need in England, 2001 to 2031” by Alan Holmans).</p> <p>The HBF notes that the 25 to 44 year old age group were particularly hard-hit by the recession and as such the headship rates are likely to have been significantly depressed. Indeed by 2014 the proportion of 25 to 34 year olds who were home-owners had dropped to 35%, from 59% a decade earlier. The HBF considers it would be prudent to consider an uplift in headship rates amongst this group, to</p>	<p>the basis for the calculations on OAN. It is considered the 10 year period that the 2014 forecasts cover a range of market conditions included the boom, the recession and the recovery – these are all market conditions which may be experienced over a 15 year plan period and are therefore seen as a reasonable base on which to form the OAN. Though the issues raised are pertinent to Hartlepool, the relative affordability of properties means that issues experienced in other areas of the country, where property prices are extremely high and impact on accessibility to the housing market, they would not be experienced in Hartlepool to such an extent and as such it was not considered necessary to make an adjustment on this basis.</p> <p>The original SHMA (2015) considered the 290 jobs identified in the Strategic Economic Plan (SEP) in the same manner. The Tees Valley Economic Strategy seeks to see significant jobs growth over the next ten years but with a focus on increasing the existing employment rates within the Tees Valley and reducing the unemployment rate. At a Tees Valley Level there is significant work occurring to attract new business to the Tees Valley and to increase job opportunities, with these aspirations set out in the Tees Valley Strategic Economic Plan. This sub-regional work is being complimented by work within Hartlepool looking to increase the student population, but with an aim to create the infrastructure and opportunities to maintain these economically active elements of the population through the creation of an Innovation and Skills Quarter which will provide job opportunities closely linked with the colleges including the provision of workshop space and links with some of the national and international companies based within Hartlepool. Hartlepool has historically lost population to areas outside of the Tees Valley and Durham often as the jobs were not available in the sectors people wanted to work in – through the creation of these opportunities to access the jobs market, the aim of the Council is to retain this element of the working population and to significantly boost the economy of Hartlepool.</p>

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			<p>reverse this negative trend and reflect their improved ability to access housing. It is also notable that the Government is actively trying to boost home ownership, particularly amongst younger age groups through initiatives such as 'Help to Buy' and 'Starter Homes'. Help to Buy is already having an impact with 81% of purchasers using the product being first time buyers. The PPG notes that the household projections do not take account of such policy interventions by Government (PPG ID 2a-015).</p> <p>An increase in headship rates for the 25 to 44 age group is supported not only by the NPPF requirements to boost housing supply but also the advice contained within the Local Plan Expert Group (LPEG) recommendations to Government<sup>2</sup>. It is therefore considered that improved headship rates for 25 to 44 year olds are considered as part of the demographic starting point for the OAN.</p> <p>The PPG (ID 2a-018) advises that plan makers should have regard to the likely change in job numbers when assessing an OAN. The 2015 SHMA and 2016 SHMA addendum both include such considerations. However, the conclusions between the two studies vary markedly. The 2015 SHMA suggested a figure of 325dpa to represent the OAN (paragraph 10.4 Hartlepool Local Plan: Preferred Options) whilst this was not based upon any particular modelled scenario it was based upon utilising a figure at the upper end of the economic range.</p> <p>In contrast the 2016 SHMA addendum recommends the use of scenario D2 (paragraph 4.20) which identifies jobs growth of 290 per year, based upon the growth envisaged in the Tees Valley Strategic Economic Plan (SEP). This scenario creates a need for 240dpa. The HBF is unclear on the rationale for the shift in focus from an upper end requirement within the Preferred Options document to a figure at the lower end of the range within the Publication version of the plan. The HBF also has a number of concerns in relation to scenario D2.</p> <p>Scenario D2 relates to the job growth ambitions set out within the SEP, this is supported. However the remaining elements of the scenario and the assumptions made in translating this jobs growth into a housing requirement are considered somewhat opaque.</p> <p>Table 4.2 of the 2016 SHMA addendum indicates that under this scenario 70% of all jobs created (3,045) are taken up by existing residents, 15% are taken up by new migrants and 15% by in-commuters. The justification for these figures is non-existent in either the 2015 SHMA or the 2016 SHMA addendum.</p> <p>These assumptions are considered extremely optimistic particularly given the fact</p>	<p>Given the aims of the SEP and Hartlepool Borough Council and bearing in mind that Hartlepool is its own housing market, scenario D2 assumed a split of 70% of jobs would be filled by existing residents, with some net in-migration and some in commuting, resulting in a dwelling requirement of 240 dwellings per year. Ongoing meetings and discussions with neighbouring authorities and those within the Tees Valley have formed an element of the ongoing duty to cooperate – these authorities have been consulted with during the formation of the SHMA and other meetings with regard to the Local Plan have also discussed the issue, with no objections being raised to the proposed housing figures or how they were formed or the assumptions on migration within them. As such the approach is considered sound and is not challenged by our neighbouring authorities or any other authority within the Tees Valley.</p> <p>The previous approach identified within the Preferred Options was based on the job creation from the ELR of 1,700 jobs over the plan period – these however had been based on the new jobs all being filled from new residents. This scenario was challenged regarding its realism in terms of all jobs growth being from in migrants – the concern over the soundness of the approach was considered in light of the aims of the Tees Valley SEP and aspirations for jobs growth within Hartlepool and was considered to be an inappropriate approach to take.</p> <p>As such the SHMA Addendum relooked at a range of economic scenarios and considered it most appropriate to follow a scenario based on the Tees Valley SEP.</p> <p>The reason scenario F1 which, zero net growth, results in a higher requirement is because the commuting ratio is fixed at 1.1 (net out commute) and assumes new residents are needed for all jobs. As you will see in the other scenarios which assume these factors such as D1 and E1 these result in very high dwelling requirements due to assuming new residents are needed for all new</p>

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			<p>that Hartlepool has an aging population which is likely to reduce economic participation rates within the resident population over time. Therefore achieving 70% of the jobs from existing residents will be extremely challenging and unjustified. Furthermore even if participation rates could be increased substantially amongst the working age population the Council would still need agreement from neighbouring authorities to take some of their housing need. This is because of the 15% of the additional workforce assumed to be due to increased commuting rates from locations outside Hartlepool. The HBF is unaware that any agreement has been made with neighbouring authorities in relation to commuting patterns and as such considers the approach unsound. The PAS guidance<sup>3</sup> concurs with our views upon this issue.</p> <p>This stance on commuters is also considered contrary to the advice contained within the PPG (2a-019) which states;</p> <p>“...Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”</p> <p>36. A sense check of the figures can also be made by comparing the 240dpa figure related to scenario D2 and the 250dpa required for scenario F1. Given that scenario F1 is based upon zero jobs growth it would appear nonsensical that it requires a higher housing requirement than a scenario which creates 290 jobs per annum.</p> <p>The HBF notes that scenario D1 also utilises the same jobs growth as D2 but anticipates all new jobs are taken by migrants to the area. This produces a figure of 530dpa. This indicates the scale of impact the assumptions within D2 have upon the housing requirement. Whilst the HBF would not anticipate that all the jobs created would be taken by new migrants the levels of increase in economic activity rates and in-commuting related to scenario D2 are considered unrealistic and unfounded.</p> <p>The HBF would, therefore, like to see further modelling of realistic economic scenarios, particularly variants upon scenario D1 and D2, which provide realistic and defensible economic employment and commuting rates.</p> <p>Market Signals The 2015 SHMA and 2016 SHMA addendum both provide an analysis of market</p>	<p>jobs.</p> <p>HBC consider the scenarios tested as part of the SHMA Addendum cover a range of scenarios including different levels of jobs growth and are aligned with aspirations for economic development for Hartlepool and the Tees Valley. It is not considered further scenarios are necessary and indeed to make assumptions based on higher level of in migrants (especially from outside of the Tees Valley) would contradict the aspirations of the Strategic Economic Plan and would have greater impact on other authorities housing needs.</p> <p>Note that the HBF is supportive of market periods being considered over a longer period within the SHMA Addendum.</p> <p>Note that the HBF considers the approach at looking at backlog to the beginning of 2006 (the start date of the adopted Local Plan) is a pragmatic response to their concerns raised at the Preferred Options Stage to deal with past under supply.</p> <p>Note that HBF is supportive of the housing requirement of 409 dwellings / annum being greater than the OAN of 290 dwellings / annum.</p> <p>In terms of the concerns HBF have raised in regards to the demolitions evidence, table 3.3 of the SHMA Addendum illustrates the demolitions over the 2006 Local Plan period – the average over the 10 year period was 130 dwellings per annum. Assuming a replacement level of 50% on site led to a need to include 65 dwellings per annum within the housing requirement. Whilst it is noted that a figure of 575 in 2007/8 skewed the average, there were 3 other years in a ten year period where a demolition total of more than 129 or more was achieved. Given that there are still significant areas of old terraced stock within the central area of Hartlepool which is not meeting modern day standards and is in need of renewal, the Council will be continuing to investigate options for intervention in</p>

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			<p>signals. These are essential elements of determining an objectively assessed housing need for the area. The HBF is pleased to note that the 2016 SHMA addendum has responded to our previous criticism regarding the period over which the market signals are considered and now provides a longer time frame.</p> <p>Within our comments upon the Preferred Options consultation we expressed concern that the 2015 SHMA analysis of previous rates of development and their impact upon household formation rates within Hartlepool is weak. There has been persistent under-delivery within Hartlepool since at least 2004, as shown by the various Annual Monitoring Reports. The 2016 SHMA addendum seeks to address this by adding the delivery backlog since 2006/7 of 700 additional dwellings, over the plan period. This is considered a pragmatic response to our previous concerns and the under-delivery that has occurred over numerous years.</p> <p>The inclusion of this additional 700 dwellings over the plan period, approximately 50dpa, once added to the preferred economic scenario leads to the 2016 SHMA addendum OAN figure of 290dpa.</p> <p>Translating the OAN to a housing target - As noted in paragraph 21 of these comments the move from the OAN to the gross housing target includes 65dpa for demolitions and a further 20% buffer for affordable housing need and buffer (57dpa). This creates a housing target of 409dpa. The HBF is supportive of the Council choosing a housing target which is greater than its preferred OAN.</p> <p>In terms of the rate of demolitions it is noted that this is based upon evidence provided by the Council's Housing Services Team (paragraph 10.4 Local Plan). The 65dpa figure also relies upon 50% of the losses being replaced (table 6, Local Plan). The HBF is unaware that any of this evidence has been published and it is therefore difficult to ascertain whether the figures are realistic. It is therefore recommended that the Council publish any evidence they have with regards to this assumption prior to submission of the plan for examination.</p> <p>In terms of the uplift for flexibility and affordable housing need this is supported. The HBF notes there is a substantial net imbalance in affordable dwellings, 144 per annum. This represents nearly 50% of the suggested OAN and 35% of the housing target. Such a high percentage is clearly undeliverable within Hartlepool from market sites.</p> <p>To address this significant problem the Council should investigate other methods of delivery. In addition a higher housing target would undoubtedly assist in</p>	<p>these areas and alternative options for funding given that Housing Market Renewal funding is no longer available. Whilst this is currently the case in terms of funding, and given the plan covers a period of 15 years, there are still significant areas across the country where intervention and renewal is needed, it is likely that funding pots will arise, perhaps through agencies such as the Homes and Communities Agency or through funding pots which may become available through the Combined Authority. The Council has not sought to include demolition areas on the proposals map as to do so at this time could cause blight within areas identified.</p> <p>The HBF's comments in relation to affordable housing at the Preferred Options Stage were taken on board and a 20% allowance was included on top of the OAN to allow for a buffer which would provide both additional affordable units over and also flexibility if any sites stalled. The HBF appear to be asking the authority to include a further 20% on top, even though this has already been included within the housing requirement set out in Table 6 of the Publication Document and in Policy Hsg1. As such, it is not considered necessary or appropriate to make any further adjustments to the housing requirement.</p> <p>Support for not seeking to control housing delivery is noted.</p>

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			<p>reducing this figure.</p> <p>Conclusion on OAN / Housing Target</p> <p>The current OAN calculation and housing target are not considered sound as the assumptions used are not justified by evidence. The HBF has not undertaken its own modelling at this stage it does, however, appear that the assumptions made will suppress the housing need and requirement. We therefore make the following recommendations in relation to the OAN and housing target;</p> <ul style="list-style-type: none"> <li>• The target be expressed as a minimum;</li> <li>• Clarity be provided in terms of the assumptions used in each scenario;</li> <li>• Further work be undertaken in relation to jobs-led scenarios D1 and D2 (2016 SHMA addendum) including the realism of the assumptions used; and</li> <li>• Clarity provided upon the rate of demolitions proposed.</li> </ul> <p>Housing Delivery</p> <p>Table 8 of the consultation document and the policy identify a total future supply of 6,199 dwellings over the plan period. This is just 64 dwellings greater than the proposed requirement.</p> <p>Whilst it is recognised that a number of permissions for apartments have been discounted from the supply this provides only a 1% buffer over the housing target to provide flexibility and choice as required by the NPPF. Given the previous levels of under-delivery within Hartlepool it would appear prudent to provide a significantly greater buffer over the plan period. The HBF recommend 20%.</p> <p>To achieve a higher buffer the Council will need to consider all potential sources of delivery. It would, however, appear a reasonable assumption that further site allocations will be required. A buffer of 20% should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. It is also notable that the recent recommendations from the Local Plan Expert Group suggest such a buffer is required.</p> <p>Paragraph 10.18 identifies that the Council will not seek to control housing delivery and that;</p> <p>“ ...each housing site identified will deliver according to the housing market at the time, table 7 and graph 1 are included for illustrational purposes only...”</p> <p>48. The HBF supports this stance and considers it an appropriate response to previous delivery issues.</p>	



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Resident	LP0217	Pub0113	<p>A major component of the Local Plan is the provision of new housing. There are still a significant number of town residents who have great difficulty in reconciling the minimum target of 6135 houses over the Local Plan 15 year period, of whom I am one.</p> <p>The justification appears to be principally predicated on the population increase (2800 over the period 2014-2037) and economic growth, attracting inward migration of blue chip companies and their professional personnel, coupled with the “overall ambition of the Government to increase the delivery of new housing” (para.10.7, p 79).</p> <p>Increasing delivery should be driven by vectorial discipline, and not just a scalar, pandering to the Government’s ambitions. It should reflect real need rather than being hidebound by presumption in favour of the Developers.</p> <p>The housing target is highly aspirational and does not reflect the situation on the ground.</p> <p>Crystal ball gazing (aka OAN) 15 years ahead requires the remarkable propensity of hypermetropia, which not even ARC consultants are empowered with.</p> <p>1) An article in The Sunday Times, 29 January 2017, reported that in 2016, 36% of all properties in Hartlepool were sold for a price less than what they were bought for.</p> <p>NE England was the worst area in the UK in 2016 for this problem, and Hartlepool was the worst place in the NE. This would imply that there already exists a situation where housing supply exceeds demand and is hardly an endorsement for open door housing development, which has become the norm.</p> <p>2) Assuming linear interpolation for population growth of 2800 over a period of 23 years this would equate to an increase of 1800 over the Local Plan period. Population actually dropped in 2015-2016. If one assumed as an absolutely worst case scenario that a “new” dwelling was required for an average of 1.5 additional individuals, 1200 “new” dwellings would be required, ie 80 per year over the period.</p> <p>It is recognized that other factors obviously enter the calculation, as described in the bullet point list of para.10.3, and reflected to some degree in Table 6, para. 10.4, however it has to be stated that the contingency elements (and historical backlog) in the Table 6 calculation do not bear close inspection and should be revised to reflect the SHMA annual dwelling requirement of 240, equating to 3600 dwellings over the Local Plan period, tops.</p> <p>3) Table 7: Summary Demonstrating Supply of Deliverable Housing Sites over Local Plan Period shows a delivery trajectory of 2480 houses in the first 5 year period, reflecting a heavy upfront loading due to “certainty” on planning permissions.</p> <p>As population increase over this period would be fairly modest, and as the</p>	<p>Note main concern relates to proposed housing numbers over the plan period.</p> <p>The local authority consider that the housing requirement set out within the Local Plan and based on the evidence within the SHMA Addendum is sound and sets an appropriate level in line with national guidance.</p> <p>In terms of deliverability only a very small portion of the High Tunstall and Quarry Farm 2 schemes have been assumed to deliver in the first 5 year period due to the issues regarding the bypass that you have highlighted.</p>

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			<p>proposed developments at High Tunstall and Quarry Farm Phase 2 are contingent upon the approval and subsequent construction of the proposed Elwick village bypass, which is not expected to be operational until 2019/20, then construction on the above sites would not be allowed to start until such time – if still deemed necessary.</p> <p>At that time it may be apparent that the housing OAN could be challenged in the light of empirical data and a reassessment may be necessary to reflect the situation on the ground.</p> <p>It is recognized that all Developers (constructing over a certain number of dwellings) will be required to contribute towards the cost of the Elwick bypass, and could be placed at some limited financial risk if it transpired the market demand spiralled downwards, but this should not be used as an argument against housing targets being reduced.</p> <p>Development on sites other than High Tunstall and Quarry Farm Phase 2 would still be ongoing during the period 2016-2019/20 and would provide a marker on which to facilitate the appraisal of real demand, as opposed to perceived demand.</p> <p>4) In conclusion I believe we all know what Hartlepool needs is more affordable housing, more bungalows and more brownfield site development.</p> <p>Furthermore we all know that Developers are not minded to prioritise the above requirements as their profitability and “inconvenience” factor (brownfield sites) compare unfavourably with private sector Greenfield site developments. They want their cake and eat it.</p> <p>To the best of my knowledge there is no legal or contractual obligation to build 6135 houses (or whatever the significantly reduced, “final” proposed number is) over the Local Plan period so need must be put before greed.</p> <p>Altruistic developers ? – surely an excellent example of oxymoron.</p>	
Galliford Try	LP0349	Pub0114	<p>Policy HSG1 identifies where the Borough’s housing numbers will be distributed over the plan period. Taking account of the Strategic Housing Market Assessment, (SHMA), historical backlog, replacement of demolitions and a 20% buffer to factor in previous under-delivery, Policy HSG1 identifies an annual housing need of 410 dwellings over the plan period, with the 20% shortfall to be delivered within the first five years of the plan 27048/A3/PS 4 3 February 2017</p> <p>period. For the purposes of these representations we have not undertaken a formal assessment of the housing requirement, but our Client reserves the right to critique this at future consultation stages or at Examination in Public.</p> <p>Paragraph 10.5 of the Draft HLP notes that “this need is not considered a ceiling, purely a figure to meet need”. As such, this figure should be considered as a minimum. Where sites have been identified as suitable to deliver new</p>	<p>The housing requirement has allowed for a 20% buffer on top of the OAN to meet the government’s aspirations for housing growth identified at Paragraph 47 of the NPPF and to allow for the provision of a greater number of affordable units to be delivered as well as giving flexibility if sites stall.</p> <p>The local authority agrees that the figures set out within Policy Hsg1 are a minimum. However the Council considers that the policy sets out approximate yields for those sites which are appropriate in meeting the overall housing requirement.</p>

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			<p>development, efforts should be made to maximise the yield of these sites, whilst of course ensuring that any impacts are appropriately mitigated and the developments would deliver high quality homes.</p> <p>Table 7 of the Draft HLP notes a total housing requirement of 6,150 dwellings over the plan period, and Table 8 lists the sites capable of delivering 6,199 dwellings. It is acknowledged that over 50% of the sites noted as deliverable already benefit from planning permission. However, market conditions may change, some of these sites may become undeliverable and the housing requirement may increase.</p> <p>As such, the Draft HLP should seek to identify options should such a scenario occur, as there is currently no 'fall-back' position if sites fail to come forward for development. In addition, further sites should be identified to deliver the development needed beyond the plan period or during the plan period if conditions change.</p> <p>Our Client supports the inclusion of their Site in Policy HSG1 as a location to deliver housing. However, the general wording of the policy is fairly restrictive and offers little flexibility for the delivery of housing either outside of the identified sites, or for increased numbers on the identified sites. We consider the policy should be worded to promote these sites as the 'preferred' options for development over the plan period, but should build in flexibility on the numbers for each site and allow other sites to come forward if any of these sites are undeliverable. This will ensure a safety net for housing delivery in the Borough over the plan period if any of the identified sites are not capable of delivering the anticipated development. As such, we currently consider the policy to be unsound as it is not positively prepared. Our Client would therefore object to the detail of Policy HSG1 as currently drafted, as per the justification outlined above.</p>	<p>An assessment of the planning permissions was undertaken to take out any sites where the local authority considered there may be a deliverability issue, mainly relating to brownfield issues such as contamination or where there was considered to be a significant over provision of a particular type of housing (such as flats in the Marina) which had impacted on delivery rates of the permissions and could therefore not be relied upon. As such it is considered that the approach which was taken in identifying planning permissions which would form part of the housing requirement was sound. As identified in the previous paragraph the 20% buffer was included on top of the OAN to give flexibility if some sites did stall.</p> <p>The local authority considers the wording in the policy is suitable and is not restrictive.</p> <p>It sets out very broadly where housing developments will be, it states that it is a minimum requirement and within the table identifies that the yields of the developments are approximate therefore offering a significant amount of flexibility.</p> <p>The Council considers the policy to be sound and positively prepared.</p>
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>A promotional document has been submitted by Persimmon Homes in support of allocating land at Hart Farm for residential development (see written representation).</p> <p>Persimmon Homes object to Policy QP1 as we do not consider the council's approach to be justified.</p> <p>The Objectively Assessed Housing Need (OAN) has been re-assessed in the light of the publication of the 2014-based household projections within an addendum to the SHMA (October 2016). Whilst we supportive of the Council exploring the implications of the most recent projections on the OAN, we are disappointed to note that the OAN fell from 325 dwelling per annum (dpa) in the Preferred Options to 290 dpa in the Publication Plan.</p>	<p>Note concern with current wording of Policy Hsg1 and propose to amend as follows to draw reference to the housing requirement:  <b>"...and sites elsewhere in the borough to, as a minimum, meet the housing requirement set below"</b></p> <p>Note support for use of the 2014 Sub-national population and household projections as a starting point and also for the amendment based upon a 10 year migration trend.</p> <p>In regard to comments regarding an improved headship rate for 25 to 44 year olds as part of the demographic starting point for the OAN as stated within the SHMA Addendum the 2014 household formations have formed</p>

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			<p>The 290dpa OAN figure is then translated into the housing requirement through the addition of units to replace expected demolitions (65dpa) and a 20% buffer and affordable housing allowance (57dpa). This creates an overall housing requirement of 409dpa, which is marginally higher than the 400dpa identified at the Preferred Options stage.</p> <p>We are concerned that there is no explicit reference to the housing requirement within the policy. It is recommended that the housing requirement is included within Policy HSG1 and that it be identified as a ‘minimum’ requirement to ensure that the plan meets the NPPF requirements for positive planning and the need to boost significantly housing supply.</p> <p>Whilst we support the approach of identifying a housing requirement which is in excess of the OAN, Persimmon Homes consider the Housing Target to lack sufficient aspiration and therefore do not believe it to be positively prepared or robustly justified. The reasons for this view are set out below.</p> <p><b>Demographic Trends</b>  The SHMA Addendum (October 2016) explores three alternative Household Representative Rates (HRRs) under the three demographic scenarios (2014-based, 2012-based and 2008-based). In line with PAS guidance, the SHMA concludes that the latest Household Representative Rates (2014-based) are the most appropriate to use as the starting point for calculating OAN. The projections are then amended based upon a 10 year migration trend assumption, raising the demographic starting point from 200 dpa to 210 dpa. This approach is supported however we are concerned HRRs within both the 2012 and 2014 based household projections are reliant upon recent trends from the last 10 years rather than those experienced over the longer term. The implication of this bias is that the latest projections continue to be affected by suppressed trends in HRRs associated with the impacts of the economic downturn, constrained mortgage finance, past housing undersupply and the preceding period of increasing un-affordability.</p> <p>This particularly affected younger households (25 to 44) who were hard-hit by the recession and as such the HRRs for this age group are likely to be significantly depressed. This is evidenced by the proportion of 25 to 44 years who were homeowners in 2014 (35%), compared to a decade earlier (59%). It is therefore unclear why the study has not considered an improvement in headship rates for the 25 to 44 year age group over the plan period, particularly as the Government are actively seeking to increase HRRs through interventions such as Help to Buy and Starter Homes, the latter of which is aimed directly at the under 40 age</p>	<p>the basis for the calculations on OAN. It is considered the 10 year period that the 2014 forecasts cover a range of market conditions included the boom, the recession and the recovery – these are all market conditions which may be experienced over a 15 year plan period and are therefore seen as a reasonable base on which to form the OAN. Though the issues raised are pertinent to Hartlepool, the relative affordability of properties means that issues experienced in other areas of the country, where property prices are extremely high and impact on accessibility to the housing market, they would not be experienced in Hartlepool to such an extent and as such it was not considered necessary to make an adjustment on this basis.</p> <p>The original SHMA (2015) considered the 290 jobs identified in the Strategic Economic Plan (SEP) in the same manner. The Tees Valley Economic Strategy seeks to see significant jobs growth over the next ten years but with a focus on increasing the existing employment rates within the Tees Valley and reducing the unemployment rate. At a Tees Valley Level there is significant work occurring to attract new business to the Tees Valley and to increase job opportunities, with these aspirations set out in the Tees Valley Strategic Economic Plan. This sub-regional work is being complimented by work within Hartlepool looking to increase the student population, but with an aim to create the infrastructure and opportunities to maintain these economically active elements of the population through the creation of an Innovation and Skills Quarter which will provide job opportunities closely linked with the colleges including the provision of workshop space and links with some of the national and international companies based within Hartlepool. Hartlepool has historically lost population to areas outside of the Tees Valley and Durham often as the jobs were not available in the sectors people wanted to work in – through the creation of these opportunities to access the jobs market, the aim of the Council is to retain this element of the working population and to significantly boost the economy of Hartlepool.</p>

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			<p>groups. Given the improving economic conditions and these Government stimuli, it is consider appropriate to apply an uplift in HRRs amongst the 25 to 44 year old age group to account for this past suppression. This approach would not only accord with the NPPF requirement to boost housing supply but also align with the advice contained within the Local Plan Expert Group (LPEG) recommendations to Government.</p> <p>Economic Trends With regard to the implications of economic trends on calculating the OAN, Persimmon Homes have significant concerns with the approach utilised by the Council. These concerns are detailed in full within the HBF representations on behalf of the house-building industry and are echoed below by Persimmon Homes.</p> <p>Whilst both the 2015 SHMA and the 2016 SHMA Addendum both examine the effect of changes in job numbers over the plan period when assessing the OAN, the approach taken by the two varies significantly. The 2015 SHMA identifies a figure of 325dpa as OAN based upon utilising a figure at the upper end of the economic range whilst the 2016 SHMA Addendum identifies a need for 240 dpa based upon scenario D2, a model at the lower end of the economic range. The rationale behind the shift in focus from an upper end requirement within the Preferred Options document to a figure at the lower end of the range within the Publication version of the plan is currently unclear and has not been justified by the Council. Persimmon Homes would therefore recommend the continued use of a figure at the upper end of the economic range to greater align with the principles of the NPPF which require plans to ‘plan positively’ and be ‘aspirational’.</p> <p>There are also concerns with scenario D2 itself. A sense check of the figures can be made by comparing the 240dpa figure related to scenario D2 and the 250dpa required for scenario F1. Given that scenario F1 is based upon zero jobs growth it would appear nonsensical that it requires a higher housing requirement than a scenario which creates 290 jobs per annum. The modelling evidence therefore cannot be supported by Persimmon Homes.</p> <p>Finally, the 2016 SHMA addendum indicates that under scenario D2, 70% of all jobs created (3,045) are taken up by existing residents, 15% are taken up by new migrants and 15% by in-commuters. These assumptions are considered extremely optimistic particularly given the fact that Hartlepool has an aging population which is likely to reduce economic participation rates within the resident population over time. Therefore achieving 70% of the jobs from existing</p>	<p>Given the aims of the SEP and Hartlepool Borough Council and bearing in mind that Hartlepool is its own housing market, scenario D2 assumed a split of 70% of jobs would be filled by existing residents, with some net in-migration and some in commuting, resulting in a dwelling requirement of 240 dwellings per year. Ongoing meetings and discussions with neighbouring authorities and those within the Tees Valley have formed an element of the ongoing duty to cooperate – these authorities have been consulted with during the formation of the SHMA and other meetings with regard to the Local Plan have also discussed the issue, with no objections being raised to the proposed housing figures or how they were formed or the assumptions on migration within them. As such the approach is considered sound and is not challenged by our neighbouring authorities or any other authority within the Tees Valley.</p> <p>The previous approach identified within the Preferred Options was based on the job creation from the ELR of 1,700 jobs over the plan period – these however had been based on the new jobs all being filled from new residents. This scenario was challenged regarding its realism in terms of all jobs growth being from in migrants – the concern over the soundness of the approach was considered in light of the aims of the Tees Valley SEP and aspirations for jobs growth within Hartlepool and was considered to be an inappropriate approach to take. As such the SHMA Addendum relooked at a range of economic scenarios and considered it most appropriate to follow a scenario based on the Tees Valley SEP.</p> <p>The reason scenario F1 which, zero net growth, results in a higher requirement is because the commuting ratio is fixed at 1.1 (net out commute) and assumes new residents are needed for all jobs. As you will see in the other scenarios which assume these factors such as D1 and E1 these result in very high dwelling requirements due to assuming new residents are needed for all new jobs.</p>

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			<p>residents will be extremely challenging in itself, particularly with available evidence to justify this assumption. Furthermore even if participation rates could be increased substantially amongst the working age population the Council would still need to agree this approach with neighbouring authorities due to the implications the strategy would have on commuting rates and housing needs in adjacent authorities. We are currently unaware of any agreement that has been made with neighbouring authorities in relation to commuting patterns and as such we consider the approach unsound. The justification for these figures is non-existent and therefore not sound.</p> <p><b>Market Signals &amp; Past Trends</b> We welcome the recognition by the Council that an adjustment of an additional 700 dwellings is necessary to take account of the past under-delivery of housing within the borough. This uplift reflects the identified shortfall of 694 dwellings over the past ten years against the 2006 Local Plan housing target.</p> <p><b>Housing Requirement</b> As set out within Table 6 ‘Housing Target Breakdown’ of the Local Plan, to the SHMA OAN requirement of 240 dpa the Council have applied an uplift to account for the historic backlog from the 2006 Local Plan (47 dpa), plus a further 65 dpa to replace expected demolitions plus a final ‘20% buffer and affordable housing allowance’ (57dpa). This establishes a total annual housing requirement of 409 dwellings per annum, equivalent to 6,135 dwellings over the plan period to 2031.</p> <p>In addition to the concerns outlined above in respect of the demographic and economic trends, we are also concerned that the rate of demolitions within the borough has not been sufficiently evidenced by the Local Plan or any supporting documentation. It is therefore impossible to establish whether this is either justified or realistic. Further evidence is therefore required before Persimmon Homes can support this element of the housing requirement.</p> <p>It is also noted that a ‘20% buffer and affordable housing allowance’ has been added to allow for flexibility if sites stall and to help address the affordable housing shortfall. Whilst this is welcomed it is noted that there is a substantial net imbalance in affordable dwellings equating to 144 units per annum. This represents nearly 50% of the suggested OAN and 35% of the housing target.</p> <p>As the viability evidence demonstrates, such a high percentage is clearly undeliverable within Hartlepool from market sites and the PPG (Ref: 2a-029-20140306) is clear when it states, “An increase in the total housing figures included in the local plan should be considered where it could help deliver the</p>	<p>HBC consider the scenarios tested as part of the SHMA Addendum cover a range of scenarios including different levels of jobs growth and are aligned with aspirations for economic development for Hartlepool and the Tees Valley. It is not considered further scenarios are necessary and indeed to make assumptions based on higher level of in migrants (especially from outside of the Tees Valley) would contradict the aspirations of the Strategic Economic Plan and would have greater impact on other authorities housing needs.</p> <p>The Council disagrees with Persimmon that the policy is not in line with paragraph. The policy identifies a housing requirement significantly above the OAN. Table 7 does indicate that only a 4.52 year supply is likely to come forward in the last five years, however it does indicate a 5.56 supply in years 6-10. It is always likely that it is harder to accurately forecast delivery in the later stages of the plan. As the housing requirement is already significantly more than the OAN it is considered the policy has been positively prepared in line with national guidance. It is not considered there is a need for the additional site at Hart Farm.</p>

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			<p>required number of affordable homes.”</p> <p>To address this significant shortfall, the Council should identify a higher housing target to ensure that the plan can meet the full market and affordable housing needs in the housing market area as per paragraph 47 of the NPPF.</p> <p>Supply Table 8 ‘Future Housing Supply over the Next 15 Years’ of the Local Plan details the sources of housing over the next 15 years and in the process identifies a total supply of 6,199 dwellings from allocations and extant permissions against a total requirement of 6,135. This equates to 64 dwellings above the proposed requirement or a 1% buffer over the housing target. This is considered contrary to the national guidance.</p> <p>Firstly the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement; this interpretation is consistent with numerous inspectors’ decisions at local plan examinations.</p> <p>Therefore if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, it is inevitable, due to a variety of reasons, some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement and such an approach will align with LPEG recommendations.</p> <p>Given the lack of any buffer built into the plan, the failure of any allocated sites to come forward will have significant consequences on the supply of housing within the borough, particularly given the fact that Table 7 and Graph 1 of the plan both respectively identify that in the final 5 years of the plan period, the council expect only to be able to demonstrate a 4.52 years supply of sites, contrary to paragraph 47 of the NPPF. It is imperative that any shortfall is planned for and further sites allocated to avoid such a situation in the latter stages of the plan.</p> <p>To resolve the identified housing shortfall and contribute towards the creation of a buffer within the housing supply, we wish to take this opportunity on behalf of the Leebell Consortium to promote Land at Hart Farm for the residential development of up to 120 dwellings.</p> <p>As explained within the Deliverability Document which accompanies this letter,</p>	

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			<p>the site is situated adjacent to the Consortium’s proposed Upper Warren development (which has outline planning permission for 500 units) and would form a natural extension of this development, resulting in the comprehensive rounding off of development in this area. The Deliverability Document explains that a suitable buffer with the nearby quarry can be achieved, in line with the existing separation distances to surrounding dwellings, to protect the amenity of future residents, thereby overcoming the concerns expressed by the SHLAA. The form and character of the development will complement the adjacent developments to the north and south whilst ensuring that the Plan objective of maintaining the gaps between settlements and avoiding coalescence is not compromised. The site will form a logical continuation of the Upper Warren development in towards the latter part of the plan period (years 11-15), thus help to addressing the identified shortfall and contributing towards the creation of a buffer within the Plan’s supply.</p> <p>For more information we would kindly refer to the accompanying Deliverability Document.</p>	
Northumbrian Water	LP0241	Pub0117	<p>We recognise that a proposed annual housing target of 409 dwellings is included within Table 6, and Northumbrian Water will seek to work with the Borough Council and developers to support development and meet this requirement through the alignment of housing delivery with investment in water and wastewater infrastructure. Excluding those sites with extant planning permissions, we note that future housing supply is focused upon sites in the Urban Edge and at Wynyard. For strategic sites, we recommend that masterplans are prepared that identify sustainable foul and surface water drainage strategies for all phases of development on a site, irrespective of the specific developer and differences in land ownership, and in alignment with the phased delivery of housing on site.</p>	<p>Development proposals for strategic sites will need to meet the requirements of the relevant site specific policies as well as Policy CC1: Minimising and adapting to climate change (including point 3 of the policy which requires development to be located in areas of low flood risk wherever possible and to incorporate appropriate measures to minimise flood risk such as sustainable drainage systems and the use of porous materials along with water retention and recycling) and Policy CC2: Reducing and Mitigating Flood Risk.</p>
Gladman Developments	LP0351	Pub0118	<p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework has been with us now for over four years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government’s goal to ‘significantly boost the supply of housing’ and how this should be reflected through the preparation of local plans. In this regard it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:</p> <p>“To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> <li>• Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing</li> </ul>	<p>The Council recognises that it must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside its existing joint working arrangements, to satisfactorily address cross boundary strategic issues and would refer Gladman Developments to the Duty to Co-operate Statement in this context. Regarding the requirement to meet any unmet housing needs, the Council does not require the release of land for housing in any neighbouring authority in order to meet the housing needs of Hartlepool as Policy HSG1 clearly sets out that sufficient sites are allocated to meet the housing requirement. Similarly, no other</p>



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			<p>market area</p> <ul style="list-style-type: none"> <li>• Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."</li> <li>• Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)"</li> </ul> <p>The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the Framework, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries.</p> <p>It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).</p> <p>Once a local authority has identified its objectively assessed needs for housing, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152). It is vital that these important nuances are reflected through suitably drafted policy wording within local plans.</p> <p>As the Council will be aware the Government published its suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:</p> <ul style="list-style-type: none"> <li>• Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need</li> <li>• Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.</li> <li>• Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to</li> </ul>	<p>authority in the Tees Valley, or Durham County Council, has identified that it has an unmet housing need which would require strategic cross-boundary co-operation in order to be addressed. Regarding the assertion that Hartlepool is part of a wider housing market area, the Council would refer Gladman Developments to the following extract from the Hartlepool 2015 SHMA:</p> <p>"An analysis of 2011 census migration data suggests that 80.2% of households move within Hartlepool Borough area and 67.1% of residents in employment work within the Borough... Therefore, Hartlepool Borough can be described as a self-contained housing market on the basis of migration, and although it is largely self-contained in terms of workplace, it is part of a wider functional economic area including Tees Valley and County Durham.</p> <p>On the basis that over 70% of households moving within Hartlepool originated from within Hartlepool Borough, and over 70% of households planning to move intend to stay in the Borough, it is proposed that Hartlepool is considered to be a self-contained Market Area for the purposes of Local Plan policy making."</p> <p>The Council is confident that the SHMA / OAN has been undertaken using a methodology which is fully consistent with the relevant national policy and guidance. The consultants who undertook the SHMA / OAN clearly identified the full OAN as a discrete step before the Council undertook a clearly additional step of determining the housing requirement. The two stage process referred to in the representation where first the unconstrained OAN must be arrived at is clearly the process that the Council has undertaken. Moreover, there has been no attempt to constrain the housing requirement to a figure lower than the full OAN. The housing requirement that the Council has determined is appropriate to meet its economic growth and interrelated retention of population (particularly the most economically active part of the population) ambitions for the Borough is significantly higher than the OAN.</p>

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			<p>reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.</p> <ul style="list-style-type: none"> <li>• Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.</li> <li>• Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.</li> <li>• The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.</li> </ul> <p>The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.</p> <p>The national policy guidance contained in the Framework seeks to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value” (NPPF Paragraph 17). Whilst the delivery of viable re-development proposals on brownfield sites can certainly be encouraged through the Local Plan, it should not be ‘prioritised’ as this would be contrary to the Framework. The Local Plan should not prevent sustainable greenfield sites from being delivered to support the area in meeting its development needs in viable locations that can be well served by day-to-day services and facilities. The approach that is being proposed is contrary to paragraphs 14, 17 and 49 of the Framework.</p> <p>The strategy should therefore be amended to reflect the intentions of national policy guidance to ‘encourage brownfield development’ rather than ‘prioritise it ahead of other forms of sustainable development’.</p> <p><b>Duty to Cooperate</b></p> <p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily</p>	<p>The representation contrasts the housing requirement of 6,199 dwellings with the projected housing delivery of 6,135 dwellings and contends that the proposed strategy allows no margin for error. The representation also contends that the strategy for Hartlepool should introduce a contingency of 20%.</p> <p>The Council would point out that the annual housing target of 409 dwellings incorporates a flexibility buffer of 20% partially as insurance should any sites not deliver at the rate expected and partially in order to have the flexibility to additional affordable homes. There is therefore already a contingency of 20% and consequently considerable flexibility built into the strategy. The representation contends that the Council’s housing trajectory should be formulated on appropriate evidence that demonstrates that sites can be delivered within appropriate timeframes having applied realistic delivery rates and taken into account issues that affect their delivery. The Local Plan includes an indicative housing trajectory that has been informed by intelligence about the delivery of housing sites including that gained from the preparation of the SHLAA, the steering group for which included representatives of the development industry. The plan does aim to allocate sufficient housing to ensure a five year housing land supply and the Council considers that the scale of housing allocation provides sufficient flexibility to ensure that a rolling five year housing land supply will be maintained.</p>

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			<p>discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.</p> <p>Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration', as set out in the PPG it is clear that it is intended to produce effective policies on cross- boundary strategic matters. In this regard Hartlepool Borough Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.</p> <p>The Department for Communities and Local Government Study into the 'Geography of Housing Market Areas, Centre for Urban and Regional Development Studies (CURDS) (2010) concluded that Hartlepool Borough (including its main centres of population), forms part of a wider Housing Market Area (HMA) that covers Middlesbrough, Stockton-on-Tees, Redcar &amp; Cleveland and Hambleton.</p> <p>However, it appears evident that local authorities across this recognised 'Strategic Housing Market Area' are now looking to advance local plans that are based on more localised housing markets that operate within their own local authority boundaries.</p> <p>It is the view of Gladman that the proportionate evidence base required for a new local plan should be based on a comprehensive understanding of development needs of the strategic housing market area. This comprehensive evidence is not currently available from the reports that have been prepared to support this Plan or those of its neighbouring authorities within the Strategic Housing Market Area.</p> <p>An ad-hoc approach to producing assessments of housing need based on a single local authority boundaries (as is the proposed approach in Hartlepool Borough) is not necessarily an appropriate way forward in this area. Whilst Gladman are encouraged by the suggestion that there is a collaborative approach to planning across the wider housing market area (paragraphs 2.7 to 2.10 of the Plan), this rhetoric must be borne out in practice through the production of a proportionate evidence base and positive plan-making. For these reasons, we assert that given the current and clear functional relationship between authorities in the wider sub-region, further considerations should be given to ensuring that the full CAN is identified on the basis of the correct HMA in accordance with 159 of the Framework.</p> <p>The need to positively plan to meet full housing needs across a housing market area should not be underestimated. It is all too easy for the duty to cooperate to</p>	

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			<p>be seen as an administrative exercise, however the fundamental social and economic need to ensure a supply of good quality housing to meet the homes and employment requirements across the wider area is a key issue that must be addressed properly through the plan making process. Whilst it may be the case that a local planning authority has sought to understand the local plan making of its neighbours in order to fulfil a legal duty to cooperate, the strategic priorities that arise from important cross-boundary evidence of development need must still be properly understood if an effective future strategy is to be put in place. Such issues can go beyond being a matter of legal compliance and become an issue of soundness.</p> <p><b>OBJECTIVELY ASSESSED HOUSING NEED</b></p> <p><b>Background</b></p> <p>The process of undertaking an OAN is clearly set out in the Framework principally in 14, 47, 152 and 159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base. The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in 159 of the Framework.</p> <p>The Framework goes onto set out the factors that should be included in a SHMA including identifying</p> <p>“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:</p> <ul style="list-style-type: none"> <li>• Meets household and population projections taking account of migration and demographic change;</li> <li>• Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and</li> <li>• Caters for housing demand and the scale of housing supply necessary to meet this demand.”</li> </ul> <p>Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure.</p> <p>In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the</p>	

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			<p>need to address the under provision of housing from the previous local plan period, the results of the Census oii, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.</p> <p>Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in 517 of the Framework, which states:  ‘..Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.’</p> <p>Of critical importance is what the Framework goes onto say in 158 in the section discussing Plan Making. It states here:</p> <p>Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.’</p> <p>Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.</p> <p>The formal publication of the Planning Practice Guidance in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §ig and 520 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.</p> <p>The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.’</p> <p>The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at 17, quoted above, it seems clear that particular consideration should be given to affordability.</p>	

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			<p>In order to consider how market signals should be taken forward 20 identifies some key concepts:</p> <p>‘Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.’</p> <p>It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully bench mark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.</p> <p>What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.</p> <p>The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph the report states: ‘There remains more to do. As the London School of Economics (LSE) Growth Commission found, ‘under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.’</p> <p>Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their CAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local</p>	

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			<p>authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.</p> <p>The need to identify the full CAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (i) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained CAN must be arrived at. In the judgement it was stated:</p> <p>“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the Hartlepool Publication Stage Local Plan Gladman Developments Ltd striking of a balance. By contrast paragraph 47 required the OAN (objectively assessed need) to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. (...) The two- step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “(h)ere, numbers matter; because the larger the need, the more pressure will or might be applied to (impinge) on other inconsistent policies”.</p> <p>Therefore following the exercise to identify the full, OAN for housing in an area, “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF 152)</p> <p>This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.</p> <p>The final stage of the process is outlined in 14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, “Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> <li>• any adverse impacts of doing so would significantly and demonstrably outweigh</li> </ul>	

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			<p>the benefits, when assessed against the policies in this framework taken as a whole; or</p> <ul style="list-style-type: none"> <li>• specific policies in this Framework indicate development should be restricted.”</li> </ul> <p>It is also worth noting that the final part of this sentence refers to footnote of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:</p> <p>“sites protected under the Birds and Habitat Directive (see paragraph 119) and for designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.</p> <p>Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.</p> <p>The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.</p> <p>As noted in section e above, Gladman are concerned that the Local Plan has not been formulated against a proportionate evidence base that seeks to examine the development needs of the wider market area within which the local authority lies. This is clearly problematic when finalising an appropriate strategy for future growth and identifying and robustly assessing reasonable alternatives to it.</p> <p>Further to sections 3, 4 and 5 above, Gladman are concerned that the Local Plan is being prepared in isolation of evidence of full, objectively assessed development needs for the wider housing market area. The locally derived OAN for Hartlepool should therefore be treated with caution in the absence of evidence that demonstrates the housing needs of the wider housing market area, taking account of functional economic geography.</p> <p>The Plan proposes an annual housing target of 409 dwellings (6135 for the 15 year plan period). Against this requirement, land is identified for approximately 6199 dwellings, taking account of extant planning permissions and proposed allocations. The proposed strategy provides no margin for error should sites not come forward as predicted and policy HSG1 is therefore not effective in ensuring that the identified housing requirement will be achieved. It is likely that the quantity of housing from the proposed allocations will not meet the needs of the borough within the plan period as they provide land for just 1% more than the</p>	



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			<p>requirement. It does not therefore represent a sound approach when considered against the four tests set out in the Framework (Paragraph 182).as they provide land for just i% more than the requirement. It does not therefore represent a sound approach when considered against the four tests set out in the Framework (Paragraph 182).</p> <p>Greater flexibility is required as part of the Local Plan’s strategy to ensure that overall plan targets will be met. Gladman note in this regard the findings in the Inspectors report into the Stratford-on-Avon Core Strategy, published in June 2016 . In that report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF the 10% reserve for housing sites should be increased to 20%. More locally, the emerging plan for Redcar and Cleveland, at policy H13 considers a buffer of an additional 20% of housing land on top of requirement to be needed in order to:-  “promote a continuous supply of housing land in line with national policy, and to reduce the risk of under-delivery...”  Gladman are therefore of the view that the strategy for Hartlepool should introduce a contingency of 20% for the reasons provided above.</p> <p>In addition, the Council’s housing trajectory should be formulated on appropriate evidence that demonstrates that the site allocations will be delivered within appropriate timeframes having applied realistic delivery rates and taken into account issues that could affect their deliverability. This is particularly important when a plan is promoting an ambitious regeneration strategy which includes brownfield land that could be difficult to deliver and strategic sites that may take some time before reaching peak delivery rates.</p> <p>The Local Plan should also aim to allocate sufficient housing to demonstrate a rolling five year housing land supply. An appropriate mechanism should therefore be included within Policy HSG1 to set out indicators against which a process for releasing additional housing sites will be triggered in circumstances where it is becomes apparent that a rolling five year housing land supply cannot be evidenced.</p> <p>Conclusion  Gladman raise concerns that the Plan is not sound in relation to a range of matters, including: housing requirement; the shortage of land allocated for housing; and, a number of other policies that are overly restrictive in the context of the presumption in favour of sustainable development.  The Plan must be positively prepared, effective, justified and consistent with national policy to be considered sound at examination. In the first instance, the</p>	

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			<p>Council must start with defining an NPPF and PPG compliant full, objectively assessed development needs for the Housing Market Area (FOAN) which properly follows the guidelines set out at a national level. The Council should then develop a robust and deliverable housing requirement using this FOAN as a starting point.</p>	
<p>Cecil M Yuill Ltd (Quarry Farm)</p>	<p>LP0252</p>	<p>Pub0119</p>	<p>Overall Housing Requirement</p> <p>Cecil M Yuill Ltd welcomes the addition of the site known as Quarry Farm 2 in the Publication Draft as a housing allocation for a quantum of 220 dwellings. This site offers the opportunity of providing a high-quality, landscape-led, residential development in a sustainable location on the west edge of Hartlepool in line with the Council's overarching housing strategy.</p> <p>However, for the reasons highlighted in these representations, whilst the additional allocation is welcomed, there remains a shortage of allocated sites to meet, in full, the objectively assessed housing need for Hartlepool, as required by both the NPPF and PPG.</p> <p>Local Plan Housing Requirement</p> <p>In July 2016 Cecil M Yuill Ltd appointed Regeneris Consulting to carry out a review of Hartlepool Borough Council's proposed housing policy and the supporting evidence base. The key focus of the report was whether the Council's housing target is based on the full objectively assessed need (OAN) for the Borough, as defined by the National Planning Policy Framework and Planning Practice Guidance.</p> <p>Regeneris Consulting have since been commissioned to update this earlier assessment in light of the publication of the Local Plan Publication Stage Consultation document and the updated housing evidence in the form of a Strategic Housing Market Assessment Addendum (October 2016).</p> <p>Whilst the Regeneris Consulting report is submitted at Appendix 1 of these representations, for clarification it concludes that the key difference between the 2015 SHMA and the 2016 SHMA update is the scale of the adjustment for economic growth. The 2015 SHMA had a starting point of 190dpa, but made an upward adjustment to 300 - 325dpa to support jobs growth (+110-135dpa) whilst the 2016 update adjusts from 200 to 240dpa (+40 dpa).</p> <p>3.5 The Regeneris Consulting report confirms that the OAN of 4,305 (287dpa) in</p>	<p>Support for the allocation of Quarry Farm 2 welcomed. Comments that discussions are ongoing with Highways England to unlock the holding directive on the current planning application for this site are noted. The representation also contends that additional housing sites are needed. The representation contends that a site referred to as 'Quarry Farm Phase 3' in the representation should be allocated. A number of supporting documents such as a bat survey and a habitat survey and an ecological impact assessment have been submitted in support of the contention that the site is deliverable (see the written representation for these documents). The Council acknowledges that the site is in a broadly sustainable location for housing development assuming that holding directive on the planning application for Quarry Farm 2 is unlocked (and hence the site would be adjoining and not separate from the urban area. Key to the deliverability of the site would be whether the impact on the local highway network within the urban area could be mitigated. However, for the reasons outlined in response to the part of the representation that contends that the OAN is unsound, the Council does not consider that there is a need to allocate an additional housing site.</p> <p>The representation contends that the calculation of objectively assessed housing need (OAN) is unsound. It is contended that the OAN makes unrealistic assumptions about how Hartlepool employers will source employees for future jobs growth.</p> <p>It is argued that the preferred scenario used by Arc4 (the consultants who undertook the OAN on behalf of the Council) is flawed because, according to Regeneris, it assumes an undeliverable reduction in the level of unemployment and an unrealistic change in commuting patterns.</p>

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			<p>the 2016 SHMA update is some 75dpa lower than the OAN identified in the 2015 SHMA. This is despite both SHMAs being undertaken by Arc4, following an identical approach and making very similar assumptions. The main reason for the OAN falling so significantly is that Arc4 have dismissed their previous preferred economic scenario as being extreme, and have instead adopted a preferred scenario which results in a lower housing figure.</p> <p>Regeneris Consulting are of the view that the new preferred scenario makes unrealistic and unjustified assumptions about how Hartlepool employers will source the workforce they need for future growth. As such, the scale of the economic adjustment in the 2016 update is insufficient to support the anticipated level of jobs growth and therefore fails to meet the requirements of PPG. This concern is also expressed by the HBF in their representations to the Plan.</p> <p>Instead, using the same jobs growth assumptions as the preferred scenario, but making more realistic assumptions about falls in unemployment based on long-term trends in Hartlepool, Regeneris Consulting confirm that after making this economic adjustment, the housing need figure would be around 400 dpa. This would put it between Scenario D1 (530 dpa based on no fall in unemployment) and Scenario D2 (240dpa based on an extreme and implausible fall in employment).</p> <p>Further to this, making the same adjustments as the Local plan to arrive at the gross housing target, i.e. an additional 47 dwellings to address the historical backlog and an additional 65 dwellings to replace demolished stock, Regeneris identify a total housing requirement of 512dpa. If a 20% buffer is then applied to allow for delays in sites coming forward and an 'affordable housing allowance', this would take the total gross housing target to 614dpa.</p> <p>In light of these conclusions drawn by Regeneris Consulting, following analysis of the Council's OAN, Cecil M Yuill Ltd consider that without an increase in the housing requirement to c614dpa, the Plan remains unsound.</p> <p>On the basis of a total housing requirement of 614dpa, this creates an additional requirement of approximately 3,000 dwellings over the Plan period.</p> <p>Notwithstanding the above, even if the overall housing requirement of 6,135 dwellings over the Plan period was accepted, the Council are currently seeking to provide just 64 dwellings over and above this requirement. In effect, this is just in excess of a 1% buffer to provide flexibility and choice, as required by paragraph</p>	<p>The Tees Valley Economic Strategy seeks to see significant jobs growth over the next ten years but with a focus on increasing the existing employment rates within the Tees Valley and reducing the unemployment rate. At a Tees Valley Level there is significant work occurring to attract new business to the Tees Valley and to increase job opportunities, with these aspirations set out in the Tees Valley Strategic Economic Plan. This sub-regional work is being complimented by work within Hartlepool looking to increase the student population, but with an aim to create the infrastructure and opportunities to maintain these economically active elements of the population through the creation of an Innovation and Skills Quarter which will provide job opportunities closely linked with the colleges including the provision of workshop space and links with some of the national and international companies based within Hartlepool. Hartlepool has historically lost population to areas outside of the Tees Valley and Durham often as the jobs were not available in the sectors people wanted to work in – through the creation of these opportunities to access the jobs market, the aim of the Council is to retain this element of the working population and to significantly boost the economy of Hartlepool.</p> <p>Given the aims of the SEP and Hartlepool Borough Council and bearing in mind that Hartlepool is its own housing market, scenario D2 assumed a split of 70% of jobs would be filled by existing residents, with some net in-migration and some in commuting, resulting in a dwelling requirement of 240 dwellings per year. Ongoing meetings and discussions with neighbouring authorities and those within the Tees Valley have formed an element of the ongoing duty to cooperate – these authorities have been consulted with during the formation of the SHMA and other meetings with regard to the Local Plan have also discussed the issue, with no objections being raised to the proposed housing figures or how they were formed or the assumptions on migration within them. As such the approach is considered sound and is not challenged by</p>

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			<p>50 of the NPPF.</p> <p>In light of the analysis by Regeneris Consulting of the latest OAN update, it is the firm view of Cecil M Yuill Ltd that the overall housing requirement within the Plan should be increased to reflect the conclusions drawn by Regeneris Consulting in their report in terms of the flawed approach taken by Arc4 to the scale of the economic adjustment required and, as a result, the deficient overall housing requirement for Hartlepool over the Plan period.</p> <p>See the written representation for the full Regeneris analysis of the OAN Suitability of additional housing sites required.</p> <p>Cecil M Yuill Ltd welcome the inclusion of the site known as ‘Quarry Farm 2’ as a housing allocation with a proposed quantum of 220 dwellings across the site. However, for the reasons already highlighted, they are firmly of the view that additional housing sites and, therefore, additional housing numbers are required across the Plan period.</p> <p>Planning permission already exists for 81 dwellings on land directly north of Elwick Road which is currently under construction by Bellway Homes. Land to the north of this site is subject to a housing allocation for a further 220 dwellings referred to within the Local Plan Publication Draft as Quarry Farm 2. This is also the subject of a live planning application currently being supported, in principle, by the Local Planning Authority. However, safety concerns over any increase in use of the Elwick/A19 junction has resulted in Highways England issuing a holding directive until such time as this highways situation can be resolved. In this regard, discussions are ongoing between Cecil M Yuill Ltd, Highways England and the Highways Authority with a view to agreeing mitigation measures which would allow development on the site prior to the construction of the GSJ and Elwick bypass.</p> <p>In addition to the site at Quarry Farm currently under construction and Quarry Farm 2, which is subject of a housing allocation and also live outline planning application, Cecil M Yuill Ltd have a further landholding of 22ha, adjoining these two former sites, to the west.</p> <p>This additional area of land is under the single ownership of Cecil M Yuill Ltd and is fully deliverable. An indicative masterplan has been prepared (see Appendix 2) to demonstrate how the site could satisfactorily deliver around 450 dwellings over the Plan period. The masterplan shows how this additional land forms a natural, sustainable extension of both Quarry Farm Phases 1 and 2 without extending westwards to the same extent as the High Tunstall housing allocation</p>	<p>our neighbouring authorities or any other authority within the Tees Valley.</p>

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			<p>to the south of Elwick Road.</p> <p>The indicative masterplan confirms a proposed quantum of 450 dwellings across the site at a density of circa 22 dwellings per hectare. This would ensure that a high quality, low density development could be achieved which is very much landscape led, with a significant landscape buffer on the site's western extent, reflecting the need for the western extension of Hartlepool to respect the rural nature of the land and avoidance for landscape and visual impact from the surrounding area.</p> <p>Aside from the fact that the site is fully owned by Cecil M Yuill Ltd, the full deliverability of the site has been confirmed by the preparation and submission of the following supporting information:</p> <ul style="list-style-type: none"> <li>• A Landscape and Visual Effects Outline Appraisal which concludes that overall the proposed development can be integrated successfully into the local landscape without generating notable adverse landscape or visual impact visual effects (see Appendix 4);</li> <li>• A Flood Risk Assessment which confirms that the site can be developed without any issue of flood risk and with certainty that scheme can be delivered in conjunction with an appropriate drainage and surface water management scheme (Appendix 3);</li> <li>• A highways Technical Note confirming that the delivery of 450 dwellings on the site offers the potential to create a sustainable urban extension to the west of the town whilst at the same time, in terms of traffic, being able to be accommodated satisfactorily on the surrounding road network with any impacts mitigated by the strategic highways works proposed within the Publication Draft Plan (Appendix 5); and</li> <li>• Ecological assessments comprising an Extended Phase 1 Survey Report (February 2017), Bat Activity Survey Report (2015) and Bat Survey Report of Quarry Farm Buildings (January 2017) which confirm that, subject to appropriate on-site/off-site mitigation measures, 450 dwellings can be delivered on the site whilst, at the same time, provide a net benefit in terms of biodiversity (Appendices 6, 7 and 8).</li> </ul> <p>As is demonstrated with Quarry Farm Phase 1, which is under construction, and Phase 2 which already has a housebuilder in tow ready to commence development on receipt of planning permission, Cecil M Yuill Ltd have a sound track record of delivering high quality residential developments within predicted timescales.</p> <p>As such, not only would this additional quantum of 450 dwellings over the Plan period help to address the increased housing requirement identified by Regeneris Consulting (614 dpa), it would also, critically, make a significant contribution to the major infrastructure costs associated with the grade separated junction and</p>	

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			<p>Elwick bypass and, in doing so, reduce the financial burden on the other allocated sites at High Tunstall, Elwick Village and Quarry Farm, by reducing the pro-rata costs per dwelling to circa £9,500. This would result in the following reductions in the level of financial contribution required from each of the other three sites (slight discrepancies due to rounding up/down):</p> <p>Site Units Contribution Reduction  High Tunstall 1,200 £11.4m £3,480,000  Elwick Village 35 £332,500 £101,500  Quarry Farm 2 220 £2,090,000 £638,000  Quarry Farm 3 450 £4,275,000 N/A</p> <p>Whilst it is considered that further allocated housing sites are required, the additional 450 units on Quarry Farm 3 will improve the potential viability of the sites listed above and, in so doing, enable each of these to potentially provide a greater percentage of affordable housing to help meet the significant need identified in the SHMA across the Borough, which the Council already acknowledges they will not achieve.</p>	
Brenda Road Holdings Ltd	LP0244	Pub0120	<p>1) Exclusion of housing units from SECAAH Village from the plan  We understand that the housing units in SECAAH Village in the housing provision numbers for the plan. Following telephone and email correspondence with Fiona Riley we understand despite having outline planning permission, Hartlepool Council considers the development is not deliverable as our current permission is time limited.  In response we contend that:</p> <p>The development is deliverable and indeed desirable given the stated aims of the Local Plan to deliver the required number of new homes over the plan period and to create homes specifically for older people.  We have re-applied to extend the existing outline application (H/2016/0532) and expect permission to be granted.  WE fully expect that the development will be delivered within the 15 years of this plan period.</p> <p>2) Designation of the SECAAH site as white land</p> <p>We note that the site now has no official planning permission and is classed as white land . We contend that the SECAAH Village development (and indeed other major development sites in Hartlepool that have outline permission) should be designated as New Housing provision (HSG1) given that these homes will be completed within the plan period and will have significant impact on housing provision.</p>	<p>The representation contends that the SECAAH Village development is deliverable within 15 years. The Council concurs with this. The representation also contends that the SECAAH Village development should be identified under Policy HSG1. Policy HSG1 identifies allocations rather than commitments. Exception is made to this for the South West Extension Strategic Housing Site because this is a site of strategic scale and the Council therefore took the view that it should be acknowledged in the plan.</p>

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Taylor Wimpey	LP0025	Pub0121	<p>Hartlepool Local Plan Publication Draft Consultation: Tunstall Farm, Hartlepool Nathaniel Lichfield &amp; Partners are pleased to provide the following response to the Hartlepool Local Plan Publication Draft Consultation. We provide this response in light of our Client's (Taylor Wirnpey UK) land interest in bringing forward a residential development at Tunstall Farm, Hartlepool.</p> <p>Our previous representations to the Council's emerging Local Plan have clearly highlighted the significant deficiencies in the Council's approach to calculation of housing supply and allocation of sites for residential development. In light of the recent changes to the Plan reflected in the Publication Draft we provide key comments below which set out where we believe the Plan is unsound.</p> <p><b>Housing Requirement</b></p> <p>The latest SI-IMA housing requirements, as defined within the Preferred Options Consultation Document proposed a total dwellings requirement of 3,600 homes over a 15 year period, equating to an annual requirement of 240 dwellings. This number has decreased significantly from the 2015 SHMA update, which set out a requirement for 4,875 dwellings over 15 years and 325 annually. Both target breakdowns are set out in tables 1 and 2 below. The proposed annual housing target in the Local Plan has marginally increased from 400 dpa to 409 dpa.</p> <p>The total Objectively Assessed Need (OAN) requirement is grossly underestimated in the latest SHMA update which in turn has formed unrealistic and underestimated housing requirements. NLP have undertaken an in-depth review of this which is discussed in the next section (see written representation for Table 1: Previous Housing Target Breakdown and Table 2: Housing Target Breakdown).</p> <p>Within previous representations to the Local Plan, we have stated that there is no reference to the housing requirement within Policy HSG1 which only focuses on Approximate Dwelling Provision. For clarity, the housing requirement must be expressed as a minimum and included within Policy HSG1.</p> <p>Strategic Housing Market Assessment (SHMA) Addendum (October 2016)</p> <p>Further to the above, NLP have undertaken a review of the Strategic Housing Market Assessment (SHMA) Addendum (October 2016). A number of key points can be made which underpins our view that the CAN for Hartlepool, identified as 290 dpa, is not the full CAN for Hartlepool as required by national Planning Practice Guidance (PPG) and will not support the future economic needs of Hartlepool. It will not satisfy the requirements of the National Planning Policy Framework in terms of significantly boosting the supply of housing and ensuring that the OAN supports the achievement of sustainable development, as defined</p>	<p>The representation contends that the calculation of objectively assessed housing need (OAHN) is unsound. Refer to Pub0108 under Policy HSG1 for the HBC response to a number of the points made. The representation refers to two legal judgements ('Satnam' and 'Kings Lynn') which it is argued support the contention that full OAHN must include affordable housing needs. The PPG sets out the steps which need to be taken in order to calculate the affordable housing component of the OAN and as the SHMA Addendum details, these steps have been followed and the OAN includes the necessary adjustments recommended by the PPG to take affordable housing need into account. The PPG also states "The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." This advice has also been followed. Appendix 1-Economic Viability Assessment of the Planning Obligations SPD states that the level of affordable housing need identified, may have an impact on the viability of developments coming forward.</p> <p>It continues that an assessment of economic viability of affordable housing provision has been undertaken and that this has established a deliverable affordable housing target of 18%. An increase in the total housing figures to be included in the plan has been considered and a 20% buffer added in order both to deliver additional affordable homes and to provide flexibility in case any housing sites do not deliver at the rate anticipated. The Council therefore fundamentally disagrees with the contention advanced in the representation that the OAN has resulted in a housing requirement significantly lower than it should be. On the contrary, the housing requirement fully reflects the Council's aspirations of retaining population, particularly the economically active</p>

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			<p>in paragraph 9 of the Framework.</p> <p>The 2014-based household projections</p> <p>The SHMA Addendum considers the differences between the 2008-based, 2012-based and 2014- based Sub National Population Projections (SNPP) and Sub National Household Projections (SNHP) for Hartlepool. The SHMA Update also considers zero net-migration and 10-year internal migration scenarios.</p> <p>The SHMA Addendum goes on to consider the headship rates underpinning the 2008-based, 2012-based and 2014-based SNHP. It cites the Planning Advisory Service (PAS) Guidance in respect of household formation rates which concludes the 2008-based projections are no longer relevant as they are based on very old evidence and do not provide a robust evidence base. The SHMA Addendum concludes on this basis that the 2014-based rates should be used to inform the QAN calculation. However, the SHMA Addendum does not go on to consider any sensitivities in which alternative levels of household formation are considered to allow the household formation of younger households to ‘catch-up’, who have been impacted upon by the market conditions during the recession. These are identified by PPG (Paragraph: 015 Reference ID: 2a-015-20140306) as an important local consideration which should be made.</p> <p>It would be appropriate for the analysis to consider an adjustment in the formation rates for younger households to ensure short term trends are not perpetuated through the plan period.</p> <p>The SHMA Addendum concludes that the demographic baseline should be adjusted upwards in Hartlepool to take account of long term migration trends to 210dpa. This is a positive adjustment in light of long term migration trends.</p> <p>Employment Trends</p> <p>The SHMA Addendum, like the SHMA (February 2015) itself, sets out its assessment of likely future change in job numbers (as required by PPG paragraph 2a-018), based on two different future jobs growth scenarios. No consideration is given to past trends jobs growth in Hartlepool. The two future economic scenarios are:</p> <ul style="list-style-type: none"> <li>• 290 jobs per annum set out in the Strategic Economic Plan (SEP); and</li> <li>• 100 jobs per annum, the jobs forecast underpinning the Employment Land Review in Hartlepool.</li> </ul> <p>The SHMA and SHMA Addendum consider a number of sensitivities regarding identified future jobs growth based on; future economic activity, unemployment rates and commuting ratios which impact upon the different levels of household growth required to support the two different jobs growth scenarios. The sensitivities considered in the Addendum differ from those set out within the SHMA (February 2015). The impact of this is less clarity on the assumptions made</p>	<p>elements of the population, increasing job opportunities and meeting affordable housing needs and it is fully cognisant of the NPPF.</p>



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			<p>under each scenario.</p> <p>The testing of different sensitivities is welcomed. However, further clarity is required to justify the assumptions made given the impact they have on the QAN required to support future economic aspirations in Hartlepool (Table 4.2 of the SHMA Addendum).</p> <p>This is particularly important as scenario FI in the SHMA Addendum based on zero jobs growth requires a level of housing greater than the preferred scenario identified which it is claimed would support jobs growth.</p> <p>The SHMA Addendum concludes that Scenario D2 is the most reasonable in terms of assumptions, requiring 240dpa to support the future jobs growth of 290 jobs per annum. This is based on:</p> <ul style="list-style-type: none"> <li>• SEP employment growth of 290 jobs per annum;</li> <li>• OBR future economic activity rates;</li> <li>• Unemployment fixed rate of 9.7%; and</li> <li>• 70% employees are existing residents, 15% commuters and 15% new residents.</li> </ul> <p>Understanding the sensitivities in more detail is particularly important given that the SHMA (February 2015) identifies an CAN of between 300 and 325dpa, between 10 and 35 dwellings per annum less than the CAN identified in the SHMA Addendum.</p> <p>Market Signals</p> <p>The SHMA Addendum presents a confused approach to the assessment of market signals as set out in PPG (paragraph 019 Reference ID: 2a:O1 9). A worsening trend in any of the indicators identified would require an upwards adjustment to planned housing numbers compared to the demographic baseline (paragraph ID: 2a:020).</p> <p>The SHMA Addendum considers past delivery separately from the other market signals identified in the PPG and concludes (paragraph 4.23) that the CAN should not be adjusted upwards to take account of market signals relating to affordability.</p> <p>However, it then goes on to state an additional 700 dwellings are necessary to take into account past under delivery.</p> <p>The SHMA Addendum is correct to make an adjustment to the demographic baseline as a consequence of failing to deliver housing in alignment with past requirements. This should be referred to as a market signals uplift. However, the PPG and subsequent inspector's decisions provide additional clarity on the application of the PPG. They endorse a proportional uplift to the demographic baseline in order to address performance against the various market signals identified.</p> <p>The upwards adjustment should be made applied to the demographic baseline</p>	

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			<p>for Hartlepool which is identified as 210dpa.</p> <p><b>Affordable Need</b></p> <p>In identifying the CAN for Hartlepool, neither the SHMA nor SHMA Addendum consider the affordable need as part of the CAN as anticipated by the NPPF paragraph 47 and paragraph 29 of the PPG (Reference ID 2a-029-20140306): “local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework” (Paragraph 47 NPPF)</p> <p>Two legal judgements provide further clarity when interpreting the PPG in respect of meeting affordable housing need:</p> <p>‘Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370’ referred to as “Satnam”; and</p> <p>Kings Lynn and West Norfolk Borough Council v (i) Secretary of State for Communities and Local Government and (ii) Elm Park Holdings [2015] EWHC 1958’ referred to as “Kings Lynn”.</p> <p>Satnam - Satnam highlights the importance of considering affordable housing needs in concluding on full DAN. The decision found that the adopted CAN figure within Warrington’s Local Plan was not in compliance with policy in respect of affordable housing because (as set out in paragraph 43) the assessed need for affordable housing need was never expressed or included as part of CAN. The decision found that the “proper exercise” had not been undertaken, namely:</p> <p>(a) having identified the CAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing; an increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes;</p> <p>(b) the Local Plan should then meet the CAN for affordable housing, subject only to the constraints referred to in NPPF paragraphs 14 and 47.</p> <p>In summary, this judgment establishes that full OAHN has to include an assessment of full affordable housing needs.</p> <p><b>Kings Lynn</b></p> <p>Whilst Satnam establishes that full OAHN must include affordable housing needs, Kings Lynn establishes how full affordable housing needs should be addressed as part of a full OAHN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not necessarily to meet these needs in full. The justification of this statement is set out in paragraphs 35 to 36 of the judgment.</p> <p>The judgment is clear that the correct method for considering the amount of</p>	

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			<p>housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver the full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to a full OAHN figure which is so large that a LPA would have “little or no prospect of delivering (it) in practice”. Therefore, it is clear from this judgment that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be ‘addressed’ is necessary as part of the full OAHN calculation. This reflects paragraph 159 of the Framework.</p> <p>Given recent legal judgements on this issue, it is clear that the full CAN should be increased to reflect the need for affordable housing in Hartlepool, identified as 144 net annual affordable need.</p> <p>Summary</p> <p>It is our view that the shortcomings of the methodology used in the SHMA Addendum results in an OAN that is significantly lower than it should be and the housing requirement on which it is based will be unable to support the future aspirations of the borough and meet identified affordable housing need as required in NPPF and PPG.</p> <p>NLP respectively requests to reserve the right to comment further on an appropriate housing requirement subject to liaison with Hartlepool Borough Council to better understand their calculations.</p> <p>Housing Delivery</p> <p>Table 7 of the Publication Draft Local Plan identifies a total future supply of 6,199 dwellings over the plan period — just 49 dwellings (0.8%) greater than the proposed requirement. The buffer on the identified requirement has been reduced from 1.2% in the Preferred Options Consultation Document to just 0.8%. This approach is wholly unacceptable as it will be insufficient to deal with any under-delivery which is likely to occur from some sites; and is not flexible enough to deal with inevitable changes in the planned supply, or ensuring choice in the market and robustness in supply.</p> <p>Despite the marginal increase in housing requirement (from 400 — to 409 dpa) within Tables 1 and 2 of this document, we believe the 0.8% housing supply buffer remains far from sufficient and a 10% additional supply buffer should be provided. The current emerging allocations are insufficient and further provision must be made by the Council to achieve this.</p> <p>Emerging Allocations</p> <p>Site and Surroundings</p> <p>Tunstall Farm is located within the Rural West ward of Hartlepool and extends to approximately 24.9ha of arable farmland.</p>	

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			<p>The majority of the site is located within Flood Zone 1, and is therefore at the lowest risk of flooding.</p> <p>The site is bounded by:</p> <ul style="list-style-type: none"> <li>• Tunstall Farm Phase I with permission for residential development to the north;</li> <li>• A public footpath to the east;</li> <li>• Planting / agricultural boundaries to the south with Summerhill Country Park beyond; and</li> <li>• Agricultural boundaries and a river to the west.</li> </ul> <p>The site is well-served by facilities in the surrounding area, including sports facilities and schools. Local shops including convenience stores and takeaways are a short walk from the site at the Catcote Road/Oxford Road junction. Integration to these important existing services and facilities would be enhanced through the development of the Tunstall Farm site with pedestrian connections through the site, and linkages with surrounding routes to the north, south and west which will provide a permeable scheme and improving pedestrian circulation in the local area.</p> <p>There are six primary schools located within a two mile walking radius of the site, namely:</p> <p>West Park Primary School;  Eldon Grove Primary School;  Sacred Heart Primary School;  Jesmond Gardens Community Primary School;  Lynnfield Primary School; and  Rift House Primary School.</p> <p>At secondary level there are five schools located within a three mile walking radius, including:</p> <ul style="list-style-type: none"> <li>• High Tunstall College of Science;</li> <li>• Catcote Academy;</li> <li>• The English Martyrs School and Sixth Form College;</li> <li>• Dyke House Sports and Technology College; and</li> <li>• Manor Community Academy.</li> </ul> <p>Further facilities including supermarkets and public houses are available at High Throston and Rift House which are approximately 2.1km north and 2.6km south east of Tunstall Farm respectively. Hartlepool town centre is also just 3.2km east of the site and hosts a train station with services throughout the North East. Bus services are also available in the local area.</p> <p>Tunstall Farm Phase 2 should be considered a suitable, available and deliverable which is in a sustainable location. Free from constraints, the site could provide approximately 400 houses, which could help to meet the Council's housing requirement and future housing needs, and therefore should be allocated in the</p>	

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			<p>Local Plan. Tunstall Farm Phase I now has planning permission, and development has now commenced on site.</p> <p>As such this means Phase 2 is a logical extension of development, and should be recognised in the Plan through its allocation. Tunstall Farm Phase 2 is currently not allocated for residential development within the emerging Local Plan. This is unacceptable given the clear shortfall in provision within Hartlepool; the commencement of Tunstall Farm Phase 1; and the context of the proximal proposed allocations including the High Tunstall Strategic Site. The High Tunstall Strategic Site is allocated for 1,200 dwellings across the plan period. It constitutes a highly incongruous extension to the western boundary of Hartlepool; extending far beyond the existing built form of the urban area in an unsympathetic and harmful manner. To allocate this site ahead of Tunstall Farm Phase 2, which is a suitable, achievable and deliverable urban extension is considered unacceptable. We strongly recommend the Council remove the High Tunstall allocation from the Plan and make provision to meet their housing requirement by allocating more suitable sites including Tunstall Farm Phase 2. There is clearly a preference within the emerging Plan for new housing to be accommodated in urban edge extensions with provision of 55.8% (up from 51.9% in the Preferred Options draft of the plan) of the future housing supply over the next 15 years coming from this source. We agree that this is an appropriate approach to the spatial distribution of housing within Hartlepool. Tunstall Farm Phase 2 offers a more logical site for an urban extension than other proposed strategic allocations including High Tunstall.</p> <p>Indeed, the Council themselves accept that the site is suitable for residential development with a yield of 400 dwellings within the most recent Strategic Housing Land Availability Assessment (SHLAA, 2015 — Ref 65). Notwithstanding the significant shortfall in housing supply and the recommended buffer increase, Tunstall Farm must be considered suitable, deliverable and achievable for residential development and be allocated for approximately 400 dwellings within the emerging Plan. The proposed settlement boundary must also be revised to reflect this allocation and the importance of Tunstall Farm as part of the Borough’s wider strategic housing requirement. Tunstall Farm offers a viable and sustainable opportunity to assist in achieving this buffer and forms a much more logical site in relation to the surrounding environment than the allocation at the High Tunstall Strategic Site and is equally or more sustainably located. Moreover, the site will form Phase 2 of the Tunstall Farm development and be able to draw from the infrastructure which will be</p>	

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			<p>implemented as part of Phase 1.</p> <p>The Opportunity at Tunstall Farm - Tunstall Farm Phase 2 offers an excellent opportunity for provision of a high quality residential neighbourhood to help address the current housing supply shortfall outlined earlier in this document. Taylor Wimpey UK has commissioned a number of technical reports to assess key attributes of the site and find that there are no constraints which would restrict residential development at this site. Further information on these assessments can be found within the accompanying Vision Document.</p> <p>The Vision</p> <p>The design principles for Tunstall Farm will provide a vibrant and sustainable new community, created through a holistic design approach and carefully considered scheme response. This will be achieved through a realisation of the following key objectives:</p> <p>The scheme will successfully integrate within the landscape context of the surrounding area through retention and celebration of key existing landscape features including existing hedgerows and tree planting through and around the perimeter of the proposed site.</p> <p>Integration and enhancement of important existing pedestrian connections through the site. Linkages with surrounding routes to the north, south and west will provide a permeable scheme which will improve pedestrian circulation in the local area.</p> <p>The development will be configured with an outward aspect along key development edges with a primary access point to the west from Summerhill Park. An outward aspect along this edge and through a central primary route will help to create the entrance to the development and draw residents and visitors in.</p> <p>To create and maintain a 'landscape dominant' character, typified by the retention of important landscape features allied to a carefully considered design along the primary route through the site to create a landscaped boulevard route though the scheme incorporating generous verge planting and intersected with existing hedgerows. The development has the capacity to provide extensive green linkages around and through the site with the retention of large informal areas of open space.</p> <p>Identifiable focal points along the key route through the scheme will enhance the architectural character of the scheme whilst allowing way-finding points for pedestrian and vehicular circulation.</p> <ul style="list-style-type: none"> <li>• The scheme could provide formal play provision to enhance and increase facilities already provided to the south west of the site at Summerhill Park. Key</li> </ul>	

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			<p>landscape positions will be retained and route corridors will be utilised to frame views across the park and associated landscape features.</p> <ul style="list-style-type: none"> <li>• Through successful integration of existing watercourses and the provision of SUDS areas, the ecological value of the site could be significantly enhanced whilst providing a natural and sustainable solution to surface water drainage — reducing risk of flooding in the surrounding area.</li> <li>• The scheme will turn the constraints created by existing services running through the site into opportunities by creating green corridors and public open spaces to enhance the ‘landscape dominant’ character of the scheme whilst minimising disruption to existing supply.</li> </ul> <p>Benefits</p> <p>Tunstall Farm offers an excellent opportunity for a sustainable, vibrant residential development in Hartlepool. Its development will provide numerous economic, environmental and social benefits to the Borough and local residents.</p> <p>Economic Benefits</p> <p>The economic benefits arising from delivery of 400 new homes at Tunstall Farm Phase 2 are likely to include:</p> <ul style="list-style-type: none"> <li>• £45 million private capital investment in the Borough;</li> <li>• 60 direct construction jobs per annum;</li> <li>• 95 indirect / induced jobs supported per annum in the supply chain and local services;</li> <li>• £5.8 million additional GVA per annum over an estimated 8 year build period;</li> <li>• £2 million first occupation expenditure on goods and services to make a house ‘feel like home’, a proportion of which would be captured locally;</li> <li>• £5 million net additional residential expenditure retained within the local economy;</li> <li>• 70 new operational jobs supported by increased resident expenditure in the local area;</li> <li>• A £2.9 million New Home Bonus payment to the Council from the Government over a 6 year period;</li> <li>• £550,000 additional Council Tax revenue each year; and</li> <li>• Additional S106 Payments to support local infrastructure.</li> </ul> <p>Social Benefits</p> <ul style="list-style-type: none"> <li>• Significant opportunity to meet local housing requirements, widening range and choice of: <ul style="list-style-type: none"> <li>- Family housing; and</li> <li>- Affordable housing.</li> </ul> </li> <li>• Potential for new public open space   Children’s play area; and</li> <li>• More spending power in local area to enhance vitality of local facilities.</li> </ul> <p>P9/10 13228625v1 Nathaniel Lichfield &amp; Partners</p>	

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			<p>Planning. Design. Economics.</p> <p>Environmental Benefits</p> <ul style="list-style-type: none"> <li>• Improvements to Summerhill Country Park for leisure and play; and</li> <li>• Reduce off-site floodrisk;</li> <li>• Provision of sustainable pedestrian and cycle routes;</li> <li>• Creation of high quality public realm and landscaping;</li> <li>• Biodiversity and habitat improvements.</li> </ul> <p>Conclusion</p> <p>The short comings of the OAN methodology set out within the SHMA Addendum result in a significantly lower housing requirement for Hartlepool, which would be unable to support future aspirations for the Borough, or meet identified affordable housing need as required in NPPF and PPG.</p> <p>The Hartlepool Local Plan Publication Draft identifies a requirement for 6135 additional new dwellings across the authority during the plan period. The identified supply of 6,199 dwellings in the Plan provides only a 0.8% buffer for flexibility on the CAN — even lower than the previous draft’s buffer of 1.2%. Provision of a 0.8% buffer does not meet the flexibility requirements contained within the NPPF. The Publication Draft Plan is unsound. The CAN should be recalculated taking into account the recommendations in this representation. The housing requirement should then be recalculated with an additional buffer of 10% to the resultant supply of housing sites.</p> <p>Our Client’s site offers a much more viable and sustainable proposal than surrounding proposed allocations within the Local Plan. Tunstall Farm Phase 2 should be allocated in the Plan to meet recalculated housing needs.</p> <p>This correspondence, alongside previous representations made to the Local Plan consultations, illustrates how Tunstall Farm Phase 2 can be comprehensively delivered to contribute towards the Council having a sound Plan.</p> <p>The site will provide a range of high quality homes in a sustainable location. In order that this is achieved it is imperative that the Tunstall Farm Phase 2 site should be considered suitable, available and deliverable and allocated for approximately 400 houses in the emerging Local Plan. The proposed settlement boundary contained within the draft Proposals Map should also be amended to accommodate the allocation.</p> <p>Taylor Wimpey UK looks forward to working proactively with the Council to progress the proposals for Tunstall Farm.</p>	



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Wynyard Park	LP0027	Pub0124	<p>The Wynyard Park Housing Allocation – Meeting Objectively Assessed Needs The Housing Target Breakdown (Table 6 within the consultation document) sets out the components that make up the Council’s housing requirement of 409 dwellings per annum. Importantly, the housing requirement includes both an Objectively Assessed Housing Need figure (290 dwellings per annum) derived from the Strategic Housing Market Assessment Update (2016) and an adjustment to take into account: anticipated issues with housing demolitions (+65 dpa) , lapse rates on sites and to improve affordable housing (+57 dpa). We consider these points further below.</p> <p>Objectively Assessed Housing Need The SHMA Addendum identifies a starting point of 200 dpa from the latest DCLG household projections. This is considered to be an appropriate starting point and in line with paragraph 15 of the ‘Housing and Economic Development Needs Assessment’ (HEDNA) chapter of the PPG. As per paragraph 15 of the PPG, the SHMA Addendum undertakes a number of sensitivity scenarios looking at local demographic factors and concludes that a longer term migration scenario (10 years) is appropriate. An adjustment of +10 dpa is then made to take account of the increased migration that a longer term trend would deliver (see table 4.1 of the SHMA Addendum). This concludes the demographic stage of the OAN process and is considered to be robust and in line with the PPG.</p> <p>The SHMA Addendum makes a further adjustment to take into account the ‘likely change in job numbers’ that is due to occur in the Borough as per paragraph 18 of the HEDNA chapter of the PPG. The likely change in employment comes from the Tees Valley Unlimited Strategic Economic Plan and will allow for the creation of 290 jobs per annum. Utilising the employment growth of the Tees Valley economic partnership allows for cross boundary agreement on the assumptions used around employment growth. The SHMA addendum assesses a range of different assumptions to derive a housing need figure from the likely change in employment. These scenarios are set out in Table 4.2 of the SHMA Addendum. Scenario D2 is chosen as the preferred set of assumptions to translate 290 jobs into a housing need figure. Scenario D2 results in an annual housing need of 240 dpa however this relies on increases in in-commuting and potentially large increases in economic activity in the existing population. GVA has not been able to obtain the detailed assumptions referred to in Table 4.2 as the document seems to rely on separate material published by Tees Valley Unlimited. However, increases to in-commuting and economic activity can be justified and GVA would reserve the right to review that information in the future. If these assumptions were not able to be fully justified it could potentially mean a higher housing requirement is needed in the Borough. Notwithstanding, the Council makes a</p>	<p>The Council welcomes the comments that the ‘OAN of 290 dwellings per annum is justified and in line with the PPG HEDNA Guidance’ and ‘Overall the Council’s housing target of 409 dpa is considered justified and positively prepared, i.e. it is sound (as per paragraph 182 of the NPPF)’. However, the representation also raises a concern that ‘the SHMA Addendum makes a number of adjustments to commuting and economic activity which have not been fully justified and if reversed would mean a higher requirement’. The adjustments are based on evidence provided by Tees Valley Unlimited (TVU) which considers the labour force and employment growth outcomes of the demographic scenarios and considered the scale of jobs growth under recent economic forecasts. For further explanation regarding the assumptions that informed the SHMA Addendum, see the HBC response to Pub0108 under Policy HSG1.</p>

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			<p>further adjustment to the OAN which addresses this issue (see below).</p> <p>The SHMA Addendum (para 4.31) states that “a further uplift to the baseline demographic requirement to take account of market signals is not recommended. However, in order to take into account historical under delivery against housing targets it is recommended that an additional 700 dwellings should be added [...]” Whilst the SHMA Addendum does not recommend a market signals adjustment, paragraph 19 of the HEDNA Chapter of the PPG states that “if the historic rate of development shows that actual supply falls below planned supply, further supply should be increased to reflect the likelihood of under-delivery of a plan.” Therefore, the Council’s adjustment of 700 dwellings is a market signals adjustment and is considered an appropriate adjustment given the evidence of undersupply in the Borough.</p> <p>Overall, the OAN of 290 dwellings per annum is justified and in line with the PPG HEDNA Guidance. GVA’s previous comments on behalf of Wynyard Park that the future base date of the plan risked discounting under provision has been alleviated by the adjustment within the SHMA Addendum for historical under-delivery.</p> <p><b>Housing Requirement</b> To identify the housing requirement (which in Hartlepool is the total level of housing) the consultation document makes two further adjustments to the housing requirement.</p> <p>The first is an adjustment of 65 dpa to take account of demolitions that are likely to occur over the plan period. This relates to approximately half of the demolitions programmed however Table 6 of the consultation document assumes that 50% of these dwellings will be replaced through housing renewal schemes. Overall this adjustment is considered appropriate and justifies and ensures that the housing stock increases at an appropriate rate to meet needs once demolitions are netted off.</p> <p>The housing requirement also contains an additional adjustment to further improve the delivery of affordable housing and to allow for housing commitments which may lapse over the plan period. This amounts to an adjustment of 57 dpa. Paragraph 29 of the HEDNA chapter of the PPG states that a local authority should consider a further adjustment to its housing target to improve the delivery of affordable housing when faced with a shortfall. The adjustment made here is considered appropriate and in line with the PPG. Furthermore, it is prudent to plan for some lapses in commitments and the Council’s explicit inclusion of this within the housing requirement is similarly prudent.</p>	

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
			<p>Overall the Council’s housing target of 409 dpa is considered justified and positively prepared, i.e it is sound (as per paragraph 182 of the NPPF). Notwithstanding, the SHMA Addendum makes a number of adjustments to commuting and economic activity which have not been fully justified and if reversed would mean a higher requirement.</p> <p>Therefore, it is noted and welcomed that the housing target is cited as a minimum total (paragraph 10.8 of the consultation document) so that should these changes in labour force behaviour fail to materialise and further housing is needed to support increases in the labour force, the plan will be able to accommodate this in an effective manner.</p>	
Natural England	LP0043	Pub0129	<p>Natural England note that there is a substantial level of housing growth predicted over the 15 year plan period, including some areas of development on greenfield sites, and some areas within the 6km ‘buffer zone’ of internationally, and nationally designated sites which has been identified as the radius from which most users originate, and is used to assess potential recreational disturbance from new housing. Generally housing policy advocates the requirement for schemes to provide sustainable development with a high importance in green infrastructure as being intrinsic to any new proposal, however in order to mitigate against the potential for residential disturbance, mitigation should not be limited to the provision of green space. Alternative compensation provision may be needed in some instances. Natural England advises that as an overarching policy item, alternative mitigation for recreational disturbance is included within policy text. Further comments regarding this point are discussed in a separate further paragraph.</p> <p>AND</p> <p>Recreational Pressures from new housing. Natural England notes that the HRA identifies several International, European and Nationally designated sites both adjacent and within the Local Plan area and there is potential for connectivity between proposals and qualifying interests. The Local Plan allocates significant growth in development over the next 15 years, which includes an aspirational delivery of 4,300 new homes.</p> <p>The increase in the level of housing predicted will result in higher levels of recreational disturbance through increasing levels of people walking with or without dogs. Given the proximity of the greater part of the plan area to designated sites (especially those located at the coast), diverse and flexible mitigation strategies should play a greater role in mitigating recreational disturbance.</p>	<p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new leisure and tourism opportunities as well as from housing. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

Company	Unique Ref	Pub Ref	HSG1 New Housing Provision	HSG1 New Housing Provision HBC
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

**Policy HSG2: Overall Housing Mix**

Company	Unique Ref	Pub Ref	HSG2 Overall Housing Mix	HSG2 Overall Housing Mix HBC
Wynyard Residents Association	LP0277	Pub0022	<p>None of the Wynyard provision should be affordable housing for the following reasons:</p> <ul style="list-style-type: none"> <li>• There is no public transport in Wynyard and no plans for either council to provide any.</li> <li>• From a resident’s survey for the Wynyard neighbourhood plan, average car ownership is 3.4 per household, due to the lack of public transport there is approximately 1 car per resident age 17 and over.</li> <li>• From the resident’s survey, very few residents work in the Wynyard Park industrial development, therefore there can be approximately 3.4 car journeys per household per rush hour on the A689 and A19. This does not fit with HBC green policies.</li> <li>• People who live in affordable housing cannot afford this level of car ownership per household.</li> <li>• Affordable housing does not fit in with the HBC executive vision for Wynyard.</li> </ul>	<p>Whilst it is agreed that car ownership levels within the Wynyard area are high, and the authority supports the public consultation exercises that the Residents Association have undertaken, the concept behind the proposals for Wynyard is to promote the creation of a sustainable community with a range of housing, jobs and facilities which minimise the need to travel. The plan (and Local Infrastructure Plan) does also recognise the issues with the A689 and A19 and highlights that improvements and mitigation will be needed alongside the development proposals at Wynyard. At present there is a bus service operating from the Wynyard Park developments which was secured as part of one of the planning applications within Stockton. Other housing schemes within both authorities will seek to extend this scheme in the future.</p>
Resident	LP0281	Pub0025	<p>The Hartlepool Local Plan Publication Stage summary identifies an ageing population as a factor in the OAN. Ideally dwellings suitable for this age group should be made available for these people. This means that the requirement for a percentage of bungalows should become mandatory in any finalised plan. This should have the same priority as the requirement for affordable housing. Experience of recent developments (Tunstall Farm, High Tunstall and Quarry Farm) indicate this is not the case. Surely, if not for consideration of older people or to ensure that the developments remain in keeping with the area, then the impending Care Home shortages support this requirement.</p>	<p>Whilst we agree that there is a need for bungalows and appropriate housing for the elderly population, there are considered to be a range of sites which already benefit from planning permission which will cater for over 55’s provision and will also be opportunities within sites included within the plan. Many of these are within the main conurbation of Hartlepool, in areas which are served well by a range of facilities. New allocations will also contribute new homes which will be appropriate for the ageing population and affordable housing for those in need of social rented and intermediate tenure properties. The authority has endeavoured to secure an element of bungalows on recent schemes, however, given the flexibility viability gives to developers, it is very hard to make the provision of bungalows mandatory.</p>

Company	Unique Ref	Pub Ref	HSG2 Overall Housing Mix	HSG2 Overall Housing Mix HBC
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, Story Homes supports Policy HSG2 which seeks to deliver a range, and mix of housing to meet local needs, including affordable housing. We consider that the inclusion of executive housing is a significantly important consideration going forwards. This diversification of housing assists in both retaining existing residents and attracting future residents to the borough by providing developments which cater for higher expectations. This aspirational provision of homes also has knock-on effects in attracting economically active households. This approach towards increasing aspirational/executive housing is becoming increasingly important across the North East. Where positively and effectively planned for, the additional demand for higher specification properties will seek to ensure that stronger market areas can retain and attract higher earners and the retention of affluent household will also seek to assist in preventing economic stagnation and planning for decline. However, we advise that the Council should ensure that Policy HSG2 is flexible in regard to housing mix to ensure that individual schemes can determine the appropriate mix dependent upon local needs and demand, and where appropriate, deliver aspirational housing which will subsequently ensure that housing sites are put to the most effective and efficient uses.</p>	<p>Note support for the Policy and the fact that Storey consider it will help to attract and retain economically active households. The local authority considers that the policy is flexible in that it permits a full range of house types on all allocations with the exception of the North Pentagon which is a solely executive site.</p>
Landowner (Hartville Meadow)	LP0337	Pub0094	<p>Our client would support the overall thrust of Policy HSG2 but in line with representations submitted in connection with Policy HSG1 he would seek the inclusion of his land, East of Easington Road, Hartlepool (see Figure 1) within Policy HSG2 for a “Full Range of Housing Types”</p> <p>It is noted that each of the sites listed in Policy HSG2 is also the subject of an individual site specific Policy HSG4 -8. For consistency our client’s land East of Easington Road should also be the subject of such a policy (e.g. HSG 9) with the policy providing greater guidance on development opportunities and constraints presented by this site.</p>	<p>As noted in the response to Policy LS1 the Council do not consider that this site should be allocated as a housing site as it is considered a Local Wildlife Site. As such the proposed changes are not necessary.</p>

Company	Unique Ref	Pub Ref	HSG2 Overall Housing Mix	HSG2 Overall Housing Mix HBC
Hartlepool Civic Society	LP0013	Pub0107	<p>The SHMA states “a major strategic challenge for the Council is to ensure a range of appropriate housing provision – adaptation and support for the area's older population. “</p> <p>Eighty per cent of estate agents interviewed also highlighted that the elderly market presented a major gap. While elderly homeowners are often wishing to downsize and could sell their current property with relative ease, many are unable to find suitable accommodation and are choosing therefore not to sell. Others are selling and moving into rented accommodation. Despite high demand there is little availability of suitable housing within the elderly market. Very few bungalows are available for purchase. Many elderly are instead, seeking ground floor one-bedroom flats either for sale or rent (Section 5.18 SHMA)</p> <p>It is well-established that the numbers of older people is increasing. It is common sense therefore, that in a 15-year period increased accommodation will be required. The Society strongly urges the Council to include the stipulation in the Local Plan that a proportionate number of bungalows be included. It is obvious that in determining policy regarding this element of 'the mix' at the 'planning stage' is far too late. Developers are going to seek the most commercial option. They will then 'drive' the mix in favour of 2/3 storey houses and the shortage of bungalows will continue. The Local Plan proposal as it stands, risks failing to address a clearly identified need.</p>	<p>Note concern over the provision of bungalows for the elderly within the plan period. The policy as worded notes that significant weight will be given to up-to-date housing need and this will be reflected in what is required of developers as part of applications. Where there is a need for bungalows officers have been asking for provision on sites and have secured some provision recently purely using the need, without the policy adopted.</p>
HBF	LP0005	Pub0108	<p>The HBF supports the need to deliver a range and mix of housing to meet local needs, including aspirational housing. Whilst the 2015 SHMA identifies current deficits these reflect a snap-shot in time and will vary both geographically and over the plan period. The 2016 SHMA addendum does not revisit the issue of housing mix.</p> <p>It is considered policy HSG2 provides a pragmatic approach to dealing with housing mix. It provides guidance upon need but also ensures that flexibility is maintained. It is important that this approach is reflected in decision making and as such further commentary upon this issue within the supporting text would be welcomed. This would allow individual schemes to determine the appropriate mix dependent upon local needs, viability and demand as well as the ability to make the most beneficial use of the site.</p>	<p>Note support for policy seeking to deliver a range and mix of housing to meet need.</p> <p>Note support for the flexibility provided within the policy.</p> <p>Consider the last sentence of the first paragraph emphasises that housing need will be given significant weight when considering planning applications. Other Policies allow for viability to be a consideration as part of the application process and it is not considered this needs to be re-iterated within this policy.</p>

Company	Unique Ref	Pub Ref	HSG2 Overall Housing Mix	HSG2 Overall Housing Mix HBC
Galliford Try	LP0349	Pub0114	<p>Policy HSG2 outlines the types of housing that are anticipated to be delivered on the sites identified by Policy HSG1. With regard to our Client's Site in Elwick, the policy anticipates a 'full range of house types'.</p> <p>Policy HSG2 identifies that the range and mix of house types should be appropriate to their locations and local needs. Our Client is broadly supportive of this policy, as it will not prescribe unreasonable restrictions on the house types to be provided. One minor alteration would be suggested – it should be made more clear that sites identified for a 'full range of house types' should only be expected to provide house types that are suitable to their location and needs. Whilst the Policy does suggest this, it is not explicit. The key concern is that these sites should not be expected to provide dwellings that are inappropriate to the location, either in impact or viability terms.</p>	<p>Note your client is broadly supportive of the policy which seeks a range and mix of house types. The policy outlines that housing need will be a consideration in determining planning applications. It is not considered any change is needed to the policy as the policy gives flexibility to propose a scheme which is appropriate to the locality and other policies within the plan give flexibility in terms of development viability.</p>



**Policy HSG3: Urban Local Plan Sites**

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0271	Pub0011	<p>There ‘appears’ to be a change in policy within the proposed Local plan in relation to an area of Council owned land at Coronation drive, Seaton crew. It ‘appears’ to change a large part of the site from Protected Open Space (a green corridor) to a residential development site.</p> <p>This change has mainly been identified in a supplementary planning Document.</p> <p>The document Seaton Carew Masterplan Supplementary Planning Document states:-</p> <p>1.3 The purpose of the Seaton Carew Masterplan Supplementary Planning Document (SPD) is to support the policies of the Hartlepool Local Plan and to provide further, more detailed, guidance setting out the parameters and development principles to achieve the most appropriate development and sustainable regeneration of Seaton Carew.</p> <p>8.12 The new Local Plan currently being developed will replace the current policies covering Seaton Carew in due course.</p> <p>10. Masterplan Area (SPD)</p> <p>10.1 The Seaton Carew Masterplan area covers development sites across the whole settlement as identified in Figure 3 including: Coronation Drive Warrior Drive site</p> <p>The document does refer to saved policies from the 2006 Local Plan which are in conformity with the National Planning Policy Framework. The list includes GN3 Protection of Key Green Space Areas.</p> <p>The document includes Figure 2: Hartlepool Local Plan 2006 Proposals Map . The map does NOT however show the full extent of the CORONATION DRIVE site OR that a large part of the area is COVERED BY GN3 - legend states PROTECTED Green Spaces and Coastal.</p> <p>The document provides the following description of the Coronation Drive Warrior Drive site</p> <p>11.9 The Coronation Drive site extends to 11.98 acres and consists of a large open site located at the entrance to Seaton Carew when approaching from the north and adjoins an existing residential development site.</p>	<p>Thank you for your comprehensive representation. As you correctly point out the area of land in question is identified within the 2006 Local Plan as GN3 (Protection of Key Green Spaces). However, the emerging Local Plan, once adopted, will replace the 2006 Local Plan policies. The site was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors.</p> <p>Your comments in relation to the Seaton Carew Masterplan are noted and it is agreed it would have been beneficial for the extract of the 2006 Local Plan Proposals Map to have been extended northwards to include the Coronation Drive Site. It is also accepted that prior to the adoption of the emerging Local Plan any planning application at present would be in conflict with the existing designation as GN3.</p> <p>As the emerging plan will supersede the existing policies from the 2006 Local Plan your proposals for consideration at the examination are not necessary. The appointed inspector will determine whether they believe the proposal is acceptable and should be an allocation within the adopted plan.</p> <p>The Open Space Assessment and the SHLAA are both pieces of evidence base which help to inform the development of the Local Plan. The open space assessment purely assesses the land for the use it is currently in and sets quantitative and qualitative targets for a wide variety of open spaces across the Borough. Table 5 within the SHLAA notes that the Coronation Drive site was considered a deliverable site within years 6-10 of the plan period with a yield of 100.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
			<p>11.10The Coronation Drive site is an undeveloped site currently serving as informal recreational space. It is a former industrial site and is known to be contaminated with a significant earth mound to the rear of the site. The area is bounded on three sides by residential use.</p> <p>21. Coronation Drive  21.1 Coronation Drive should be considered for residential development providing a range of family homes at a density of 25-30 homes per hectare  No where in the document does it state that a large part of the site is part of GN3 Protection of Key Green Space Areas or that there would be a deviation from the saved policy from the 2006 Local Plan. It also does not point out that without the policy change that any planning application for residential development of the protected Green Corridor area would be in conflict with this Council policy.</p> <p>As the document has the get out of jail free card of stating 'should be considered' I would like the matter be clarified as part of the Examination process.</p> <ol style="list-style-type: none"> <li>1. The area to be 'considered' is to be reduced to that area not covered by the GN3 Protection area or</li> <li>2. The area is to be 'considered' is to be subject to all existing Saved Policies or</li> <li>3.The area to be 'considered' will require the Policy GN3 to be amended to exclude the area; to allow the Council to develop/sell its land for residential purposes ?</li> </ol> <p>Other documents of note are:-  The Local Plan Consultation document also includes the Saved Policies 2006 Hartlepool Local Plan Planning Policy Framework Justification November 2015 Section 5. 2006 LOCAL PLAN POLICIES NPPF CONSISTENCY  5.1 Table 3 below summarises the saved 2006 Local Plan policies and illustrates their consistency with the National Planning Policy Framework (NPPF) in terms of full or not consistent. The full discussion of the policies is contained in appendix 1.  Table 3: 2006 Local Plan Saved Policies NPPF Consistency</p> <p>This section includes Green network policies GN1, GN2,GN3,GN4,GN5 and GN6</p> <p>The Local Plan Consultation document also includes the HARTLEPOOL BOROUGH COUNCIL OPEN SPACE, SPORT &amp; RECREATION ASSESSMENT Report January 2015</p>	

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC				
			<p>2.12 Hartlepool Local Plan</p> <p>The Hartlepool Local Plan and its associated documents forms the development plan for Hartlepool. The planning policies and standards within them are used to determine planning applications.</p> <p>The Council had been through the process of producing a new Local Plan; however the decision was taken to withdraw the Local Plan and it was formally withdrawn on 11<sup>th</sup> November 2013. A new Local Plan is being developed and, whilst this work proceeds, a HBC Policy Framework has been produced indicating the saved policies from the 2006 Local Plan that are in conformity with the NPPF. Details of the green corridors are shown in this table and in Appendix 9.</p> <p>Table 9.4: Green Corridors and Sub-areas.</p> <table data-bbox="595 501 1155 564"> <tr> <td>GC017 Coronation Drive</td> <td>20.12 Southern</td> </tr> <tr> <td>GC017 Coronation Drive</td> <td>5.59 Southern</td> </tr> </table> <p>Nowhere in this document does it state that the area(s) should be removed or reduced.</p> <p>The Local Plan Consultation document also includes the HARTLEPOOL BOROUGH COUNCIL: REGENERATION AND NEIGHBOURHOODS Strategic Housing Land Availability Assessment 2014 Draft Final Report December 2014</p> <p>The site is identified but again Nowhere does it state that part of the site is part of GN3 Protection of Key Green Space Areas .</p>	GC017 Coronation Drive	20.12 Southern	GC017 Coronation Drive	5.59 Southern	
GC017 Coronation Drive	20.12 Southern							
GC017 Coronation Drive	5.59 Southern							

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0276	Pub0021	<p>My question relates to the change from an area of Protected Green Space land from the Local Plan of 2006, to now on this Local plan to Brown field Land when HBC professes to Safeguard the Natural Environment. I'm referring to the land off Coronation Drive behind Lithgo Close as this was formally designated Protected Green space but HBC have now seen fit to change this status with the view to develop this land for housing. I am extremely concerned about the future development of this land as I live in Lithgo Close and was a resident at the time of the contaminated land issue. At this time it was extremely difficult and a lot of mess and interruption to daily life and concern for the levels of contamination and the overall effects it was having. The remedial work was far from satisfactory and residents are still experiencing problems to this date so to have to endure that process again with the land to the rear of my property then as you will realise I have grave concerns about this proposal.</p> <p>I would appreciate you taking my comments and concerns into consideration</p>	<p>Thank you for your representation. As you correctly point out the area of land in question is identified within the 2006 Local Plan as GN3 (Protection of Key Green Spaces). However, the emerging Local Plan, once adopted, will replace the 2006 Local Plan policies. The site was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. It is noted that there are contamination issues on this site, an issue that has also been identified by the Environment Agency, and it is realised that this contamination would have to be removed to make the site suitable for housing development. This is an issue that the Council is continuing to investigate to ensure that the contamination could be dealt with in an appropriate and safe manner whilst still maintaining the viability of the site.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0279	Pub0023	<p>Government policy states that the greenbelt should only be built on in "exceptional circumstances Can someone tell me what exceptional circumstances are for changing the land behind Lithgo Close from Green belt to brown building land?</p> <p>How can it go from so many difderent catergories so quickly?</p> <p>ie: Contaminated land Green belt Important wildlife area</p> <p>I could go on but my complaint is does this land need development? Isn't Hartlepool over developed now? I moved here thinking i have safe wildlife areas behind and alongside me? The land is very poor for building, you can only dig in your garden so far then you hit a protective layer due to contaminated soil?</p> <p>Please accept this email as my proof of concern and disagreement to any development to land rear of Lithgo close... we are strongly advising against any change of land use other than it been kept as green belt.</p> <p>The disruption will be vibration as it's so close to neighbouring houses, mess and noise.. my dog is a nervous wreck from the drilling last year.. not to mention been over looked by houses on this land... surely you can find more suitable land if you have to build, or better still make sure every new housing development in Seaton and Hartlepool is 100% sold before building new houses.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area. The emerging plan will replace the 2006 Local Plan once adopted. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. It is noted that there are contamination issues on this site, an issue that has also been identified by the Environment Agency, and it is realised that this contamination would have to be removed to make the site suitable for housing development. This is an issue that the Council is continuing to investigate to ensure that the contamination could be dealt with in an appropriate and safe manner whilst still maintaining the viability of the site. Unfortunately your proposal that every house should be sold prior to it being built is not one which is considered acceptable due to the impact it would have on the timing of the delivery of homes; many people like to be able to see the home they are purchasing, prior to buying it.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0280	Pub0024	<p>I would like to object to the Local plans suggestion on building on the land that is classed as a green corridor in Seaton Carew off Coronation Drive (Ref HSG3 on plan).I object on the grounds that this is classed as green space and used by members of the public for recreation and walking of dogs and I have seen many animals using this green corridor as home such as hedgehogs, foxes , many birds including Kingfishers in the Beck and have witnessed bats flying around the area on multiple times, There is not a massive amount of green space in Seaton and the town left and I think expansion outwards is the sensible option for the town and would raise a premium price for the council rather than proven contaminated land.</p> <p>Also I understand that some contamination has been found on the site so why would you like to repeat the debacle where millions of pounds were spent cleaning the land in Lithgo Close and surrounding area and the negative impact it would have on the house prices on the estate being built and the amount the council would raise from the sale of the land.</p>	<p>The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. This will help to ensure that land is retained for ecological benefit. It is noted that there are contamination issues on this site, an issue that has also been identified by the Environment Agency, and it is realised that this contamination would have to be removed to make the site suitable for housing development. This is an issue that the Council is continuing to investigate to ensure that the contamination could be dealt with in an appropriate and safe manner whilst still maintaining the viability of the site.</p>
Resident	LP0305	Pub0051	<p>I live at 67 lithgo close, Seaton. I recently moved to Lithgo close in Septemper. My end property's back garden can only be accessed from side gates this was a concern, however i knew the land was green belted so I wouldn't have a problem. Today i learnt that this land banding's now changed from green belt to possible building i am really concerned. My concerns are</p> <ol style="list-style-type: none"> <li>1 how can this land change from green belt ?? I thought land is protected?</li> <li>2. Why arent local residents getting this information by post?</li> <li>3. Is the council considering local wildlife?</li> <li>4. Is the council considering the light into our homes if 4 storey housing is placed directly behind us?</li> </ol> <p>Can you take this email as a lodged complaint about this future planning and i would appreciate any further information regarding this above issue.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. All residents in the town were written to, to notify them of the proposals within the Local Plan Publication document. At present there are no proposals about how the site would be developed or the types of property, however it would be expected to reflect the adjacent developments and respect the amenity of the existing residents – it is likely the scheme would be a mix of 2 storey buildings and it is not considered 4 storey properties would be appropriate on the scheme.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0306	Pub0052	<p>I object strongly to the development plans for the back of our property. One of the main reasons for the wife and myself buying our house was the FACT that the ground outside our back was green belt. Why has it suddenly become a brown belt ( a more cynical person would think there is something more underhand going on ). So firstly if needs be could you let me know which ombudsman I would need to contact to discuss this matter . then I would also need to see a solicitor to see if I have any claim against the council for telling me it was a GREEN BELT then changing there minds after the fact</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan. If you considered you needed to raise your concern with an Ombudsman following the examination you would need to contact the Local Government Ombudsman.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0310	Pub0057	<p>I am writing to express my concerns regarding the GN3 Green Belt land at Coronation drive which Gala, Lithgo etc back onto.</p> <p>When I bought my property in 2003, the said piece of land was, and still is green belt. The piece of green belt offers recreation to dog walkers and children alike. The Green belt field also offers lots of homes to our local wildlife which we have on our doorsteps. We have 2 families of Foxes who come and reproduce every year as well as birds, sparrow hawks, tits etc . The endangered hedgehog population on that field is immense and thrive on this field.</p> <p>I have noticed that in 2016 Local plan, HBC have decided to reclassify half of this field into brown field purely so that it can be built upon. I think this is a big mistake.</p> <p>As you know, the land is extremely contaminated so surely is not worth a large amount of money and as a resident, I know how poor the land is around this area. My conservatory has already sunken so much that I had to take it down and my garage is sinking. Neighbours drives have collapsed as have walls so you can see by building on this land, you are in my opinion asking for trouble.</p> <p>Regardless of the poor land, this field was and should be left as GN3 – Green Band as it has been for many years. An article from The Minister for Housing and Planning (Brandon Lewis) was in June 2016 is quoted as saying ‘We are committed to retaining strong protection of the green belt, and its boundaries can be changed only in exceptional circumstances’. I also read this article posted in Mail online this month:-</p> <p>A housing free-for-all on the Green Belt is set to be abandoned as ministers come under pressure from their own constituents.</p> <p>At least half the Cabinet are already facing controversy over plans to allow green fields to be bulldozed for housing.</p> <p>Those affected include Theresa May, Chancellor Philip Hammond, and Defence Secretary Sir Michael Fallon, who has vowed publicly to ‘fight to protect the Green Belt from inappropriate development’.</p> <p>Communities Secretary Sajid Javid was reported last year to be considering easing the rules that allow councils to build on Green Belt land provided they designate equivalent areas of land for protection.</p> <p>But Tory sources insist his remarks were over-interpreted and believe the idea will be quietly shelved when a White Paper on housing is published later this</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area and therefore unfortunately the references to green belt discussions are not relevant in this instance. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors which will help in terms of ecology. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan.</p>



Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
			<p>month.</p> <p>One senior Tory said: ‘There will be a riot if they mess about with the Green Belt. We made a promise to protect it, and there are plenty of MPs – including some in the Cabinet – who are going to make sure we stick to it.’ At least ten Cabinet ministers are facing controversy over proposed Green Belt developments in their constituencies, including Mr Javid, who lodged a formal objection to plans for 2,800 homes in his Bromsgrove constituency in the West Midlands last year before taking up his current role.</p> <p>Read more: <a href="http://www.dailymail.co.uk/news/article-4142144/Ministers-shelve-plans-bulldoze-Green-Belt.html#ixzz4Wy6OmlxQ">http://www.dailymail.co.uk/news/article-4142144/Ministers-shelve-plans-bulldoze-Green-Belt.html#ixzz4Wy6OmlxQ</a></p> <p>I would be interested to know what exceptional circumstances you are finding to reclassify our field from GN3 to Brownfield?</p> <p>When I moved into my property, I spoke to HBC ‘one stop shop’ regarding buying some of this land to extend my garden. I was flatly told ‘NO’, it is greenbelt and will never be sold! so why are you now reclassifying it to Brown field and sell it to Esh for housing?</p> <p>I could sit here and list all the government guidelines regarding reclassifying GN3 to Brownfield but you have probably read them all. To reclassify this land is just wrong for residents and for wildlife and hope that HBC think twice about this strategy.</p>	

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0311	Pub0059	<p>I would like to object to the field which was designated as Green belt (GN3) in the 2006 local plan being changed to Brownfield as per the 2016 local plan. This has been done without consultation and it goes against government policy as per the following link;  <a href="http://www.dailymail.co.uk/news/article-4142144/Ministers-shelve-plans-bulldoze-Green-Belt.html">http://www.dailymail.co.uk/news/article-4142144/Ministers-shelve-plans-bulldoze-Green-Belt.html</a></p> <p>The area in question regardless of the report which has been carried may unearth potentially dangerous substances which may be wind blown particle or potential water contamination may cause risk to public health and at the moment these risks are very much dormant and well concealed. Therefore, development of this land would potentially cause a public health risk. On the basis of these concerns I would like to strongly object to the land being developed on.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area and therefore unfortunately the references to green belt discussions are not relevant in this instance. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan (which was consulted on between May and July 2016), following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors which will help in terms of ecology. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan. It is noted that there are contamination issues on this site, an issue that has also been identified by the Environment Agency, and it is realised that this contamination would have to be removed in a safe manner to make the site suitable for housing development. This is an issue that the Council is continuing to investigate to ensure that the contamination could be dealt with in an appropriate and safe manner whilst still maintaining the viability of the site.</p>
Resident	LP0312	Pub0060	<p>I am writing to inform you that myself &amp; my Husband strongly oppose to the idea of building on the green land at the back of Gala Close, I have lived in Gala Close for 15 years with my Husband &amp; our house has the green land at the back of us, I feel that to build on that land would be so wrong as there is such a lot of wild life on there.</p>	<p>The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. This will help to ensure that land is retained for ecological benefit.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0313	Pub0061	<p>I understand that the land situated between Lithgo Close and Seaton Snook is being considered for change of use to residential use. As a resident of Seaton Carew whose property overlooks this impending development I am dismayed at Hartlepool Borough Council not notifying me of any change, and myself being made only aware by local neighbours, and not being informed directly from you.</p> <p>As I understand it, the area namely Seaton Snook is designated as a flood zone 3 being the highest category of flood risk and any change of use would require the Council to carry out Statutory duties under the National Planning Policy Framework</p> <p>The Seaton Snook beck has on a number of occasions been close to bursting its banks, under conditions of high tide, combined with storm surges and high rainfall.</p> <p>Whilst the land under consideration is soft landscaped with trees and scrub this does offer to reduce the speed of run off, of surface water, I consider that should any development in the form of hard landscaping, namely roads, drives, paths and roofs then this would increase the speed of surface water being discharged into the beck increasing the possibility of the beck bursting its banks.</p> <p>Under the National Planning Policy Framework clauses 100 to 104, I believe you are bound by statute to consider the implications of any decisions made. Clause 100 stipulates inappropriate development in areas of risk flooding which should be avoided by directing development away from areas of high risk.</p> <p>Can I enquire under clause 100</p> <ol style="list-style-type: none"> <li>1/. Has a sequential test been carried out?</li> <li>2/. If necessary has a Exception Test been carried out?</li> <li>3/. The safeguarding of land from development?</li> <li>4/. Reducing the causes and impacts of flooding?</li> <li>5/. Taking into account climate change?</li> </ol> <p>Clause 101</p> <ol style="list-style-type: none"> <li>1/. To steer new development to areas with the lowest probability of flooding?</li> <li>2/. Using the sequential approach in areas known to be at risk?</li> </ol> <p>Clause 102</p> <ol style="list-style-type: none"> <li>1/. You must demonstrate that the development provides wider benefits to the community that outweigh flood risk?</li> <li>2/. The assessment must demonstrate it will be safe for a lifetime, without increasing the flood risk elsewhere.</li> </ol>	<p>As part of the production of the new Local Plan, various pieces of evidence base work need to be produced and these can be viewed on the Council's website at: <a href="http://www.hartlepool.gov.uk/localplan">www.hartlepool.gov.uk/localplan</a></p> <p>In relation to paragraphs 100-104 of the National Planning Policy Framework (NPPF), I can confirm that a Strategic Flood Risk Assessment (SFRA) was undertaken in 2010 and the Council is currently in the process of updating this document, which will take into account the issues raised and shall be complete prior to submission of the Local Plan to the Secretary of State.</p> <p>The Environment Agency is a statutory consultee and as such has been engaged with the Local Planning Authority throughout each stage of the Local Plan consultation process. The most recent representation from the Environment Agency is available to view on the Council's website within the Consultation Statement from Preferred Options (July 2016) document.</p> <p>The abovementioned evidence base also includes a Strategic Housing Land Availability Assessment (SHLAA), which identifies and assesses the suitability of various sites within the Borough for future housing provision, including the Coronation Drive site, taking into account all relevant constraints, including flood risk. The Environment Agency was also consulted as part of this process. Whilst no concerns have been raised to date with respect to flood risk at this site, the Environment Agency's views will again be sought through the updated SFRA.</p> <p>With respect to land contamination, The Environment Agency has however raised concerns regarding potential for ground contamination at the site, given its history. The site at Coronation Drive was included in the Preferred Options stage of the Local Plan for 100 dwellings. Further ground investigation works were subsequently undertaken, given concerns raised by the Environment Agency regarding the allocation of the site, and these have revealed that the full extent of the site could not be</p>

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			<p>As I understand it, all of these tests will need to pass before any development can be allocated or permitted.</p> <p>Clause 103 When determining planning applications any decisions should not increase the risk of flooding elsewhere. Environmental Agency Can you please confirm, has the environmental agency been contacted to obtain there views on the impending application?  If so. Can you please publicise there report and findings.</p> <p>Existing Seaton Snook (beck) The existing beck varies in its cross sectional area and provides little or no catchment being tidal. The beck is also very overgrown with weeds and vegetation, offering very slow discharge of water, along its narrow width. Are there any plans to increase the catchment of the beck or remove the excessive vegetation?</p> <p>Land contamination As I understand it, the land and the mounds may contain contaminated soil from previous industrial use? Has a survey been carried out to determine the extent of the contamination and the type of contaminants present? Has the Health and Safety Executive been made aware of these contaminants and what procedures will or may be adopted in the removal to mitigate dust born particles.</p> <p>Financial consideration I believe I speak for the majority of residents when I say that the purchase of our existing properties was made with the aspect of the view being a major consideration. And any alteration to the aspect will reduce the overall value of our properties.</p> <p>Tree Coverage The councils own local plan admits that the tree coverage in the borough amounts for only 4% against a national average of 13%, and it is the Boroughs ambition to increase this figure. Surely by leaving the land as its present use and increasing the tree population in this area, it would have a twofold significant effect 1/. Increasing the absorption rate of surface water run off to allow the beck to</p>	<p>developed, with the site now proposed to be included for circa 70 dwellings. The Council are currently investigating the level of contaminated material which may need to be moved from the site to an appropriate disposal facility and the costs involved in that.</p> <p>With respect to the existing Seaton Snook beck, the draft update of the strategic flood risk assessment recommends that the housing development proposed for the site is subject to detailed layout and design considerations around flood risk and any planning application to develop the site will need to be consistent with this recommendation.</p> <p>With regards to the hard surfaces increasing the surface water discharge into the watercourse, this will be managed by a series of engineering techniques whereby surface water will be retained on the site and discharged at a rate that will not overburden the watercourse.</p> <p>I can confirm that the Health and Safety Executive (HSE) has also been consulted through the Local Plan consultation process and no specific concerns have been raised to date with respect to the Coronation Drive site. However, in relation to details of removal of any contaminants from the site and mitigation of dust born particles, this would be dealt with through the planning application process in consultation with relevant internal and external consultees, should an application be subsequently submitted for this site.</p>

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			<p>recover in high peak periods. 2/. Increasing the national average tree coverage within the borough.</p>	
Resident	LP0314	Pub0062	<p>I would like to object against the proposed 4 storey building at back of my house, as this will stop all the afternoon sun. All my neighbours disagree to this proposal.</p>	<p>The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. This will help to ensure that land is retained for ecological benefit. The Policy does not stipulate that there would be 4 storey buildings – the scheme would have to respect the amenity of neighbours and would most likely be a range of 2-5 bedroom 2 storey dwellings.</p>
Resident	LP0066	Pub0063	<p>We would like to formally object to the re-designation of the Green Belt - GN3 Green Belt land - which backs on to Coronation drive, Gala, and Lithgo Close. Specifically, we wish to know which authority gave permission for this Green Belt land to be changed? Was it a local re-designation, or a government entity? In either case, we wish to have the contact details so ourselves and other residents can contact them directly.</p> <p>Many people bought their properties with the specific understanding that nothing COULD be built near to them in the future because it was declared Green Belt Land, so you can't just change it when it suits you.</p> <p>Additionally, land for wildlife and birds is shrinking so rapidly, and there are plenty of other spaces for building, even some abandoned properties in built up areas in Seaton itself being available now.</p> <p>You suck all the joy out of living in this town, you have no idea how much unrest all these matters cause.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area and therefore unfortunately the references to green belt discussions are not relevant in this instance. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used.</p> <p>The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan (which was consulted on between May and July 2016), following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 70 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors which will help in terms of ecology. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0224	Pub0071	<p>In 2006 local plan the field behind Lithgo Close, Seaton Carew was protected green space therefore couldn't be built upon. In the 2016 Local Plan, half of the field has been reclassified as brown field (the half behind Lithgo Close). I am objecting to changes from protected green field to brown field so that in the future it can be built upon.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan (which was consulted on between May and July 2016), following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 70 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors which will help in terms of ecology. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan.</p>
Resident	LP0223	Pub0072	<p>In the 2006 local plan the field behind Lithgo Close, Seaton Carew was protected green field space therefore couldn't be built upon. In the 2016 Local Plan, half of the field has been reclassified as brown field (the half behind Lithgo Close). I am objecting to changes from protected green field to brown field so that in the future it can be built upon.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The emerging plan will replace the 2006 Local Plan once adopted at which time the allocation from the 2006 plan will cease to be used. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan (which was consulted on between May and July 2016), following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 70 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors which will help in terms of ecology. It is not considered brown belt – the land is considered green field but proposed for a housing site. The Planning Inspector who examines the plan will be required to form a view on whether it is appropriate as a housing site and allocated as such within the Local Plan.</p>

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0323	Pub0082	See Pub0061 for the representation.	Rep is a duplicate of Pub0061 by the same person - See Pub0061 for response.
Environment Agency	LP0031	Pub0101	<p>We wish to raise significant concerns regarding the designation of the Coronation Drive site for housing development in Policy HSG3: Urban Local Plan Sites. This area of land is completely underlain by a former historic landfill and was known as the Coronation Drive landfill site. The site was operated by Hartlepool District Council between 1977 and 1987 for the disposal of construction wastes and incinerator ash. The Environment Agency has no environmental monitoring results for this site. However, given the period of time this material was deposited, the site is assumed to contain a significant proportion of biodegradable wastes which may still have the potential to produce landfill gas. It is likely that we would object to the building of residential dwellings at this site without extensive ground contamination surveys beforehand which would need to demonstrate that the site could suitably mitigate any potential risk of landfill gas, subsidence and land contamination issues.</p> <p>We acknowledge that at publication stage the council have reduced the overall size of the site and also its capacity from approximately 100 dwellings to approximately 65 dwellings. However, our advice still stands in that any further housing development in this area should not proceed without extensive ground contamination surveys having been undertaken beforehand.</p>	The Council notes the Environment Agencies concerns regarding the Coronation Drive site in relation to the contamination on site and are aware that extensive ground contamination surveys need to be undertaken. This is something which the Council are working on to illustrate it can be safely remediated and still form a viable housing site.

Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0344	Pub0105	<p>Further to the above, please accept this as a formal complaint against the proposal to change the land GN3 from Green Belt to Brown Belt status and subsequent proposed development.</p> <p>This land has been designated as contaminated and therefore would be detrimental to ALL neighbouring families, putting their health at risk, during construction and thereafter.</p> <p>Also, this area is a haven for numerous wildlife and their existence is vital in an ever increasing concrete world. These are just two of the many reasons to object to the proposals suggested.</p> <p>On closing, having lived in Seaton Carew for over 40 years, witnessing many changes, I feel that our beautiful village is fast becoming over saturated and as a consequence is diluting the heart of it.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The land is not green belt land which is a specific green designation – there is no green belt within the Tees Valley area. The emerging plan will replace the 2006 Local Plan once adopted. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 70 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. It is noted that there are contamination issues on this site, an issue that has also been identified by the Environment Agency, and it is realised that this contamination would have to be removed to make the site suitable for housing development. This is an issue that the Council is continuing to investigate to ensure that the contamination could be dealt with in an appropriate and safe manner whilst still maintaining the viability of the site.</p>



Company	Unique Ref	Pub Ref	HSG3 Urban Local Plan Sites	HSG3 Urban Local Plan Sites HBC
Resident	LP0353	Pub0128	<p>I am writing to you as a long time resident of Seaton Carew to object to the proposed development of housing on the land behind Lithgo close. The reasons behind my objections are simple,</p> <p>1. The Seaton Snook tidal beck runs right outside my house and is frequently up at a high level, in winter times very close to bursting it's banks in recent years, the addition of extra housing comprising more tarmac concrete etc will only add to the rain water run off therefore exacerbating the problem and raising levels even higher which in turn could flood existing properties.</p> <p>2.The area for proposed development is a haven for wildlife and wild flowers and in summer time the area is in full bloom with wild foxglove and wild cornflower among the many different varieties growing. These flowers in turn attract wildlife which in turn is important for the biodiversity of the area.</p> <p>3.The proposed land is a green area, we as seaton residents have already had to shoulder green areas taken away for housing ( behind Elizabeth way shops &amp; the area next to seaton cricket and rugby ground ). Is it not time to start building housing on areas which have previously been used as housing or spending money regenerating town centre housing rather than expanding out more and more leaving central areas desolate !!</p> <p>I hope you take into consideration my views I may not have articulated them very well but I'm sure you'll understand what im getting at and I'm sure I am not the only resident concerned by this proposal.</p>	<p>The land in question is currently allocated as protected open space under Policy GN3 (Protection of Key Green Space) of the 2006 Local Plan. The site at Coronation Drive was proposed for 100 homes within the Preferred Option Local Plan, following comments from a number of parties during that consultation the dwelling numbers were reduced to approximately 65 dwellings, with more space retained as open space and protected under Policy NE2(e) Green Corridors. This will help to ensure that land is retained for ecological benefit.</p> <p>With respect to the existing Seaton Snook beck, the draft update of the strategic flood risk assessment recommends that the housing development proposed for the site is subject to detailed layout and design considerations around flood risk and any planning application to develop the site will need to be consistent with this recommendation. With regards to the hard surfaces increasing the surface water discharge into the watercourse, this will be managed by a series of engineering techniques whereby surface water will be retained on the site and discharged at a rate that will not overburden the watercourse.</p> <p>The representation suggests that the Council should concentrate on spending money on regenerating the Town Centre. The vitality and viability of the Town Centre is a very high priority for the Council but this is a separate issue from that of ensuring that a range of housing sites are available to meet the Borough's housing requirement.</p>
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

**Policy HSG4: The South West Extension Strategic Housing Site**

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
Resident	LP0270	Pub0007	<p>I have glanced over all 300 plus page of the plan on the council website, however do have some concern's/questions.</p> <p>I am concerned about the large housing estate planned for Owton Mannor/Fens. If this is going to be like Bishop Cuthert or whatever you want to call it then its going to be an eye sore. Bishop Cuthbert is badly planned with houses on top of one another, residents/visitors park on the main road making navigating it difficult, it seems (from social media) to have a very large problem with crime, mostly likely due to the layout of the properties. I would hope more care is going to be given to this new estate and the lessons from Throston learned.</p>	<p>The South West Extension already benefits from planning permission. The South West Extension Policy Hsg4 is to help ensure design standards and masterplanning of a high quality is ensured at the Reserved Matters Stage (this is a stage of planning which de</p>
Fens Residents Association	LP0011	Pub0012	<p>Policy HSG4: The South West Extension (SWE)</p> <p>Although FRA very much doubts that the Claxton element of the SWE will be needed (see our comments on Policy HSG1), we see the need for the plans to be revised to cover two major issues:</p> <ul style="list-style-type: none"> <li>• As we have previously pointed out, only one area of flood shelving is planned alongside Greatham Beck. More are needed upstream within the development area to provide extra protection against flood risk. This is not a big ask, and the extra shelving would provide additional ecological gain. Surely Hartlepool Council can insist on the extra shelving to protect the interests of its residents? No matter what the developers and the Environment Agency state climate change is difficult to predict and no opportunity should be missed to reduce flood risk.</li> <li>• Casualties and fatalities at the notoriously dangerous staggered junction of the A689/Dalton Back Lane/Greatham Bank Road drove the need for it to be made safe at the same time as it would form the southern entrance to the SWE. This golden opportunity was abandoned before the Planning Committee Meeting which approved the application, the reason given being that the number of units proposed had reduced. This is 'developer led planning' at the serious expense of Hartlepool residents and other users of that junction. Hartlepool Council should now make every effort possible to rectify the situation. It is within their power.</li> </ul>	<p>In terms of your concerns relating to flood risk and your view that additional flood shelving is needed, the proposals were assessed as part of the outline planning permission which was granted subject to the signing of the legal agreement; the Council's engineers and the Environment Agency were both satisfied with the flood mitigation proposed as part of the application.</p> <p>The Council set out its position in relation to the junction at the A689/Dalton Back Lane within the Consultation Statement following the Preferred Options. For reference the Councils response stated:          "The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner).          Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to</p>

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
				<p>Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction.</p> <p>The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police." – This position remains the same.</p>
Friends of Rossmere (Residents' Group)	LP0233	Pub0085	<p>South Extension</p> <ul style="list-style-type: none"> <li>• The new junction on the A689 I fear will lead to tail backs up the A689 causing a potential death trap</li> <li>• The South Extension is being built on an area prone to flooding. I would question the validity of such a location and hope that sufficient anti flood measures have been taken.</li> <li>• Having inspected the layout of the South Extension in the past I in common with Jim Lindbridge feel that extra traffic will be funnelled down Brierton Lane which in busy times can be a challenge due to parked cars anyway. I hope the council undertakes a plan of adding hard standing adjacent to the properties on Brierton Lane and introduces double yellow lines to curb the parking problems.</li> </ul>	<p>In terms of your concerns relating to flood risk, the proposals were assessed as part of the outline planning permission which was granted subject to the signing of the legal agreement; the Council's engineers and the Environment Agency were both satisfied with the flood mitigation proposed as part of the application.</p> <p>The Council set out its position in relation to the junction at the A689/Dalton Back Lane within the Consultation Statement following the Preferred Options. For reference the Councils response stated:  "The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner).</p> <p>Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing</p>

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
				<p>planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane.</p> <p>The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction.</p> <p>The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police." – This position remains the same.</p> <p>With respect to Brierton Lane, the Council's Highway section are satisfied that the proposed improvements to the Brierton Lane/Catcote Road junction and other junctions in this area will sufficiently mitigate any significant impact on the local road network from the proposed development.</p>

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
Resident	LP0204	Pub0088	<p>South west extension too large site and should have another road to bypass A689 to A19 towards Stockton/Middlesborough. Too much traffic would come from site as most houses today have 2 or more cars, A689 from Hartlepool to A19 already too congested and more would cause havoc. Impact on A689 would become dangerous, unsafe and hazardous especially between 7am-9:30am and 3:00pm-7pm. When accidents or road works on A689 or A19 traffic comes to standstill with people unable to get to any destination. Very frustrating stuck in traffic for very long times and this has been happening very frequently on A19 since beginning January. Should have more than one way in/out site.</p> <p>Do not need more shops/pubs in area and would be too close A689 and difficult to get on/off road at busy time. Should support nearby villages as shops/pubs etc are already struggling even some pubs closing. Current primary schools should be supported as well as existing community centres.</p> <p>If any traffic lights put between Dalton Back lane and Sappers Corner when traffic slow or standstill traffic would use Greatham as rat run to bypass lights. This should not be allowed sa unfair to villagers as when road works were on traffic diverted through Greatham and drivers raced through without much care which is dangerous coming around corner near Hope &amp; Anchor with people having difficulty getting onto road in High Street.</p> <p>Need new infrastructure to support any development if Elwick have a bypass there should be on similar for South West extension. Especially as more houses are intended for site.</p>	<p>The South West Extension already benefits from outline planning permission with an element in the northern part benefitting from full planning permission. As part of those permissions the highways impacts and improvements needed were agreed as part of the applications. The plan safeguards land to the north of the south west extension between Brierton Lane and the High Tunstall scheme with a longer term view of building a road between the two developments to take some of the pressure off Catcote Road. In terms of the schools and shops and other facilities, it is considered these are needed as part of a development of this size and that existing facilities did not have capacity to cope with the additional population created from the development.</p>
RSPB - Northern England Region	LP0253	Pub0091	<p>Suitable Alternative Natural Greenspaces (SANGs) as mitigation</p> <p>We note that an amount of SANGS has been allocated within some housing policies. It is important to note that the use of SANGs is still experimental. Whilst such measures are welcome in terms of providing a facility for the new residents, to date, there is little evidence to confirm the supposition that they should work in diverting recreational pressure from important nature conservation areas, in particular in a coastal location. In the context of mitigation for predicted adverse effects on SPAs from recreational disturbance (including dog walking), SANGs were originally developed to protect inland lowland heathland sites around the Thames Basin Heaths and the criteria to establish them were intended to replicate key aspects of the experience of using lowland heath. We consider that the Council needs to supply evidence that indicates that the alternative green spaces provided will work to address coastal visitor pressure, and in particular to show that people will choose to use an inland space rather than visiting the coast.</p>	<p>HBC assesses that the pull of open countryside, whether it is the coast, heathland or other natural habitats, is equally strong for those communities living within reach of it and wishing to pursue recreational activities. HBC does not think that it would be proportionate to undertake research to demonstrate this, when it has used the precautionary principle to assess the impact of recreational disturbance on its coastal European Sites.</p>

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>A Phase 2 Site Deliverability Document has been submitted in support of a wider allocation than the allocated site (see written representation).</p> <p>We are pleased to note the amendments to Diagram 1 following our earlier comments to the Hartlepool Local Plan Preferred Options Consultation Document however in the interests of accuracy we would continue to request that the proposed land identified for a school is labelled on the diagram as 'School Land' rather than 'Green Wedge'. We would also request that the 'safeguarded land for the future road' label is identified as an indicative route to provide an element of flexibility.</p> <p>Persimmon Homes support the general approach outlined within Policy HSG4 to the South West Extension but request that part 3 of the policy is amended to read as follows:</p> <p>"Land will be set aside and allocated for the following neighbourhood facilities:</p> <p>Safeguarded land (2.7 hectares) for Primary Education provision (Use Class D1) in accordance with policy INF4, and;..."</p> <p>The figure of 2.7 hectares was initially identified when the hybrid application was first submitted. Through the course of the subsequent application and ongoing Section 106 discussions, this position has since changed and the 2.7 hectare figure is now no longer reflective of the most update Draft Section 106 Agreement.</p> <p>The delivery of the school, in accordance with Policy INF4, will be secured via the Section 106 agreement and therefore Persimmon Homes consider a reference to the site area within the policy to be both incorrect and unnecessary.</p> <p>In relation to the fourth bullet point, we would also request the following amendment to the policy:</p> <p>"Land is to be safeguarded for an access road through the site connecting the A689 and Brierton Lane with appropriate vehicular, pedestrian and cycle linkages to the adjoining urban area will be provided."</p> <p>This change is necessary as the link road connecting the A689 and Brierton Lane can only be provided as part of a Second Phase to Hartlepool South West Extension and given the policy constraints, as currently proposed within the plan, a Second Phase would not be possible and therefore the road, in full, cannot be delivered.</p>	<p>Note that Persimmon are pleased with amendments to Diagram 1 from Preferred Options Stage but want the school site shown as School Lane rather than Green Wedge. <b>Agree to amend Diagram 1 to show school land under Policy INF4 (Community Facilities). Also agree to amend the key on Diagram 1 to read "indicative route of land safeguarded for the future road."</b></p> <p>Note comments regarding point 3 of Hsg4 in relation to the school, however it is unclear what change is wanted – the proposed wording reads exactly the same as the Publication Document – do Persimmon want the site size removing or changing to reflect an updated position?</p> <p>The land in relation to the link guard is safeguarded. <b>Note concerns regarding the current wording and propose to remove the wording "...will be provided" from the end of the criterion.</b></p> <p>As previously noted under Policy LS1, the Council notes the ongoing concern with regard to the element of Policy LS1 which refers to the Strategic Gap. In order to overcome the concerns the Council will undertake a piece of work prior to the examination to assess the parcels of land which are included within the Strategic Gap to ensure the policy is supported by evidence.</p> <p>The HBF's and other house builders comments in relation to affordable housing and flexibility if sites stalled at the Preferred Options Stage were taken on board and a 20% allowance was included on top of the OAN to allow for a buffer which would provide both additional affordable units over and also flexibility if any sites stalled. No further alteration to the plan is considered necessary. As such it is also not considered necessary to safeguard any land for future developments as suggested as the local authority consider that the housing requirement is already aspirational and builds in flexibility to allow if sites stall. The 2nd phase was part of the previous plan, however, as stated in other responses a view was taken that two strategic sites along with western edge was a more appropriate proposal and would minimise reliance</p>

Company	Unique Ref	Pub Ref	HSG4 The South West Extension	HSG4 The South West Extension HBC
			<p>Nevertheless, as discussed in our response to Policy LS1, specifically the impractical and inflexible Strategic Gap policy, we strongly believe that the Second Phase of the South West Extension should be identified as contingency/safeguarded land. The second phase formed part of the wider HSWE site which was previously draft allocated for 2500 units and found to be a sound by a government appointed inspector following the Public Examination in 2013.</p> <p>Whilst it is accepted that the Council are now pursuing a different approach, the plan lacks a fallback position or the flexibility to respond to changing market conditions to ensure that it can continue to meet its housing needs should sites stall or fail to come forward. Given the acceptance by the Council that the wider Hartlepool South West Extension land will form part of future plans beyond the current plan period we see no harm identifying the site as safeguarded land within this plan to come forward in later phases should the need arise.</p> <p>As safeguarded land, the site would only come forward if the need arose and therefore it would not prejudice existing preferred allocations. It would however contribute to the creation of a buffer within the Council's housing supply to ensure that the plan provides sufficient flexibility to adapt to changing conditions over the full plan period. As safeguarded land, should the Council's position in terms of a 5 year land supply weaken at any point before 2031, the site will fill the void and ensure that the long-term expansion of the town continues to be 'plan-led' in accordance with the core principles of the planning system.</p> <p>A Deliverability Statement detailing how the whole site is deliverable with no legal, policy or physical constraints which would prevent or inhibit development coming forward over the plan period was submitted to the Council in March 2015 for consideration. As a refresher the statement is again enclosed within this letter and Persimmon Homes would draw the Council's attention to the document. The statement demonstrates that the second phase is sustainable as well as suitable, available and achievable.</p>	<p>on one house builder who already has a range of other sites included within the housing requirement.</p>
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

**Policy HSG5: High Tunstall Strategic Housing Site**

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
High Tunstall Homes	LP0060	Pub0002	<p>I refer to the above and write to make representations on behalf of our clients, Tunstall Homes Ltd, in respect of the proposed allocation of land at High Tunstall as a 'Strategic Housing Site'.</p> <p>I would confirm that we fully support Policy HSG5, 'High Tunstall Strategic Housing Site' and the associated Policies INF4, 'Community Facilities', NE2i 'Green Infrastructure' (amenity open space), and NE3, 'Green Wedges', insofar as they relate to the allocation of land at High Tunstall as a strategic housing site and the proposed development as illustrated on the masterplan (dwg ref: 14.039 P101 K) that has previously been submitted to the Council. Black &amp; white and coloured copies of the masterplan are attached for your convenience.</p> <p>In this regard we consider that the aforementioned Local Plan Policies are legally compliant and sound.</p>	<p>Note support for policies INF4 (Community Facilities), HSG5 (High Tunstall), NE2(i)(Green Infrastructure) and NE3 (Green Wedges). We also note that you consider the plan to be legally compliant and sound.</p>
Resident	LP0274	Pub0015	<p>Main complaint is traffic congestion and traffic at Park Road Elwick Road junction</p>	<p>The Local Infrastructure Plan sets out where improvements to the local road network will be necessary to accommodate the proposed growth within the Local Plan. Whilst it is accepted that there will be increased levels of traffic in the local area, the proposals in the Infrastructure Plan, in particular the proposed bypass and grade separated junction at Elwick will see significant improvements to the local road network. This Park Road / Wooler Road junction does suffer from congestion at peak times – some improvements have been secured as part of the Tunstall Farm permission. Whilst other improvements are hindered by the layout of the junction, other improvements will continue to be explored.</p>



Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
Resident	LP0281	Pub0025	<p>This proposal will substantially increase traffic flow in both directions along Park, Catcote, Wooler and Elwick roads. This will compound travel issues around the West Park Estate Roads as increased traffic will restrict flow. The additional “normal” traffic may also hinder any emergency services. This is a major concern with this plan which does not indicate any proposal to deal with traffic flow through the town.</p> <p>In particular the traffic lights at the top of Park Road are a bottle neck; any additional traffic will increase queues heading both ways on Elwick Road, more specifically turning right to approach the Park Road traffic lights. Any proposal to build in the area of High Tunstall, Quarry Farm etc. should negate the need to travel through the West Park Estate and address the access problems in this area.</p>	<p>The Local Infrastructure Plan sets out where improvements to the local road network will be necessary to accommodate the proposed growth within the Local Plan. Whilst it is accepted that there will be increased levels of traffic in the local area, the proposals in the Infrastructure Plan, in particular the proposed bypass and grade separated junction at Elwick will see significant improvements to the local road network. The Park Road / Wooler Road junction does suffer from congestion at peak times – some improvements have been secured as part of the Tunstall Farm permission. Whilst other improvements are hindered by the layout of the junction, other improvements will continue to be explored including whether it is possible to signalise the whole junction.</p>
Resident	LP0202	Pub0078	<p>We bought this property because of its semi-rural location and are disgusted that this area is going to turn into another Bishop Cuthbert which consists of cramming as many houses into an area in order to make as much money as possible.</p> <p>Quarry Farm, Tunstall Farm were never in the original local plan but its amazing how quickly building can progress even though a lot of the residents are opposed to these developments. This is an area where the people pay huge amounts in poll tax so their views should be considered.</p> <p>If you look at the proposed local plan &amp; compare the South West extension with the High Tunstall development. The former has had, a lot more consultation and more consideration to existing residents. Why should the South West extension have so much more green space:- 50.92 ha whereas the High Tunstall site only has a very narrow strip of 13.5 ha running through the development. Also the new houses on the High Tunstall development are very close to the existing houses.</p> <p>There’s talk of a care home being built on the High Tunstall development. There are numerous care homes in the town which are standing empty. Why can’t some of these be brought back into use.</p> <p>You propose a primary school. Children grow up so where will they go when they reach secondary school age?</p> <p>You want all these extra homes &amp; there will be a lot more traffic passing High Tunstall school. There are no traffic calming measures near this school and it is a road where motorists speed a lot already. It will be even more dangerous.</p>	<p>Unfortunately, due to the geography of Hartlepool and the existing heavy industry to the south, growth of the town will always be westward. The plan includes a range of policies on design of development which are in line with national policy and builds on the requirements under paragraph 56 of the NPPF requiring good design. These policies should help to avoid poor design that has occurred on instances in the past.</p> <p>Quarry Farm and Tunstall Farm were both refused by Planning Committee and were taken to appeal (an independent inspector is appointed and holds an inquiry into the issue) by the developers who won the appeals and gained planning permission.</p> <p>In terms of the green space within the South West Extension, a number of landscape and infrastructure issues such as overhead cables, a major gas pipeline and the river corridor resulted in the green wedge being of a significant size. Residents in the areas surrounding the High Tunstall Scheme and the Quarry Farm 2 scheme have been consulted not only through the Local Plan consultations but also through planning applications which are currently with the Local Authority to determine.</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
				<p>Originally, there was proposed to be a care home on the High Tunstall site, however in the most recent masterplan that has been submitted to the Local Authority, there is no care home included in the plans.</p> <p>Currently in the north west part of the urban area of Hartlepool there is very little capacity in existing primary schools which is why there is a requirement for the development at High Tunstall to provide a site for a new primary school. However, in the existing secondary schools within the town the Education team have informed that there is the potential to cope with the proposed growth of the town on the existing sites, possibly through rebuild or extensions to those schools.</p> <p>Note concerns in relation to highway capacity and safety. The Local Plan and associated Infrastructure Plan set out proposals for improvements to highway infrastructure to allow for the proposed developments. Not only will there be the provision of the bypass and grade separated junction at Elwick which will help to improve highway capacity and safety, along with the benefit of helping to distribute the flows of traffic more evenly, there will also be significant work at the A179/A19 junction to signalise and improve the junction. These major works will be accompanied by schemes to improve local road junctions as set out within the Local Infrastructure Plan which will help to improve the network to deal with the increase in traffic associated with the new developments. Where the Highways team deem it necessary to provide traffic calming measures or crossings to improve safety, these will be secured as part of the planning applications.</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
Resident	LP0322	Pub0081	<p>1. The number of new housing proposed for the High Tunstall area is unnecessarily large, and will impact too heavily on greenbelt land.</p> <p>2. The resulting extra traffic will cause hazards for children attending the schools (secondary and primary), many of whom will be travelling by foot or on bicycles.</p>	<p>The proposed developments at High Tunstall and Quarry Farm are on Greenfield land / open countryside – there is no land designated as green belt within the Tees Valley. The scale of the developments is required, not only to meet the identified housing need as set out within the SHMA Addendum (November 2016), but also as a result of the need to have a quantum of development which was able to fund the supporting infrastructure such as the bypass and grade separated junction and also to support the provision of the primary school which is needed given existing capacity issues at the primary level in the North West of the urban area.</p> <p>Note concerns in relation to highway capacity and safety. The Local Plan and associated Infrastructure Plan set out proposals for improvements to highway infrastructure to allow for the proposed developments. Not only will there be the provision of the bypass and grade separated junction at Elwick which will help to improve highway capacity and safety, along with the benefit of helping to distribute the flows of traffic more evenly, there will also be significant work at the A179/A19 junction to signalise and improve the junction. These major works will be accompanied by schemes to improve local road junctions as set out within the Local Infrastructure Plan which will help to improve the network to deal with the increase in traffic associated with the new developments. Where the Highways team deem it necessary to provide traffic calming measures or crossings to improve safety, these will be secured as part of the planning applications.</p>
Homes and Communities Agency	LP0063	Pub0084	<p>It is the HCA's position that the Hartlepool Local Plan Consultation Draft does not satisfactorily demonstrate that High Tunstall is a deliverable site. Given the critical importance of High Tunstall to the Hartlepool Local Plan, if this strategic allocation is not demonstrably deliverable then the draft plan is unsound.</p> <p>The Local Plan Publication Draft proposed to allocate approximately 1,200 homes at High Tunstall via urban extensions. A further 220 homes are proposed at Quarry Farm.</p> <p>We understand that High Tunstall is in a number of landownerships and that HBC</p>	<p>High Tunstall is in a more sustainable location and the infrastructure needed to support the site would have greater benefits which would be far wider ranging than supporting just one site – for example the new grade separated junction and bypass at Elwick will not only support the housing development, it was also improve highway safety at Elwick by closing the central reserves, it will take large amounts of traffic out of Elwick village making it far safer for residents and it will help to provide a third route into Hartlepool from the A19 thus helping to</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
			<p>intend to recoup the costs of enabling infrastructure from the landowners as development come forward. Without being aware of the specifics of any agreements, this is potentially a complex process and one which introduces risks to delivery particularly given the significant costs associated with delivering the enabling infrastructure.</p> <p>On this basis High Tunstall does not compare favourably with North Burn, which held by a single landowner.</p> <p>Current planning applications for parts of High Tunstall and Quarry Farm are subject to a holding directive from Highways England due to concerns regarding road safety resulting from increased traffic movements to and from the A19 Elwick Village junction. A remedial scheme has been identified which comprises:</p> <ul style="list-style-type: none"> <li>• Closure of the central reservation of the A19 at Elwick Village to prevent right hand turns to and from the A19;</li> <li>• Construction of a new grade separated junction on the A19 on the northern junction for Elwick Village; and</li> <li>• Construction of a bypass road to the north of Elwick Village.</li> </ul> <p>The estimate for the remedial scheme identified above is in the region of £18 million. The HCA have concerns about this figure given that the estimates for a more modest scope of highway improvements at North Burn are estimated to be approximately of £25 million.</p> <p>Notwithstanding the concerns regarding the estimate for the remedial scheme, the HCA is given to understand that the remedial scheme is not funded.</p> <p>In a similar manner to North Burn, High Tunstall requires the remedial scheme to be implemented in full before meaningful development can take place. To fund the remedial scheme, Hartlepool Borough Council proposed to use Regional Growth Scheme funding through the Tees Valley Combined Authority, establishing a claw-back mechanism via S106 contributions from developers on a pro rata basis.</p> <p>Recent Government announcements on RGF funding indicate that the level of funds likely to be available via the Tees Valley Combined Authority are likely to be insufficient to fund the High Tunstall remedial scheme. Consequently, Hartlepool Borough Council have recently appointed the HCI (the investment arm of the HCA) with an application to provide funding via the HBF scheme. No decision on this funding has yet been made.</p>	<p>re-profile traffic movements and reducing some of the congestion on the A689 and the A179. Spending £18million on the grade separated junction and bypass to the benefit of a large proportion of the Borough is considered far more appropriate than spending £25m to provide access to North Burn on its own. It must be noted that the Council has always been willing to use prudential borrowing to fund the works should the other funding options not work. The £18m was based on a detailed design for the grade separated junction produced by Highways England which included a significant contingency. The bypass element was costed by the Council's engineers who are currently working on the detailed design following site surveys and productive meetings with landowners.</p> <p>Given the Council are confident over the deliverability of the bypass and the fact that both High Tunstall and Quarry Farm 2 currently have planning applications in with house builders linked to them it is considered that the sites are deliverable in the early stages of the plan.</p> <p>The HCA using information from discussions with landowners on the High Tunstall and Quarry Farm sites to promote their site as more deliverable is not considered appropriate practice, especially when the money that the HCA would use for their own site is public money which the government has made available to invest in infrastructure to unlock housing developments – surely the proposals at High Tunstall would have a far better cost benefit analysis as it would not only unlock the housing within this plan period but also in future plans whereas the investment in North Burn would only unlock 1000 homes at that site.</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
			It should therefore be noted that when completing the Local Plan Publication Draft, Hartlepool Borough Council discounted a funded and deliverable strategic housing site in preference for High Tunstall which is not funded and therefore not deliverable.	
Story Homes	LP0219	Pub0090	Story Homes supports the Council's approach to allocating 1,200 dwellings as part of a strategic site in High Tunstall. The positively prepared and sustainable allocation, which incorporates a primary school and playing fields, a green wedge, sustainable drainage provision and a local centre and play facilities is a welcome addition to Hartlepool's housing delivery strategy over the next plan period and consistent with the NPPFs approach to delivering a wide choice of high quality homes.	Note support for the proposed sustainable development at High Tunstall.
RSPB - Northern England Region	LP0253	Pub0091	Suitable Alternative Natural Greenspaces (SANGs) as mitigation We note that an amount of SANGS has been allocated within some housing policies. It is important to note that the use of SANGs is still experimental. Whilst such measures are welcome in terms of providing a facility for the new residents, to date, there is little evidence to confirm the supposition that they should work in diverting recreational pressure from important nature conservation areas, in particular in a coastal location. In the context of mitigation for predicted adverse effects on SPAs from recreational disturbance (including dog walking), SANGs were originally developed to protect inland lowland heathland sites around the Thames Basin Heaths and the criteria to establish them were intended to replicate key aspects of the experience of using lowland heath. We consider that the Council needs to supply evidence that indicates that the alternative green spaces provided will work to address coastal visitor pressure, and in particular to show that people will choose to use an inland space rather than visiting the coast.	HBC assesses that the pull of open countryside, whether it is the coast, heathland or other natural habitats, is equally strong for those communities living within reach of it and wishing to pursue recreational activities. HBC does not think that it would be proportionate to undertake research to demonstrate this, when it has used the precautionary principle to assess the impact of recreational disturbance on its coastal European Sites.
Resident	LP0339	Pub0097	I wish to comment on the Hartlepool Local Plan as I have very serious concerns particularly relating to the loss of greenbelt and the proposed development at Tunstall.  The proposed Tunstall development will result in the loss of circa 69 ha of prime agricultural land used to grow cereal crops such as barley and wheat in the heart of the greenbelt separating the conurbation of Hartlepool from the rural villages of Dalton Piercy and Elwick.  This open farmland provides the habitat for a wide variety of wildlife that relies on this habitat to survive as it has become specifically adapted. An example being the nationally endangered Skylark which is frequently seen in this area and is bird	Note your serious concerns and objection to the High Tunstall housing development. It should be noted that the site proposed for development is Greenfield /countryside land, it is not classified as Green Belt which is a particular land designation in Planning terms. The government has clearly set out its desire to see housing growth and given the lack of deliverable brownfield sites in the town and taking account of the geography of Hartlepool the only direction for growth is to the west on Greenfield sites currently used as agricultural land. The growth estimations have been formulated through national guidance in the form of a Strategic Housing Market

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
			<p>that is already on the RSPB's "red" list due to its serious decline primarily due to habitat loss.</p> <p>Another example being the meadow pipit again a fairly common bird currently seen within and adjacent the site of the proposed development and a bird that is on the RSPB's "amber" list due to its serious decline.</p> <p>There is a host of other wildlife that will be seriously compromised by habitat loss from the development including Lapwings, Buzzards, Tawny and Barn Owls. The proposed development will also interfere with existing wildlife corridors within the green belt that will affect the movement of animals like Roe Deer that are found in the area.</p> <p>The site of the proposed development appears to be right in the middle of the Strategic Gap that presumably identified specifically to form a barrier between the conurbation of Hartlepool and the rural villages.</p> <p>The irreversible loss of habitat will also seriously compromise the rural integrity of the adjacent villages particularly Dalton Piercy. Already Dalton is only separated from Owton Manor by a few fields. The proposed development will result in Dalton being little more than a "rural theme park" within the greater conurbation of Hartlepool.</p> <p>The proposed Tunstall development is clearly not environmentally sustainable and is clearly at odds with the Consultation Local Plan summary notes that claim to "Protect and enhance the varied natural landscapes and geological features of the area and to maintain and enhance biodiversity" The proposed plan will do the exact opposite and result in irreversible greenbelt and habitat loss.</p>	<p>Assessment (SHMA) which the authority is required to follow – this takes account of information from the Census and demographic, economic and household forecasts.</p> <p>It is accepted that the proposals will have an impact of habitat for a range of birds. In particular it will probably result in the loss of some lapwing and skylark habitat, however with other species there are opportunities to provide mitigation such as roosts and new owl boxes. Due to the issues described above relating to the geography the only site for growth are westwards onto agricultural land and therefore other sites would experience similar issues, including brownfield land within the town.</p> <p>The Strategic Gap proposed would be to the west of the High Tunstall development and is proposed to protect the integrity of the villages.</p> <p>The previous plan was withdrawn in 2013 following a meeting of full Council which stated the reasons for withdrawal at the time. The previous plan included a larger South West Extension – it was considered that two smaller strategic sites was the preferred route this time so as not to be too reliant on one site to deliver. The sites identified are considered sustainable as highlighted in the Sustainability appraisal which accompanies the Local Plan – whilst it is accepted that there are some environmental impacts of the proposals these are balanced and outweighed by other criteria. The green wedges which will be created as part of the developments will also deliver environmental benefits in the future which may be far more varied than the existing use as farm land.</p> <p>In terms of the housing forecasts, they are detailed in the Strategic Housing Market Assessment Addendum (SHMA) November 2016. The allocations proposed link with the deliverable planning permissions to meet the need identified.</p> <p>The 2015 SHMA and the subsequent 2016 Addendum</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
				<p>identified that Hartlepool has its own housing market area with a large percentage (80.2%) of moves in the year preceding the census being from within Hartlepool. The Tees Valley Economic Strategy seeks to see significant jobs growth over the next ten years but with a focus on increasing the existing employment rates within the Tees Valley and reducing the unemployment rate. As such, and bearing in mind that Hartlepool is its own housing market, scenario D2 assumed a split of 70% of jobs would be filled by existing residents, with some net in-migration and some in commuting, resulting in a dwelling requirement of 240 dwellings per year. Ongoing meetings and discussions with neighbouring authorities and those within the Tees Valley have formed an element of the ongoing duty to cooperate – these authorities have been consulted with during the formation of the SHMA and other meetings with regard to the Local Plan have also discussed the issue, with no objections being raised to the proposed housing figures or how they were formed or the assumptions on migration within them.</p> <p>On this basis the local authority believe that the objectively assessed need and housing requirement contained within the Publication Local Plan are both appropriate and sound and also that the ongoing work, meetings and liaison between neighbouring authorities, as well as the house builders and other statutory bodies, has ensured that the requirements under the Duty to Cooperate have been met.</p> <p>The site next to Spion Kop (Old Cemetery Road / Former Britmag Site) is not allocated as sites which benefitted from planning permission were simply shown as white land on the proposals map but are included within the housing numbers which form the planning permissions element of the housing requirement shown in table 7 within the Housing Chapter of the Local Plan.</p> <p>As mentioned above, at a Tees Valley Level there is significant work occurring to attract new business to the Tees Valley and to increase job opportunities, with these</p>

Company	Unique Ref	Pub Ref	HSG5 High Tunstall	HSG5 High Tunstall HBC
				<p>aspirations set out in the Tees Valley Strategic Economic Plan.</p> <p>This sub-regional work is being complimented by work within Hartlepool looking to increase the student population, but with an aim to create the infrastructure and opportunities to maintain these economically active elements of the population through the creation of an Innovation and Skills Quarter which will provide job opportunities closely linked with the colleges including the provision of workshop space and links with some of the national and international companies based within Hartlepool. Hartlepool has historically lost population to areas outside of the Tees Valley and Durham often as the jobs were not available in the sectors people wanted to work in – through the creation of these opportunities to access the jobs market, the aim of the Council is to retain this element of the working population and to significantly boost the economy of Hartlepool.</p> <p>It is considered that the provision of the bypass and grade separated junction at Elwick in association with the developments in the area will form a far safer option for travel than the very narrow and winding road to Dalton Piercy and would likely take a similar amount of time.</p> <p>Movements through the village will continue to be monitored over time and appropriate solutions proposed if it does become apparent that some drivers are using the option to go via Dalton Piercy.</p>
Resident	LP0343	Pub0103	Given the major housing development at High Tunstall is of significant width, East to West, and given the variety of wildlife along the current Western edge of housing, we believe that the proposed development must include additional East-West wildlife corridors, including access points for safe crossing above and below any major new roads.	The issue will be discussed with the developer in relation to the masterplan for the site.
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.



**Policy HSG5a: Quarry Farm Strategic Housing Site**

Company	Unique Ref	Pub Ref	HSG5a Quarry Farm Housing Site	HSG5a Quarry Farm Housing Site HBC
Resident	LP0274	Pub0015	Main complaint is traffic congestion and traffic at Park Road Elwick Road junction.	As HSG5 above
Resident	LP0281	Pub0025	<p>This proposal will substantially increase traffic flow in both directions along Park, Catcote, Wooler and Elwick roads. This will compound travel issues around the West Park Estate Roads as increased traffic will restrict flow. The additional “normal” traffic may also hinder any emergency services. This is a major concern with this plan which does not indicate any proposal to deal with traffic flow through the town.</p> <p>In particular the traffic lights at the top of Park Road are a bottle neck; any additional traffic will increase queues heading both ways on Elwick Road, more specifically turning right to approach the Park Road traffic lights. Any proposal to build in the area of High Tunstall, Quarry Farm etc. should negate the need to travel through the West Park Estate and address the access problems in this area.</p>	<p>The Local Infrastructure Plan sets out where improvements to the local road network will be necessary to accommodate the proposed growth within the Local Plan. Whilst it is accepted that there will be increased levels of traffic in the local area, the proposals in the Infrastructure Plan, in particular the proposed bypass and grade separated junction at Elwick will see significant improvements to the local road network. The Park Road / Wooler Road junction does suffer from congestion at peak times – some improvements have been secured as part of the Tunstall Farm permission. Whilst other improvements are hindered by the layout of the junction, other improvements will continue to be explored including whether it is possible to signalise the whole junction.</p>

Company	Unique Ref	Pub Ref	HSG5a Quarry Farm Housing Site	HSG5a Quarry Farm Housing Site HBC
Resident	LP0309	Pub0056	<p>I would like to object to the local plan which includes Quarry Farm 2. At present HBC plans to allow 220 dwellings on Quarry Farm 2 with the main access being through Reedston Road.</p> <p>Assuming that 220 houses have at least 2 cars each that is 440 vehicles. Assume also that each vehicle makes only ONE trip per day that equates to an ADDITIONAL 880 journeys which will all spill out of Reedston Road onto Cairnston Rd and will either find their way onto Elwick Road and if going South they will travel through Elwick Village to join the A19 If going North they will turn left onto Hart Lane and travel towards the Hart Bypass to join the A19 Both of these junctions are over stretched now with the amount of traffic it will become dangerous and I can foresee many accidents.</p> <p>Alternatively some of the additional traffic will turn left out of Cairnston Road and proceed past the park to the junction with Elwick Road and Catcote Road which again is a notorious junction at the best of time.</p> <p>The whole road network will become overstretched even at normal time but at peak times when people are rushing to schools or to work it will become intolerable with the whole road network becoming grid locked.</p> <p>There is a solution to my objection and that would be to make the main entrance into and out of Quarry Farm 2 at the point which is designated for emergency vehicle access onto Worsett Lane which will need upgrading anyway, It can then join up with the proposed new Elwick Bypass and in so doing takes the traffic safely onto the A19 at the new proposed junction.</p> <p>This would alleviate all the extra traffic being forced to go through a housing estate and Elwick Village and make life more dangerous for the residents especially in the dark mornings and evening rush hours.</p>	<p>Note concerns in relation to highway capacity and safety. The Local Plan and associated Infrastructure Plan set out proposals for improvements to highway infrastructure to allow for the proposed developments. Not only will there be the provision of the bypass and grade separated junction at Elwick which will help to improve highway capacity and safety, along with the benefit of helping to distribute the flows of traffic more evenly, there will also be significant work at the A179/A19 junction to signalise and improve the junction. These major works will be accompanied by schemes to improve local road junctions as set out within the Local Infrastructure Plan which will help to improve the network to deal with the increase in traffic associated with the new developments. Based on the current proposals within the Local Plan, the Highways Authority do not deem that it is necessary to require the access to be via Worset Lane to the Quarry Farm 2 development.</p>

Company	Unique Ref	Pub Ref	HSG5a Quarry Farm Housing Site	HSG5a Quarry Farm Housing Site HBC
Resident	LP0317	Pub0066	<p>I would like to object to the local plan which includes Quarry Farm 2. At present HBC plans to allow 220 dwellings on Quarry Farm 2 with the main access being through Reedston Road.</p> <p>Assuming that 220 houses have at least 2 cars each that is 440 vehicles. Assume also that each vehicle makes only ONE trip per day that equates to an ADDITIONAL 880 journeys which will all spill out of Reedston Road onto Cairnston Rd and will either find their way onto Elwick Road and if going South they will travel through Elwick Village to join the A19</p> <p>If going North they will turn left onto Hart Lane and travel towards the Hart Bypass to join the A19 Both of these junctions are over stretched now with the amount of traffic it will become dangerous and I can forsee many accidents. Alternatively some of the additional traffic will turn left out of Cairnston Road and proceed past the park to the junction with Elwick Road and Catcote Road which again is a notorious junction at the best of time.</p> <p>The whole road network will become overstretched even at normal time but at peak times when people are rushing to schools or to work it will become intolerable with the whole road network becoming grid locked.</p> <p>There is a solution to my objection and that would be to make the main entrance into and out of Quarry Farm 2 at the point which is designated for emergency vehicle access onto Worsett Lane which will need upgrading anyway, It can then join up with the proposed new Elwick Bypass and in so doing takes the traffic safely onto the A19 at the new proposed junction.</p> <p>This would alleviate all the extra traffic being forced to go through a housing estate and Elwick Village and make life more dangerous for the residents especially in the dark mornings and evening rush hours.</p>	<p>Note concerns in relation to highway capacity and safety. The Local Plan and associated Infrastructure Plan set out proposals for improvements to highway infrastructure to allow for the proposed developments. Not only will there be the provision of the bypass and grade separated junction at Elwick which will help to improve highway capacity and safety, along with the benefit of helping to distribute the flows of traffic more evenly, there will also be significant work at the A179/A19 junction to signalise and improve the junction. These major works will be accompanied by schemes to improve local road junctions as set out within the Local Infrastructure Plan which will help to improve the network to deal with the increase in traffic associated with the new developments. Based on the current proposals within the Local Plan, the Highways Authority do not deem that it is necessary to require the access to be via Worset Lane to the Quarry Farm 2 development.</p>
Resident	LP0202	Pub0078	<p>We bought this property because of its semi-rural location and are disgusted that this area is going to turn into another Bishop Cuthbert which consists of cramming as many houses into an area in order to make as much money as possible.</p> <p>Quarry Farm, Tunstall Farm were never in the original local plan but its amazing how quickly building can progress even though alot of the residents are opposed to these developments. This is an area where the people pay huge amounts in poll tax so their views should be considered.</p>	<p>Unfortunately, due to the geography of Hartlepool and the existing heavy industry to the south, growth of the town will always be westward. The plan includes a range of policies on design of development which are in line with national policy and builds on the requirements under paragraph 56 of the NPPF requiring good design. These policies should help to avoid poor design that has occurred on instances in the past.</p> <p>Quarry Farm and Tunstall Farm were both refused by Planning Committee and were taken to appeal (an independent inspector is appointed and holds an inquiry into the issue) by the developers who won the appeals and gained planning permission.</p>

Company	Unique Ref	Pub Ref	HSG5a Quarry Farm Housing Site	HSG5a Quarry Farm Housing Site HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>Suitable Alternative Natural Greenspaces (SANGs) as mitigation</p> <p>We note that an amount of SANGS has been allocated within some housing policies. It is important to note that the use of SANGs is still experimental. Whilst such measures are welcome in terms of providing a facility for the new residents, to date, there is little evidence to confirm the supposition that they should work in diverting recreational pressure from important nature conservation areas, in particular in a coastal location. In the context of mitigation for predicted adverse effects on SPAs from recreational disturbance (including dog walking), SANGs were originally developed to protect inland lowland heathland sites around the Thames Basin Heaths and the criteria to establish them were intended to replicate key aspects of the experience of using lowland heath. We consider that the Council needs to supply evidence that indicates that the alternative green spaces provided will work to address coastal visitor pressure, and in particular to show that people will choose to use an inland space rather than visiting the coast.</p>	<p>HBC assesses that the pull of open countryside, whether it is the coast, heathland or other natural habitats, is equally strong for those communities living within reach of it and wishing to pursue recreational activities. HBC does not think that it would be proportionate to undertake research to demonstrate this, when it has used the precautionary principle to assess the impact of recreational disturbance on its coastal European Sites.</p>
Cecil M Yuill Ltd (Quarry Farm)	LP0252	Pub0119	See comments under Policy LS1	See HBC response under Policy LS1
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

## Policy HSG6: Wynyard Housing Developments

Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
Wynyard Residents Association	LP0277	Pub0022	The provision of housing at Wynyard of a further 732 dwellings is excessive. Combined with the Stockton plan allocation the area will be seriously overdeveloped. This does not fit with the executive housing policy being promoted by the HBC plan. The planned upgrades to the A689 and A19 will not cope with the levels of development at Wynyard proposed by both councils especially when the developments at Sedgfield are factored in.	Whilst there is a recognition that sites such as the North Pentagon will provide a large proportion of the executive or top end housing within the Borough over the next 15 years, other sites proposed, as noted within Hsg2, will provide a mix of dwellings – this is to help create a mixed community with a range of dwellings. The levels of housing are being tested within highway modelling which has identified the improvements needed to the highway network including a dedicated north bound lane from the A689 onto the A19, an additional lane (3rd lane) on the A689/A19 roundabout to enable to lanes for south bound traffic and a dedicated east bound lane and also a pedestrian bridge across the A19. Other works which are proposed by Highways England to add a 3rd lane onto the A19 between Wynyard and Norton will also help to improve the efficiency of the road network.
RSPB - Northern England Region	LP0253	Pub0091	Suitable Alternative Natural Greenspaces (SANGs) as mitigation We note that an amount of SANGS has been allocated within some housing policies. It is important to note that the use of SANGs is still experimental. Whilst such measures are welcome in terms of providing a facility for the new residents, to date, there is little evidence to confirm the supposition that they should work in diverting recreational pressure from important nature conservation areas, in particular in a coastal location. In the context of mitigation for predicted adverse effects on SPAs from recreational disturbance (including dog walking), SANGs were originally developed to protect inland lowland heathland sites around the Thames Basin Heaths and the criteria to establish them were intended to replicate key aspects of the experience of using lowland heath. We consider that the Council needs to supply evidence that indicates that the alternative green spaces provided will work to address coastal visitor pressure, and in particular to show that people will choose to use an inland space rather than visiting the coast.	HBC assesses that the pull of open countryside, whether it is the coast, heathland or other natural habitats, is equally strong for those communities living within reach of it and wishing to pursue recreational activities. HBC does not think that it would be proportionate to undertake research to demonstrate this, when it has used the precautionary principle to assess the impact of recreational disturbance on its coastal European Sites.
Wynyard Park	LP0027	Pub0124	These representations are prepared in the context of previous representations that have been submitted regarding the Hartlepool Local Plan Issues and Options consultation document in the summer and autumn of 2014 followed by the Preferred Options consultation document in July 2016. These representations proposed the inclusion of allocations for up to 732 dwellings on land at Wynyard Park (beyond those which already have planning consent or minded to grant planning consent) and requested that land which is currently allocated for employment purposes be de-allocated in order to deliver this. This was to ensure	Support for the increased allocation at Wynyard Park and the recognition that the Council's approach is aspirational but realistic, as required by the NPPF, is welcomed. The representation contends that the following text in the policy should be amended 'Development will be phased over the plan period, with site A available prior to any of the off-site road infrastructure improvements. Sites B and C are linked to the provision of off-site road infrastructure

Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
			<p>that the plan was positively prepared, maximised housing delivery across the plan period and facilitated a sustainable development at Wynyard Park.</p> <p>Mindful of the content of previous representations and the evidence submitted, Wynyard Park welcome and fully support the increased allocation at Wynyard Park to 732 dwellings as proposed within this Publication Stage consultation document. It is considered that, subject to the suggested minor amendments made in these representations, this increased allocation will assist the Council in preparing a sound plan (as defined in paragraph 182 of the NPPF), that is positively prepared, justified and effective in terms of deliverability whilst also remaining consistent with national policy.</p> <p>In principle and notwithstanding the proposed policy wording in draft Policy HSG6, the allocation of 732 dwellings on approximately 46 ha of land at Wynyard Park shows that the Council have taken an “aspirational but realistic” approach to the development plan and have “identified opportunities for growth”, “positively seeking the opportunity to meet the development needs of their area”. This approach is required by the NPPF (paragraphs 14 and 154 respectively) and Wynyard Park fully agree with this strategy. Indeed, the allocated site contains sufficient land to deliver both the housing and community facilities whilst also funding the necessary highways works. Not only does this make a vital contribution toward “meeting objectively assessed needs”, but the amount of land allows for “sufficient flexibility to adapt to rapid change” as required by NPPF paragraph 14.</p> <p>Based on the positive discussions and feedback received to-date, Wynyard Park have acted positively and proactively to bring forward planning applications for development in the short term and to help boost the supply of homes in the Borough. Indeed, a significant amount of development has taken place at Wynyard Park in the last 5 years (across the entire estate which falls within the Boroughs of Hartlepool and Stockton), with four major house builders comprising Taylor Wimpey, Barratt, Avant and Story Homes now on site constructing over 500 new homes to meet local demand. Indeed, Taylor Wimpey now have plans to deliver phase 2 of their existing development scheme at the Pentagon which will deliver an additional 109 dwellings.</p> <p>As part of this on-going development process, Wynyard Park have invested over £5m into site infrastructure such as roads, lighting, sewers and surface drainage associated with existing and forecast development in the last 12 months alone. Therefore, in addition to the delivery of housing Wynyard Park is clear that Wynyard Park is also generating substantial economic benefits through the initial investment in infrastructure, the employment of contractors and the multiplier</p>	<p>improvements, as identified in the Local Infrastructure Plan and as agreed with Highways England, and will not be permitted to commence prior to the installation of the highway improvements’. The amendment proposed is the deletion of ‘and will not be permitted to commence prior to the installation of the highway improvements’. The Council disagrees with this proposed amendment. Advice from the Council’s Highway Engineers is that It is essential that the necessary highway improvements are implemented prior to the development of Sites B and C. The representation also contends that the following text should be amended “Reserved matters applications will be determined in strict accordance with the following criteria”. The amendment proposed is the deletion of ‘strict’ and its replacement with ‘general’. The council does not consider that this amendment is appropriate. The word strict is necessary to adequately convey the need for development proposals to be consistent with the criteria set out in the policy.</p> <p>The Council considers that the criteria set out are not onerous and allows for an adequate degree of flexibility in the layout and design of any development proposal and for the development to be viable.</p> <p>The reference to ‘including the provision of a skate park’ will be amended to <b>‘including the provision of a skate park or suitable alternative teenage play provision’</b> as a minor modification.</p> <p>The representation suggests that ‘the reference to “general accordance” with this policy as suggested above is important as the spatial location of this will be likely be different to that which is shown on the proposals map, once the Masterplan process has been undertaken.’ The Council considers that the Masterplan process should be consistent with the allocations set out within the plan. The representation comments on the section of the policy which states that a phasing plan should be submitted as part of the initial planning application in order to ensure that the necessary infrastructure is delivered. It is requested that “the initial planning application” is amended to “the initial planning application(s)”. Whilst</p>

Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
			<p>effects within the local supply chain.</p> <p>Furthermore, in addition to the major house builders listed above, Wynyard Park have planning consent for circa 60 self-build plots, 80% of which have already been taken by high net worth individuals who wish to build their own home within the Borough. Wynyard Park have applications being determined for an additional 26 self-build plots with demand identified for additional self-build development beyond that which is currently provided. As such, Wynyard Park is also assisting the Council in meeting identified demands for self-build accommodation, as required by the Housing and Planning Bill (2016). When viewed in the context of levels of demand and development in the wider Borough of Hartlepool, this is an opportunity to continue to deliver new homes at Wynyard Park and to increase the supply of homes at an attractive and marketable location. The proposed allocation within the draft plan capitalises upon this opportunity.</p> <p>First and foremost, these representations provide further evidence to support and justify the draft allocation and its deliverability. However, mindful of the test of soundness and the need to maintain sufficient flexibility to adapt to rapid change, Wynyard Park would like to make some comments to assist the Council in finalising the wording of the draft allocation policies (LS1 and HSG6) and some of the wider draft policies which could have an adverse impact upon deliverability and effectiveness. Where concerns are raised these are identified with suggested amendments. The structure of the remainder of these representations is as follows:</p> <ul style="list-style-type: none"> <li>• The Wynyard Park Housing Allocation – Meeting the Objectively Assessed Needs</li> <li>• The Wynard Park Housing Allocation - Highways</li> <li>• Draft Policy HS6 &amp; Proposals Map – Suggested amendments to facilitate delivery</li> <li>• Draft Policy EMP1 – The Wynyard Park Employment Allocation</li> <li>• Wider Draft Policy comments</li> </ul> <p>Draft Policy HS6 and the Proposals Map – Suggested amendments to facilitate delivery</p> <p>As stated earlier in these representations, the allocation for 732 dwellings within draft Policies LS1 and HSG6 is fully supported and welcomed by Wynyard Park.</p> <p>Nonetheless, we consider that it is crucial that a number of minor amendments are made to the wording of this policy to ensure sufficient flexibility in delivery to</p>	<p>the Council acknowledges that the infrastructure may be delivered by more than one planning application, it is essential that a phasing plan is submitted at the outset. A number of points are made in relation to Policy NE3 in the context of its relationship to Policy HSG6. These points have been responded to under Policy NE3. The representation reference that the landscape buffer referred to in point 6 of the policy has not been illustrated on the proposals map.</p> <p>The Council acknowledges this error and will as a minor modification illustrate the landscape buffer on the proposals map under Policy NE2e: Local Green Corridors.</p>

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			<p>make the policy sound and to allow for masterplanning to take place, as agreed with Council Officers in recent meetings. Whilst Wynyard Park have concerns regarding the current policy wording, it is considered that this can be easily rectified.</p> <p>It is noted that the allocation is separated into three separate areas and that a phasing element is included within the policy. Wynyard Park recognise the need for highways works to come forward to facilitate the future development of the park, but in its current form, the policy does not allow for any further development to take place beyond that which is allocated at the North Pentagon until the highways works have been undertaken in full. Moving forward, these highways works will likely come forward in sub phases at different times and during this process capacity for new housing at Wynyard will be created which will cross fund the next set of infrastructure improvements. As such, we suggest the following simple amendment to this policy to allow for the phasing of the highways works to be agreed with officers and Highways England:</p> <p>“Development will be phased over the plan period, with site A available prior to any of the off-site road infrastructure improvements.</p> <p>Sites B and C are linked to the provision of off-site road infrastructure improvements, as identified in the Local Infrastructure Plan and as agreed with Highways England, and will not be permitted to commence prior to the installation of the highway improvements.” (GVA amendment)</p> <p>The proposed amendment above will still ensure that infrastructure improvements will be provided to facilitate housing delivery, but it prevents a scenario where development could be stalled unnecessarily.</p> <p>The remainder of the policy sets out the criteria for reserved matters applications for each part of the site. Wynyard Park are committed to delivering the facilities required by the draft Policy, however, in the absence of a designed scheme or masterplan, it is important to ensure that this draft Policy is not overly prescriptive in terms of the exact siting and location of housing and community facilities. As such it is suggested that the reference to reserved matters applications should be amended to state:</p> <p>“Reserved matters applications will be determined in strict general accordance with the following criteria”.</p> <p>Furthermore, we consider it necessary make the following comments and suggested amendments regarding the criteria listed within this Policy:</p>	



Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
			<p>Whilst providing a high quality housing development, the live application proposals at the North Pentagon submitted by Taylor Wimpey and Wynyard Park have been discussed in detail with Officers.</p> <p>Whilst Officers have agreed that the layout is acceptable the proposals do not constitute executive development and comprise a development density of circa 16 dwellings per hectare (also applicable draft Policy HSG2) and includes 2ha of open space. Indeed, the wider self-build developments at Wynyard Park (on white land within the draft plan) will assist the Council in meeting their need for executive housing on separate sites at Wynyard Park. Furthermore, the reference to the provision of a skate park is too prescriptive and could act as an obstacle to delivery. As discussed with Officers determining the current application, the developer does not consider a skate park to be in keeping with the character of the development and any requirement to provide this could jeopardise the future development of the North Pentagon. In determining the live application on this site, it was agreed with Officers that an alternative form teenage play provision would be catered for within the identified play area and that this would be secured via condition. As such, we would request that the reference to a skate park be replaced with a more general reference to “teenage play provision” and that the rest of this policy sub-section reflects the application that is recommended for approval.</p> <ul style="list-style-type: none"> <li>• The infrastructure requirements of the draft Policies HSG6 and INF4 are noted and agreed in terms of their provision. However the reference to “general accordance” with this policy as suggested above is important as the spatial location of this will be likely be different to that which is shown on the proposals map, once the masterplan process has been undertaken.</li> <li>• The Green Wedge (draft Policy NE3) is noted on the archaeological exclusion zone, however, it should be acknowledged in both draft Policies that this allocation is only in place due to the archaeological potential of the land in question. Wynyard Park request that this element of the policy is clarified to be in place subject to future archaeological investigations.</li> <li>• The proposals map shows a small area of green space to the west of the archaeological exclusion zone/proposed Green Wedge that could be confused with the Green Wedge Policy. It is important that this be removed and incorporated into the housing allocation to allow its development as part of reserved matters submissions which will ultimately accord with the objectives of</li> </ul>	

Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
			<p>the policy.</p> <p>The landscape buffer referred to at point 6 is not currently shown clearly on the proposals map. However, Wynyard Park have started the development of a landscape bund on the southern boundary of the site to the north of the A689. Mindful of the buffer zones required by point 7 of the policy, Wynyard Park do not consider it necessary to create additional landscape buffers beyond this.</p> <ul style="list-style-type: none"> <li>• With regard to the final point within the policy which concerns the phasing of utilities infrastructure, we would request that “the initial planning application” is amended to “the initial planning application(s)” as it may be necessary to deliver the site via a number of planning consents.</li> </ul> <p>Subject to the minor amendments suggested above, we consider that Draft Policy HSG6 is sound when viewed in the context of policy tests, not only in that it takes a positive approach toward meeting identified housing needs but that it also has “sufficient flexibility to respond to rapid change” (NPPF paragraph 14).</p> <p>Conclusion - To summarise, Wynyard Park strongly agree with the strategy set out within the consultation document and welcome the allocation for 732 dwellings at Wynyard Park. As set out within these and previous representations, this allocation capitalises upon a great opportunity to significantly increase the supply of housing within the Borough in a sustainable and high quality location, to meet identified needs in an aspirational, yet realistic manner.</p> <p>These representations have demonstrated that the Council’s approach to assessing their housing need is sound when viewed in the context of guidance and policy requirements.</p> <p>The highways modelling undertaken to date and the subsequent identification of bespoke mitigation measures to the A689 and A19 have also demonstrated that the proposed allocation at Wynyard Park can be delivered in a sustainable manner.</p> <p>Subject to the suggested amendments to the wording within draft Policy HSG6 and the wider policies to ensure there is sufficient flexibility within the plan. Wynyard Park consider that the plan passes the test of soundness as set out in paragraph 182 of the NPPF as follows. The plan is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – through taking a positive approach to development at Wynyard Park and identifying an allocation which will form a key part of the identified strategy to meet objectively assessed housing and infrastructure requirements. There is an opportunity to create a sustainable development and this allocation provides the critical mass to facilitate this.</li> </ul>	

Company	Unique Ref	Pub Ref	HSG6 Wynyard	HSG6 Wynyard HBC
			<ul style="list-style-type: none"> <li>• Justified – The need for additional housing has been clearly identified in the plan and GVA consider that the identification of a target of 409 dwellings per annum (as a minimum target) is both positive and justified. Mindful of existing development under construction and consented at Wynyard Park (in both Hartlepool and Stockton) and the existing growth area at Wynyard Village, it is evident that Wynyard Park represents a key strategic development location within the plan in order to meet these needs.</li> </ul> <p>Indeed, Wynyard Park provides a unique opportunity to provide the correct mix of housing and community development on a single sustainable site, building upon the work done to date. The quantum of development will also fund the necessary highways improvements, as documented and justified in previous representations.</p> <ul style="list-style-type: none"> <li>• Effective – Wynyard Park have already established their ability to boost the supply of new housing in the Borough. Indeed, four major housebuilders are in operation across the site (inclusive of land at Stockton) comprising Taylor Wimpey, Barratt, Avant and Story Homes and a number of self-build housing schemes are currently under construction in Hartlepool. The allocation for 732 dwellings ensures that Wynyard Park can maximise housing delivery across the next plan period and fund the identified highways improvements.</li> </ul> <ul style="list-style-type: none"> <li>• Consistent with National Policy – When viewed holistically, the creation of a sustainable community at Wynyard with a mix of housing, highways improvements and community facilities as part of an on-going masterplanning exercise it is evident that sustainable development that accords with national policy is achievable. Subject to the proposed amendments made within these representations, the Council’s technical policies regarding Local Centres, sequential tests, Green Wedges and the flexibility for infrastructure delivery will fully accord with national policy and guidance.</li> </ul> <p>We welcome the opportunity to continue to hold positive discussions with Hartlepool Borough Council regarding the Local Plan and Wynyard Park will continue to work with all parties on the on-going highways modelling work between this consultation period and the Examination in Public.</p>	
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

**Policy HSG7: Elwick Village Housing Development**

Company	Unique Ref	Pub Ref	HSG7 Elwick Village	HSG7 Elwick Village HBC
Potters Farm	LP0321	Pub0079	<p>We attended the Hartlepool Local Plan consultation on Wednesday January 2017 at Hart Village Hall regarding the pending Elwick village housing development HSG7. At this meeting we spoke to Matthew King and raised a number of concerns these were as follows:</p> <p>a) At present the vehicular access to the farm is an ongoing concern of the parish council as agricultural machinery increases in size as time moves on and the only point of access is via the village green. However, at present, to ensure the farm can run successfully the machinery needs to enter and leave as needed.</p> <p>b) The construction of the pending Elwick Bypass essentially splits the farm into 2 lots the southern side of the bypass were we currently reside, and the north side containing a parcel of 80 acres.</p> <p>c) To combat both of these issues, we would be willing to relocate to the site of 80 acres on the northern side of the bypass. For this to be a viable move, planning permission would be required for a similar size dwelling home, steading and the provision of appropriate agricultural buildings should this be deemed acceptable by the town planners. This in turn would satisfy concerns on behalf of the residents of the village green regarding vehicular access.</p> <p>d) We also raised concerns surrounding the proximity of the new build properties to existing agricultural livestock sheds, which may be off putting to potential new buyers/tenants. Currently the boundary for the development HSG7 backs straight on to the livestock sheds, such construction would likely cause disruption and distress to the livestock.</p>	<p>Thank you for attending the consultation events at both Hart Village and Elwick Village. Your concerns are noted and it is noted that it was previously agreed to include your existing sheds and part of the existing track within the site Hsg7 for the North Farm / Potters Farm development site for 35 dwellings. The Proposals Map has been incorrectly plotted and this has excluded the sheds and tracks which it is considered need to be included to remove, as part of the housing development, the sheds which would create an issue in the design of the scheme. Given the bypass will severely impact on the land holdings leaving you an 80 acre site to the north of the bypass, then Planning Policy would support the proposal to apply for a new farm house in a rural location to the north of the bypass with an access from the bypass subject to it meeting the relevant design and landscaping policies within the plan. It is therefore envisaged that the existing farm house and entrance/exit would be sold as a separate dwelling and would no longer be linked to the farm, with the associate benefit of removing the movements of the heavy farm vehicles from the village green area, thus improving pedestrian safety within Elwick Village.</p>
Resident	LP0336	Pub0093	<p>We are concerned at the implications of the Elwick North Farm development on traffic on the Elwick - Hartlepool road.</p> <p>Access to the road is at a bend with poor sight lines .A significant proportion of traffic using the road ignores published speed restrictions. Some years ago, the owners of North Farm sold vegetables to the public. Even then, with much less traffic through the village green,, access and egress were dangerous. Unless the road configuration at the point of access is significantly altered, and / or means are found to slow traffic at that point, the advent of perhaps 50+ new vehicles at the junction will present what we feel are unacceptable dangers.</p>	<p>Your concerns in relation to the junction at North Farm housing site are noted, however, the traffic through the village will be significantly reduced from the current levels given the bypass and grade separated junction will be implemented in the early stages of the Plan period. Church bank in Elwick will be made into a one way in road meaning that traffic will not seek to take a route through the village if going south bound. As such, Highway officers at the Council believe the access at North Farm will be safe when the development proceeds.</p>

Company	Unique Ref	Pub Ref	HSG7 Elwick Village	HSG7 Elwick Village HBC
Galliford Try	LP0349	Pub0114	<p>Our Client has land interests at North Farm, Elwick (the 'Site'), and comments in these representations will be limited to the policies specifically affecting the Site only. The Site is identified as a draft allocation for housing in the HLP (HSG7) for approximately 35 dwellings. Whilst our Client supports the fact that the Site is allocated for housing, these representations will focus on the specific requirements of the allocation and other related policies.</p> <p>Policy HSG7 relates to our Client's land interests in Elwick Village. It should be noted that our Client's Site only refers to the eastern portion of the HSG7 allocation (as per the enclosed location plan), with the western portion coming under separate land ownership.</p> <p>As previously confirmed, our Client supports the inclusion of their Site as an allocation for housing development. However Policy HSG7 includes a number of criteria that development of the Site should be determined in "strict accordance" with. Our Client has concerns that some of these criteria could adversely affect the viability of this Site and act to impede delivery.</p> <p>The first criteria limits that no more than 1.67 hectares of the Site can be developed for housing, with at least 0.4 hectares being retained for green space. Requiring developments to strictly accord with this criteria is considered an overly onerous policy requirement, as this will fail to take account of the individual facets of development. Elwick Village is blessed with an abundance of green space, including the village green that 27048/A3/PS 5 3 February 2017 runs through the centre of the village to the south west of the Site.</p> <p>Notwithstanding this, the types of dwellings proposed will each be afforded spacious private gardens and green space, in common with the general characteristics of dwellings in the area, and any development will be subject to a robust landscaping strategy. It therefore seems slightly excessive to request that almost a quarter of the Site is retained for green infrastructure. Our Client will seek to provide an element of green infrastructure as part of the proposals in order to achieve a high quality layout and attractive streetscenes, however the quantum is not known at present and this specific policy requirement may place unreasonable and unnecessary burdens on development that could hamper viability. In accordance with paragraph 173 of the NPPF, the sites and scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Furthermore, paragraph 182 requires that plans should be positively prepared and justified, and it is not considered that this policy meets either of these criteria. As currently drafted, this aspect of the policy is therefore considered to be unsound. Whilst our Client appreciates that the Council wish to see high quality developments with green infrastructure, it is not considered necessary to impose specific requirements on the amount of green space</p>	<p>Note general support for allocation as a housing site.</p> <p>Note that the site is in more than one ownership.</p> <p>The local authority note concern over the use of the word "strict" however consider that points 1 to 5 of policy Hsg7 are not particularly onerous and can all be delivered without threatening the deliverability of the site. They are however considered important development requirements to ensure that the development is well designed, sustainable and reflects densities within the village.</p> <p>The first criteria requires on site open space as a key element of the design. This requirement still ensures that a density can be achieved on site of approximately 21 dwellings per hectare which is considered appropriate within the village setting. The main reason that 0.40 hectares of open space was required on site was to provide incidental open space for residents – this was considered important given that access to the village green is not particularly safe from the development site given the lack of footpaths on that side of the road. This would mean that, especially for young children, access to the green would not be safe. It is considered the inclusion of the open space will significantly improve the development and will result in higher house prices being achievable.</p> <p>The policy has been positively prepared and has given thought to the health and safety of future residents. In recent times, in the absence of an up-to-date plan, the local authority has found that applications received have had very limited, if any, incidental open space on site – it is therefore considered that this requirement within the policies will help to ensure incidental open space is provided on sites within the Local Plan.</p> <p>Note your client does not object to criteria two.</p> <p>Note comments regarding landscape buffer. The proposal</p>

Company	Unique Ref	Pub Ref	HSG7 Elwick Village	HSG7 Elwick Village HBC
			<p>required. An appropriate layout and design incorporating a suitable quantum of development could be worked up and agreed through an iterative design process, and it is not considered necessary or positive to impose specific requirements on the quantum of development at such an early stage in the process.</p> <p>It is therefore considered that this requirement should be removed.</p> <p>The second criteria requires that all access to the Site should be from Elwick Road via the North Farm access, with no access to be permitted via the new bypass or the village green (to the west). Our Client's Site layout could be designed to allow for future development to be accommodated on the land to the west not controlled by them, and so our Client does not object to this.</p> <p>The third criteria requires the creation of a landscaped buffer to the north of the Site, between the Site and the proposed bypass. The Proposals Map appears to identify that this should be situated to the north of the Site itself, not within the land controlled by our Client. It is also noted from the Proposals Map that the route of the bypass is approximately 500 metres north of the Site. Given this distance, it is not considered necessary to require a full landscape buffer to the north of the Site, as it would be already separated from the bypass by a significant distance and a number of agricultural fields. Appropriate screening and landscaping could be provided within the Site as part of any future development proposals, but it is considered excessive to request a buffer in this instance. It is therefore not considered that this aspect of the policy is justified, as required by paragraph 182 of the NPPF.</p> <p>The fourth criteria requires development proposals to take account of, respect and protect the adjacent heritage assets.</p> <p>The closest listed building is the Grade II Listed Wilson Cottage, to the south west of the Site. It is not considered that developing the Site would have any impact on this building given the relative separation distance. The Elwick Village Conservation Area lies to the south of the Site and slightly encroaches on the southern section, encompassing some of the former farm buildings. However none of these buildings are listed and they may restrict the deliverability of suitable development on the Site. As such, subject to appropriate design, it is considered that the policy should allow for the demolition of some of these buildings if it could be demonstrated as necessary.</p> <p>The final criteria requires suitable pedestrian and cycle linkages to be incorporated as part of the proposals. Our Client is determined to deliver a development of high quality and would seek to incorporate these features as part of the development, and our Client would therefore not object to the inclusion of this requirement subject to viability. The criteria also requires a</p>	<p>was illustrated in that way on the proposals map to make it clear – the aim is that it would be formed along the northern boundary of the site and would therefore be deliverable. It could also form part of the open space on the site.</p> <p>The fourth criteria point was required by Heritage England and is considered entirely appropriate given the close proximity of the conservation area boundary to the site.</p> <p>Note comments on criteria 5. The local authority are pleased that the developer is determined to deliver a development of high quality and would seek to incorporate features as part of the development where viable. Subject to viability the local authority are comfortable that the requirement to provide a contribution towards a subsidised bus service meets the tests.</p> <p>As noted above the Council considers that as currently drafted the policy would allow a development of a density of approximately 21 dwellings / hectare on the 1.67 hectares considered developable for housing. This is considered appropriate and in line with the character of the village and will help to ensure a high quality development.</p>

Company	Unique Ref	Pub Ref	HSG7 Elwick Village	HSG7 Elwick Village HBC
			<p>contribution to a subsidised bus service to help maximise the sustainability of the Site. Again, this should only be required if it could be demonstrated that the obligation meets the three tests outlined at paragraph 204 of the NPPF. One overarching element of Policy HSG7 is the allocation of the Site for approximately 35 dwellings. It is acknowledged that this is noted as “approximately” 35 dwellings, and therefore cannot be seen as an upper limitation, however it is considered that this is a very low density of approximately 16 dwellings per hectare.</p> <p>Whilst Elwick Village is a predominantly rural location, the historic form of development within the village is fairly dense and this has not adversely impacted on its character. Elwick Village therefore serves as an 27048/A3/PS 6 3 February 2017 example that higher density development can still produce high quality streetscenes and attractive developments that maintain and enhance the historic character of the village. The proposed development would use a sympathetic palette of materials and high quality landscaping to blend well with the existing village, and it is considered that a higher yield on this Site is achievable. Furthermore, this offers an excellent opportunity to increase the Borough’s supply of deliverable dwellings whilst providing a sympathetic and attractive development. Whilst a more specific indication of numbers are not provided at this stage, it is considered that the Site offers an excellent opportunity to provide more than the indicated 35 dwellings, and this will be refined in more detail as part of an iterative design process. It is considered that the indication of 35 dwellings appears restrictive, and the Site is fully capable of accommodating additional housing numbers. This aspect of the policy is therefore not considered to be positively prepared and is unsound.</p> <p>In all, our Client supports the inclusion of their Site as an allocation for housing development in accordance with Policy HSG7. However, our Client has significant concerns with some of the detailed wording of the policy. It is not considered that the policy as currently drafted is positively prepared, justified or consistent with national policy, and is therefore unsound.</p> <p>As such, for the reasons outlined above, our Client would object to the policy as currently drafted.</p> <p>Our Client welcomes the Council’s positive attitude towards providing economic growth and housing delivery over the plan period. They also support the inclusion of their Site in Elwick Village as an allocation for residential development and concur that the settlement’s inherent sustainability and ability to accommodate development makes it an ideal location for new housing in the rural area. However, our Client retains concerns regarding the overall</p>	

Company	Unique Ref	Pub Ref	HSG7 Elwick Village	HSG7 Elwick Village HBC
			identification of sites to deliver housing over the plan period, and the detailed requirements of Policy HSG7 relating to the Site in Elwick. In accordance with the representations outlined above, our Client does not consider the plan to currently be sound. However our Client does consider that these issues can be resolved and are willing to engage in further discussions with the Council throughout the preparation of the emerging Local Plan.	
Cecil M Yuill Ltd (Quarry Farm)	LP0252	Pub0119	See comments under Policy LS1	See HBC response under Policy LS1
Historic England	LP0044	Pub0125	<p>We have only a few minor comments, below, where we feel that particular policies may need slight amendments in order for the Plan to be legally compliant and/or sound.</p> <p>Page 102, Policy HSG7: While para 10.39 recognises the heritage assets within Elwick, Policy HSG7 does not appear to be fully reflective of the requirements of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. Paragraph 126 of the NPPF is clear that heritage assets are an irreplaceable resource, and sections 66 and 72 of the make it clear that local authorities must have ‘special regard to the desirability of preserving the building or its setting’ (section 66) and that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance’ of a Conservation Area (section 72). The policy wording for section (4) at present is only requiring development proposals to ‘take account of, respect and protect’. It may therefore need amending to also include the need to enhance the assets and their setting, character or appearance.</p>	The plan needs to be read as a whole. Policy HE1: Heritage Assets, states that the Borough Council will seek to preserve, protect and positively enhance all heritage assets.
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.



**Policy HSG8: Hart Village Housing Developments**

Company	Unique Ref	Pub Ref	HSG8 Hart Village	HSG8 Hart Village HBC
Resident	LP0275	Pub0016	<p>I attended the publication stage consultation event held at Hart Village Hall on Wednesday 11 January and wish to object to the housing development proposal at Hart Village for the following reasons.</p> <p>Firstly if each house has on average only one child of primary school age this will place an unacceptable burden on an already saturated primary school. This will also increase an already dangerous traffic situation at peak times increasing the risk of accidents to both parents and children.</p> <p>Secondly the junction to the north of the village will be almost impossible to exit onto the A179 at peak times therefore increasing pressure to the road passing through the village. This will be further complicated by the Burn Road Harrier run which makes free movement of traffic through the village almost impossible due to the amount of vehicles parked in the village during the event.</p> <p>Put simply the infrastructure in the village does not exist to be able to support this development.</p>	<p>Note objection to housing proposals within Hart Village. In terms of the capacity of the school, where development takes place developer contributions can be sought towards the provision of additional spaces at a school. This would be the case with the developments at Hart; both would be expected to contribute towards the provision of additional places at the school which may be facilitated through an extension to the school. The calculation which is used by the education team to ascertain numbers of primary pupils assumes that there would be 21.5 per 100 dwellings, meaning that the two sites within Hart would generate 10.75 primary aged pupils. The authority is able to secure £13,755 per pupil towards increasing capacity from developers meaning that the two schemes would generate £147,866 towards school improvements. Any proposals would need planning permission and this would involve comments from the Highways section who would need to be satisfied that the proposal was satisfactory in highway safety terms.</p> <p>In terms of Highway safety within the village and the concerns with the northern exit onto the A179 these are issues which have been discussed with Highway engineers. The possibility of improvements to the junction are being considered which may involve the installation of a roundabout but this would need to be investigated in detail as part of the planning applications.</p>
Gentoo Homes	LP0335	Pub0092	See comments under LS1	See HBC response to LS1.

Company	Unique Ref	Pub Ref	HSG8 Hart Village	HSG8 Hart Village HBC
Resident	LP0342	Pub0100	<p>I would like to object to the housing building plots known as HSG8a and HSG8b located at Hart Village in the local town plan for Hartlepool.</p> <p>Hart is a small village with inadequate amenities to support developments of the size and magnitude in the proposed local plan. The village boasts of two public houses, a church, an over subscribed school and an ever depleting part time bus service. The village has no shop within a mile and has no doctor, dentist or chemist within two miles.</p> <p>Access to these developments is non existent and the road infrastructure both through and around the village struggles to cope at present without further hindrance from new developments. There is a tight bottle neck road through the village which is quite frankly an accident waiting to happen and the junctions both out of Hart Village and onto the A19 are both notorious and dangerous. All of these traffic problems have been flagged up to the relevant council authorities to no avail by the local parish council, adding more traffic to these situations without rectifying the original problems of complaint would be ludicrous.</p> <p>Some of the land proposed to be built upon is classed as agricultural grade 1 farming land, should this not be preserved as such? The countour and gradient of the land would also make new developments overlook existing properties, some of which are bungalows that would be deprived of sufficient light and privacy. It would be proposterous to go ahead with these developments and give no thought to the amenties available, traffic concerns already expressed and views of existing residents to be affected.</p>	<p>Note concerns with proposals for the two housing sites within Hart Village. Policies within the Local Plan will help to ensure that the two developments help to improve the sustainability of Hart Village and will see investment in local infrastructure. For example, paragraph 10.45 notes that one of the requirements of the developments will to be to provide a new play area for the village, probably next to the existing school playing field. Contributions will also be request to increase the capacity of the primary school within the village. Other developer contributions are likely to be directed to improving the village hall which provides a valuable facility for residents.</p> <p>In terms of highway infrastructure necessary improvements will be secured as part of the planning applications. The Highways section will consider whether the junction with the A19 at the western end of the village needs to be improved. This may involve the installation of a roundabout.</p> <p>Any planning applications for the sites would have to meet the guidelines set out within guidance documents in terms of separation distances and officers would need to consider the impact on amenity of neighbouring residents.</p>
Hartlepool Rural Plan Working Group	LP0017	Pub0110	<p>The other concern has not been addressed to the satisfaction of the Rural Neighbourhood Plan Group. This relates to the housing site at Glebe Farm, Hart which is not part of the Rural Neighbourhood Plan housing allocation but is included as such on the Local Plan.</p> <p>Housing development over the past 20 years or so has been carefully managed throughout the Local Plan area, with the definition of village envelopes and strategic gaps between Hart and Greatham, and the main urban area of Hartlepool. Just over 200 new households have been added to the rural area during the last 20 years mainly through small developments and conversions of existing property. The figure of 170 additional homes contained in the Rural Neighbourhood Plan is in line with recent housebuilding trends in the area. It is considered to be sufficient to meet the housing needs of the plan area in the light of the results of the Housing Needs Survey undertaken during the consultation on the Neighbourhood Plan.</p> <p>Any requirements for significant areas of growth in the Borough's housing requirements are expected to be accommodated either in the urban area or</p>	<p>Note that the Rural Plan group object to the inclusion of the Glebe Farm Housing site as it does not form part of the emerging Rural Neighbourhood Plan.</p> <p>It is noted that the Rural Neighbourhood Plan includes proposed allocations for 170 new dwellings which the group consider is in line with just over 200 new households within the rural area over the past 20 years. The local authority considers that the proposals within the local plan to include another 20 dwellings at the Glebe Farm site on top of those within the Rural Plan still leaves the Local Plan in general conformity with the Rural Plan and is in line with government aspiration to boost significantly the supply of housing. It is also considered that the site is sustainable and the development of both sites is appropriate in terms of the village form.</p>

Company	Unique Ref	Pub Ref	HSG8 Hart Village	HSG8 Hart Village HBC
			<p>adjacent to the urban area of Hartlepool in order to support the sustainable development and regeneration of the town.</p> <p>From the following tables it is clear that Hart has more existing permissions for housing than any of the other villages. The Rural Plan proposed a further 23 on the Nine Acres Site while the Local Plan proposes 30 at Nine Acres. Such an allocation would be in line with the other larger villages of Elwick and Greatham.</p> <p>The proposed addition of housing at Glebe Farm would put Hart even further out of sync with the other villages in terms of new development despite the fact that Hart has fewer facilities – in particular no village shop that can offer day to day essentials.</p> <p>Table: Rural housing sites with existing permissions (see written representation)</p> <p>Table: Rural housing sites proposed in the Neighbourhood Plan (see written representation)</p> <p>Both the Local Plan and Neighbourhood Plan strategy for housing appear to agree on seeking small scale incremental development commensurate with the size of the villages and services available, taking account of environmental constraints. There appears to be little in the justification to explain why the allocation at Glebe Farm, Hart has been included in the Local Plan except the arguments about the sustainability of the village, in particular the village hall and school, and to provide a green buffer to the bypass.</p> <p>The school at Hart is already oversubscribed and the village hall is one of the most vibrant in the rural area. There is no suggestion that an extra 20 houses might secure the return of a village shop. While a further 20 houses may seem very minor to a town the size of Hartlepool, it is a very significant increase for a village the size of Hart. That most valued of village features, it's sense of community can too easily be lost, becoming a detached dormitory estate around an old church – and the likes of a voluntary run village hall can be starved of the community spirit necessary for it to find those willing to run it.</p> <p>Rounding off the village to give a neat built form is not a sound argument. Hart is a linear village which has been pulled slightly to the North by the presence of the Church on that side of the village. The Nine Acres site would continue this linear development and draw the group of houses at Nine Acres closer to the village. The presence of the by-pass now restricts development to the south of the village. The need for a green buffer is created only to shield the proposed site at Glebe Farm from the by-pass.</p> <p>The site at Nine Acres was chosen by the Neighbourhood Plan because:</p> <p>a) It is an ideal location and would act as an enabling development for a substantial, safe, attractive green space for informal recreation which was identified as a need by Hart residents.</p>	<p>The proposals at Hart Village will secure contributions to increase the capacity at the village school and will also secure other developer contributions such as a new play area for children within the village, contributions which will be directed to the village hall (recognising its importance to the village in providing classes such as yoga etc and providing a valuable facility for community groups) and contributions will be secured which will improve the walkway between the village and the shop at Middle Warren.</p> <p>In terms of the proximity of the A179 to the Glebe Farm site, the site allocated was considered to still leave a field to the south to buffer the development from the road. The land owners wanted those fields including as well but that was not considered appropriate due to the proximity of the bypass.</p>

Company	Unique Ref	Pub Ref	HSG8 Hart Village	HSG8 Hart Village HBC
			<p>b) The site draws the village and isolated streets at Nine Acres &amp; Burn's Close closer.</p> <p>c) The site was further from the existing traffic noise of the A179.</p> <p>d) New housing at Nine Acres could be designed to ensure security of the new green space.</p> <p>e) Local Authority ownership of the site was considered a potential bonus for securing the future of the green space.</p> <p>The Glebe Farm site was not chosen by the Neighbourhood Plan because:</p> <p>a) Proximity to the A179 and therefore housing will be more likely to be impacted by traffic.</p> <p>b) The Neighbourhood Plan seeks improvement of the A179, including dualling of the Hart bypass, which could adversely affect the Glebe Farm site.</p> <p>c) No clear need for a second site as Neighbourhood Plan research and Housing Needs Survey indicated demand for few extra houses and the Neighbourhood Plan allocation more than met the demand.</p> <p>Paragraph 159 of the NPPF states that 'Local Planning Authorities should have a clear understanding of housing needs in their area. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period that: - Meets household and population projections, taking account of migration and demographic change; - Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and - Caters for housing demand and the scale of housing supply necessary to meet this demand'.</p> <p>The SHMA for Hartlepool Borough is based on Borough Wards not villages. Both Wards that include the rural area include substantial urban areas. The Neighbourhood Plan sought to base housing sites on need within rural area balanced with past history of housing development.</p> <p>In view of the amount of joint working, and the fact the Neighbourhood Plan recognises and supports the strategic development needs set out in the adopted and emerging Hartlepool Local Plans which involve the expansion of the urban area of Hartlepool into the rural area, we regret the Local Plan has not left allocation of any housing sites in the Rural Area to the Neighbourhood Plan.</p> <p>In many other rural areas, the Local Plan is allocating the strategic sites and those in the urban areas and leaving the smaller sites in villages to the Neighbourhood Plans.</p>	
Highways England	LP0029	Pub0130	See comments under Policy LS1 for aggregated response.	See HBC response to LS1.

**Policy HSG9: Affordable Housing**

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
Story Homes	LP0219	Pub0090	<p>Further to our previous representations to the preferred options consultation, Story Homes supports the broad aims of Policy HSG9 which seeks to respond to and address the affordable housing requirements identified within Hartlepool. However, we consider that the Council should take great consideration of the NPPF, which seeks to ensure that the affordable housing policies should take account of housing need as well as viability.</p> <p>We welcome the Council’s amendment to the policy wording following our previous comments to the preferred options plan. This change will ensure that the 18% housing requirement is no longer expressed as a ‘minimum’ obligation for new development. This will provide the development industry with further certainty over the next plan period and will ensure that there is a ceiling to affordable housing requirements. We also consider that the affordable housing requirement should be tested against infrastructure requirements, plus the cumulative impacts of other policies in the plan to ensure that the proposed affordable requirement is viable and deliverable.</p> <p>We have also noted that Policy HSG9 makes reference to the guidance set out within the Planning Obligations SPD. In conformity with our aforementioned comments, and although we appreciate that SPDs are useful for providing further guidance for development on specific sites or in relation to specific issues, we must emphasise that the Council should not use SPDs as a mechanism for introducing policy requirements and burdens outside of the formal plan-making process. As set out in paragraph 153 of the NPPF:  “...Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.”  We urge the Council to review their SPDs following Local Plan adoption to ensure that they are still in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p>	<p>Note broad support for policy. It is considered the policy as drafted is in line with the NPPF with regards to taking account of housing need – the policy is flexible and states that “affordable provision and tenure and mix will be negotiated on a site by</p>
HBF	LP0005	Pub0108	<p>The policy is considered unsound as it is not justified.</p> <p>The HBF supports the need to address the affordable housing requirements of the borough. It is noted that the 2015 SHMA identifies an annual target of 144 dwellings, this represents 35% of the proposed housing target. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Whilst the need for affordable housing is not disputed the policy requirement is considered unsound and is likely to hinder development within Hartlepool.</p> <p>The policy sets a target of 18% affordable housing on qualifying sites, over a</p>	<p>In terms of Policy Hsg9 it is considered that the policy is flexible and allows for viability on a site by site basis to be considered. The 18% target, formed from the identified need within the SHMA, is assessed as deliverable and achievable on most sites within, particularly Greenfield ones. Recent planning permissions have secured 18% affordable housing along with other contributions required. As such and in current market conditions it has proved deliverable, including on larger brownfield sites such as the Brenda Road development which has secured</p>

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
			<p>threshold of 15 units. The HBF is pleased to note that the identification of the 18% policy requirement as a 'minimum' has been removed. This is consistent with our comments at the Preferred Options stage of consultation.</p> <p>The Council's viability evidence is set out within the appendix to the 2015 Planning Obligations SPD. It is unclear when this study was undertaken and as such the relevancy to current development costs is queried. Indeed the study as a whole lacks transparency many of the costs are identified as estimates with no clear identification of how they were derived. Furthermore the HBF has concerns over a number of the inputs such as marketing costs and developer profit which are considered too low. The reliability of the study is therefore questioned. It is recommended further work and information is provided prior to the submission of the plan.</p> <p>Notwithstanding the above concerns the study is clear that an 18% affordable housing contribution is at best marginal across most sites and unviable on smaller sites. The lack of assessment of sites between 15 and 50 units gives little comfort that sites within this range will be viable. The PPG (ID 10-008) is clear that the cumulative impact of plan policies should not be set at the margins of viability but should allow for a buffer to respond to changing market conditions. Table 3 in the study clearly indicates 18% provides very little buffer. This is particularly concerning given the significant costs associated with a number of other financial contributions, such as the significant highway works described in Policy LS1. The HBF therefore recommends a reduced affordable housing requirement to take account of our comments.</p> <p>It is recognised that an 18% requirement from sites of 15 units or more is unlikely to address the affordable housing needs set out within the 2015 SHMA. Indeed given our comments above it appears unlikely that 18% will be delivered from a significant number of sites. There are, however, other mechanisms available to address this shortfall which would not have implications upon site viability and delivery. The Council should consider these alternatives. As previously noted this could include the provision of further sites and / or a higher overall housing requirement to reduce the burden upon individual developments.</p>	<p>all the contributions sought, including 18% affordable. The policy however includes the flexibility to provide a lower level if viability of sites meant the 18% couldn't be achieved. The Council therefore considers the Policy to be sound and in line with national guidance set out at paragraph 50 of the NPPF.</p> <p>Note that HBF is supportive of the removal of the word minimum from the policy.</p> <p>The viability study that accompanies the Planning Obligations SPD was undertaken in house approximately 1-2 months prior to the adoption of the SPD in November 2015 and is considered up-to-date as house prices and land values have remained relatively stable since that date. It is considered that the approach to viability testing as set out in the Planning Obligations SPD and policy is sound. This was based on the following:</p> <ul style="list-style-type: none"> <li>• The most likely development types likely to come forward in Hartlepool in the future; i.e. medium to high quality Greenfield residential schemes.</li> <li>• A representative sample of the development costs/values set out in submitted economic viability assessments which have been submitted to the Council over the last few years.</li> <li>• Local development cost/value indicators.</li> <li>• Standard development costs in the local area as represented in the Building Cost Information Service (BCIS).</li> <li>• Advice from Council officers including Highways, Engineers, Parks &amp; Countryside, Education etc.</li> </ul> <p>This is based on evidence which had come forward over the previous two years. It should be noted that the sales values that are being achieved on site (particularly in Wynyard and Quarry Farm) are in excess of the levels anticipated at the planning application stage. Given that the majority of the housing sites set out in the Local Plan are Greenfield, the level of development costs in relation to site issues are anticipated on site to be minimal in relation to site issues. Where there are infrastructure</p>

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				<p>contributions required in relation to the delivery of sites, such as road improvements, the policy offers the flexibility to discuss the viability of the scheme and the appropriate contributions on a site by site basis and in those situations the Council will accept a lower level of affordable housing contribution if the viability assessment supports this. It is also of note that for planning obligations to be applied they must meet the three tests set out in the CIL regulations.</p> <p>The Council believes that the inputs such as developer profit are acceptable. Some developers claimed that 20% profit was necessary in the period following the recession due to the need to provide banks with the security to offer them a mortgage. Since then the market has picked up finance is more acceptable, particularly where a developer has a Greenfield site in an areas where property values are at the top end of the market within Hartlepool. Given the majority of allocated sites within the local plan are Greenfield sites the local authority is confident that developer profit levels in the region of 15% are suitable and will not risk the delivery of developments. In terms of viability assessments it is also note worthy that many of the assessments which have been viewed have predicted house prices which have been substantially lower than those prices achieved when the houses have been brought to market. In some instances this has been up to £100,000 per property more than those figures submitted within the viability assessments. This indicates to officers that the levels of contributions required on these Greenfield sites in good market areas are achievable whilst still leaving the developers and landowners with good profit levels. The Council has incorporated a buffer level to allow for additional affordable and to give flexibility if a site stalls. It is not appropriate to include any further sites or higher overall housing requirement above the levels proposed.</p>

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
Galliford Try	LP0349	Pub0114	<p>An affordable housing target of 18% on all sites of 15 dwellings or more is sought by Policy HSG9. However the policy does note that the provision and tenure mix will be negotiated on a site-by-site basis, having regard to economic viability and housing need. It is considered that the policy allows sufficient flexibility for discussion regarding affordable housing provision, and as such our Client does not object to the policy.</p>	<p>Note that there is no objection to the policy as it is considered sufficiently flexible.</p>
Persimmon Homes (Teesside)	LP0045	Pub0115	<p>Persimmon Homes object to Policy HSG9 as we do not consider the council's approach to be justified by a robust evidence base.</p> <p>The policy identifies a target of 18% affordable housing on sites over a 15 unit threshold. We are also pleased to note that following our concerns set out to the Hartlepool Local Plan Preferred Options, the wording of the policy has been amended to remove the reference to the target being a 'minimum'.</p> <p>We also welcome the flexibility provided by the policy in so much that the tenure and mix of affordable housing will be negotiated on a "site-by-site basis, having regard to the economic viability of the development and the most up-to-date evidence of housing need, aspiration and the local housing market." This is considered consistent with the NPPF and will ensure that sufficient flexibility is incorporated within the policy to adapt to changing market conditions.</p> <p>Nonetheless, we have a number of concerns with how the affordable housing requirement has been established. As discussed previously, the Council's viability evidence is set out within the appendix to the 2015 Planning Obligations SPD. We would question the robustness of this testing in relation to this policy requirements of this plan and would also query a number of the assumptions used within the testing. We therefore do not consider it accurate and suggest that further work is undertaken prior to the next stage of the plan making process to support and inform the plan.</p> <p>The available viability testing demonstrates that an 18% affordable housing contribution is at best marginally achievable across most sites and unviable on smaller sites. The lack of assessment of sites between 15 and 50 units gives little comfort that sites within this range will be viable. The PPG (ID 10-008) is clear that the cumulative impact of plan policies should not be set at the margins of viability but should allow for a buffer to respond to changing market conditions. Table 3 in the study clearly indicates 18% provides very little buffer. We therefore strongly suggest that the affordable housing requirement is reduce to provide a suitable buffer. A lower requirement would reflect recently achieved viable levels of affordable housing on Persimmon sites throughout the town.</p>	<p>Note objection to Policy HSG9 and that Persimmon do not consider it is justified by a robust evidence base.</p> <p>Note Persimmon are pleased with the removal of the minimum requirement from the Preferred Options Document. Also note that Persimmon considers the policy allows sufficient flexibility in terms of viability and assessment on a site by site basis and is considered in line with national policy.</p> <p>In terms of Policy Hsg9 it is considered that the policy is flexible and allows for viability on a site by site basis to be considered. The 18% target, formed from the identified need within the SHMA, is assessed as deliverable and achievable on most sites within, particularly Greenfield ones. Recent planning permissions have secured 18% affordable housing along with other contributions required. As such and in current market conditions it has proved deliverable, including on larger brownfield sites such as the Brenda Road development which has secured all the contributions sought, including 18% affordable. The policy however includes the flexibility to provide a lower level if viability of sites meant the 18% couldn't be achieved. The Council therefore considers the Policy to be sound and in line with national guidance set out at paragraph 50 of the NPPF.</p> <p>The viability study that accompanies the Planning Obligations SPD was undertaken in house approximately 1-2 months prior to the adoption of the SPD in November 2015 and is considered up-to-date as house prices and land values have remained relatively stable since that date.</p> <p>It is considered that the approach to viability testing as</p>



Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
			<p>Finally, as discussed previously, it is noted that there is a substantial net imbalance in affordable dwellings equating to 144 units per annum. This represents nearly 50% of the suggested OAN and 35% of the housing target. As the viability evidence demonstrates, such a high percentage is clearly undeliverable within Hartlepool from market sites and the PPG (Ref: 2a-029-20140306) is clear when it states, “An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”</p> <p>To address this significant shortfall created by the reduced affordable housing target, Persimmon Homes suggest that the Council explore further opportunities to increase the housing supply through further allocations to ensure that the plan can meet the full market and affordable housing needs. This approach will ensure that the current allocations are not burdened by a scale of obligations which would threaten their delivery whilst ensuring that as far as practically possible, both market and affordable housing needs are met.</p>	<p>set out the in Planning Obligations SPD and policy is sound. This was based on the following:</p> <ul style="list-style-type: none"> <li>• The most likely development types likely to come forward in Hartlepool in the future; i.e. medium to high quality Greenfield residential schemes.</li> <li>• A representative sample of the development costs/values set out in submitted economic viability assessments which have been submitted to the Council over the last few years.</li> <li>• Local development cost/value indicators.</li> <li>• Standard development costs in the local area as represented in the Building Cost Information Service (BCIS).</li> <li>• Advice from Council officers including Highways, Engineers, Parks &amp; Countryside, Education etc.</li> </ul> <p>This is based on evidence which had come forward over the previous two years. It should be noted that the sales values that are being achieved on site (particularly in Wynyard and Quarry Farm) are in excess of the levels anticipated at the planning application stage. Given that the majority of the housing sites set out in the Local Plan are Greenfield, the level of development costs in relation to site issues are anticipated on site to be minimal in relation to site issues.</p> <p>Where there are infrastructure contributions required in relation to the delivery of sites, such as road improvements, the policy offers the flexibility to discuss the viability of the scheme and the appropriate contributions on a site by site basis and in those situations the Council will accept a lower level of affordable housing contribution if the viability assessment supports this. It is also of note that for planning obligations to be applied they must meet the three tests set out in the CIL regulations.</p> <p>The Council believes that the inputs such as developer profit are acceptable. Some developers claimed that 20% profit was necessary in the period following the recession due to the need to provide banks with the security to offer them a mortgage. Since then the market has picked up and finance is more acceptable, particularly where a</p>

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
				<p>developer has a Greenfield site in an areas where property values are at the top end of the market within Hartlepool. Given the majority of allocated sites within the local plan are Greenfield sites the local authority is confident that developer profit levels in the region of 15% are suitable and will not risk the delivery of developments. In terms of viability assessments it is also note worthy that many of the assessments which have been viewed have predicted house prices which have been substantially lower than those prices achieved when the houses have been brought to market. In some instances this has been up to £100,000 per property more than those figures submitted within the viability assessments.</p> <p>This indicates to officers that the levels of contributions required on these Greenfield sites in good market areas are achievable whilst still leaving the developers and landowners with good profit levels.</p> <p>The Council has incorporated a buffer level to allow for additional affordable and to give flexibility if a site stalls. It is not appropriate to include any further sites or higher overall housing requirement above the levels proposed.</p>

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
Cecil M Yuill Ltd (Quarry Farm)	LP0252	Pub0119	<p>Paragraph 10.50 of the Local Plan Publication Draft confirms that the 2015 SHMA identifies an annual target of 144 dwellings. Compared to the net additional dwelling target of 400 quoted the net affordable housing delivery target is approximately 36%. Notwithstanding this paragraphs 10.51-10.54 acknowledge that, providing an element of affordable housing as part of a private development, can affect the economic viability of schemes. Bearing this in mind, the Council correctly highlight that it is necessary to ensure that affordable housing is provided at a level that is economically viable and does not prevent development from taking place.</p> <p>This approach is reflected in Policy HSG9 (Affordable Housing Provision) which sets an affordable housing target of 18% on all sites above the 15 dwelling threshold. This approach clearly brings into question, first, the soundness of a policy which seeks to apply no negotiation below a level 18% and, perhaps more significantly, the ability of the Council to deliver anywhere near the level of affordable housing need over the Plan period.</p> <p>In terms of the requirement, at paragraph 47 of the NPPF, for Local Planning Authority's to ensure that their Local Plan meets, in full, objectively assessed need for both market and affordable housing, by advocating an affordable housing target of 18% the Local Planning Authority are already conceding that, due to viability issues, there will be a significant shortfall in affordable housing over the Plan period. On the basis that the Council achieve their target of 18% affordable housing on all sites that contribute to the overall dwelling requirement of 6,199 units (this assumes the 18% target has been met on the sites with consent which is not the case) this would achieve a maximum of 74 affordable units per annum. This is approximately half of the annual target of 144 dwellings identified within 2015 SHMA. In addition, the Council's viability evidence, as set out within the appendix to the 2015 Planning Obligations SPD, confirms that an 18% affordable housing contribution is, at best, marginal across most sites and unviable on smaller sites. As such, it is highly unlikely that even 74 affordable housing units will be delivered per annum as this would rely on 18% provision across each site.</p> <p>In light of this alarming scenario of the Council's clear inability to meet, in full, their affordable housing requirement, other means of delivering affordable housing need to be urgently identified. In this regard, Cecil M Yuill Ltd consider, which the HBF also advocate, that the only realistic possibility of the Council getting anywhere near their affordable housing requirement is to increase the overall housing requirement over the Plan period to reduce the percentage requirement per site which would, in turn, ensure that more sites were viable</p>	<p>The representation refers to the critical assessment of the OAN undertaken by Regeneris. Regeneris contended that the calculation of objectively assessed housing need (OAN) is unsound (see comments under Policy HSG1) as it does not, Regeneris contends, meet in full the housing required to meet the need arising from the predicted growth in jobs. The representation contends that the resulting inadequate (according to the representation) OAN will in turn impact negatively on the Council's ability to meet the affordable housing annual figure identified in the SHMA of 144 dwellings. This is because, the representation contends, not enough housing has been allocated overall to produce an affordable housing yield anywhere near this figure.</p> <p>For the reasons set out in the HBC response to the comments recorded under Policy HSG1, the Council considers that the OAN is sound in the context of making sufficient allowance for the needs arising from the predicted growth in jobs. Regarding affordable housing, the PPG sets out the steps which need to be taken in order to calculate the affordable housing component of the OAN and as the SHMA Addendum details, these steps have been followed and the OAN includes the necessary adjustments recommended by the PPG to take affordable housing need into account. The PPG also states "The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments.</p> <p>An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.' This advice has also been followed. Appendix 1-Economic Viability Assessment of the Planning Obligations SPD states that the level of affordable housing need identified, may have an impact on the viability of developments coming forward. It continues that an assessment of economic viability of affordable housing provision has</p>

Company	Unique Ref	Pub Ref	HSG9 Affordable Housing	HSG9 Affordable Housing HBC
			<p>and, therefore, deliverable.</p> <p>Cecil M Yuill Ltd, therefore, considers that an uplift to 614dpa advocated by Regeneris Consulting would not only increase flexibility and address potential underdelivery, but importantly also assist in addressing what will clearly be a significant undersupply of the affordable housing required over the Plan period, as identified within the 2015 SHMA. An annual housing requirement of 614dpa would, using the Council's target of 18% on sites over 15 units, provide 110 affordable dwellings per annum which is a significant uplift from the current Plan target of 74dpa and a lot closer to meeting the identified need for 144dpa.</p>	<p>been undertaken and that this has established a deliverable affordable housing target of 18%. An increase in the total housing figures to be included in the plan has been considered and a 20% buffer added in order both to deliver additional affordable homes and to provide flexibility in case any housing sites do not deliver at the rate anticipated.</p> <p>The representation states the soundness of the policy is called into question because it seeks to apply no negotiation below 18%. The representation also contends that the evidence presented in the Appendix to the Planning Obligations SPD shows that an 18% affordable housing contribution is at best marginal across most sites and unviable across smaller sites. The policy requirement is 18% affordable housing provision as the Council considers that this figure has been demonstrated to be viable on a borough-wide basis. However, the Council recognises that it is the prerogative of any applicant to seek to demonstrate that the development of a particular site would be unviable at 18% affordable housing provision and the Council would assess the robustness of the evidence advanced in support of such a contention.</p> <p>The plan needs to be read as a whole and Policy QP1: Planning Obligations, states that the Council will seek planning obligations where viable. It is not relevant that the evidence shows that small sites would unviable at this level, as the threshold for the application of the affordable housing requirement is 15 dwellings or more.</p>

**Policy HSG10: Housing Market Renewal**

Company	Unique Ref	Pub Ref	HSG10 Housing Market Renewal	HSG10 Housing Market Renewal HBC
Resident	LP0320	Pub0077	<p>I was gratified to see, under the section ‘Housing Market Renewal’ s.10.57; the Borough Council has implemented measures to combat this problem with: “improved management such as landlord accreditation and community support measures” (the former which presupposes participation on behalf of the landlord), but sense that for these initiatives to be fully effective they need to be supplemented by aforementioned agreements which articulate a responsibility towards the wider community. Moreover, and in good faith, that the public be made aware of what safeguards are in place should they encounter behaviour inimical towards social cohesion. It is also not an unreasonable expectation that landlords operating within the private sector subscribe fully to ss.11.- (l)(a)(b)(c) of the Landlord and Tenant Act 1985 thereby ensuring the appearance, and condition, of their properties do not become perceived as being detrimental to the amenities of the neighbourhood, and the easements enjoyed by its inhabitants:</p> <p>An express, or implied, obligation of a lease imposed upon a landlord or tenant to repair the ‘premises’ which are subject to the lease.</p> <p>It is an implied condition of a tenancy that the house let for a low rent is fit for human habitation at the commencement of the tenancy and an undertaking that the house will be kept by the landlord fit for human habitation during the term of the tenancy: Landlord and Tenant Act 1985 s.8.</p> <p>Where a tenancy is granted after October 24, 1962 for a term of less than seven years the landlord is under an implied obligation to keep in repair the structure and exterior of the property, to keep in repair and proper working order proper working order the installations in the dwelling-house for the supply of water, gas and electricity and for sanitation and to keep in repair and proper working order the installations in the dwelling-house for space-heating and heating water: Landlord and Tenant Act 1985 s.11(l). If the dwelling-house forms part of a building of which the landlord has an estate or interest but the landlord is not required to carry out any works or repairs unless the disrepair is such as to affect the tenant’s enjoyment of the dwelling-house or the common parts: Landlord and Tenant Act 1985 s. 11(1 A) and (1 B). The same applies to installations which, directly or indirectly, serve the dwelling-house and which either form part of the building in which the landlord has an interest or is owned by the lessor or under his control: Landlord and Tenant Act 1985 s.11(1A) and (1B).</p> <p>If I may return to the above observations, i.e.,: “there are specific issues relating to an oversupply of poor quality, low demand, terraced housing, particularly surrounding the town centre.” the area within which we reside is comprised of</p>	<p>The Council provides a range of statutory and non statutory services to support the private sector market. To ensure properties available in the private rented sector are maintained to an adequate standard and meet conditions as determined by the Housing Health and Safety Rating System (HHSRS). The Council employs Housing Standards Officers who respond to complaints of disrepair and take the necessary enforcement action to ensure compliance. In addition, the team administers grant and loan property improvement schemes as funding permits. The Council is also pro-active in taking Section 215 action under the Town and Country Planning Act 1990 to tackle property condition that is adversely affecting the amenity of the local area.</p> <p>The Council has a long-term policy to tackle empty homes across the town which includes engaging with property owners, acquisition of properties through the Empty Property Purchasing Scheme and appropriate enforcement action where necessary.</p> <p>Initiatives the Council delivers specifically relating to tackling anti-social behaviour relating to private sector housing includes the designation of areas for selective licensing; there are currently 13 distinct streets in the Borough that are included in the current designation. These streets were identified due to a range of factors including instances of anti-social behaviour specifically related to the private rented sector. Selective licensing aims to ensure the property is being managed effectively.</p> <p>The Council operates both a tenant referencing service (Good Tenant’s Scheme) and a social lettings agency (Quality Homes Letting Agency) that aim to improve and support the private rented sector. Information about each of these services is available on the Council’s website <a href="https://www.hartlepool.gov.uk/housingservices">https://www.hartlepool.gov.uk/housingservices</a></p>

Company	Unique Ref	Pub Ref	HSG10 Housing Market Renewal	HSG10 Housing Market Renewal HBC
			<p>professional, and working class, families. Some are young, some elderly retired. On the whole most are well-behaved and diligent as concerns household maintenance taking pride in the appearance of their properties.</p> <p>Several newly purchased properties being afforded comprehensive refurbishments to a high standard. I may be overstating my case but I sense the majority of residents are appreciative of their proximity to the Town Centre and the access afforded to nearby amenities. Understandably there are drawbacks to living within close proximity of any town centre and it is reassuring to see that the Borough Council remains aware of these and has initiated measures to deal with them.</p> <p>In conclusion my concerns are prompted both by the piecemeal development of the larger properties in the region and, with flagrant disregard to government statute, by a dearth of maintenance manifest in the woebegone appearance of rented accommodation. It may be argued that property speculators who purchase these homes are catering to individuals who, by force of circumstance, have little choice when it comes to an abode. This does not, however, exempt their owners from the requirements of the Landlord and Tenant Act 1985 s.11.- (l)(a)(b), Section 12 of the Anti-Social Behaviour Act 2003, or s 218A of the Housing Act 1996. It is to be hoped that measures will be implemented to ensure that:</p> <ul style="list-style-type: none"> <li>(i) These properties are structurally well-maintained, internally as well as externally. That they remain habitable up to a 'reasonable' standard and, that in appearance, do not reflect badly upon the surrounding neighbourhood, easements, or amenities;</li> <li>(ii) That the owners publish formal policies defining how they intend to counteract anti-social behaviour thereby minimising its corrosive effects upon the wider community;</li> <li>(iii) That these proposals be available to the general public.</li> </ul>	
Hartlepool Civic Society	LP0013	Pub0107	The Society strongly supports this Policy.	Support noted.

**Policy HSG11: Extensions to Existing Dwellings**

No comment received.

**Policy HSG12: Residential annexes**

No comment received.

**Policy HSG13: Gypsy and Traveller Provision**

Company	Unique Ref	Pub Ref	HSG13 Gypsy and Traveller Provision	HSG13 Gypsy and Traveller Provision HBC
Resident	LP0307	Pub0053	<p>Page 111 of the document in general states that there is no requirement for a permanent site but if it is proved to be a need for one HBC will follow the guidelines in bold on page 112</p> <p>1 Will HBC revert to the decision reached in 2014 and propose the site chosen at Hart?</p> <p>Or</p> <p>2 Will HBC commission another public consultation document for review by the electorate?</p> <p>Due to the change in circumstances and requirements, I would expect another review.</p>	<p>If the Planning Inspector who examines the Local Plan finds the policy sound this would form part of the adopted Local Plan. This would mean that should the Local Authority receive any planning applications for a Gypsy and Traveller site, the application would be dealt with in line with the criteria within Policy Hsg13. The Policy does not specify any particular location. Any residents in the vicinity of the proposed site would be consulted as part of the planning application process to seek their views.</p>

**Section 6 of the Consultation Statement, covering:  
Strengthening the Local Economy**

- Policy EMP1: Prestige Employment Site Wynyard Business Park
- Policy EMP2: Queen’s Meadow Business Park
- Policy EMP3: General Employment Land
- Policy EMP4: Specialist Industries
- Policy EMP5: Safeguarded land for new Nuclear Power Station
- Policy EMP6: Underground Storage

**Policy EMP1: Prestige Employment Site Wynyard Business Park**

Company	Unique Ref	Pub Ref	EMP1 Prestige Employment Wynyard	EMP1 Prestige Employment Wynyard HBC
Wynyard Residents Association	LP0277	Pub0022	<p>Business Park (EMP1)</p> <p>The provision for the classes of employment is good. Please ensure these restricted classes are adhered to. As a further control, it would be beneficial to have a written constraint against noise and pollution from the proposed industry and that it should be environmentally sound.</p>	Noted.
Hartlepool Civic Society	LP0013	Pub0107	<p>The Society still maintains that clear guidance should be given in such an exceptional landscape which is unique in this locality.</p> <p>NPPF 59 – Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new developments in relation to neighbouring buildings and the local area more generally.</p>	Noted. Landscape is protected within the policies set out in the local plan – particularly within the Rural Chapter.



Company	Unique Ref	Pub Ref	EMP1 Prestige Employment Wynyard	EMP1 Prestige Employment Wynyard HBC
Wynyard Park	LP0027	Pub0124	<p>It is noted that 32.7 hectares of land is allocated under Draft Policies LS1 and EMP1 for employment land at Wynyard Park adjacent to the A689. With regard to the proposals map Wynyard Park also note that the EMP1 allocation encroaches upon the land which was previously consented for the Wynyard Hospital. Whilst Wynyard Park can confirm that the Hospital will not be coming forward due to a lack of third party funding this land has been deemed acceptable for non-employment uses via the grant of planning consent for the hospital and as such our client would request that the land that comprised the hospital site forms part of the HSG6 or INF4 allocations. This reflects previous discussions with Officers on the understanding that this land will form part of the future housing and community facilities development.</p> <p>In previous representations, Wynyard Park raised objections to the proposed EMP1 allocation on the basis that there is an oversupply of employment land within the borough and in light of the low levels of demand predicted within the Employment Land Review. Whilst Wynyard Park maintain their concerns regarding the allocation of this land for prestige employment land, our client recognises and welcomes that this draft allocation has been significantly reduced by 21.3 hectares (from 54 hectares to 32.7 hectares) within the consultation document as requested in previous representations to facilitate much needed housing growth.</p> <p>When viewed holistically and subject to the amendment of the boundary of the EMP1 allocation to take into account the boundary of the former hospital site, Wynyard Park are content that this land remains allocated for future development subject to on-going plan reviews and assessments of demand in the future.</p>	<p>The Council remains firmly convinced that Wynyard Business Park has the potential to play a regional, sub-regional and local role in the Tees Valley's employment land portfolio over the next 15 years and beyond. Therefore the level of remaining employment land reflects the recommendations of Employment Land Review. The NPPF requires local authorities to plan for sustainable communities. The provision of land for employment uses plays an integral part of creating sustainable communities, providing opportunities for work close to where people live and therefore reducing commuting levels. Wynyard Park Ltd has stated that it wishes to create a sustainable community at Wynyard, retention of a level of employment land and land to support community infrastructure will help to achieve this.</p>
Natural England	LP0043	Pub0129	<p>It is noted that any aspirational Local Plan document will seek to promote local economic growth and Hartlepool's latest document promotes the development of the borough's economy in a proactive way. Natural England welcome the assurance contained with policy text that some development will need to meet suitability criteria and provide appropriate mitigation in line with the Habitat Regulations and as an overarching approach Natural England welcome this policy inclusion.</p>	<p>Comments welcomed.</p>
Highways England	LP0029	Pub0130	<p>See comments under Policy LS1 for aggregated response.</p>	<p>See HBC response to Policy LS1.</p>

**Policy EMP2: Queen's Meadow Business Park**

Company	Unique Ref	Pub Ref	EMP2 Queens Meadow	EMP2 Queens Meadow HBC
Hartlepool Civic Society	LP0013	Pub0107	<p>The Society still maintains that clear guidance should be given in such an exceptional landscape which is unique in this locality.</p> <p>NPPF 59 – Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new developments in relation to neighbouring buildings and the local area more generally.</p>	Noted. Landscape is protected within the policies set out in the local plan – particularly within the Rural Chapter.
Natural England	LP0043	Pub0129	<p>It is noted that any aspirational Local Plan document will seek to promote local economic growth and Hartlepool's latest document promotes the development of the borough's economy in a pro-active way. Natural England welcome the assurance contained with policy text that some development will need to meet suitability criteria and provide appropriate mitigation in line with the Habitat Regulations and as an overarching approach Natural England welcome this policy inclusion.</p>	Comments welcomed.

**Policy EMP3: General Employment Land**

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
Resident	LP0270	Pub0007	<p>What are the Council's plans with the Trading estates please that have empty units. I am particularly concerned with the Winterbottom Ave estate, the amount of rubbish and fly tip in this estate is disgusting, its no wonder there is a lack of interest in businesses wanting to use this estate.</p>	<p>The existing trading estates within the town are to be safeguarded through policy EMP3 (General Employment Land) for business development falling within use classes B1 (Business), B2 (General Industrial) and B8 (Storage or Distribution), as well as other uses which are complementary to the dominant use of a development. With respect to the Winterbottom Avenue estate (Oakesway), all 38.8 hectares of the Oakesway site is included as part of the Enterprise Zone Local Development Order, which seeks to incentivise the development of advanced engineering, advanced manufacturing and renewable energy manufacturing uses within the site.</p> <p>Fly tipping is not a planning issue; this has been reported to the HCA who are responsible for the site.</p>
Resident	LP0050	Pub0018	<p>Heavy industry is dying Hartlepool needs a clear vision on the types of activity and employment that they want to attract to improve the living standards.</p> <p>What consideration has been given for the redevelopment of Brenda Road to make this a central leisure / sports facility? The facility could include 50 metre swimming pool, athletics track, double hall sport facility with sprung floors, this area also has space to include a touring caravan park, noisy sports area, additional car parking. Cycle links could be improved for visitors to leave their cars/caravans at the site and cycle around the area. Currently children involved in athletics have to travel to Middlesbrough to experience running on a 'proper' athletics track, I believe that Hartlepool should aim to have much better sporting facilities that will provide employment and the opportunity for a healthier lifestyle.</p>	<p>Brenda Road area is allocated for employment uses and a site for onshore wind turbines. The allocation of such uses is based on evidence set out in the Employment Land Review and consideration of appropriate sites for wind turbine development. Previously it has been deemed acceptable that noisy sports are appropriate in this area due to the area being away from residential development. With regard to the development of leisure facilities the policies in the plan support a sequentially preferable approach focusing such development within firstly within the town centre.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
HCA (Oakesway)	LP0086	Pub0068	<p>The HCA agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. It is considered that in order to achieve economic growth it is imperative that a range of appropriate development opportunities are made available. The HCA and Hartlepool Borough Council are focusing investment into the Queen's Meadow Enterprise Zone following market interest and success of recent development phases. Queen's Meadow is also a more attractive location for tenants due to the higher amounts of grants and incentives offered to Government endorsed Enterprise Zones.</p> <p>The viability and market appraisal assessments undertaken by the HCA indicate that despite the allocation of the site as a local Enterprise Zone there has been no development at Oakesway for over 30 years.</p> <p>Paragraph 22 of the NPPF states that planning policies should avoid long term protection of sites allocated for employment use where there is not a "reasonable prospect" of the site being used for that purpose. The NPPF further states that if there is no "reasonable prospect" of the site being used for the allocated employment use, applications for alternative uses should be considered relating to market signals and the need for different land uses to support sustainable development.</p> <p>At Oakesway, given the current employment market., and the track record of employment delivery on the site, it is reasonable to conclude that the whole of the remainder of the Oakesway site will not come forward and be used for employment uses despite its Enterprise Zone status.</p> <p>Residential development on this site should be supported because there is no realistic prospect of the site being taken up for employment uses and indeed there are other suitable employment sites elsewhere in the Authority area. There is therefore no evidence to suggest that residential development on this site would result in a negative impact on the local economy or have an undue impact on the supply of employment land in the Borough.</p> <p>The ELR suggests an oversupply of employment land in the borough. It indicated a minimum need of 19.58 ha per year, comprising 15.13 ha, plus a five year buffer of 4.45 ha to reflect a choice of sites and to</p>	<p>Oakesway industrial estate was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone. The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. As presented at preferred options stage further discussion with the Council's inward investment team has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable residential environment and community within the constraints of the site.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>provide a continuum of supply beyond the end of the plan period. Measured against the Borough's current realistic supply, there is a supply surplus of 238.32 ha to 2031.</p> <p>It is clear that a range of sites is required to ensure that there is a versatile and flexible employment land supply to meet changing demands for the borough. For instance, Oakesway has not delivered in 30 years and prospects for employment development on a site that does not have the same level of prominence as others, should be re-evaluated – the HCA are of the view that residential development is the only viable alternative here.</p>	
Campaign to Protect Rural England	LP0015	Pub0074	<p>CPRE recognises that, apart from Policy EMP5 (safeguarding land for a new Nuclear Power Station), these Policies do not appear to allocate new sites for employment purposes but do allocate areas for different types of employment in existing sites. We have no objection to this approach and indeed welcome the opportunity for some of the more run down industrial estates in Hartlepool to be refurbished. The sites in the Brenda Road area in particular would benefit from considerable landscape improvements and we represent that the Plan should include this as an objective.</p> <p>While we do not wish to comment individually on each proposed Policy, including EMP5 (see above) and EMP6 (underground storage), we do represent that the following issues affect the soundness of this section of the Published Draft</p> <p>1) In our representations to the Preferred Options, we expressed concern about the number of number of new jobs to be created and where these people were to come from. We commented on the potential impact this may have on housing provision and, in effect, whether it demonstrated that the Duty to Co-operate with neighbouring authorities could be demonstrated. We represent that this remains unclear.</p> <p>2) There is no reference in this Publication Draft to the Report of the Natural Capital Committee. A fourth annual report has now been published this month which we accept cannot have been considered when the Publication Draft was published. However, we represent that the Draft should have considered earlier reports from the Natural Capital Committee and the benefits that it is said this can</p>	<p>Noted. The Employment Land Review (ELR) suggested reallocation of employment sites where the evidence suggests over supply which will not be met by demand. Policy EMP3 does require that development is of a high design quality and landscaping will be required along main approaches and key estate roads.</p> <p>The assumption made in relation to jobs was revisited as part of the independently produced Hartlepool Strategic Housing Market Assessment (SHMA) addendum following the preferred options stage. The addendum considers two jobs forecasts for Hartlepool, 1500 over the plan period outlined in the Employment Land Review and the more optimistic scenario than that suggested by the Tees Valley Strategic Economic Plan of 290 jobs per year. As a result the evidence suggested a lower level of development based on jobs growth scenarios, these were based on a 70 / 15 / 15 split of increase the employment rate / in migration / in commuting on the basis that the Strategic Economic Plan has a main focus of reducing unemployment through increasing job opportunities – the 15% in migration was based around an aspiration to increase the opportunities and types of jobs on offer in the town through initiatives such as those within the Innovation and Skills quarter and starter units associated with the college with the aim of retaining young working population which has previously been lost to areas of Great Britain outside of the Tees Valley and County Durham.</p> <p>The total number of new households expected to be formed in Hartlepool over the 15 year plan period includes other factors as well as reflecting economic growth and its associated migration</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>bring both to the economy and to the well-being of the workforce (and so, by implication, benefits for the NHS). Green infrastructure is addressed and referred to in Policy QP1 (Planning Obligations) but we represent that without a reference to Natural Capital, these policies are not sound</p>	<p>implications. These include factors such as more single person households, an increase in lone parent households and other demographic changes.</p> <p>The SHMA has demonstrated that Hartlepool is a single housing market area based on DCLG guidance, although it is acknowledged that in terms of workplace Hartlepool is part of the wider economy of the Tees Valley and parts of Co. Durham.</p> <p>A Duty to Cooperate Statement has been produced which was available during the Publication Consultation – this noted the ongoing dialogue between a range of parties, including neighbouring authorities, which was used to help influence the development of the plan. The neighbouring authorities have accepted that Hartlepool is a self contained housing market and that there are only small movements of households and have raised no concerns or objections to the proposals within the Local Plan. These issues are dealt with on an ongoing basis and the neighbouring authorities are aware of our aspiration to make changes to the jobs offer in Hartlepool as a means of avoiding loss of population to areas outside of the Tees Valley and County Durham.</p> <p>Noted. The Council is aware of the development and increased Government emphasis on Natural Capital, highlighted with the recent publication of the fourth annual report.</p> <p>Whilst we are confident that the Natural Environment Chapter of Local Plan is comprehensive in detailing the natural assets within the Borough, and the NE policies aim to protect and enhance all elements of the natural environment, it is acknowledged that the preamble to the chapter could be strengthened to include reference to Natural Capital. <b>The following wording update to section 16.1 is suggested</b>  <b>“16.1 In line with the Government’s emerging Natural Capital agenda, the Borough Council recognises the important role that Hartlepool’s natural environment plays in enhancing people’s quality of life and improving quality of place. The benefits of a high quality natural environment run as a cross-cutting theme through many of the policies and proposals of the Local Plan. A high quality environment can:</b></p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
				<ul style="list-style-type: none"> <li>• Encourage more people to live and work in Hartlepool</li> <li>• Complement efforts to attract new economic growth and investment</li> <li>• Help to increase the number of visitors and boost the tourism economy</li> <li>• Provide more opportunities for leisure and recreation with consequent benefits for people’s health and well-being</li> <li>• Support measures to adapt to and mitigate against the potential impacts of climate change”</li> </ul> <p>The Council is confident the detail of the policies set out in the Natural Environment Chapter help to support the key objective of the Natural Capital Committee “of being the first generation to leave the natural environment of England in a better state than that in which we found it” .</p> <p>In addition, the following description should be included in the glossary. “Natural capital - Natural capital refers to the elements of the natural environment which provide valuable goods and services to people. The Government focus that the state of natural capital matters, not just because people enjoy the aesthetic elements of landscapes and wildlife of England, but because of the wide-ranging economic benefits that natural assets provide when managed well.”</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>Employment Policies. HBC has concluded no LSE arising from policies EMP3 – General Employment Land and EMP4 – Specialist Industries. The RSPB does not agree that the policies (individually or cumulatively) can be assessed as not having LSE on the integrity of internationally designated sites – namely the Teesmouth and Cleveland Coast SPA/pSPA/Ramsar (SPA). We believe that these policies require further assessment.</p> <p>AND</p> <p>EMP3 - the HRA (page 51) states: “The location and operation of businesses within what is called the Southern Business Zone (SBZ) could have an adverse effect on site integrity. This is because the SBZ partly borders the Teesmouth and Cleveland Coast SPA/Ramsar. The policy wording states that industrial development here may be restricted or required to provide appropriate mitigation and/or compensation measures. This negates any LSE.”</p> <p>Supporting text to policy EMP4 (page 126) states: “Where relevant proposals will need to demonstrate that there will be no adverse impact on the integrity of the Teesmouth and Cleveland Coast SPA/Ramsar either alone or in combination with other plans and programmes. Any mitigation/compensation measurements must be secured in advance of the development in order to meet the requirements of the Habitat Regulations”</p> <p>The HRA (page 53) states: “The recognition that development at any of the sites allocated under this policy (EMP4) has the potential to have an adverse effect, either directly or indirectly on the Teesmouth and Cleveland Coast SPA/Ramsar is addressed in the wording of the policy. With the inclusion of this wording, LSE will be negated and this policy is assessed as not having an adverse effect on the integrity of internationally designated sites”.</p> <p>Whilst inclusion of wording within policies (as described above) is to be welcomed, it is our opinion that applying a blanket requirement for impact assessment to plan policies will simply defer any consideration of the viability of development allocations to the planning proposal stage. This could lead to wasted resources being put into the preparation and submission of unviable applications, or lack of due consideration being given to the combined effects on the SPA/Ramsar at the individual application stage. This approach can lead to serious doubts over the deliverability of the allocations and thus the soundness of the overall plan. In our response to the Draft</p>	<p>HBC will update the HRA, including re-screening the Employment policies and allocations in-combination, as queried by RSPB and with reference to the pSPA. Proportionate safeguards will be recommended as appropriate. Changed text will be clearly marked.</p> <p>AND</p> <p>Hartlepool’s EMP4 Special Industries covers seven sites. Five are linked to existing companies and these are signatories to the Tees Estuary Partnership (TEP) and are therefore party to the strategic conservation of European Sites. As with any large infrastructure project, Hartlepool BC accepts that a full HRA will be required at the planning application stage, but believes that Specialist Industry companies, who are members of INCA and the TEP, are proactively considering future, strategic nature conservation mitigation for their businesses, which will be invaluable at any future development control stage. In addition, EDF Energy (policy EMP5) makes an annual contribution of £10,000 to the Hartlepool Partnership for Nature and this funding is spent on nature conservation projects including some that benefit European Sites.</p> <p><b>HBC recommends adding the following wording on to the end of paragraph 11.36: WORDING: ‘In order to demonstrate strategic commitment to conserving European Sites, industrial companies will be encouraged to join INCA and participate in the Tees Estuary Partnership. If EMP4 sites are developed, this is likely to adversely impact upon neighbouring pSPA and SPA land.</b></p> <p><b>Construction and operation will need to mitigate adverse impact on European Sites, for example through timing of works and companies should consider this in their long-term planning’.</b></p> <p>HBC will update the HRA. Employment policies and allocations will be re-assessed and basic assumptions made where these are more useful than doing nothing. For example, sites can be assessed for their functional SPA value by analysing the likelihood of species such as curlew, lapwing and oystercatcher to use them and proportionate recommendations be made. All changes will be clearly marked.</p> <p>Whilst HBC acknowledge the importance of the precautionary principle, it has undertaken an Employment Land Review to inform need and to provide a portfolio of options to drive inward</p>



Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>Plan, the RSPB urged caution in this approach.</p> <p>We strongly suggest that it is incumbent upon the Council to use all available evidence to robustly assess all potential impacts of new development on the sites allocated across all employment policies – both cumulatively (should development be proposed on all allocated sites) and at allocated site level. If the evidence suggests an adverse effect upon the SPA then, rather than rely on impact assessments and mitigation on a case by case basis (at the individual project level), HBC should seek to (preferably) avoid harm, or alternatively secure strategic mitigation through the Plan itself.</p> <p>We acknowledge that, until individual proposals come forward, not all potential impacts from new development can be predicted. Nonetheless, given the level of detail within the wording of the various policies, it should be possible for the Council to make some basic assumptions about potential impacts (direct and indirect) arising from new development to feed in to a strategic process. It may still leave the details of specific schemes to be addressed at the planning application level but would identify any issues that can and should be addressed at the plan level.</p> <p>Consideration should also be given to removing individual sites from the allocations map - where new development would likely result in an adverse effect that cannot be mitigated - unless HBC is satisfied that such a development would meet the requirements of Article 6(4): (i) there are no alternative solutions; (ii) the damage is justified for imperative reasons of overriding public interest (IROPI) and (iii) they have secured the necessary compensatory measures to ensure the overall coherence of the Natura 2000 network is maintained. For the avoidance of doubt the RSPB consider that it is unlikely that allocations within the plan will be able to satisfy the requirements of these legal tests.</p>	<p>investment. The Local Plan balances the need for inward investment with nature conservation and many other factors. Many of the EMP3 General Employment allocations are surrounded by existing Employment sites and it is noted that, even in combination, these were screened out at HRA stage 1.</p> <p>Further, HBC believes there will always be a proportion of available, open land, providing a choice of sites for SPA birds outside of the SPA. For example, oystercatchers and turnstones regularly feed on the wide grass verges along Coronation Drive and on sports pitches, golf courses and school playing fields. Curlew are known to use farmland between the coast and their moorland breeding grounds.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
Landowner	LP0338	Pub0096	<p>My client's have recently submitted a Planning enquiry to your Council regarding this piece of land. They wish to construct a bungalow and detached garage, for their own use, on this land, which would be used in connection with the adjacent business premises they currently operate their haulage business from. Your Council's response to this enquiry was to inform us that under the 2006 Local Plan the land was allocated for employment use, and that any subsequent planning application would be resisted. However the same site was, in 2004, granted Planning Permission for a detached bungalow and detached garage.</p> <p>Your Council's own description of the land at the time was 'an area of surplus industrial land sandwiched between the rear of properties on Thirsk Grove and industrial premises on the Usworth Road Industrial Estate'.</p> <p>In the first instance we question how a specific piece of land that was granted Planning Permission for a dwelling in 2004 could still have been classified as employment land in 2006. The factors which lead to the Council granting the Planning Permission in 2004 are still relevant and the conclusion that your Planning Section came to at the time remains sound.</p> <p>The new 2016 Local Plan on page 123 refers to the area under sub section EMP3: General Employment Land, as part of the Usworth Road/Park View West area.</p> <p>We would respectfully ask yourselves that the land in question is classified as WHITE LAND, without any specific allocation, in the new LOCAL PLAN.</p>	<p>Given the location adjacent to the industrial estate, it is considered that the allocation of the site is appropriate for employment land use. It is noted that a bungalow was allowed in 2004 under planning reference H/FUL/2004/0480. However this planning approval has now lapsed and as such cannot be implemented, in addition it is understood that the occupation was linked to the neighbouring industrial use at the time. Under the emerging local plan the land in question is allocated for General Employment Land use in Usworth Road Industrial Estate, allowing business use within use classes B1 and B8, the continued allocation is based on the land assessment in the Employment Land Review (2014) which did not recommended this site for de-allocation. As such it is to be retained as employment land and this is the proposed allocation within the emerging Local Plan. There would be particular concerns in increasing the proximity of residential uses to the employment area in terms of residential amenity. The site currently acts as a buffer between the employment and residential uses, the designation as set out in the plan protects this.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
Greatham Parish Council	LP0018	Pub0102	<p>Greatham Parish Council is concerned at the location of ‘bad neighbour’ uses on the Graythorp Industrial Estate. A requirement for buffer areas similar to that being required for the strategic housing sites is required. Such buffer areas should be planted appropriately for the benefit of wildlife and to compensate for the ‘bad neighbour’ uses by providing an improved environment and visual screening.</p> <p>Similar conditions should be imposed as those on renewable energy proposals:-</p> <p>1/ All proposals should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties during construction, operational lifespan and decommissioning.</p> <p>2/All proposals should also include details of how the site will be satisfactorily restored.</p> <p>3/Developers will be expected to work constructively with local communities and local authorities (including Parish Councils) to secure appropriate community benefits.</p>	<p>The Borough Council understands the concerns of the Parish Council with regard to ‘bad neighbour’ developments at Graythorp industrial estate. While such uses can be visually unattractive the Borough Council does exercise strict control over such aspects as smell, noise and vibration, and works alongside the Environment Agency where necessary. If hazardous materials are involved then the Council must seek the advice of the Health and Safety Executive before granting any planning permission.</p> <p>The Borough Council also recognises the generally poor environment of the Graythorp area and, where funding and resources allow, will undertake environmental improvements in the area. The Council will also pursue where appropriate contributions for developers to secure landscaping and improvements to individual sites in the Graythorp area.</p> <p>In relation to the suggested planning conditions, these are agreed as part of the development control / management process and would be development specific.</p>
Northumbrian Water	LP0241	Pub0117	<p>We support the development of a framework to deliver land for economic growth within the Borough and welcome consultation as appropriate as the sites identified progress. With regard to Policy EMP3, General Employment Land, we welcome that appropriate surface water management and sustainable drainage are required components of proposed employment schemes.</p>	<p>Noted.</p>
Sovereign Park	LP0260	Pub0123	<p>Hansteen Ltd have engaged McGough Planning Consultants to make representations to the above, on their behalf. As you may well already know, Hansteen Ltd own Sovereign Park industrial estate and land, accessed from Brenda Road – identified within the draft local plan and proposals map for general employment purposes under policy EMP3 and allocation EMP3d.</p> <p>Hansteen wishes to continue to object to the allocation for general employment purposes of the undeveloped land forming part of their estate at Sovereign Park (policy allocation EMP3d) and the green corridor allocation of the neighbouring Council owned land fronting Seaton Lane (NE2e)</p> <p>The Sovereign Park land was historically home to a large smelting works that was demolished some decades ago, which has left a legacy of issues that create a considerable barrier to employment development. Joint working with Council officers (from both</p>	<p>The Council is aware of the advice in the National Planning Policy Framework which states that land should not be retained for employment uses if there is no reasonable prospect of land being used for that purpose.</p> <p>As noted in the response to the preferred options stage consultation representation, the Council notes the comments made about flooding and acknowledges that the Environment Agency flood zone map may be inaccurate regarding the Sovereign park area. However as mentioned in the representation, the only way for this to be progressed is an assessment by the EA as a result of additional flood assessments, this is a matter for the owner / agent to pursue with the Environment Agency – it would be at their discretion as to whether they considered information of a flood assessment in relation to a different site being appropriate for reassessment of the floodrisk.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>planning and estates departments) has resulted in agreement that there is no market for employment related development on the Sovereign Park land. This is due to a variety of reasons, including:</p> <p>low demand for employment related development in the area;</p> <ul style="list-style-type: none"> <li>- better located sites nearby;</li> <li>- better quality sites in the area;</li> <li>- the increased cost of development of Sovereign Park land due to the legacy left by the previous industrial activity.</li> </ul> <p>Officers will be aware that Hansteen (the previous owner before them) has robustly marketed for employment related development over a considerable period of time, without success. Unfortunately, it would seem that the legacy of the site's previous use for heavy industry resulted in the degradation of the land that is so costly to put right that it makes any employment development unviable.</p> <p>Much of the Sovereign Park land appears to be covered by a layer of clinker and building rubble mixed with soil. The precise depth and composition of the contamination is still to be established. Hansteen has established that there are sub-surface foundations that require removal before development can take place.</p> <p>Employment development on the site is also hampered by the need for land-forming, required to create a level site before development can commence. The site is scarred and rutted. The cost of creating level developable areas alone makes employment development unviable.</p> <p>Given the joint working efforts of Hansteen and Council officers (dating back to 2010 with Spencer Holdings, the previous owners), it will be well understood that all possible avenues for public subsidy/ grant, in an effort to make employment development viable, have been explored. It is accepted by all parties that there are no such assistance regimes available.</p> <p>It is worth reminding Council officers that their discussions with Hansteen also considered the joint development of Sovereign Park and the adjacent Council owned landscaped strip on Seaton Lane (identified by the allocation ref NE2e); to allow an access for a new</p>	<p>The Council has commissioned a Level 1 Strategic Flood Risk Assessment (SFRA). The draft Level 1 SFRA shows that 75.09% of the site is in Flood Zone 1 and 24.91% is in Flood Zone 3a (high risk). The current use is classified as 'less vulnerable' in Table 3: Flood risk vulnerability and flood zone 'compatibility' in the National Planning Practice Guidance. Residential use is classified as 'more vulnerable' in Table 3. This means that the allocation of the site for residential development would fail the Sequential Test.</p> <p>Given the constraints the Council does not accept that Sovereign Park is a viable housing site that could be delivered during the plan period. In relation to comments regarding the de-allocation of the SECAAH site, this is as a result of the grant of planning permission, a decision granted on appeal by the planning inspectorate, which resulted in the loss of employment land in this area which another justification for this site to be retained for employment land.</p> <p>The NE2e designation allocates the land adjacent to the site as Local Green Corridor, protection of this along Seaton Lane a key route through the town is seen as necessary to provide a buffer between the highway and the site.</p> <p>Nevertheless in line with National Planning Policy Framework paragraph 22 the Council will keep the employment land designation under regular review and will remain open to consideration of alternative uses.</p> <p>Comments about the previous use of the site as a smelting works are noted – however early ordnance survey maps suggest that the smelting works (which eventually formed part of British Steel North Works) did not extend as far south as the Sovereign Park site.</p>

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>residential development from Seaton Lane instead of Brenda Road.</p> <p>It is Hansteen’s understanding that Council officers considered that the NE2e landscaped strip to be essentially a visual screen to the Sovereign Park Estate and development land. It was also considered the NE2e strip had little value in terms of its open space contribution, and that there were no overriding ecological issues that would affect the strips incorporation to a wider Sovereign Park land residential development. The land making up by the spoil mound (NE2j) also formed part of the discussions, including bringing forward an enhanced open space as part of the residential masterplan. Council officers advised the residential masterplan would have to look to compensate for the loss of the open space provided by NE2e.</p> <p>As well as the residential masterplan discussions, it is also worth recalling that the Council considered buying part of the site and an existing empty commercial unit on the estate for a new depot facility, in 2015. Despite extensive negotiations (not least on price), the Council decided their requirement was matched better by another site in Tofts Farm. Part of the reason given by officers for not proceeding with the Sovereign Park acquisition was the expense of development of the land due to land forming and uncertainties about contamination issues.</p> <p>The Council's ELR from December 2014 referred to some of the difficulties associated with the Hansteen’s site. Whilst the report summary view of the land was, “not (to) recommend deallocation from employment uses at this time but does suggest further monitoring and study to clarify if land here is viable for employment uses over the long term”. This view remained unchanged in the later version of the ELR from January 2015. The further evidence provided to officers from their discussions with Hansteen over the past three years amply shows the concerns expressed in both versions of the ELR about the site’s unsuitability for employment are borne out.</p> <p>It is apparent from the both versions of the ELR that part of the Council's reasoning for keeping the employment allocation related to is designation as being within flood zone 2 – making it unsuitable housing development. Recent work has cast doubt on this designation.</p>	

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>Flood modelling undertaken for the nearby SECAAH village site (just south of Sovereign Park land, across Seaton Lane) has shown that the EA flood map for the area (which includes Sovereign Park land) to be inaccurate. From this and discussions with the Council officers and the EA, there is an expectation that the flood map for Sovereign Park is equally wrong.</p> <p>Hansteen's flood study work has been accepted by both the Council and EA, but the only way suggested to amend the EA's flood map was to complete modelling work to the same standard as that done for SECAAH, which an onerous position and repeats work already undertaken. However, if necessary, Hansteen will commission such modelling work, even though there seems to be little doubt that this will show that the inaccuracies in the EA flood map for SEECAH will be replicated on the flood map for Sovereign Park land. It is likely both sites are unaffected by flood i.e. both are in flood zone 1.</p> <p>The NPPF provides guidance to LPA's on local plan policy matters. In relation to employment allocations, in particular, it urges LPAs not to continue to allocate sites for employment where there is little prospect of development. Paragraph 22 sets this out very clearly:</p> <p>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>The new draft Hartlepool Local Plan presents a further good opportunity to look again at the site's employment allocation, in the same way to the SECAAH village site on the opposite side of Seaton land from Sovereign Park. Both Sovereign Park and the SECAAH sites were allocated for employment in the previous local plan – the adopted proposals map shows Sovereign Park was IND4a and the SECAAH site was IND5. However, the SECAAH site has been de-allocated in the new draft local plan, whilst the employment allocation for Sovereign Park land has been carried over.</p>	

Company	Unique Ref	Pub Ref	EMP3 General Employment Land	EMP3 General Employment Land HBC
			<p>Given NPPF guidance, the de-allocation of the nearby SECAAH site, the discussions that have taken place over the last few years between Council officers and Hansteen and particularly the unchallenged view that employment development on the site is not viable, it is frustrating and unreasonable that the allocation of Sovereign Park land for general employment continues.</p> <p>Hansteen consider that they have clearly demonstrated there is no reasonable prospect of Sovereign Park Land being used for employment purposes, not least because the Council came to the view themselves when they concluded that the cost of overcoming the site's problems were so great that they could not relocate their depot there. Rather than challenging this position, Council officers have engaged with Hansteen in a constructive way to develop a joint approach for a residential masterplan for both Sovereign Park land and the Council owned landscape strip along Seaton Lane.</p> <p>In summary, Hansteen seeks the following:</p> <ul style="list-style-type: none"> <li>• For the Council to reconsider their allocation of Sovereign Park Land and, as a minimum, de-allocate it in a similar fashion to the SECAAH site; And</li> <li>• Amendment to NE2e to allow for the possibility of future development in the context of a masterplanned approach and in accordance with discussions that have so far taken place. This would clearly be contingent on reaching an agreement with the Council as landowner.</li> </ul>	
Natural England	LP0043	Pub0129	<p>It is noted that any aspirational Local Plan document will seek to promote local economic growth and Hartlepool's latest document promotes the development of the borough's economy in a proactive way. Natural England welcome the assurance contained with policy text that some development will need to meet suitability criteria and provide appropriate mitigation in line with the Habitat Regulations and as an overarching approach Natural England welcome this policy inclusion.</p>	Comments welcomed.

**Policy EMP4: Specialist Industries**

Company	Unique Ref	Pub Ref	EMP4 Specialist Industries	EMP4 Specialist Industries HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>1. Employment Policies. HBC has concluded no LSE arising from policies EMP3 – General Employment Land and EMP4 – Specialist Industries. The RSPB does not agree that the policies (individually or cumulatively) can be assessed as not having LSE on the integrity of internationally designated sites – namely the Teesmouth and Cleveland Coast SPA/pSPA/Ramsar (SPA). We believe that these policies require further assessment.</p> <p>AND</p> <p>2. EMP3 - the HRA (page 51) states: “The location and operation of businesses within what is called the Southern Business Zone (SBZ) could have an adverse effect on site integrity. This is because the SBZ partly borders the Teesmouth and Cleveland Coast SPA/Ramsar. The policy wording states that industrial development here may be restricted or required to provide appropriate mitigation and/or compensation measures. This negates any LSE.”</p> <p>Supporting text to policy EMP4 (page 126) states: “Where relevant proposals will need to demonstrate that there will be no adverse impact on the integrity of the Teesmouth and Cleveland Coast SPA/Ramsar either alone or in combination with other plans and programmes. Any mitigation/compensation measurements must be secured in advance of the development in order to meet the requirements of the Habitat Regulations”</p> <p>The HRA (page 53) states: “The recognition that development at any of the sites allocated under this policy (EMP4) has the potential to have an adverse effect, either directly or indirectly on the Teesmouth and Cleveland Coast SPA/Ramsar is addressed in the wording of the policy.</p> <p>With the inclusion of this wording, LSE will be negated and this policy is assessed as not having an adverse effect on the integrity of internationally designated sites”.</p> <p>Whilst inclusion of wording within policies (as described above) is to be welcomed, it is our opinion that applying a blanket requirement for impact assessment to plan policies will simply defer any consideration of the viability of development allocations to the planning proposal stage. This could lead to wasted resources being put into the preparation and submission of unviable applications, or lack of due consideration being given to the combined effects on the SPA/Ramsar at the individual application stage. This approach can lead to serious doubts over the deliverability of the allocations and thus the soundness of the overall plan. In our response to the Draft Plan, the RSPB urged caution in this approach.</p>	<p>1. HBC will update the HRA, including re-screening the Employment policies and allocations in-combination, as queried by RSPB and with reference to the pSPA. Proportionate safeguards will be recommended as appropriate. Changed text will be clearly marked.</p> <p>AND</p> <p>2. Hartlepool’s EMP4 Special Industries covers seven sites. Five are linked to existing companies and these are signatories to the Tees Estuary Partnership (TEP) and are therefore party to the strategic conservation of European Sites. As with any large infrastructure project, Hartlepool BC accepts that a full HRA will be required at the planning application stage, but believes that Specialist Industry companies, who are members of INCA and the TEP, are proactively considering future, strategic nature conservation mitigation for their businesses, which will be invaluable at any future development control stage. In addition, EDF Energy (policy EMP5) makes an annual contribution of £10,000 to the Hartlepool Partnership for Nature and this funding is spent on nature conservation projects including some that benefit European Sites. <b>HBC recommends adding the following wording on to the end of paragraph 11.36: WORDING: ‘In order to demonstrate strategic commitment to conserving European Sites, industrial companies will be encouraged to join INCA and participate in the Tees Estuary Partnership. If EMP4 sites are developed, this is likely to adversely impact upon neighbouring pSPA and SPA land.</b></p> <p><b>Construction and operation will need to mitigate adverse impact on European Sites, for example through timing of works and companies should consider this in their long-term planning’.</b></p> <p>HBC will update the HRA. Employment policies and allocations will be re-assessed and basic assumptions made where these are more useful than doing nothing. For example, sites can be assessed for their functional SPA value by analysing the likelihood of species such as curlew, lapwing and oystercatcher to use them and proportionate recommendations be made. All changes will be clearly marked.</p> <p>Whilst HBC acknowledge the importance of the precautionary</p>



Company	Unique Ref	Pub Ref	EMP4 Specialist Industries	EMP4 Specialist Industries HBC
			<p>We strongly suggest that it is incumbent upon the Council to use all available evidence to robustly assess all potential impacts of new development on the sites allocated across all employment policies – both cumulatively (should development be proposed on all allocated sites) and at allocated site level. If the evidence suggests an adverse effect upon the SPA then, rather than rely on impact assessments and mitigation on a case by case basis (at the individual project level), HBC should seek to (preferably) avoid harm, or alternatively secure strategic mitigation through the Plan itself.</p> <p>We acknowledge that, until individual proposals come forward, not all potential impacts from new development can be predicted.</p> <p>Nonetheless, given the level of detail within the wording of the various policies, it should be possible for the Council to make some basic assumptions about potential impacts (direct and indirect) arising from new development to feed in to a strategic process. It may still leave the details of specific schemes to be addressed at the planning application level but would identify any issues that can and should be addressed at the plan level.</p> <p>Consideration should also be given to removing individual sites from the allocations map - where new development would likely result in an adverse effect that cannot be mitigated - unless HBC is satisfied that such a development would meet the requirements of Article 6(4): (i) there are no alternative solutions; (ii) the damage is justified for imperative reasons of overriding public interest (IROPI) and (iii) they have secured the necessary compensatory measures to ensure the overall coherence of the Natura 2000 network is maintained. For the avoidance of doubt the RSPB consider that it is unlikely that allocations within the plan will be able to satisfy the requirements of these legal tests.</p> <p>AND</p> <p>3. EMP 4 - Hartlepool Port – Victoria Harbour</p> <p>The HRA states that the site “can hold a flock of lapwing ranging from around 50-300 birds during the winter in periods when the land is not being used for operational reasons. The birds merely rest on the large open area of tarmac and, as they only use the tarmac area they do not feed on the site.</p> <p>Their use of the site is not considered to be integral to the functionality of the European site as the land is only intermittently available to flocks of birds when not operational. Nevertheless it is recognised that compensatory provision needs to be made should this land be further</p>	<p>principle, it has undertaken an Employment Land Review to inform need and to provide a portfolio of options to drive inward investment. The Local Plan balances the need for inward investment with nature conservation and many other factors. Many of the EMP3 General Employment allocations are surrounded by existing Employment sites and it is noted that, even in combination, these were screened out at HRA stage 1. Further, HBC believes there will always be a proportion of available, open land, providing a choice of sites for SPA birds outside of the SPA. For example, oystercatchers and turnstones regularly feed on the wide grass verges along Coronation Drive and on sports pitches, golf courses and school playing fields. Curlew are known to use farmland between the coast and their moorland breeding grounds.</p> <p>AND</p> <p>3. The Hartlepool Port area is owned by PD Ports and has a long-standing use as an industrial site – mainly for lay down areas for imports and exports, e.g. cars and wind turbine parts. There appears to be no recorded lapwing counts, with the figure of 50-300 lapwings being provided by the previous local authority Ecologist. Lapwings were not recorded on the site in 2016, though may have been present. Regardless, if they have occurred in the recent past they are assumed to be functional to the SPA, because it is assumed that they are feeding within the SPA. HBC agrees that roosting is an ecological function. HBC will undertake a new HRA assessment of this site. The open area of hard surfacing (not all of which is tarmac) covers approximately 30 Ha and it within a larger area of land covering approximately 100 Ha (mainly brownfield grassland and sheds). While HBC understands the precautionary principle, its response has to be proportionate to the likelihood of all of the available hard standing being developed and sterilised in terms of bird roosting. It is noted that there are a number of gently sloping roofed buildings on site and that lapwings have been recorded roosting on such roofs (British Birds, 2001, Volume 94, ‘Roof assemblies of lapwings and plovers in Britain’). The land owner, PD Ports, is a member of INCA and the Tees Estuary Partnership and is proactively considering future, strategic nature conservation mitigation for its businesses (at this and all its sites in the Tees estuary). This will be invaluable for any future development control process.</p>

Company	Unique Ref	Pub Ref	EMP4 Specialist Industries	EMP4 Specialist Industries HBC
			<p>developed and it has been discussed with Natural England that a suitable compensatory measure would be to enhance the island which currently forms a small isolated compartment of the Teesmouth and Cleveland Coast SPA.</p> <p>A flock of 300 lapwing represents 7% of the Teesmouth and Cleveland Coast SPA lapwing population. This species is an interest feature of the SPA – being included in the wintering assemblage. Important points to note here are that:</p> <p>Functional land can be ephemeral in nature but that does not negate its importance in providing both feeding and roosting opportunities for SPA interest features.</p> <p>The key to assessing whether this site is of functional importance is to determine whether the birds using the site for roosting are feeding within the SPA. If so then members of this flock can be considered to be part of the wintering assemblage.</p> <p>Mitigation measures will need consider the predicted impacts from new development on the SPA features (i.e. Roosting lapwing) using the site and whether the enhancement proposed to the bird island provides a suitable alternative to ensure that the adverse impacts on those features will be offset.</p> <p>Should it be required, the RSPB would like to see evidence within the Plan that appropriate mitigation (as described above) has been secured for the lifetime of the predicted adverse effect.</p> <p>AND</p> <p>4. EMP4 - Greenabella Marsh EMP4 (page 125) states: b) “The allocated site is reserved for expansion by the existing occupier” The HRA (page 52) states “The allocated land west of Seaton Channel around Huntsman Tioxide takes in the majority of Greenabella Marsh. It extends to the boundary with the part of Greenabella Marsh that is within the Teesmouth and Cleveland Coast SPA/Ramsar but excludes the SPA/Ramsar site itself.” The HRA further states “there are four ponds within the site that are used by waterbirds to some extent. HBC has conducted surveys of these ponds to establish the extent to which they are used by SPA/Ramsar birds. Results indicate that they are used by relatively low numbers of duck with one pond in particular being used by shoveler.” Accepting that the site is used by relatively low numbers of birds this site is, nevertheless, functionally linked to the SPA. Consideration needs to be given as to whether loss of functional habitat from this site will contribute</p>	<p>The potential mitigation discussed in the HRA may be possible, but would need permission from the owner of the West Harbour roost island. Management works would consist of levelling off the concave surface and removing scrub. HBC will update the HRA and clearly mark any changes. AND</p> <p>4. A site visit on 01/03/2017 found that the only pond within the EMP4 allocation on Greenabella Marsh, has experienced vegetation succession and is now a reedbed and sedge swamp with no standing water. No wetland birds were present. HBC considers that this pond is no longer a functional part of the SPA. The rest of the marsh on EMP4 is coarse grassland and is not functionally linked to the SPA. Huntsman Tioxide is a member of the Tees Estuary Partnership and is therefore party to the strategic conservation of European Sites. The Company has a management plan for nature conservation on its site. AND</p> <p>5. The Phillips Tank farm EMP4 site is a long-standing Special Industries site, which forms part of the owning company’s portfolio. The company may wish to use this land in future for biodiversity offsetting, which would be compatible with its nature conservation designation. The site has been under dual designated in previous Local Plans as the site has been allocated for Specialist Industries and as a Local Wildlife Site. It is currently functional SPA land. It is part of the Teesmouth and Cleveland Coast pSPA extension. Thus it is now allocated as Specialist Industries, Internationally Designated Site, Nationally Designated Site and Local Wildlife Site.</p> <p>Should the site be developed then the company would need to create compensatory SPA habitat. Hartlepool BC believes that the allocation is fair and deliverable. There is an on-going benefit to nature conservation and should the land be developed, this benefit must be transferred elsewhere, giving SPA continuity. The owner could have sterilised the site in the past, but instead, has been proactive in retaining it with its biodiversity value, which is a better outcome for wildlife and has led to part of the site being of SPA quality. Conocco-Phillips is a member of INCA and the Tees Estuary Partnership and is proactively considering future, strategic nature conservation mitigation for its business, which will be</p>

Company	Unique Ref	Pub Ref	EMP4 Specialist Industries	EMP4 Specialist Industries HBC
			<p>to a cumulative adverse effect arising from the combined loss of habitat if development comes forward across all the sites allocated by the suite of employment policies within the Plan.</p> <p>Furthermore, there is the potential for any development on this site to cause displacement/ disturbance to SPA interest features either during construction or operational phases. Please refer to our comments regarding cumulative impacts above. AND 5. EMP4 - Phillips Tank Farm EMP 4(page 125) states: c) "The site is reserved for use of the existing occupier." The HRA (page 53) states: "Phillips Tank Farm is land allocated approximately 600m from the Teesmouth and Cleveland Coast SPA/Ramsar at its nearest point. The southern part of the allocated land has been set aside to be managed as mitigation for the loss of habitat for SPA, as part of a development of a Liquefied Natural Gas (LNG) plant in the neighbouring borough of Stockton on Tees. It currently has some functional use for birds for which the Teesmouth and Cleveland Coast SPA/Ramsar is designated and this is anticipated to increase significantly once mitigation proposals are implemented. Any proposals for development on this part of the site allocated under this policy would therefore, need to provide mitigation not only for its current use by SPA/Ramsar birds but also provide such alternative mitigation for the development of the LNG plan as is allowed under that that permission. The land allocated by EMP4 at Phillips Tank Farm is (in part) within the proposed terrestrial extension of the Teesmouth and Cleveland Coast SPA (pSPA).</p> <p>Formal consultation on the proposed extension is likely to be early 2017. At this point HBC will need to treat the land as if designated, in accordance with the NPPF. This, therefore, means that development undertaken on this site could represent the destruction of SPA habitat (an adverse impact on site integrity that cannot be mitigated on site) which would require compensatory measures - subject to the scheme meeting the tests on no alternative solutions and IROPI – detailed above.</p>	<p>invaluable at any future development control stage. Further, HBC will recommend to Natural England that the adjacent and newly created Salterns Wetland (a LWS) is of SPA quality.</p>
Greatham Parish Council	LP0018	Pub0102	See comments under EMP3	See response under EMP3.
Natural England	LP0043	Pub0129	<p>Allocated Sites: Specific issues The assessment of allocated sites within this document has raised some</p>	<p>Greatham Tank Farm. HBC will update the HRA to include the proposed pSPA, even though the formal consultation has not</p>

Company	Unique Ref	Pub Ref	EMP4 Specialist Industries	EMP4 Specialist Industries HBC
			<p>concerns that there may be a conflict of interest with the proposed land designations and nature conservation issues.</p> <p>The parcel of land which remain of concern are: Land has been allocated for industry at Greatham Tank Farm. However, these sites have been identified for inclusion in the proposed extension to the Teesmouth and Cleveland Coast SPA and Ramsar site (pSPA) due to the number of wintering waterbirds that it supports. We acknowledge that the formal consultation for the extension has not yet commenced and so the land receives no formal protection from this designation at present. However, the land supports birds which form part of the 20,000 wintering assemblage of the SPA as it is currently designated, and so the land receives protection under the Habitats Regulations as it is 'functional land'. It is unclear whether this allocation has been included as mitigation for consented development on Seal Sands, or whether further industrial development is proposed here. If it is the latter these allocations need to be considered under the Habitats Regulations in terms of their potential for likely significant effect, and we note this assessment has not been undertaken. Greenabella Marsh is allocated for industrial development on the allocations plan, however this site has massive potential for improvement, is strategically placed and represents one of a limited number of opportunities for improvement on the estuary. We therefore advise that this area should be limited in development potential.</p> <p>AND</p> <p>It is noted that any aspirational Local Plan document will seek to promote local economic growth and Hartlepool's latest document promotes the development of the borough's economy in a pro-active way. Natural England welcome the assurance contained with policy text that some development will need to meet suitability criteria and provide appropriate mitigation in line with the Habitat Regulations and as an overarching approach Natural England welcome this policy inclusion.</p>	<p>started. The pSPA creates an issue by creating dual designation of Special Industries and Natural Environment (underlying SSSI to be extended, thus creating Nationally Designated Site and Internationally Designated Site allocations). Changed text in the HRA will be clearly marked.</p> <p>AND</p> <p>Greenabella Marsh. HBC response: The land (on part of Greenabella Marsh) allocated as Special Industries, is partly dual designated as a Local Wildlife Site. One non Special Industries part of Greenabella Marsh is SSSI and SPA. Another non-industrial part of Greenabella Marsh is just Local Wildlife Site. The southern part of the LWS area contains ponds used by SPA birds and is currently functional SPA land and is consequently part of the pSPA extension. This area of pSPA is not adjacent to the Special Industries allocation. Hartlepool BC recognises that Huntsman Tioxide has excellent nature conservation credentials, is committed to managing non-industry critical areas for biodiversity and is a pro-active partner of INCA and the Tees Estuary Partnership (TEP).</p> <p>As with any large infrastructure project, Hartlepool BC accepts that a full HRA will be required at the planning application stage and that this will need to examine the impact on nearby SPA features. Hartlepool BC believes that Specialist Industry companies that are members of the TEP, are proactively considering future, strategic nature conservation mitigation for their businesses, which will be invaluable at any future development control stage.</p>

**EMP5: Safeguarded land for new Nuclear Power Station**

Company	Unique Ref	Pub Ref	EMP5 Nuclear Power Station	EMP5 Nuclear Power Station HBC
Resident	LP0272	Pub0013	<p>I have recently been to one of the planning meetings for the future of Hartlepool and would like to make a comment on the plans.</p> <p>I don't agree with the proposal to reserve space for a new nuclear power station. We have already been in close proximity to a nuclear power station for far longer than we were told originally this would be and I don't see why we should be under the threat of a new one.</p> <p>From looking at the plans it seems like Hartlepool is planning to go greener in the future with wind turbines, so it seems like a conflict of interest having a nuclear power station. Plus we don't even have a hospital to support if anything were to go wrong at the power station.</p> <p>There are numerous terror incidents across the world and having a nuclear power station would also make Hartlepool a target for this. I am sure there are other sites across England not so close to where people live that would be better so I think the government should put it there rather than our door step again as we have done our bit!</p> <p>Finally the power station there at the moment would need to be decommissioned and I am sure the land would need to settle before another nuclear power station is built for health and safety I don't think this can be done safely in the next 15 years.</p> <p>Thanks for taking my comments into consideration.</p>	<p>In relation to the allocation of provision of a Safeguarded Site for a Nuclear Power Station Development, this is a site that has been identified by the government through National Policy Statement for Nuclear Power Generation (EN-6), this would be a Nationally Significant Infrastructure Project (NSIP) which is therefore set at a national level. The Local Plan considers the development of green energy generation through the Climate Change chapter of the plan.</p>
Durham Bird Club	LP0222	Pub0075	<p>The Club covers this area as well as Teesmouth Bird Club. Although independent of each other, we do seek to co-operate and I have sought the views of TBC to this letter. They have informed me that they support its contents.</p> <p>The Club makes takes a neutral stance on the nuclear issue as such. We did not comment on this issue at the Preferred Options stage. However, the proposed site for any new power station is next to sites of considerable importance from the Club's point of view.</p> <p>We note that this is referred to in the text to this Policy and indeed the Policy and that there has to be a Habitats Regulation Assessment under the Habitats Directive. Compensatory sites may need to be considered. However, we also represent that there may need to be an Assessment under the Birds Directive in accordance with paragraph 119 of the NPPF. We also consider that the Reports of the Natural Capital Committee need</p>	<p>Durham Bird Club (DBC) is correct that both the text (11.40) and the EMP5 policy wording, include references to a Habitat Regulations Assessment being needed, should the nuclear power station development come forward and that provision of compensatory habitat will be needed. DBC state that a HRA would also be needed under the Birds Directive. However, In the UK, the provisions of the Birds Directive are implemented through the Conservation (Natural Habitats, &amp; c.) Regulations 2010 and therefore it is the same legislation as the Habitats Directive and so is already covered in the Local Plan.</p> <p>The Council is aware of the development and increased Government emphasis on Natural Capital, highlighted with the recent publication of the fourth annual report. Whilst we are confident that the Natural Environment Chapter of Local Plan is comprehensive in detailing the natural assets within the Borough, and the NE policies aim to protect and enhance all elements of the</p>

Company	Unique Ref	Pub Ref	EMP5 Nuclear Power Station	EMP5 Nuclear Power Station HBC
			<p>to be considered in this respect. While any provision taking these Reports into account may not fully protect species that may be lost as a result, we represent that this is an important consideration which would help to promote biodiversity within the development itself.</p> <p>We represent that the importance of this area cannot be over-emphasised. While we acknowledge that this development is almost inevitable, we represent that this plus the issues we mention in relation to Policy NE 1 are important. As such, we represent that the Policy as currently worded in not sound.</p>	<p>natural environment, it is acknowledged that the preamble to the chapter could be strengthened to include reference to Natural Capital. <b>The following wording update to section 16.1 is suggested:</b></p> <p><b>“16.1 In line with the Government’s emerging Natural Capital agenda, the Borough Council recognises the important role that Hartlepool’s natural environment plays in enhancing people’s quality of life and improving quality of place. The benefits of a high quality natural environment run as a cross-cutting theme through many of the policies and proposals of the Local Plan. A high quality environment can:</b></p> <ul style="list-style-type: none"> <li>• Encourage more people to live and work in Hartlepool</li> <li>• Complement efforts to attract new economic growth and investment</li> <li>• Help to increase the number of visitors and boost the tourism economy</li> <li>• Provide more opportunities for leisure and recreation with consequent benefits for people’s health and well-being</li> <li>• Support measures to adapt to and mitigate against the potential impacts of climate change”</li> </ul> <p>The Council is confident the detail of the policies set out in the Natural Environment Chapter help to support the key objective of the Natural Capital Committee “of being the first generation to leave the natural environment of England in a better state than that in which we found it” .</p> <p><b>In addition, the following description should be included in the glossary. “Natural capital - Natural capital refers to the elements of the natural environment which provide valuable goods and services to people. The Government focus is that the state of natural capital matters, not just because people enjoy the aesthetic elements of landscapes and wildlife of England, but because of the wide-ranging economic benefits that natural assets provide when managed well.”</b></p>
Natural England	LP0043	Pub0129	<p>Natural England agree that in the provision of a new nuclear power station, due to the location of the site in relation to the Teesmouth and Cleveland Coast Special Protection Area (SPA)/ Ramsar site, and the data available, the proposal will require further assessment and survey including a Habitats Regulations Assessment (HRA).</p>	<p>Comments welcomed.</p>

**Policy EMP6: Underground Storage**

Company	Unique Ref	Pub Ref	EMP6 Underground Storage	EMP6 Underground Storage HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>EMP6 – Underground Storage</p> <p>The HRA (page 54) states that “Former brine extraction on an industrial scale has left a number of underground caverns which are suitable for large scale storage. However, these are beneath land designated as Teesmouth and Cleveland Coast SPA/Ramsar and land that is proposed by Natural England to be part of the SPA extension. For that reason, the policy points to NE1 (Natural Environment) and states that only non-toxic substances would be considered.”</p> <p>The RSPB welcomes the commitment that only non-toxic substances would be considered within the context of this policy.</p> <p>AND</p> <p>The HRA further states that “The policy steers away from ‘large above ground structures’ but allows for above surface structures which are ‘limited in scale’. It follows that any above ground structure within the SPA must cause LSE through land take and would need to be compensated. An additional wording was recommended for the policy which will provide adequate compensation for any loss. The policy has been amended to include under the phrase ‘will only be considered where ‘any above-surface structures are limited in scale, not visually prominent and will be designed with flat roofs to replicate any habitat loss’. The RSPB agrees that any above ground structures would constitute a direct habitat loss to the SPA. The HRA suggests that impacts from above ground structures can be mitigated on-site through structure design.</p> <p>The RSPB fundamentally disagrees with this. In particular, a flat roof does not adequately replicate the habitat that would be lost. The destruction of SPA habitat (an adverse impact on site integrity that cannot be mitigated on site) would require compensatory measures - subject to the scheme meeting the tests on no alternative solutions and IROPI – detailed above.</p>	<p>Comment welcomed.</p> <p>AND</p> <p><b>HBC recommends adding the following wording to EMP6: WORDING: ‘In order to make any underground storage deliverable, access will need to be from the portion of Greenabella Marsh that has no Natural Environment allocation, which will avoid the need for a structure to be built on the SPA. There is such a piece of land which adjoins the A178 and the EMP6 sites’.</b> This will avoid stages 3 and 4 of the Habitat Regulations.</p>

Company	Unique Ref	Pub Ref	EMP6 Underground Storage	EMP6 Underground Storage HBC
Greatham Parish Council	LP0018	Pub0102	<p>Depositing any radioactive material should explicitly exclude.</p> <p>Similar conditions should be imposed as those on renewable energy proposals:-</p> <p>1/ All proposals should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties during construction, operational lifespan and decommissioning.</p> <p>2/All proposals should also include details of how the site will be satisfactorily restored.</p> <p>3/Developers will be expected to work constructively with local communities and local authorities (including Parish Councils) to secure appropriate community benefits.</p>	<p>Noted. The policy protects against risk to people in the area, as well as watercourses and any development would seek advice from statutory consultees regarding elimination of risk of underground storage development. In relation to the suggested planning conditions, these are agreed as part of the development control / management process and would be development specific.</p>
Natural England	LP0043	Pub0129	<p>It is noted that any aspirational Local Plan document will seek to promote local economic growth and Hartlepool's latest document promotes the development of the borough's economy in a pro-active way. Natural England welcome the assurance contained with policy text that some development will need to meet suitability criteria and provide appropriate mitigation in line with the Habitat Regulations and as an overarching approach Natural England welcome this policy inclusion.</p>	<p>Comments welcomed.</p>



**Section 7 of the Consultation Statement, covering: Protecting, Managing and Enhancing the Rural Area**

- Policy RUR1: Development in the Rural Area
- Policy RUR2: New Dwellings Outside of Development Limits
- Policy RUR3: Farm Diversification
- Policy RUR4: Equestrian Development
- Policy RUR5: Rural Tourism
- Policy RUR6: Rural Services

**Policy RUR1: Development in the Rural Area**

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
NFU North East	LP0047	Pub0020	<p>Whilst continuing to invest in flood risk management schemes to protect strategic sites is important, presumably in more urban areas, it is also important to protect rural areas and therefore the contribution they make to the wider economy. Often the flood impact on rural areas is under represented at both national and local levels and therefore overlooked when flood alleviation schemes are devised.</p> <p>Delivery of high speed broadband is a major priority for rural businesses who are often placed at an economic disadvantage due to their location. Whilst urban areas are pushing towards 5g capability, some rural businesses struggle to achieve even a basic connection speed.</p>	<p>Comments noted. Flood risk management is considered equally important in all areas and has been considered in the development of the Local Plan.</p> <p>It is acknowledged within the plan that the main gaps in the high speed broadband network are industrial estates and business parks, the town centre, and the villages and rural parts of the Borough. Paragraph 8.36 of the Local Plan indicates that, in order to address gaps in high speed broadband, the Borough Council, along with the other local authorities in the Tees Valley, will seek to meet and exceed the UK Government’s target for 95% of all premises having access to superfast broadband by December 2017, through the ‘Digital Durham’ initiative. In November 2016, additional funding was agreed between the Tees Valley Combined Authority and Broadband Delivery UK (BDUK) to improve superfast broadband coverage. At a Tees Valley level this aims to exceed 98% coverage by the end of 2018 and it should help Hartlepool to achieve coverage beyond its current 95% level. Proposals for the improvement and expansion of telecommunication networks, including high speed broadband, will be supported and applications for infrastructure will be supported subject to the proposal addressing the criteria set out within emerging Local Plan policy INF5 (Telecommunications)</p>

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our comments at the Preferred Options stage, we referred to tranquillity and dark skies and the importance these topics have for CPRE.</p> <p>We represent that our comments have not been addressed in this Publication Draft. While the Draft does refer to</p> <ul style="list-style-type: none"> <li>- Noise and amenity, this in our opinion is not the same as tranquillity and this issue should be separately addressed for development in the rural area</li> <li>- Light pollution but, as we mentioned at the Preferred Options stage, we represent that Dark Skies should also be specifically considered</li> </ul> <p>We note that tranquillity is mentioned in relation to leisure and tourism at paragraph 14.17 of the Publication Draft. We represent that there should be a similar consideration in this Section of the Draft.</p> <p>As a result, we represent that this Policy as it stands is not sound</p>	<p>Noted. The Borough Council maintains that the policy wording of RUR1 in conjunction with other policies in the plan provide sufficient control over matters that influence tranquillity and light pollution. The Council is committed to the reduction of carbon emissions and will resist any potential adverse impact on the tranquillity of the rural environment from development in the rural area through undue noise, smell or visual disturbance.</p> <p>Notwithstanding this, <b>it is recommended that paragraph 12.20 should be amended to read:</b></p> <p><b>“In the rural area outside the development limits, beyond the agricultural permitted development rights, development may be permitted where it is essential for the purposes of agriculture, forestry, public infrastructure or to meet the social needs of the local community. This and other development that is appropriate to a rural area and supports the rural economy, agricultural diversification, rural tourism or leisure development may be permitted where it respects the tranquillity and character of the local countryside and does not have a significant impact on visual amenity in the setting of the landscape or on the local road network.”</b></p> <p>In terms of the reduction of light pollution, it is considered the provisions of policy RUR1, in conjunction with other policies within the plan, provide sufficient control over these matters. The Borough Council will resist any adverse impact on the surrounding area through undue light pollution. In addition, all street lights have been changed to LED units which direct the light and reduce light pollution.</p>

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, we support the Council’s approach to protecting, managing and enhancing the rural area which seeks to support the rural economy, however, as stated in our comments in relation to LS1 we consider that the Plan should place an increased emphasis on its preferred spatial strategy for new housing provision in sustainable rural locations. We consider the Councils approach to new development in the countryside to be unsound as it is not positively prepared and is not effective. We agree with future growth being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth, however, we consider that the Council’s development strategy should include a sustainable approach to spatial planning within their rural settlements in order to provide more certainty and transparency regarding the Council’s approach to growth in the entire borough. We consider that the Council’s implementation of strict Development Limits, set out in Policy RUR1 and RUR2, and the restriction of development land in sustainable villages is not consistent with positively preparing the Local Plan or national policy and the principles of the NPPF as they significantly stifle sustainable new development from coming forwards in a sustainable manner. National guidance is very clear in stipulating that Local Plans should adopt a more flexible and positive approach to planning which can accommodate needs that are not anticipated in the plan and allow for a rapid response to changes in economic circumstances.</p> <p>The Council must reconsider their approach to housing in the rural area in order to ensure that the delivery of high quality, much needed homes, in sustainable rural locations is not severely restricted. For the avoidance of doubt, this policy is also contrary to the spirit of other area principles of the NPPF which requires LPAs to ‘plan positively’ (Para 157) and to seek to ‘boost significantly the supply of new housing’ (para 47), whilst requiring Local Plans to have ‘sufficient flexibility to adapt to rapid change’ (para 14). It will therefore significantly restrain the supply and flexibility of land that is available for housing and it will ultimately act as a constraint to both market and affordable housing delivery within the next plan period. We consider that the Council should promote sustainable rural</p>	<p>With respect to paragraph 47 of the NPPF, the plan has allocated sites (including existing planning permissions) for a total of 6,199 dwellings, above that of the Objectively Assessed Need (OAN) requirements and taking into account replacement of demolitions and a 20% buffer over the plan period. This figure and the corresponding allocations and extant planning permissions include sites within the urban area, on the edge of the urban area and in rural villages that are considered to be sustainable. If there are further windfall developments during the plan period these will be expected to be within the urban area or Village Envelopes and it is considered housing development in the open countryside, beyond the development limits, that does not comply with RUR2, would not constitute sustainable development. It is noted that whilst SPDs may need updating, the Borough Council will not use these to add financially onerous requirements to development.</p>

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
			<p>development where is would enhance or maintain the vitality of rural communities. This approach would ensure that the Plans locational strategy is consistent with national policy and paragraph 55 of the NPPF in particular. Moreover, we note that Policy RUR1 and RUR2 make reference to the 'New Dwellings Outside of Development Limits' SPD. In line with our aforementioned comments, we appreciate that SPDs are useful for providing further guidance for development on specific sites or in relation to specific issues, however, we must emphasise that the Council should not use SPDs as a mechanism for introducing policy requirements and burdens outside of the formal plan-making process.</p> <p>As set out in paragraph 153 of the NPPF: "...Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."</p> <p>We urge the Council to review their SPDs following Local Plan adoption to ensure that they are still in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p>	
Gentoo Homes	LP0335	Pub0092	See comments under LS1	See response to LS1

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
Gladman Developments	LP0351	Pub0118	<p>Gladman are of the view that as proposed, Policy RUR1 is not in conformity with paragraph 49 of the Framework. Policy RUR1 introduces a paragraph that indicates that new dwellings in the rural area must meet the criteria set out in the New Dwellings Outside of Development Limits Supplementary Document. The Policy also requires proposals to be in accordance with a Rural Neighbourhood Plan that has not to date been consulted upon under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, independently examined, the subject of a referendum or made by the local planning authority. The strategic policies of the local plan should be used to guide the production of neighbourhood plans and it is therefore not considered appropriate to include criterion 1) within this policy. In addition, any criteria relating to new development in locations adjacent to or beyond development limits should be included within the Local Plan and not deferred to a supplementary planning document. Gladman are concerned that the approach that is being proposed would prevent the testing of such criteria through the scrutiny of the local plan examination process. As currently drafted, the approach contained in RUR1 is contrary to paragraphs 14 and of the Framework.</p>	<p>Paragraph 49 of the NPPF stipulates that housing applications should be considered in the context of the presumption in favour of sustainable development. It is not considered that the provisions of RUR1 prevent this. Paragraph 49 also indicates that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year-supply of deliverable housing sites. The plan has identified and allocated sites (including existing planning permissions) for a total of 6,199 dwellings, above that of the Objectively Assessed Need (OAN) requirements and taking into account replacement of demolitions and a 20% buffer over the plan period. It is considered that the Council can therefore demonstrate a five year supply of deliverable housing sites. This figure and the corresponding allocations and extant planning permissions include sites within the urban area, on the edge of the urban area and in rural villages that are considered to be sustainable. If there are further windfall developments during the plan period these will be expected to be within the urban area or Village Envelopes and it is considered housing development in the open countryside, beyond the development limits, that does not comply with RUR2, would not constitute sustainable development.</p> <p>With respect to the reference to the Hartlepool Rural Neighbourhood Plan in criterion 1, the Council is simply seeking to ensure conformity between the two emerging documents. The criteria relating to new dwellings in locations beyond development limits are included within the Local Plan in emerging policy RUR2 (New Dwellings Outside of Development Limits), and emerging policy RUR1 cross references this policy. The New Dwellings Outside of Development Limits SPD provides additional detailed guidance with respect to the requirements of RUR2, including whether the principle of a new dwelling in the countryside is likely to be appropriate and when a justification test will be required and details what information the applicant will be required to submit as part of this. It should also be noted that the SPD will form part of the submission to the Secretary of State.</p>

Company	Unique Ref	Pub Ref	RUR1 Development in the Rural Area	RUR1 Development in the Rural Area HBC
Historic England	LP0044	Pub0125	The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.	Comments welcomed.
Natural England	LP0043	Pub0129	Natural England welcome the comprehensive sustainable development approach to development within the rural area as an overarching objective to the Local Plan.	Comments welcomed.

## Policy RUR2: New Dwellings Outside of Development Limits

Company	Unique Ref	Pub Ref	RUR2 New Dwellings Outside Development Limits	RUR2 New Dwellings Outside Development Limits HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our comments at the Preferred Options stage, we referred to the fact that many of the issues identified in the text echoed issues commonly associated with Green Belt land. As we have identified in our comments on Policy LS1, we are disappointed that there has been no consideration of any green belt designation in this Publication Draft</p> <p>As a result, we represent that this Policy as it stands is not sound</p>	<p>Comments noted. Whilst it is accepted that section 9 of the NPPF does give the opportunity to designate green belt land within a Local Plan, there is no requirement to do so and the NPPF at other sections, such as paragraph 73, 74, and paragraphs within section 11 of the NPPF including 109, 113 and 114 all offer the opportunity to designate land for other types of green designation. HBC do not intend to allocate any Green Belt within the Borough. This policy in conjunction with the Natural Environment and Green Networks chapter will ensure that development does not occur in protected areas. Not having Green Belt is not a reason for a plan to be found unsound.</p>
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, we support the Council's approach to protecting, managing and enhancing the rural area which seeks to support the rural economy, however, as stated in our comments in relation to LS1 we consider that the Plan should place an increased emphasis on its preferred spatial strategy for new housing provision in sustainable rural locations. We consider the Council's approach to new development in the countryside to be unsound as it is not positively prepared and is not effective. We agree with future growth being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth, however, we consider that the Council's development strategy should include a sustainable approach to spatial planning within their rural settlements in order to provide more certainty and transparency regarding the Council's approach to growth in the entire borough. We consider that the Council's implementation of strict Development Limits, set out in Policy RUR1 and RUR2, and the restriction of development land in sustainable villages is not consistent with positively preparing the Local Plan or national policy and the principles of the NPPF as they significantly stifle sustainable new development from coming forwards in a sustainable manner. National guidance is very clear in stipulating that Local Plans should adopt a more flexible and positive approach to planning which can accommodate needs that are not anticipated in the plan and allow for a rapid response to changes in economic circumstances.</p> <p>The Council must reconsider their approach to housing in the</p>	<p>With respect to paragraph 47 of the NPPF, the plan has allocated sites (including existing planning permissions) for a total of 6,199 dwellings, above that of the Objectively Assessed Need (OAN) requirements and taking into account replacement of demolitions and a 20% buffer over the plan period. This figure and the corresponding allocations and extant planning permissions include sites within the urban area, on the edge of the urban area and in rural villages that are considered to be sustainable. If there are further windfall developments during the plan period these will be expected to be within the urban area or Village Envelopes and it is considered housing development in the open countryside, beyond the development limits, that does not comply with RUR2, would not constitute sustainable development. It is noted that whilst SPDs may need updating, the Borough Council will not use these to add financially onerous requirements to development.</p>

Company	Unique Ref	Pub Ref	RUR2 New Dwellings Outside Development Limits	RUR2 New Dwellings Outside Development Limits HBC
			<p>rural area in order to ensure that the delivery of high quality, much needed homes, in sustainable rural locations is not severely restricted. For the avoidance of doubt, this policy is also contrary to the spirit of other area principles of the NPPF which requires LPAs to ‘plan positively’ (Para 157) and to seek to ‘boost significantly the supply of new housing’ (para 47), whilst requiring Local Plans to have ‘sufficient flexibility to adapt to rapid change’ (para 14). It will therefore significantly restrain the supply and flexibility of land that is available for housing and it will ultimately act as a constraint to both market and affordable housing delivery within the next plan period. We consider that the Council should promote sustainable rural development where it would enhance or maintain the vitality of rural communities. This approach would ensure that the Plans locational strategy is consistent with national policy and paragraph 55 of the NPPF in particular. Moreover, we note that Policy RUR1 and RUR2 make reference to the ‘New Dwellings Outside of Development Limits’ SPD. In line with our aforementioned comments, we appreciate that SPDs are useful for providing further guidance for development on specific sites or in relation to specific issues, however, we must emphasise that the Council should not use SPDs as a mechanism for introducing policy requirements and burdens outside of the formal plan-making process. As set out in paragraph 153 of the NPPF: “...Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.”</p> <p>We urge the Council to review their SPDs following Local Plan adoption to ensure that they are still in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p>	
Gentoo Homes	LP0335	Pub0092	See comments under LS1	See response to LS1



Company	Unique Ref	Pub Ref	RUR2 New Dwellings Outside Development Limits	RUR2 New Dwellings Outside Development Limits HBC
Gladman Developments	LP0351	Pub0118	<p>Gladman are of the view that Policy RUR2 is not in conformity with Paragraphs and 5 of the Framework. The approach that is being proposed through the Policy does not reflect the likely differences between sites that are located outside of the proposed development limits and is therefore unsound. The policy is more akin to an approach for the consideration of development in the open countryside and does not appropriately reflect the sustainability of development opportunities that are well related to sustainable settlements. This issue is exacerbated when considered against concerns that the Plan does not identify sufficient land to ensure the delivery of its housing requirement over the plan period.</p>	<p>The criteria set out within RUR2 are considered to be in accordance with paragraph 55 of the NPPF. With respect to conformity with paragraph 49, the plan has identified and allocated sites (including existing planning permissions) for a total of 6,199 dwellings, above that of the Objectively Assessed Need (OAN) requirements and taking into account replacement of demolitions and a 20% buffer over the plan period. It is considered that the Council can therefore demonstrate a five year supply of deliverable housing sites. This figure and the corresponding allocations and extant planning permissions include sites within the urban area, on the edge of the urban area and in rural villages that are considered to be sustainable. Most of the land in the Borough which falls outside of development limits can be characterised as being “countryside”. Therefore most dwellings proposed outside of the development limits will be, by definition, “development in the countryside”. Whilst it is acknowledged that development well related to sustainable settlements can be appropriate, it is considered that sufficient sites have been identified and allocated within and adjacent to the existing sustainable rural settlements to adequately meet the housing requirements of the Borough over the plan period.</p> <p>To provide greater clarity with respect to the criteria set out within RUR2, <b>it is recommended that the final paragraph of the policy should be amended to read:</b></p> <p><b>“The New Dwellings Outside of Development Limits SPD provides detailed guidance on the principle of a new dwelling in the countryside. For new dwellings in the rural area, further to the criteria set out in this policy, the development must have regard to the provisions of the New Dwellings Outside of Development Limits Supplementary Planning Document”</b></p>

Company	Unique Ref	Pub Ref	RUR2 New Dwellings Outside Development Limits	RUR2 New Dwellings Outside Development Limits HBC
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach:            Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p>	Comments welcomed.

**Policy RUR3: Farm Diversification**

Company	Unique Ref	Pub Ref	RUR3 Farm Diversification	RUR3 Farm Diversification HBC
NFU North East	LP0047	Pub0020	<p>I would hope that the benefits of re-using vacant/disused buildings can also be justification in allowing re-use of agricultural buildings which have been left redundant and in danger of becoming derelict. There are numerous benefits of allowing conversion of agricultural buildings, not least to benefit the wider economy in terms of farm diversification to provide tourism related infrastructure.</p> <p>Diversifying agricultural businesses is key in ensuring the long term viability of the business. However, as you have noted, developing new businesses can be made more difficult by limitations in broadband and communications in rural/remote areas. We welcome the support offered to rural businesses by the local authority and hope that the increase in agriculture related businesses continues. A objective approach needs to be taken when assessing whether a business is 'appropriate within the rural area', as diversification can take many forms to complement the existing farm business.</p> <p>We welcome the support for the re-use of existing rural buildings to support the rural economy and agricultural uses. Empty/disused agricultural buildings often deteriorate over time to the point where the cost of repair is prohibitive or uneconomical. By reusing such buildings it both enables the agricultural business to grow and also helps maintain the character of the area. It is also worth noting that due to modern agricultural practices, utilising existing buildings is not always a viable option and, in such circumstances, new development is sometimes necessary.</p> <p>The limited supply of self-catering accommodation across the borough, particularly in the rural areas, is something which rural businesses can help address through conversion of existing buildings. As noted in your plan, this also helps preserve the future of such buildings and also maintain the character of the landscape.</p>	<p>Comments noted and support welcomed. The Borough Council will encourage the re-use of vacant buildings, where appropriate and where viable. Emerging policy RUR3 (Farm Diversification) stipulates that, when considering development which forms part of a farm diversification scheme, existing farm buildings should be used as a priority. The Borough Council recognises the importance of farm diversification schemes. Any proposals for farm diversification will be required to meet the criteria set out within emerging policy RUR3. Examples of schemes that may be appropriate are set out in paragraph 12.28.</p>

Company	Unique Ref	Pub Ref	RUR3 Farm Diversification	RUR3 Farm Diversification HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our comments at the Preferred Options stage, we referred to farm diversification for Biomass development. We note the many beneficial criteria listed for consideration when a farm diversification proposal is being considered. In particular we note and agree with the qualification relating to protecting high quality agricultural land. However, we represent that this is different from the issue we raised ie agricultural land being used for fuel for biomass instead of food production. We represent that there are already signs that this may be becoming an issue and represent that this needs to be considered when such an application is made.</p> <p>As a result, we represent that this Policy as it stands is not sound.</p>	<p>The use of agricultural land for fuel for biomass is considered to be an acceptable use in the rural area. With respect to the balance between agricultural land use for food production and for biomass fuel production, this is ultimately considered to be a business decision for farms in the rural area and planning permission would not be required to change the type of crops grown or how they are used. Furthermore, The Department for Environment, Food &amp; Rural Affairs' most recent publication on non-food crops grown in the UK (Crops Grown For Bioenergy in England and the UK: 2015) indicates that the area of crops grown for bioenergy equated to just under 2% of all arable land in the UK in 2015. The Council does not currently consider this to be a significant issue for food production in the Borough.</p>

**Policy RUR4: Equestrian Development**

Company	Unique Ref	Pub Ref	RUR4 Equestrian Development	RUR4 Equestrian Development HBC
Resident	LP0082	Pub0067	<p>In five or more particular places the document refers to precautions or assurances sought by way of the phrase ‘should be provided’. That is not sound specification because the phrase is open to interpretation. Those requirements would be more robustly defined by using the word ‘must’ instead of ‘should’. Unless HBC is reserving a right to dispense with the requirements for assurances as it sees fit?</p> <p>See sections 7.44 para 1, CC5 sub para 1), RUR4 sub para 6), HE1 last para, NE3 last para.</p>	<p>With respect to sub paragraph 6 of emerging policy RUR4 (Equestrian Development), whilst in determining planning applications the Borough Council will seek to ensure provision of safe equine routes where equestrian development is not located adjacent to existing bridleways, this is subject to the viability of any given scheme and only in instances where the provision of an equine route would be necessary to make a development acceptable in planning terms would it be appropriate for the Borough Council to refuse planning permission where it had not been provided. It is therefore considered the use of the word ‘should’ reflects the Council’s position and enables Officers to seek the provision of safe equine routes in all instances where appropriate, however allows for an element of flexibility in determining applications on a case by case basis.</p>
Greatham Parish Council	LP0018	Pub0102	<p>Greatham Parish Council is concerned at the number of stand-alone ‘equestrian developments’ that have been appearing in the rural area which are not associated with farm diversification and thereby support continued agricultural use. As such the Parish Council would support any policy which controls the proliferation of such uses and would go further in restricting any new developments to being part of a farm diversification scheme. The Parish Council would also like to see the inclusion of a clause protecting the best quality and most versatile agricultural land from equestrian uses.</p>	<p>It is considered that restricting equestrian development in the rural area to farm diversification schemes only is not appropriate in this instance. Whilst emerging policy RUR4 (Equestrian Development) supports equestrian development as part of farm diversification, there may be some instances in which equestrian development may be an acceptable use in the countryside that is not linked to an existing farm, and this should be assessed on a case by case basis in view of the criteria set out in RUR4 and in accordance with other relevant policies within the emerging Local Plan.</p> <p>With respect to the inclusion of a clause protecting the best quality and most versatile agricultural land, in light of the Parish Council’s comments, <b>it is recommended that the policy wording be amended to include an additional criteria stipulating that equestrian development will be supported where: “8) The proposal does not involve a significant, irreversible loss of the best and most versatile agricultural land, those areas classed as grades 1, 2 and 3a in the Agricultural Land Classification.”</b>, in line with emerging policy RUR3 (Farm Diversification).</p>

**Policy RUR5: Rural Tourism**

No comments received.

**Policy RUR6: Rural Services**

No comments received.

**Section 8 of the Consultation Statement, covering:**

**Retail and Commercial Development**

- Policy RC1: Retail and Commercial centre Hierarchy
- Policy RC2: The Town Centre
- Policy RC3: Innovation and Skills Quarter
- Policy RC4: Avenue Road / Raby Road Edge of Town Centre Area
- Policy RC5: The Brewery and Stranton Edge of Town Centre Area
- Policy RC6: East of Stranton Edge of Town Centre Area
- Policy RC7: Lynn Street Edge of Town Centre Area
- Policy RC8: Mill House Edge of Town Centre Area
- Policy RC9: Park Road West Edge of Town Centre Area
- Policy RC10: West Victoria Road Edge of Town Centre Area
- Policy RC11: York Road South Edge of Town Centre Area
- Policy RC12: The Marina Retail and Leisure Park
- Policy RC13: West of Marina Way Retail and Leisure Park
- Policy RC14: Trincomalee Wharf Retail and Leisure Park
- Policy RC15: Tees Bay Retail and Leisure Park
- Policy RC16: The Local Centres
- Policy RC17: Late Night Uses Area
- Policy RC18: Hot Food Takeaway Policy
- Policy RC19: Main Town Centre Uses on Employment Land
- Policy RC20: Business Uses in the Home
- Policy RC21: Commercial Uses in Residential Areas

**Policy RC1: Retail and Commercial centre Hierarchy**

Company	Unique Ref	Pub Ref	RC1 Retail Hierarchy	RC1 Retail Hierarchy HBC
Resident	LP0343	Pub0103	We believe that the decline of the town centre could be halted and reversed with some basic incentives which lie within the gift of the Council. Why do out of town retail centres (like the Metro Centre) do so well? Surely it's because of favourable rates and rents and the provision of free car parking in adequate quantities, plus good road connectivity? All of the enterprises in Hartlepool would benefit from a more imaginative approach to these matters, coupled with an improved road network, as suggested above.	The level of business rates is determined by central government. Town centre parking charges are a complex issue with the Borough Council having to balance the impact on town centre vitality with its use as a traffic management tool. HBC believes that it has got this balance right.

Company	Unique Ref	Pub Ref	RC1 Retail Hierarchy	RC1 Retail Hierarchy HBC
Wynyard Park	LP0027	Pub0124	<p>With regard to Draft Policies RC1 and RC16 and their potential implications for Wynyard Park, it is noted that Draft Policy HSG6 seeks to deliver a local centre which will allow for the location of retail, leisure and commercial uses. However, in practice, there may be opportunities to improve the sustainability of the Wynyard Park site through the delivery of leisure uses outwith the local centre such as a public house or similar. Under Policy RC1, this would require a sequential test that considers each of the centres within the Borough, however, as stated within the practice guidance, “the application of the test should be proportionate and appropriate for the given proposal” and “use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements”. With regard to Wynyard, this would be the catchment area that the proposals would serve. Wynyard Park would suggest that the policy wording in RC1 which requires an assessment of all centres to be amended to state “the test should be proportionate to the proposal and consider all of the Borough’s designated centres considered to be potentially affected by the proposals”.</p>	<p>Disagree. The plan needs to be read as a whole. Paragraph 10.37 states ‘This Local Plan gives the Borough Council an opportunity to ensure that the Wynyard development creates a sustainable community’. The sequential test needs to be applied as set out in Policy RC1 but the Borough Council is clearly mindful of the need to balance this with the aspiration to provide services at Wynyard which demonstrably primarily serve the local community.</p>



## Policy RC2: The Town Centre

Company	Unique Ref	Pub Ref	RC2 The Town Centre	RC2 The Town Centre HBC
Resident	LP0320	Pub0077	<p>On a personal note I have lived in Hartlepool all of my life, my early recollections being of my grandparents who lived in Campion Street (since demolished) and first attended school at Lister Street Juniors. My childhood friends lived within the area of Landsdowne Road, St Paul's Road, Osborn Road, and Elwick Road. Consequently it is a source of sadness to see this once viable neighbourhood beginning to manifest incipient signs of neglect. Prior to the construction of the Middleton Grange Shopping Centre, York Road, and the lower Park Road, boasted a wide range of shopping outlets: a Cinema (The Northems), a Garage (Gales Motors), a Laundry, a Department store, an Electrical Appliance Store (Bruce Moore's) and numerous fashion outlets catering to men and women.</p>	Comments noted.
Historic England	LP0044	Pub0125	<p>On the basis of each of the elements above, we consider the Plan to be sound. We have only a few minor comments, below, where we feel that particular policies may need slight amendments in order for the Plan to be legally compliant and/or sound.</p> <p>In particular, there is no mention of the need to preserve or enhance the character or appearance of the designated assets in either the supporting text or the policies RC2, RC9, and RC10.</p>	The plan needs to be read as a whole. Policy HE1: Heritage Assets, states that the Borough Council will seek to preserve, protect and positively enhance all heritage assets.

**Policy RC3: Innovation and Skills Quarter**

Company	Unique Ref	Pub Ref	RC3 Innovation and Skills Quarter	RC3 Innovation and Skills Quarter HBC
Historic England	LP0044	Pub0125	<p>Policies RC3 and RC5 both refer to the relevant Conservation Areas, and also mention them within the supporting text (in paras 13.37 and 13.55). However, the level of protection afforded by the policy does not appear to be reflective of the requirements of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. RC3 only requires improvements to be ‘appropriate and respect’ the designation, while RC5 only requires developments to improve ‘the overall environment and appearance of the area.... respecting the conservation area designation’.</p> <p>In order to be found sound and legally compliant, the text and policies need to incorporate appropriate wording (or cross referencing to the heritage policies, in particular HE6) to ensure that they are providing adequate protection for the historic environment, and realising opportunities for its enhancement.</p>	<p>The plan needs to be read as a whole. Policy HE3: Conservation Area, states that the Borough Council will seek to ensure that the distinctive character of Conservation Areas will be conserved or enhanced through a constructive conservation approach. It is not considered necessary to cross-refer to this policy in Policies RC3 and RC5.</p>

**Policy RC4: Avenue Road / Raby Road Edge of Town Centre Area**

No comments received.

**Policy RC5: The Brewery and Stranton Edge of Town Centre Area**

Company	Unique Ref	Pub Ref	RC5 The Brewery and Stranton Edge of Town Centre Area	RC5 The Brewery and Stranton Edge of Town Centre Area HBC
Historic England	LP0044	Pub0125	<p>Policies RC3 and RC5 both refer to the relevant Conservation Areas, and also mention them within the supporting text (in paras 13.37 and 13.55). However, the level of protection afforded by the policy does not appear to be reflective of the requirements of the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. RC3 only requires improvements to be ‘appropriate and respect’ the designation, while RC5 only requires developments to improve ‘the overall environment and appearance of the area.... respecting the conservation area designation’.</p> <p>In order to be found sound and legally compliant, the text and policies need to incorporate appropriate wording (or cross referencing to the heritage policies, in particular HE6) to ensure that they are providing adequate protection for the historic environment, and realising opportunities for its enhancement.</p>	<p>The plan needs to be read as a whole. Policy HE3: Conservation Area, states that the Borough Council will seek to ensure that the distinctive character of Conservation Areas will be conserved or enhanced through a constructive conservation approach. It is not considered necessary to cross-refer to this policy in Policies RC3 and RC5.</p>

**Policy RC6: East of Stranton Edge of Town Centre Area**

Company	Unique Ref	Pub Ref	RC6 East of Stranton Edge of Town Centre Area	RC6 East of Stranton Edge of Town Centre Area HBC
Historic England	LP0044	Pub0125	While there is reference to heritage assets within the supporting text, there is no reference to them in policies RC6 (para 13.36 refers to the heritage assets), RC7 (heritage assets mentioned in para 13.65), and RC14 (although there is mention in para 13.109).	The plan needs to be read as a whole. Policy HE1: Heritage Assets, states that the Borough Council will seek to preserve, protect and positively enhance all heritage assets.

**Policy RC7: Lynn Street Edge of Town Centre Area**

Company	Unique Ref	Pub Ref	RC7 Lynn Street Edge of Town Centre Area	RC7 Lynn Street Edge of Town Centre Area HBC
Estates team	LP0340	Pub0098	The representation requests that Land at Hucklehoven Way / Reed Street is allocated for part commercial / part residential.	The Local Plan has allocated sufficient deliverable and developable housing sites to meet the housing requirement for the Borough, which includes a 20% flexibility buffer, over the plan period. There is no requirement to allocate any further sites for residential development in order to meet the housing requirement.
Historic England	LP0044	Pub0125	<p>We have only a few minor comments, below, where we feel that particular policies may need slight amendments in order for the Plan to be legally compliant and/or sound.</p> <p>While there is reference to heritage assets within the supporting text, there is no reference to them in policies RC6 (para 13.36 refers to the heritage assets), RC7 (heritage assets mentioned in para 13.65), and RC14 (although there is mention in para 13.109).</p>	The plan needs to be read as a whole. Policy HE1: Heritage Assets, states that the Borough Council will seek to preserve, protect and positively enhance all heritage assets.

## Policy RC8: Mill House Edge of Town Centre Area

Company	Unique Ref	Pub Ref	RC8 Mill House Edge of Town Centre Area	RC8 Mill House Edge of Town Centre Area HBC
Hartlepool United Supporters Trust	LP0303	Pub0049	<p>Further from my phone conversation with you I feel, as chairman of Hartlepool United Supporters Trust, must push for a far better explanation than I have been given. As we have an A.C.V. on one of the two leases in the area designated as RC8 (retail and commercial development), I get the impression that the planning department have seriously overlooked the way this area has been labelled/coloured. I am still at a loss as to why the football ground has been misrepresented (in my eyes) by the council and is not in NE2 green (outdoor sports code) the excuse I was given was this site is not open to public use, hence RC8, and that was why the skateboard park is in green as it is open to public to public use. Now that is fine until you take all the rugby grounds into the equation, which, as far as I am aware, are not open to public use, yet all of these sites are all in green (NE2). I am aware that the club are in talks with the council in the purchase of both of these leases, the mill house project and the football ground, as the council gave JPNG, the clubs owners, permission to raise funds for these projects externally, but as a fan of H.U.F.C., I would not like to see any owners both present and future owning the ground as it makes it far too easy to sell up and move as it , the land, has already been labelled for purposes other than football. I would urge you to change and re-label the football ground prior to it being forwarded to the Secretary Of State in March.</p> <p>I have attended two of the councils roll outs, and have a query about edge of town centre sites. One of them, RC8, is the one which concerns me. These are the mill house/Hartlepool United sites. Firstly the Mill House, why are the bowls club and the baths not denoted by a different code. Possibly LT1 leisure and tourism? the second one, the football ground, that surely should be an NE2d site in green. It seems very strange that these three sites are incorrectly denoted. It cannot be an oversight as there is a small green spot in the middle of this site in green, NE2c, children's play area, which is the skateboard park. If this, a small site, has been noted why have the larger three sites be overlooked?</p>	<p>The Borough Council considers that the area as a whole has the potential for both retail and commercial development and that this designation is therefore appropriate. It will be noted that Policy RC8 includes leisure in the uses considered to be appropriate within it. However, the Borough Council acknowledges that there is a strong case for Policy LT1 Leisure and Tourism also being applied as an overlapping designation to this area. <b>Policy LT1 is already applicable to the Town Centre so the recommendation is that it be extended to be also applicable to the Mill House Edge of Town Centre Area.</b> If there were a proposal to re-locate the leisure centre and the bowls club then the Borough Council would consider the proposal taking all material considerations into account including whether or not there were any implications for the football club. The Borough Council does not currently have specific proposals for the football club. However, the extension of Policy LT1 to include coverage of the football club stadium, expresses the Borough Council's preference for its continued use as a football ground. The Borough Council also acknowledges that that there is a strong case for the actual sports pitch i.e. the football pitch to have a separate designation from Policy RC8 and that this should be consistent with the designation that has been applied to the rugby pitches. <b>Therefore the Borough Council recommends that Policy NE2d (i.e. Green Infrastructure – outdoor sport including playing fields) is applied specifically to the football pitch and that neither Policy LT1 nor Policy RC8 applies to it.</b> However, whilst acknowledging the strong views of Hartlepool Football Club supporters on this matter, as with all policies in the development plan, the Borough Council cannot provide a cast iron assurance that there could never be other material considerations which might take precedence over the policy. The location of the football club is accessible by public transport, which is consistent with national guidance. If there was a proposal to re-locate the football club, then this would be an important material consideration when assessing the proposal. The Borough Council has been made aware that there is interest from Hartlepool United Supporters Trust in applying for Asset of Community Value status for the football ground.</p>

Company	Unique Ref	Pub Ref	RC8 Mill House Edge of Town Centre Area	RC8 Mill House Edge of Town Centre Area HBC
Resident	LP0307	Pub0053	<p>Page 162 of the document manages to mention the town’s football club in one sentence (section 13.71) This section goes on to mention the leisure centre and bowls club reaching the end of their physical lives with future options being provision of similar facilities on the existing site or within the town centre.</p> <p>1 What will happen to the football ground if these facilities are built elsewhere?</p> <p>2 What is HBC s proposals for the football ground if nothing is mentioned in the Town Plan</p> <p>3 Are HBC aware of the proposal to request an “ Application of Community Value Protection” by Hartlepool United Supporters Trust (HUST) on the football ground?</p> <p>4 What is HBC stance on the selling of the ground back to the football club?</p> <p>5 Would HBC agree that points 2,3 and 4 should be incorporated into the Town Plan to alleviate any uncertainty that the club and supporters may have?</p>	<p>The Borough Council considers that the area as a whole has the potential for both retail and commercial development and that this designation is therefore appropriate. It will be noted that Policy RC8 includes leisure in the uses considered to be appropriate within it. However, the Borough Council acknowledges that there is a strong case for Policy LT1 Leisure and Tourism also being applied as an overlapping designation to this area. <b>Policy LT1 is already applicable to the Town Centre so the recommendation is that it be extended to be also applicable to the Mill House Edge of Town Centre Area.</b> If there were a proposal to re-locate the leisure centre and the bowls club then the Borough Council would consider the proposal taking all material considerations into account including whether or not there were any implications for the football club. The Borough Council does not currently have specific proposals for the football club. However, the extension of Policy LT1 to include coverage of the football club stadium, expresses the Borough Council’s preference for its continued use as a football ground. The Borough Council also acknowledges that there is a strong case for the actual sports pitch i.e. the football pitch to have a separate designation from Policy RC8 and that this should be consistent with the designation that has been applied to the rugby pitches. <b>Therefore the Borough Council recommends that Policy NE2d (i.e. Green Infrastructure – outdoor sport including playing fields) is applied specifically to the football pitch and that neither Policy LT1 nor Policy RC8 applies to it.</b> However, whilst acknowledging the strong views of Hartlepool Football Club supporters on this matter, as with all policies in the development plan, the Borough Council cannot provide a cast iron assurance that there could never be other material considerations which might take precedence over the policy. The location of the football club is accessible by public transport, which is consistent with national guidance. If there was a proposal to re-locate the football club, then this would be an important material consideration when assessing the proposal. The Borough Council has been made aware that there is interest from Hartlepool United Supporters Trust in applying for Asset of Community Value status for the football ground. It is not considered necessary to incorporate the points made in the representation into Policy RC8.</p>



Company	Unique Ref	Pub Ref	RC8 Mill House Edge of Town Centre Area	RC8 Mill House Edge of Town Centre Area HBC
Resident	LP0346	Pub0109	<p>I am concerned that the football ground is not designated on the existing map as re recreational/sports facility, especially when the nearby skate park is shown as such. The town has always been led to believe that there was a covenant on the ground meaning it had to be kept for its current purpose. Although it is not an open space for people to use at their leisure, nor are the Rugby Club grounds! The town needs the football club for the revenue it brings to the town - please amend the map to reflect what is really there and keep the football ground on the proposals map too.</p>	<p>The Borough Council considers that the area as a whole has the potential for both retail and commercial development and that this designation is therefore appropriate. It will be noted that Policy RC8 includes leisure in the uses considered to be appropriate within it. However, the Borough Council acknowledges that there is a strong case for Policy LT1 Leisure and Tourism also being applied as an overlapping designation to this area. <b>Policy LT1 is already applicable to the Town Centre so the recommendation is that it be extended to be also applicable to the Mill House Edge of Town Centre Area.</b> If there were a proposal to re-locate the leisure centre and the bowls club then the Borough Council would consider the proposal taking all material considerations into account including whether or not there were any implications for the football club. The Borough Council does not currently have specific proposals for the football club. However, the extension of Policy LT1 to include coverage of the football club stadium, expresses the Borough Council's preference for its continued use as a football ground. The Borough Council also acknowledges that that there is a strong case for the actual sports pitch i.e. the football pitch to have a separate designation from Policy RC8 and that this should be consistent with the designation that has been applied to the rugby pitches. <b>Therefore the Borough Council recommends that Policy NE2d (i.e. Green Infrastructure – outdoor sport including playing fields) is applied specifically to the football pitch and that neither Policy LT1 nor Policy RC8 applies to it.</b> However, whilst acknowledging the strong views of Hartlepool Football Club supporters on this matter, as with all policies in the development plan, the Borough Council cannot provide a cast iron assurance that there could never be other material considerations which might take precedence over the policy. The location of the football club is accessible by public transport, which is consistent with national guidance. If there was a proposal to re-locate the football club, then this would be an important material consideration when assessing the proposal. The Borough Council has been made aware that there is interest from Hartlepool United Supporters Trust in applying for Asset of Community Value status for the football ground.</p>

**Policy RC9: Park Road West Edge of Town Centre Area**

No comments received.

**Policy RC10: West Victoria Road Edge of Town Centre Area**

No comments received.

**Policy RC11: York Road South Edge of Town Centre Area**

No comments received.

**Policy RC12: The Marina Retail and Leisure Park**

Company	Unique Ref	Pub Ref	RC12 The Marina Retail and Leisure Park	RC12 The Marina Retail and Leisure Park HBC
Network Rail	LP0250	Pub0054	See comments under Policy QP3	See Policy QP3 for aggregated response.
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park            RC14 – Trincomalee Wharf and Retail Park            LT1 – Leisure and Tourism            LT2 – Tourism Development in the Marina            LT3 – Development of Seaton Carew            LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p> <p>AND</p> <p>Furthermore, we note that RC12 promotes the use of water-taxis in an area that is within the proposed marine extension to the SPA.</p> <p>AND</p> <p>Regarding RC12 and RC14, the HRA (page 56) states “It is relatively difficult to mitigate impacts resulting from a deliberate policy to increase visitor numbers. However, the policy has been altered with the statement ‘Where appropriate the Council will seek the provision of interpretation to increase public understanding of the Teesmouth and Cleveland Coast SPA and Ramsar’”</p> <p>Regarding LT1 the HRA (page 57) states: “The policy will also promote and encourage green tourism through the provision of facilities for the observation and interpretation of wildlife, habitats and the natural environment. The provision of facilities for interpretation is expected to have a positive effect</p>	<p>HBC recommends adding new wording into Retail and Commercial Development chapter at 13.99. <b>WORDING: ‘...particularly signs that are reflective of the area’s history and/or function and promoting the area’s internationally important birds’.</b> This will increase public awareness of SPA birds.</p> <p>HBC will update the HRA, including re-screening Retail and Commercial policies RC12 and RC14 and Leisure and Tourism policies LT1, LT2, LT3 and LT5 (alone and in-combination), as queried by RSPB. Proportionate safeguards will be recommended as appropriate. Changed text will be clearly marked.</p> <p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p> <p>AND</p> <p>In fact, policy RC12 covers the Marina which is outside of the pSPA. Policy RC12 does not directly promote an increased number of boats outside of the Marina. The suggestion of water taxis was illustrative and if introduced would be transport ‘infrastructure’ within the Marina and not out into the harbour, so would not be in the pSPA. HBC recommends adding new wording into 13.99.</p> <p><b>WORDING: ‘...particularly signs that are reflective of the area’s history and/or function and promoting the area’s internationally important birds’.</b> This will increase public awareness of SPA birds. Not covered by policies, are Victoria Harbour and West Harbour, which are within the pSPA extension. By their very nature, the harbours are heavily used by boats and Natural England was aware</p>

Company	Unique Ref	Pub Ref	RC12 The Marina Retail and Leisure Park	RC12 The Marina Retail and Leisure Park HBC
			<p>on the internationally designated sites through facilitating a greater understanding and appreciation of them.</p> <p>Regarding LT1, the HRA (page 57) states: "The provision of facilities for observation could also have a beneficial effect by directing visitors to areas where they would cause fewer disturbances. Conversely inappropriately situated observation facilities could cause more disturbance, however the policy also states that all developments must be in conformity with Policy LS1 Locational Strategy.</p> <p>The RSPB welcomes the wording in policies that seek to provide facilities for the observation and interpretation of wildlife, habitats and the environment. However, we do not believe that this measure alone would negate LSE arising from these policies. Whether it is relatively difficult to mitigate impacts arising from a policy which seeks to increase visitors to a particular location, it is, nevertheless, incumbent upon HBC to use all available evidence to consider the potential impacts of these policies and to mitigate for them accordingly. Stronger policy wording that directs potentially damaging development/activities away from sensitive areas could be part of a suite of mitigation measures considered by HBC as part of a wider strategy designed to mitigate for the combined impacts (i.e. recreational disturbance) of housing, retail, leisure and tourism policies. Please see our further advice regarding this.</p>	<p>of this when it selected the boundary of the pSPA. The pSPA in this area is for foraging common terns and Hartlepool BC assesses that boats have no adverse impact on this species.</p> <p>AND</p> <p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>
Environment Agency	LP0031	Pub0101	<p>In section 13.91, it is recommended that reference is made to Estuary Edges: Ecological Design Guidance which has been developed by the Environment Agency. The guidance provides examples from the United Kingdom of techniques to improve the wildlife and visual impact of the waterfront. For further information please view attached link below:  <a href="http://www.ecrr.org/RiverRestoration/Whatisriverrestoration/tabid/2614/www.restorerivers.eu/Publications/tabid/2624/mod/11083/articleType/ArticleView/articleId/3563/Estuary-Edges.aspx">http://www.ecrr.org/RiverRestoration/Whatisriverrestoration/tabid/2614/www.restorerivers.eu/Publications/tabid/2624/mod/11083/articleType/ArticleView/articleId/3563/Estuary-Edges.aspx</a>.</p>	<p>The following text will be added to paragraph 13.91 as a minor modification: <b>The Estuary Edges: Ecological Design Guidance which has been developed by the Environment Agency will be relevant for some types of development.</b></p>

**Policy RC13: West of Marina Way Retail and Leisure Park**

Company	Unique Ref	Pub Ref	RC13 West of Marina Way Retail and Leisure Park	RC13 West of Marina Way Retail and Leisure Park HBC
Network Rail	LP0250	Pub0054	See comments under Policy QP3	See Policy QP3 for aggregated response.

**Policy RC14: Trincomalee Wharf Retail and Leisure Park**

Company	Unique Ref	Pub Ref	RC14 Trincomalee Wharf Retail and Leisure Park	RC14 Trincomalee Wharf Retail and Leisure Park HBC
Network Rail	LP0250	Pub0054	See comments under Policy QP3	See Policy QP3 for aggregated response.
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park            RC14 – Trincomalee Wharf and Retail Park            LT1 – Leisure and Tourism            LT2 – Tourism Development in the Marina            LT3 – Development of Seaton Carew            LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p> <p>AND</p> <p>Regarding RC12 and RC14, the HRA (page 56) states “It is relatively difficult to mitigate impacts resulting from a deliberate policy to increase visitor numbers. However, the policy has been altered with the statement ‘Where appropriate the Council will seek the provision of interpretation to increase public understanding of the Teesmouth and Cleveland Coast SPA and Ramsar’”</p> <p>Regarding LT1 the HRA (page 57) states: “The policy will also promote and encourage green tourism through the provision of facilities for the observation and interpretation of wildlife, habitats and the natural environment. The provision of facilities for interpretation is expected to have a positive effect on the internationally designated sites through facilitating a greater understanding and appreciation of them.</p> <p>Regarding LT1, the HRA (page 57) states: “The provision of facilities for observation could also have a beneficial effect by directing visitors to areas where they would cause fewer disturbances. Conversely inappropriately situated observation facilities could cause more</p>	<p>HBC recommends adding new wording into Retail and Commercial Development chapter at 13.99. <b>WORDING: ‘...particularly signs that are reflective of the area’s history and/or function and promoting the area’s internationally important birds’.</b> This will increase public awareness of SPA birds.</p> <p>HBC will update the HRA, including re-screening Retail and Commercial policies RC12 and RC14 and Leisure and Tourism policies LT1, LT2, LT3 and LT5 (alone and in-combination), as queried by RSPB. Proportionate safeguards will be recommended as appropriate. Changed text will be clearly marked.</p> <p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p> <p>AND</p> <p>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and</b></p>

Company	Unique Ref	Pub Ref	RC14 Trincomalee Wharf Retail and Leisure Park	RC14 Trincomalee Wharf Retail and Leisure Park HBC
			<p>disturbance, however the policy also states that all developments must be in conformity with Policy LS1 Locational Strategy.</p> <p>The RSPB welcomes the wording in policies that seek to provide facilities for the observation and interpretation of wildlife, habitats and the environment. However, we do not believe that this measure alone would negate LSE arising from these policies. Whether it is relatively difficult to mitigate impacts arising from a policy which seeks to increase visitors to a particular location, it is, nevertheless, incumbent upon HBC to use all available evidence to consider the potential impacts of these policies and to mitigate for them accordingly.</p> <p>Stronger policy wording that directs potentially damaging development/activities away from sensitive areas could be part of a suite of mitigation measures considered by HBC as part of a wider strategy designed to mitigate for the combined impacts (i.e. recreational disturbance) of housing, retail, leisure and tourism policies. Please see our further advice regarding this.</p>	<p><b>should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified. Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>
Historic England	LP0044	Pub0125	<p>While there is reference to heritage assets within the supporting text, there is no reference to them in policies RC6 (para 13.36 refers to the heritage assets), RC7 (heritage assets mentioned in para 13.65), and RC14 (although there is mention in para 13.109).</p>	<p>The plan needs to be read as a whole. Policy HE1: Heritage Assets, states that the Borough Council will seek to preserve, protect and positively enhance all heritage assets.</p>

### Policy RC15: Tees Bay Retail and Leisure Park

No comments received.

## Policy RC16: The Local Centres

Company	Unique Ref	Pub Ref	RC16 The Local Centres	RC16 The Local Centres HBC
Greatham Parish Council	LP0018	Pub0102	A lot of the descriptions of local centres (para 13.9, 13.3, 13.19, 13.125, 13.126 & 13.130) regarding how they serve local communities could be applied to the facilities Greatham village is still fortunate to enjoy, but the facilities in Greatham village are afforded none of the support or protection the urban local centres enjoy through this policy. We believe this to be contrary to NPPF 3 SUPPORTING A PROSPEROUS RURAL ECONOMY. It also adds to the decay of the character of Greatham Conservations Area by failing to preserve the variety of uses in shops, pubs and community buildings mixed in with the housing, typical of a village like Greatham.	The Borough Council is committed to retaining rural services and has introduced draft Policy RUR6 with this objective. This is consistent with the section in the NPPF – Supporting a prosperous rural economy.
Wynyard Park	LP0027	Pub0124	With regard to Draft Policies RC1 and RC16 and their potential implications for Wynyard Park, it is noted that Draft Policy HSG6 seeks to deliver a local centre which will allow for the location of retail, leisure and commercial uses. However, in practice, there may be opportunities to improve the sustainability of the Wynyard Park site through the delivery of leisure uses outwith the local centre such as a public house or similar. Under Policy RC1, this would require a sequential test that considers each of the centres within the Borough, however, as stated within the practice guidance, “the application of the test should be proportionate and appropriate for the given proposal” and “use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements”. With regard to Wynyard, this would be the catchment area that the proposals would serve. Wynyard Park would suggest that the policy wording in RC1 which requires an assessment of all centres to be amended to state “the test should be proportionate to the proposal and consider all of the Borough’s designated centres considered to be potentially affected by the proposals”.	See response under Policy RC1.

## Policy RC17: Late Night Uses Area

No comments received.



## Policy RC18: Hot Food Takeaway Policy

Company	Unique Ref	Pub Ref	RC18 Hot Food Takeaway	RC18 Hot Food Takeaway HBC
Greatham Parish Council	LP0018	Pub0102	<p>While Greatham Parish Council supports the aims of this policy it does object to what appears to disproportionately discriminate against rural areas by denying the possibility of any A5 hot food takeaways in the villages. We consider this contrary to NPPF 3 SUPPORTING A PROSPEROUS RURAL ECONOMY. The policy restricts a diverse economic offering and permanently requires any rural resident or visitor to travel into town to be able to enjoy a takeaway (or to have it delivered). While we would not advocate a village full of takeaways there needs to be an ability to allow for one or two of a suitable scale and subject to meeting all other planning considerations. This is another consequence of not being able to describe the facilities to be found in a village as a local centre because they may be spread through the village.</p>	<p>Support for the aims of the policy is welcomed. It is agreed that the policy needs to be more flexible in balancing the achievement of these aims with supporting rural services. Therefore it is recommended that a new section 'Villages' is introduced which will read '<b>A maximum of 1 hot food takeaway will be permitted within the limits to development of each of the villages in order to provide a local service to the village and where this is demonstrably supported locally</b>'. Consistent with this it is also recommended that the text at '<b>All other locations</b>' is amended to read '<b>Hot food takeaways will not be permitted outside of any designated retail or commercial centre or the limits to development of any village.</b>'</p>
Resident	LP0354	Pub0122	<p>We have reviewed the document and respond accordingly with regard to Policy RC18 (Hot food takeaway policy) and its impact upon the Fens local centre.</p> <p>By way of background the Fens local centre lies approximately 4km south west of Hartlepool town centre and comprises a large purpose-built shopping parade set back from the main road with a relatively large car parking area directly in front of the units. The centre contains a good mix of uses with convenience retail being the dominant use.</p> <p>In December 2016 our client applied for planning permission for a new A5 unit within the Fens local centre (Ref: H/2016/0453). However, the application was refused due to the proposed threshold requirements set out in Policy RC18 of the Consultation Document. As such, our client wishes to use this opportunity to submit representations to the Consultation Document.</p> <p>In its current form, Policy RC18 sets out a list of inflexible and prescriptive criteria with regards to development proposals for A5 uses. In particular, it proposes specific floorspace thresholds for A5 uses for each designated town centre and local centre. These thresholds vary from 0% in some locations to 44% in others. With regard to the Fens local centre the threshold is just 7% (150sqm). Whilst the supporting text (para 13.144) notes that the thresholds have been set by looking at current A5 occupation levels, current vacancy rates, ward level obesity data and proximity of each area to</p>	<p>The Council is provided with regular and up-to-date adult overweight and obesity data at town-wide level via the Sport England Active People Survey (2013-15), which calculates that 73.3% adults in Hartlepool are overweight or obese compared to 68.6% in the North East and 64.8% nationally. This is now being replaced by the Active Lives Survey moving forward.</p> <p>Ward level obesity data for 2006-2008 is also available via Public Health England, which estimates that 27% of adults in Fens &amp; Rossmere are obese compared to the England average of 24.1%. Also, only 20.5% of adults are estimated to eat 5 portions of fruit and vegetables per day compared to 28.7% nationally.</p> <p>For childhood obesity data, the Council is provided with statistics on overweight and obese children at reception (age 4-5) and year 6 (age 10-11). This is via the National Childhood Measurement Programme (NCMP). This data is provided for all of Hartlepool, at a ward level and by school, annually. The Council is also provided with 3-year pooled data for Hartlepool as a whole and at ward level, which is more accurate again as it irons out any anomalies that may have arisen in relation to a specific year i.e. in the event of a specific year not being fully reflective of longer term trends.</p> <p>In Fens and Rossmere, 3-year pooled data shows that in 2012/13-2014/15 there were 25.5% of reception-age children with excess weight compared to 25.4% in Hartlepool and 22.2% nationally. Of these children, 10.7% are classed as obese compared to 11.2% in Hartlepool and 9.3% nationally.</p>

Company	Unique Ref	Pub Ref	RC18 Hot Food Takeaway	RC18 Hot Food Takeaway HBC
			<p>residential properties, there is no reference to an evidence base document which clearly demonstrates how each centre has been assessed and the thresholds given. As such, the proposed thresholds appear to be completely arbitrary and this is reflected in the widely varying threshold levels.</p> <p>In accordance with national planning policy guidance contained in the NPPF, in order to be found sound the Local Plan should be based on proportionate evidence. In this respect, we consider that the proposed thresholds are not sufficiently justified given the lack of supporting evidence. The Council, therefore, should provide the supporting documentation to justify the thresholds set out in Policy RC18. Otherwise, we consider that Plan cannot be considered justified.</p> <p>In addition to the above, paragraph 21 of the NPPF states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. In this respect, we consider that the prescriptive thresholds and supporting text set out in Policy RC18 do not provide sufficient flexibility and could potentially lead to increased vacancy rates. This has already been demonstrated by the Council's decision to refuse our client's previous application for the change of use of a vacant unit to A5 use.</p> <p>Whilst we recognise the Council's need to consider the health impacts of development, the thresholds set out in Policy RC18 are inflexible and unjustified. We therefore request that the Council review Policy RC18 to ensure it is based on robust evidence and that it provides sufficient flexibility to respond to changes in economic circumstances.</p>	<p>In year 6, 40.3% of children carry excess weight compared to 39.4% in Hartlepool and 33.4% nationally. Of these children, 24.1% are classed as obese compared to 23.8% in Hartlepool and 19.0 % nationally.</p> <p>The baseline evidence which the policy is based on is as follows:</p> <ul style="list-style-type: none"> <li>• The annual survey of retail centres which HBC undertakes in order to determine which units are occupied and which are vacant.</li> <li>• The floorspace of each individual unit within the centres is the subject of a desktop survey plotted using Ordnance Survey data. The units are surveyed as a whole i.e. the floorspace calculation includes any space which is ancillary to the actual customer facing retail unit. The total floorspace that is A5 is calculated and then calculated as a proportion of the floorspace in the centre as a whole.</li> <li>• Statistics from the National Childhood Measurement Programme which calculates levels of overweight and obesity in all Hartlepool children in reception year (age 4-5) and year 6 (age 10-11).</li> </ul> <p><u>The methodology</u></p> <p>The general benchmark which HBC uses for an acceptable level of A5 use is 10% in a retail centre. However, there are four sets of statistics for obesity and excess weight in children. The four sets of statistics are recorded for each school and are:</p> <ul style="list-style-type: none"> <li>• Overweight - Reception child age 4/5</li> <li>• Overweight - Year 6 End year of primary school age 10/11</li> <li>• Obese - Reception child age 4/5</li> <li>• Obese - Year 6 End year of primary school age 10/11</li> </ul> <p>Each school has been assessed as to how many of the above set of statistics are above the regional average (using data from the National Childhood Measurement Programme). If two or more are above the regional average then that is considered to be a robust basis on which to cap A5 use at the existing level so as to preserve the current business profile and diversity and thus allow other industries to flourish.</p>

Company	Unique Ref	Pub Ref	RC18 Hot Food Takeaway	RC18 Hot Food Takeaway HBC
				<p>The Borough Council disagrees that the policy is not flexible. Ward level overweight and obesity data shows that every single ward in the Borough is above the national average for the proportion of adults who are overweight or obese. HBC has used school statistics and only caps A5 development in retail centres if the ward has above average obesity and excess weight statistics than the rest of the region.</p>

**Policy RC19: Main Town Centre Uses on Employment Land**

No comments received.

**Policy RC20: Business Uses in the Home**

No comments received.

**Policy RC21: Commercial Uses in Residential Areas**

No comments received.

**Section 9 of the Consultation Statement, covering: Leisure & Tourism Development**

- Policy LT1: Leisure and Tourism
- Policy LT2: Tourism Development in the Marina
- Policy LT3: Development of Seaton Carew
- Policy LT4: Tourism Accommodation
- Policy LT5: Caravan Sites and Touring Caravan Sites
- Policy LT6: Business Tourism, Events and Conferencing

**Policy LT1: Leisure and Tourism**

Company	Unique Ref	Pub Ref	LT1 Leisure and Tourism	LT1 Leisure and Tourism HBC
Resident	LP0050	Pub0018	<p>What consideration has been given for the redevelopment of Brenda Road to make this a central leisure / sports facility? The facility could include 50 metre swimming pool, athletics track, double hall sport facility with sprung floors, this area also has space to include a touring caravan park, noisy sports area, additional car parking.</p>	<p>Through emerging policy LT1 (Leisure and Tourism), the Council is seeking to focus major leisure and tourism developments in sustainable locations within the Town Centre, the Marina, Seaton Carew and the Headland, subject to their scale and nature. The Brenda Road area to the south of Seaton Carew is an existing established industrial area which contributes towards the Borough's employment land provision and is outside of the Seaton Carew leisure and tourism area as set out on the Proposals map. The area is detached from the main urban area of the town and it is considered that the abovementioned areas are therefore more sustainable and accessible locations for major leisure facilities. Any additional leisure or tourism provision in this area could potentially detract from the provision of leisure and tourism uses in the centre of Seaton Carew and could have an impact on its viability as a leisure and tourism destination. Any such proposals for sites within the Brenda Road area would only be supported where it could be demonstrated that the site was the sequentially preferable location for that specific type of development, there would be major tourism, leisure and/or regeneration benefits to the town and the proposal would not detrimentally affect the amenities of the occupiers of adjacent or nearby properties.</p>

Company	Unique Ref	Pub Ref	LT1 Leisure and Tourism	LT1 Leisure and Tourism HBC
Hartlepool United Supporters Trust	LP0303	Pub0049	<p>Further from my phone conversation with you I feel, as chairman of Hartlepool United Supporters Trust, must push for a far better explanation than I have been given. As we have an A.C.V. On one of the two leases in the area designated as RC8 (retail and commercial development), I get the impression that the planning department have seriously overlooked the way this area has been labelled/coloured. I am still at a loss as to why the football ground has been misrepresented (in my eyes) by the council and is not in NE2 green (outdoor sports code) the excuse I was given was this site is not open to public use, hence RC8, and that was why the skateboard park is in green as it is open to public to public use. Now that is fine until you take all the rugby grounds into the equation, which, as far as I am aware, are not open to public use, yet all of these sites are all in green (NE2). I am aware that the club are in talks with the council in the purchase of both of these leases, the mill house project and the football ground, as the council gave JPNG, the clubs owners, permission to raise funds for these projects externally, but as a fan of H.U.F.C., I would not like to see any owners both present and future owning the ground as it makes it far too easy to sell up and move as it , the land, has already been labelled for purposes other than football. I would urge you to change and re-label the football ground prior to it being forwarded to the Secretary Of State in March.</p> <p>I have attended two of the councils roll outs, and have a query about edge of town centre sites. One of them, RC8, is the one which concerns me.</p> <p>These are the mill house/Hartlepool United sites. Firstly the Mill House, why are the bowls club and the baths not denoted by a different code. Possibly LT1 leisure and tourism? The second one, the football ground, that surely should be an NE2d site in green. It seems very strange that these three sites are incorrectly denoted. It cannot be an oversight as there is a small green spot in the middle of this site in green, NE2c, children's play area, which is the skateboard park. If this, a small site, has been noted why have the larger three sites be overlooked?</p>	See aggregated response to the representation under Policy RC8.

Company	Unique Ref	Pub Ref	LT1 Leisure and Tourism	LT1 Leisure and Tourism HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park  RC14 – Trincomalee Wharf and Retail Park  LT1 – Leisure and Tourism  LT2 – Tourism Development in the Marina  LT3 – Development of Seaton Carew  LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p> <p>AND</p> <p>Regarding RC12 and RC14, the HRA (page 56) states “It is relatively difficult to mitigate impacts resulting from a deliberate policy to increase visitor numbers. However, the policy has been altered with the statement ‘Where appropriate the Council will seek the provision of interpretation to increase public understanding of the Teesmouth and Cleveland Coast SPA and Ramsar’”</p> <p>Regarding LT1 the HRA (page 57) states: “The policy will also promote and encourage green tourism through the provision of facilities for the observation and interpretation of wildlife, habitats and the natural environment. The provision of facilities for interpretation is expected to have a positive effect on the internationally designated sites through facilitating a greater understanding and appreciation of them.</p> <p>Regarding LT1, the HRA (page 57) states: “The provision of facilities for observation could also have a beneficial effect by directing visitors to areas where they would cause fewer disturbances. Conversely inappropriately situated observation facilities could cause more disturbance, however the policy also states that all developments must be in conformity with Policy LS1 Locational Strategy.</p>	<p><b>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</b></p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

Company	Unique Ref	Pub Ref	LT1 Leisure and Tourism	LT1 Leisure and Tourism HBC
			<p>The RSPB welcomes the wording in policies that seek to provide facilities for the observation and interpretation of wildlife, habitats and the environment. However, we do not believe that this measure alone would negate LSE arising from these policies.</p> <p>Whether it is relatively difficult to mitigate impacts arising from a policy which seeks to increase visitors to a particular location, it is, nevertheless, incumbent upon HBC to use all available evidence to consider the potential impacts of these policies and to mitigate for them accordingly. Stronger policy wording that directs potentially damaging development/activities away from sensitive areas could be part of a suite of mitigation measures considered by HBC as part of a wider strategy designed to mitigate for the combined impacts (i.e. recreational disturbance) of housing, retail, leisure and tourism policies. Please see our further advice regarding this.</p>	
Historic England	LP0044	Pub0125	<p>While we welcome and support this policy, to fully reflect the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990, it might be appropriate to insert ‘protecting and enhancing the Conservation Area’ in the section on Seaton Carew.</p>	<p>Comments noted. <b>In view of these comments, the recommendation is to amend the policy wording with respect to development in Seaton Carew to read:</b></p> <p><b>“Seaton Carew will be promoted and developed as a tourism destination which showcases and protects the EU designated bathing waters and Seaside Awards. Regeneration schemes which improve the vitality and viability of Seaton Carew whilst protecting and enhancing the Conservation Area and the settlement’s open seaside character will be promoted and actively supported by the Local Authority.”</b></p>

Company	Unique Ref	Pub Ref	LT1 Leisure and Tourism	LT1 Leisure and Tourism HBC
Natural England	LP0043	Pub0129	<p>Natural England welcomes the promotion of natural environmental assets across the borough for the wider public to enjoy. Education and investment in appropriate access significantly contribute to the safeguarding of important ecological sites. In order to ensure that levels of visitor numbers do not have a negative effect on features of designated sites, Natural England recommends that the policy document reinforces the importance of mitigation strategies, where new leisure and tourism initiatives or developments may increase visitor numbers. Natural England advocates the policy emphasis on the discouragement of 'noisy' activities in environmentally sensitive areas, whilst at the same time promoting general 'quiet' activities carried out in a sensitive manner to avoid damage to the special interest features of designated sites.</p>	<p><b>HBC suggests this can be achieved through stronger wording in paragraph 6.26 of the Locational Strategy.</b></p> <p><b>WORDING: Recreational disturbance can result from new leisure and tourism opportunities as well as from housing. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>



**Policy LT2: Tourism Development in the Marina**

Company	Unique Ref	Pub Ref	LT2 Tourism Development in the Marina	LT2 Tourism Development in the Marina HBC
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park            RC14 – Trincomalee Wharf and Retail Park            LT1 – Leisure and Tourism            LT2 – Tourism Development in the Marina            LT3 – Development of Seaton Carew            LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p>	<p><b>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</b></p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

**Policy LT3: Development of Seaton Carew**

Company	Unique Ref	Pub Ref	LT3 Development of Seaton Carew	LT3 Development of Seaton Carew HBC
Resident	LP0263	Pub0009	The somewhat derelict building on the sea front, formerly the Longscar Hall, could be revamped, transformed and perhaps utilised as a People's Centre and put to good use for many social and cultural events.	The Longscar Centre is privately owned and unfortunately the Council was unsuccessful in a bid to compulsory purchase the property in 2016 so it could be redeveloped as part of the Seaton Front Masterplan. Nevertheless, the Council's Regeneration team is moving forward with the Seaton Front Masterplan in order to improve the public realm along the Front and provide better facilities to attract further investment. Policy LT3 supports the improvements to the Front and supports reuse of the Longscar Centre that is appropriate to its beachside and open promenade setting and that enhances the current built form and improves connectivity with the adjacent public realm. The demolition and redevelopment of the site to enhance the quality of the environment and visitor experience of Seaton Carew is also supported.
Resident	LP0050	Pub0018	Seaton Carew is earmarked as a tourist destination and significant investment has been made into the area and additional funds have also been allocated for upgrading the front. However if the town plan goes ahead visitors will be faced with huge wind turbines when they enter Seaton via Seaton Lane area or when visiting by train. This detracts from the attractiveness of the area, surely we should be trying to improve the landscape in the area. How long do the unsightly waste dumping grounds have left to run? It appears that the council on one hand say lets invest in Seaton Carew and have done a great job with the new promenade and there are some good ideas in the regeneration plan, yet limited consideration is given to the approach into Seaton Carew as though the areas are not linked.	The Local Plan features a number of policies which seek to improve the quality of development and protect and enhance the appearance of main approaches into the urban areas of the Borough. In particular, policy NE7 (Landscaping along Main Transport Corridors) seeks to ensure that a particularly high standard of landscaping, tree planting and design are required of developments adjoining the main communication corridors, which includes the A178 Tees Road from Greatham Creek through Seaton Carew to the town centre. With respect to this approach into Seaton Carew, this passes through an established industrial area and as such it is accepted that industrial uses will continue to be appropriate along this corridor, however, emerging Local Plan policy QP4 (Layout and Design of Development) seeks to ensure development is well designed, appropriate to the area and respects the surrounding environment, whilst emerging policy QP1 (Planning Obligations) will enable the Council to seek developer contributions towards green infrastructure improvements in the vicinity of new developments where appropriate.

Company	Unique Ref	Pub Ref	LT3 Development of Seaton Carew	LT3 Development of Seaton Carew HBC
Sport England	LP0079	Pub0089	Sport England would like to offer its support to the following policies; Policy QP1 – Planning Obligations Policy LT3 – Seaton Carew Sports Domes.	Support welcomed.
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park RC14 – Trincomalee Wharf and Retail Park LT1 – Leisure and Tourism LT2 – Tourism Development in the Marina LT3 – Development of Seaton Carew LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p>	<p><b>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</b></p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

#### Policy LT4: Tourism Accommodation

No comments received.

**Policy LT5: Caravan Sites and Touring Caravan Sites**

Company	Unique Ref	Pub Ref	LT5 Caravan Sites and Touring Caravan Sites	LT5 Caravan Sites and Touring Caravan Sites HBC
Resident	LP0050	Pub0018	<p>What consideration has been given for the redevelopment of Brenda Road to make this a central leisure / sports facility? The facility could include 50 metre swimming pool, athletics track, double hall sport facility with sprung floors, this area also has space to include a touring caravan park, noisy sports area, additional car parking.</p>	<p>With respect to a touring caravan park, any such proposals would be determined on its own merits and against the criteria set out in emerging Local Plan policy LT5 (Caravan Sites and Touring Caravan Sites). The policy stipulates that proposals for touring caravan sites will only be approved where the surrounding infrastructure is capable of accommodating the development; it is accessible by a choice of means of transport to ensure sustainable linkages to amenities, appropriate landscaping is provided, adequate sewage and surface water disposal facilities are available; and there are appropriate on-site amenity facilities for the scale of development to help minimise the need for travel. Consideration would also be had with respect to the potential impact on the amenity of future occupants of any such caravan park resulting from its proximity to an industrial uses area.</p>
RSPB - Northern England Region	LP0253	Pub0091	<p>Combined Retail, Leisure and Tourism Policies. The policies listed below have all been the subject of assessment within the HRA Stage 1 screening and have individually been assessed as having no LSE on the SPA/Ramsar/pSPA. It is our opinion that these policies require further assessment.</p> <p>RC12 – The Marina and Leisure Park            RC14 – Trincomalee Wharf and Retail Park            LT1 – Leisure and Tourism            LT2 – Tourism Development in the Marina            LT3 – Development of Seaton Carew            LT5 – Caravan Sites and Touring Caravan Sites</p> <p>The general purpose of these policies is to develop some areas as major retail, tourist and leisure attractions. Thus it can be reasonably expected that the number of people visiting as a result of these policies would increase – leading to a potential increase in recreational disturbance of SPA interest features - due to the proximity of some of the areas allocated by these policies to the SPA. Therefore, it is our opinion that that HBC cannot rule out LSE for these policies – particularly in-combination.</p>	<p><b>HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</b></p> <p><b>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</b></p> <p><b>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions. Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</b></p>

**Policy LT6: Business Tourism, Events and Conferencing**

No comments received.

**Section 10 of the Consultation Statement, covering: Historic Environment**

- Policy HE1: Heritage Assets
- Policy HE2: Archaeology
- Policy HE3: Conservation Areas
- Policy HE4: Listed Buildings and Structures
- Policy HE5: Locally Listed Buildings and Structures
- Policy HE6: Historic Shopping Parades
- Policy HE7: Heritage at Risk

**Policy HE1: Heritage Assets**

Company	Unique Ref	Pub Ref	HE1 Heritage Assets	HE1 Heritage Assets HBC
Resident	LP0307	Pub0053	<p>Page 205 of the document refers to the Low Throston deserted medieval village and the Hartlepool Local Plan shows an area shaded in yellow.</p> <p>1 What is the actual location and extent of the medieval village?</p> <p>2 The area indicated shows an irregular area, and is almost two distinct areas, is either of these areas a burial ground? I would expect some form of burial area .</p> <p>3 Will any building work be allowed in either of these areas in the future?</p>	<p>Noted. Low Throston deserted medieval village is a scheduled monument. It is one site allocation a larger map of the site allocation can be found in on the listing section of the Historic England website, List entry Number: 1006765. The policy aims to protect, preserve and enhance the heritage asset from development which would cause harm or impact on the significance of the asset. The appropriateness of a development would be assessed through the planning application process.</p>
Resident	LP0082	Pub0067	<p>In five or more particular places the document refers to precautions or assurances sought by way of the phrase ‘should be provided’. That is not sound specification because the phrase is open to interpretation. Those requirements would be more robustly defined by using the word ‘must’ instead of ‘should’. Unless HBC is reserving a right to dispense with the requirements for assurances as it sees fit?</p>	<p>Noted, the use of should allows for development in exceptional circumstances – all development will be assessed on a case by case basis. The use of should allows for flexibility in the application of the policy, a pragmatic view where there could be a need to consider other factors, for example the regeneration benefit of a development.</p>

Company	Unique Ref	Pub Ref	HE1 Heritage Assets	HE1 Heritage Assets HBC
Story Homes	LP0219	Pub0090	In accordance with our previous representations to the preferred options consultation, we generally support the Council approach to protecting the Historic Environment and the NPPF compliant approach to ensuring that policy seeks to protect, enhance and promote Hartlepool's heritage. We welcome the Councils amendments to this policy which we previously recommended. The changes to the policy have ensured that the wording is in line with the NPPF which sets out that where a proposed development will lead to 'substantial harm to' or 'total loss' of significance of a designated heritage asset LPAs should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.	Noted. Recognition of response to previous comments welcomed.
Greatham Parish Council	LP0018	Pub0102	Greatham Parish Council strongly supports all the policies for the protection of the historic environment.	Noted.
Hartlepool Civic Society	LP0013	Pub0107	The Society re-iterates its strong support of the policies which appear to provide a clear strategy which should protect the future of our heritage assets and urge that legal powers under QP2 are strengthened.	Noted.
Historic England	LP0044	Pub0125	While we welcome and support this policy, the wording may need slight amendment to be fully compliant with the NPPF. The third paragraph refers to the grounds on which the Council will refuse proposals, and refers only to the public benefits. Paragraph 133 of the NPPF goes on to give a number of circumstances, in addition to public benefit, which might also lead to the justification of harm to, or loss of a heritage asset. It might therefore be more accurate to reword the third paragraph of the policy to encompass these. For example, by stating: 'the Borough Council will seek to refuse proposals which lead to substantial harm to, or result in the total loss of significance of, a designated heritage asset only in exceptional circumstances'.	Noted. <b>Amended policy wording suggested to reflect Historic England's suggestion for paragraph 3 of the policy, replace to read, "The Borough Council will seek to refuse proposals which lead to substantial harm to, or result in the total loss of significance of, a designated heritage asset only in exceptional circumstances"'</b> .

## Policy HE2: Archaeology

No comments received.

**Policy HE3: Conservation Areas**

Company	Unique Ref	Pub Ref	HE3 Conservation Areas	HE3 Conservation Areas HBC
Resident	LP0320	Pub0077	<p>The properties adjacent to the shopping outlets were, and in many respects still are, well-proportioned, robustly constructed, mid-terraced Edwardian dwellings. The more prestigious of which were located westward towards St Paul’s Roman Catholic Church. With the passing of time, an increasingly ageing population allied to the rising cost of remedial repairs, many of the larger properties, more noticeably those in the vicinity of St Paul’s Road, began to manifest signs of neglect. Quite naturally these larger, older, properties appeared both dated, and impractical to run. The younger married couples being inclined to look for smaller properties/flats boasting all modern conveniences including baths, and the luxury of indoor water closets. It has only been with the passing of time that many individuals, myself included, have come to value the unique nature, and character, of these properties, together with the opportunities they present for refurbishment. It may also be commented that they form part of the architectural history of West Hartlepool and worthy of consideration.</p> <p>In conclusion my concerns are prompted both by the piecemeal development of the larger properties in the region and, with flagrant disregard to government statute, by a dearth of maintenance manifest in the woebegone appearance of rented accommodation. It may be argued that property speculators who purchase these homes are catering to individuals who, by force of circumstance, have little choice when it comes to an abode.</p> <p>This does not, however, exempt their owners from the requirements of the Landlord and Tenant Act 1985 s.11.- (l)(a)(b), Section 12 of the Anti-Social Behaviour Act 2003, or s 218A of the Housing Act 1996. It is to be hoped that measures will be implemented to ensure that:</p> <ul style="list-style-type: none"> <li>(i) These properties are structurally well-maintained, internally as well as externally. That they remain habitable up to a ‘reasonable’ standard and, that in appearance, do not reflect badly upon the surrounding neighbourhood, easements, or amenities;</li> <li>(ii) That the owners publish formal policies defining how they intend to counteract anti-social behaviour thereby minimising its corrosive effects upon the wider community;</li> <li>(iii) That these proposals be available to the general public.</li> </ul>	<p>Noted. The policy aims to protect and enhance conservation areas within Hartlepool, policies are use as a key consideration in the recommendations made to Planning Committee on planning applications. In relation to anti-social behaviour policy QP5 (Safety and Security) aims to ensure that development minimises crime and fear of crime.</p>



Company	Unique Ref	Pub Ref	HE3 Conservation Areas	HE3 Conservation Areas HBC
Galliford Try	LP0349	Pub0114	<p>As the southern part of the Site forms part of the Conservation Area, Policy HE3 is relevant. The most relevant section of the policy concerns demolition in Conservation Areas, as follows: Proposals for demolition within Conservation Areas will be carefully assessed, the Borough Council will only permit the demolition of buildings and other features and structures in a Conservation Area if it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>1) The removal would help to conserve and/or enhance the character, appearance and significance of the Conservation Area,</li> <li>2) Its structural condition is such that it is beyond reasonable economic repair, or</li> <li>3) The removal is necessary to deliver a public benefit which substantially outweighs the impact on the significance of the heritage asset.</li> </ol> <p>In the exceptional circumstances where any demolition is granted, the Borough Council will require that detailed proposals for the satisfactory redevelopment or after treatment of the site are secured before demolition takes place. This will include the requirement to record and advance understanding of the significance of the heritage assets to be lost (wholly or in part) in a manner that is proportionate to their importance.</p> <p>It is considered that these considerations, on the whole, are acceptable, and will not prevent the demolition of any non-listed buildings where it can be justified.</p> <p>As previously noted, our Client is keen to deliver a high quality development on this Site and will only propose demolition if it is necessary to deliver a suitable scheme. It is recommended that criteria 3 should be amended to conform more accurately with paragraph 134 of the NPPF, which states: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”. In line with the NPPF, the public benefits do therefore not need to substantially outweigh the impact on the heritage asset, but the benefits need to be assessed against adverse impacts and determined accordingly. As such, whilst our Client is broadly supportive of the policy on the whole, the policy as currently drafted is not consistent with national policy and therefore unsound. Our Client would therefore object to the policy as currently drafted.</p>	<p>Noted. The Council does not agree that the wording of the policy is non-compliant with the NPPF. The wording of the policy refers to all levels of harm as a result of a development whereas the wording of NPPF para 134 is specific to development proposals which lead to less than substantial harm to the significance of a designated heritage asset. As such no changes are proposed to this policy.</p>

Company	Unique Ref	Pub Ref	HE3 Conservation Areas	HE3 Conservation Areas HBC
Historic England	LP0044	Pub0125	<p>The need for a clear and positive strategy for the historic environment: We would like to reiterate our earlier comments on how well the Council has integrated heritage considerations throughout the plan, and demonstrated an excellent strategy for the historic environment, supported by the separate Hartlepool Heritage Strategy. In particular, we welcome and support the following sections, which reflect this approach: Table 2, 4.2, Table 3, 6.9, LS1, 7.12; CC1; 7.31; CC3; CC4; CC5; QP1; 9.27; QP4; QP6 (subject to suggested amendments, below); RUR1; RUR2; RUR3; RUR5; 13.55; 13.109; 14.5; 14.14; all of Chapter 15; and NE3. We appreciate the level of thought that has gone into this thorough approach, and the level of commitment shown by the Council to protect and enhance the historic environment.</p> <p>We have previously commented that, for clarity, it might be helpful to define what is meant by 'constructive conservation', either in the supporting text, or in the glossary.</p>	<p>Noted. <b>Propose that 'Constructive Conservation' to be included in the glossary with the following suggested wording, 'Constructive Conservation is a positive, well-informed and collaborative approach to conservation. It is a flexible process of helping people understand their historic environment and using that understanding to manage change.'</b></p>

**Policy HE4: Listed Buildings and Structures**

No comments received.

**Policy HE5: Locally Listed Buildings and Structures**

No comments received.

**Policy HE6: Historic Shopping Parades**

No comments received.

**Policy HE7: Heritage at Risk**

Company	Unique Ref	Pub Ref	HE7 Heritage at Risk	HE7 Heritage at Risk HBC
Historic England	LP0044	Pub0125	<p>This policy should include a caveat to avoid the possibility of sites being put forward for enabling development where the risk has come about as the result of deliberate neglect or damage. We welcome the reference to Historic England, as our advice on enabling development is currently being updated to reflect the NPPF. In the meantime, much of our current advice remains valid and helpful available from our website at <a href="https://historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places">https://historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places</a></p>	<p>Noted. <b>The inclusion of a caveat in policy HE7 is accepted, the following wording of paragraph 2 of the policy is suggested:</b></p> <p><b>“In exceptional circumstances where a heritage asset is at risk and requires significant repairs to maintain or enhance its heritage value and the cost for repair and/or investigation is undeliverable by any other means, the redevelopment of the wider site may be considered. However this will only be an option when the proposed development does not create substantial harm or total loss of significance of a heritage asset. In the case of less than significant harm to the heritage asset it must be demonstrated that any loss and/or harm is necessary and outweighed by the need to achieve substantial public benefit. Where it is evidenced that risk has come about as the result of deliberate neglect or damage, enablement development will not be supported.”</b></p>

**Section 11 of the Consultation Statement, covering:**

**Natural Environment and Green Networks**

- Policy NE1: Natural Environment
- Policy NE2: Green Infrastructure
- Policy NE3: Green Wedges
- Policy NE4: Ecological Networks
- Policy NE5: Playing Fields
- Policy NE6: Protection of Incidental Open Space
- Policy NE7: Landscaping along main transport corridors

**Policy NE1: Natural Environment**

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our response to the Preferred Options, we supported the proposals to protect and enhance the natural environment. Given the importance of Hartlepool for its important sites of European significance, we support these proposals. However, we have referred to the reports of the Natural Capital Committee in the section relating to strengthening the local economy and we represent that there should also be a reference to these reports in this section. While the importance of economic growth is of course recognised, the loss of biodiversity is also a critical issue and the opportunity to improve on this in new development or redevelopment should be recognised. Without that, we recognise that in this respect, the Policy is not sound.</p>	<p>With regard to Natural Capital, the Council is aware of the development and increased Government emphasis on Natural Capital, highlighted with the recent publication of the fourth annual report. Whilst we are confident that the Natural Environment Chapter of Local Plan is comprehensive in detailing the natural assets within the Borough, and the NE policies aim to protect and enhance all elements of the natural environment, it is acknowledged that the preamble to the chapter could be strengthened to include reference to Natural Capital. <b>The following wording update to section 16.1 is suggested:</b></p> <p><b>“16.1 In line with the Government’s emerging Natural Capital agenda, the Borough Council recognises the important role that Hartlepool’s natural environment plays in enhancing people’s quality of life and improving quality of place. The benefits of a high quality natural environment run as a cross-cutting theme through many of the policies and proposals of the Local Plan. A high quality environment can:</b></p> <ul style="list-style-type: none"> <li>• Encourage more people to live and work in Hartlepool</li> <li>• Complement efforts to attract new economic growth and investment</li> <li>• Help to increase the number of visitors and boost the tourism economy</li> <li>• Provide more opportunities for leisure and recreation with consequent benefits for people’s health and well-being</li> </ul>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
				<p><b>• Support measures to adapt to and mitigate against the potential impacts of climate change”</b></p> <p>The Council is confident the detail of the policies set out in the Natural Environment Chapter help to support the key objective of the Natural Capital Committee “of being the first generation to leave the natural environment of England in a better state than that in which we found it”.</p> <p><b>In addition, the following description should be included in the glossary. “Natural capital - Natural capital refers to the elements of the natural environment which provide valuable goods and services to people. The Government focus is that the state of natural capital matters, not just because people enjoy the aesthetic elements of landscapes and wildlife of England, but because of the wide-ranging economic benefits that natural assets provide when managed well.”</b></p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Durham Bird Club	LP0222	Pub0075	<p>The Club covers this area as well as Teesmouth Bird Club. Although independent of each other, we do seek to co-operate and I have sought the views of TBC to this letter. They have informed me that they support its contents.</p> <p>We commented on these proposals at the Preferred Options stage and generally welcomed them. Our comments then are attached below.</p> <p>However, while we welcome the proposed Policy NE1 and the numerous considerations that need to be taken into account, we are strongly of the view that our comments at the Preferred Options stage do not appear to have been addressed.</p> <p>To be fully sound, we represent that this Policy should include</p> <ul style="list-style-type: none"> <li>- Provisions to ensure “homes for nature” are provided in appropriate development. Given the importance of this area and the potential nature of proposed development here, we represent that this should not just be things such as nest boxes and swift towers but also ledges or similar sites for birds of prey.</li> <li>- The full benefits of Natural Capital as recognised by the Natural Capital Committee should be included</li> <li>- Strict criteria should be included to assess whether biodiversity offsetting can be accomplished bearing in mind our comments on this at the Preferred Options stage.</li> </ul> <p>Given the importance of this area for wildlife and also for industry, we represent that it is critical to address this issue. We believe that this would be consistent with the relevant provisions of the NPPF, in particular paragraphs 109, 117 and 118.</p> <p>Without this being addressed, we represent that the Policy is not fully sound.</p>	<p>The RSPB is running a campaign called ‘Homes for Nature’, which ranges from providing nest and roost boxes and ‘insect hotels’ to wildlife friendly gardening and wildlife areas. Through the Countryside Service the Council has delivered numerous Family Woods and community wildlife areas in its parks and open spaces, many in conjunction with local communities. These are covered in paragraph 16.77 of the Plan under Incidental Green Space. They are often part of the borough’s green infrastructure and are protected by policy NE2: Green Infrastructure.</p> <p>In terms of providing ‘homes for nature’ in ‘appropriate development’ this is mainly delivered through the determination of planning applications (please see the NPPF paragraph 118 response below).</p> <p>With regard to Natural Capital, the Council is aware of the development and increased Government emphasis on Natural Capital, highlighted with the recent publication of the fourth annual report. Whilst we are confident that the Natural Environment Chapter of Local Plan is comprehensive in detailing the natural assets within the Borough, and the NE policies aim to protect and enhance all elements of the natural environment, it is acknowledged that the preamble to the chapter could be strengthened to include reference to Natural Capital. <b>The following wording update to section 16.1 is suggested:</b></p> <p><b>“16.1 In line with the Government’s emerging Natural Capital agenda, the Borough Council recognises the important role that Hartlepool’s natural environment plays in enhancing people’s quality of life and improving quality of place. The benefits of a high quality natural environment run as a cross-cutting theme through many of the policies and proposals of the Local Plan. A high quality environment can:</b></p> <ul style="list-style-type: none"> <li>• Encourage more people to live and work in Hartlepool</li> <li>• Complement efforts to attract new economic growth and investment</li> <li>• Help to increase the number of visitors and boost the tourism economy</li> </ul>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
				<ul style="list-style-type: none"> <li>• <b>Provide more opportunities for leisure and recreation with consequent benefits for people’s health and well-being</b></li> <li>• <b>Support measures to adapt to and mitigate against the potential impacts of climate change”</b></li> </ul> <p>The Council is confident the detail of the policies set out in the Natural Environment Chapter help to support the key objective of the Natural Capital Committee “of being the first generation to leave the natural environment of England in a better state than that in which we found it”.</p> <p><b>In addition, the following description should be included in the glossary. “Natural capital - Natural capital refers to the elements of the natural environment which provide valuable goods and services to people. The Government focus is that the state of natural capital matters, not just because people enjoy the aesthetic elements of landscapes and wildlife of England, but because of the wide-ranging economic benefits that natural assets provide when managed well.”</b></p> <p>With regard to Biodiversity offsetting, the reference to biodiversity accounting and offsetting in Policy NE1 should be read in conjunction with paragraph 16.23 which describes the concept and suggests that it could become a useful delivery mechanism in the future. There are no working examples within Hartlepool, but as stated in 16.23 there have been a number of pilots. <b>HBC will amend the wording in 16.23 to update it.</b></p> <p><b>Recommended new wording is to change: ‘A pilot scheme has been operating with six local authorities in England and the evaluation of the pilot has provided some encouraging lessons for applying biodiversity accounting in practical situations’,</b></p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
				<p><b>to: 'In 2012 Defra commissioned eight biodiversity offsetting pilots in six areas and these ran until 2014. Evaluation of the pilot has provided some encouraging lessons for applying biodiversity accounting in practical situations. At least one environmental consultancy is actively promoting biodiversity offsetting in the planning sector and has developed a 'metric' for assessing all the relevant criteria'.</b></p> <p>The following is an example of how biodiversity offsetting will become a reality during the Local Plan period. In December 2016, Natural England launched four policies which change the way that great crested newts (a European protected Species) are dealt with in planning applications. This followed a pilot in Woking Borough Council. By March 2020 Natural England will have worked with 150 Local Authorities to establish great crested newt conservation strategies for each, identifying key sites and compensation sites. Compensation sites will be managed and developers will be able to choose to use them to offset their mitigation. Natural England will permit the Local Authority to licence development effecting great crested newts. This will ensure that efforts are focused on newt populations and habitat creation that will bring the greatest benefits to the species, while simplifying the licensing process for developers where newts are present, saving them time and money.</p> <p>Hartlepool BC believes that all of the aspirations of NPPF paragraphs 109 and 117 have been spelled out in the Local Plan. NPPF 109 is 'The planning system should contribute to and enhance the natural and local environment'. NPPF 117 is 'To minimise impacts on biodiversity and geodiversity'. NPPF paragraph 118 refers to 'determining planning applications' and is therefore a development control function. Hartlepool BC has many examples of how paragraph 118 has been delivered, including the bullet point 'opportunities to incorporate biodiversity in and around developments should be encouraged', which is one area where bird nest boxes, bat roost boxes and other biodiversity improvements have been provided by developers.</p>



Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Resident	LP0322	Pub0081	5. Wildlife corridors and habitats, hedgerows and trees, as well as public rights of way need to be protected when any development is taking place, and promises need to be kept!	<p>Comments noted. The Borough Council takes very seriously the impact of development on ecology, the natural environment and green infrastructure.</p> <p>Emerging policy NE1 sets out the Council's approach to protecting, managing and enhancing Hartlepool's natural environment, including ensuring that existing woodland and trees of amenity value and nature conservation value are protected, and seeking an increase in tree cover in appropriate locations in line with the Borough Council's Tree Strategy. In line with emerging policy QP6, any development proposals that may affect hedgerows and trees will be required to ensure that issues with respect to the presence of any landscape features and in particular protected trees are investigated and satisfactorily addressed, in consultation with the Council's Arboricultural Officer and other relevant consultees.</p> <p>Emerging policy NE4 sets out the Council's approach to maintaining and enhancing ecological networks throughout the Borough. The Council will seek to ensure that all major developments take responsibility for not only protecting what currently exists but also improves upon it. Emerging policies NE1 and NE4 require that, where appropriate, all developments maintain and enhance ecological networks in the vicinity of the proposals and, where enhancements cannot be incorporated within the site, an off-site contribution may be sought. In line with emerging policy QP6, where appropriate, all development proposals must ensure that the effects on wildlife and habitat are investigated and satisfactorily addressed, in consultation with the Borough Ecologist and other relevant consultees.</p> <p>With respect to public rights of way, these are protected through relevant legislation and if development is likely to have an impact on rights of way, diversion will need to be agreed with the Council's Countryside Access Officer. Notwithstanding this, the Local Plan has a positive approach to planning for public footpaths and cycle routes with emerging policies INF1 (Sustainable Transport Network) and INF2 (Improving Connectivity in Hartlepool) setting out key priorities including</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
				<p>providing a comprehensive, safe and well managed network of footpaths and cycle routes throughout the Borough, supported by the Local Infrastructure Plan. Furthermore, emerging policy NE2 (Green Infrastructure) stipulates that the Borough Council will seek opportunities to expand and improve the Rights of Way network.</p>
Story Homes	LP0219	Pub0090	<p>In accordance with our previous representations to the preferred options consultation, we broadly supports the aims of Policy NE1 which seeks to protect, manage and enhance Hartlepool's natural environment. However, we consider that the policy is unsound as it is not consistent with national policy. We especially raise significant concerns with sub-point 4 which currently reads as follows:  “...Where appropriate an ecosystems services approach will be used to assess the impact of development proposals on the natural environment and the benefits it provides, including resource use, health and well-being, protection from the affects of climate change, economic growth, and culture...” We strongly consider that this is an unusual approach to drafting this type environmental policy which raises significant concerns and uncertainty to the development industry. As presently drafted it is unclear as to what the 'ecosystems services approach' actually comprises of. With little supporting information or additional contextual information to hand it also appears to be significantly onerous from the outset. We would have expected sub-point 4 to clearly state that ecology surveys would be required alongside new development proposals in order to ensure that the “impact of development proposals on the natural environment” are suitably considered; this approach is widely adopted and set out in other Local Plans across the North East region.</p> <p>We therefore consider that this policy should be amended going forwards to respond to our concerns. Lastly, and we raise concerns with sub-point 8 of Policy NE1, which currently reads: “Where appropriate Tree Preservation Orders will be used to protect trees under threat from development proposals. Where the loss of significant trees/hedgerows cannot be avoided their replacement by trees/shrubs/hedgerows of an appropriate scale and species for the area will be sought where practical.” We consider that TPOs should</p>	<p>Paragraphs 16.24 – 16.27 of the supporting statement to policy NE1 do provide some further detail about an ecosystems services approach and how it could be applied to the local planning process. Paragraph 109 of the National Planning Policy Framework states clearly that the planning system should contribute to and enhance the natural and local environment by.....recognising the wider benefits of ecosystem services. An ecosystem services approach is about more than just undertaking ecological surveys. The Borough Council will have regard to best practice emerging from work on an ecosystem services approach when developing and reviewing planning policies, and in considering development proposals.</p> <p>Sub point 8) states that TPOs will be used “where appropriate” to protect trees under threat. It does not use the word ‘any’ as stated in this representation. TPOs will only be used in circumstances where a particular tree or group of trees meets the necessary criteria for TPO designation.</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
			<p>only be used to protect trees of 'importance'. This policy should therefore be amended to reflect this point as it currently states that TPOs can be used to protect 'any' trees under threat from development proposals.</p>	

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Landowner (Hartville Meadow)	LP0337	Pub0094	<p data-bbox="667 137 1422 260">Our client considers the proposed allocation of his land east of Easington Road, Hartlepool (see Figure 1) as a Local Wildlife Site under Policy NE1C to be unsound as it is not properly justified and will be ineffective.</p> <p data-bbox="667 300 1422 719">The Council has identified this land as a Local Wildlife Site (Hartwell Meadows). The accompanying description states: "A grazing field sloping down to a beck, with a high proportion of herbs (particularly clovers, Self-heal and in places Autumn Hawkbit) in the sward. 2 grasses &amp; 10 herbs from App 2 Neutral Grassland Flora (other grasses are likely to be present but not flowering at time of survey)" The date of this survey and designation is not provided. The site is not identified as a Local Wildlife Site in the adopted Local Plan. Local Wildlife sites are not legally protected, but the Council can seek to enter into voluntary management agreements with the owner so that they are managed sympathetically for conservation. No such agreement has been entered into by the Council in relation to my client's land.</p> <p data-bbox="667 759 1422 1046">This draft allocation as a Local Wildlife Site is unsound as the site has been ploughed with the result that the various grasses and herbs identified and considered to be of value no longer exist across the main part of the site and if still present will be confined to the site's perimeter. The justification for the Council's allocation of this site as a Local Wildlife Site therefore no longer exists and its inclusion as a Local Wildlife site under Policy NE1 C must be regarded as unsound. The site should instead be allocated for housing development under Policies LS1 &amp; HSG1. See separate representations.</p>	<p data-bbox="1449 137 2134 751">The Hartville Meadow Local Wildlife Site (LWS) went through due process when it was designated. Following survey, it was recommended for LWS designation to what is now the Tees Local Nature Partnership, Local Wildlife Sites Panel and was ratified. Final approval must come from the Local Authority and this was done following a report taken to the appropriate Hartlepool BC Committee. It is inevitable that some LWSs (and other nature conservation designated sites) are designated between published Local Plans and therefore do not appear in a Local Plan document. However, it is accepted that nature conservation designations are part of a rolling programme. Local Wildlife Sites have no legal protection but are 'protected' to some extent through the Local Plan. In this case the opportunity to retain all or part of the site and to mitigate any damage from development has been pre-empted by a deliberately damaging operation. The site was ploughed following an approach to the Council regarding its potential to be allocated for housing. HBC interprets this as a deliberate act of attempting to destroy a LWS.</p> <p data-bbox="1449 791 2134 1046">The idea of Voluntary Management Agreements between LWS owners and the Local Authority come from Defra in their guidance on how sites could be kept in favourable condition. This guidance also includes LWS owners entering into paid Environmental Stewardship Scheme agreements with Natural England. Voluntary Management Agreements are not mandatory and a lack of an agreement does not infer that the site is not a LWS.</p> <p data-bbox="1449 1086 2134 1398">The Department of Communities and Local Government (DCLG) has an annual performance indicator which is the number of LWSs in favourable condition in the previous five years. HBC reports this figure annually to DCLG. If Hartville Meadow is de-designated then this will be reported as a loss to DCLG in 2017. Local Wildlife Sites can only be de-designated following re-survey at the appropriate time of year and a recommendation of de-designation being endorsed by the Tees Local Nature Partnership, Local Wildlife Sites Panel. Contrary to the statement that the botanical interest features of the site no</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
				<p>longer exist following the ploughing of the site, the vegetation could re-establish itself. The soil will still contain roots, rhizomes, bulbs and seeds from the native plant species and these have the potential to regrow. Therefore a full re-survey is required. This should be undertaken from 1st May onwards once the growing season is underway. The damaging of this meadow is being investigated by Natural England (as the enforcing authority) under the Environment Impact Assessment (EIA) Agriculture Regulations 2006 which were introduced to prevent the loss of old meadows by farming practices. This has been necessitated by the loss of approximately 95% of lowland meadows in England since 1945, an issue picked up in the Government's Biodiversity 2020 strategy and the White paper 'Making Space for Nature' also known as the Lawton Report 2010.</p> <p>Under the EIA Agriculture Regs, Natural England has the power to order that the meadow is reinstated, therefore, it is the HBC view that the allocation of this site as NE1c remains sound until all investigations have been concluded.</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Resident	LP0343	Pub0103	The reference to biodiversity accounting and offsetting seems to be nothing more than "weasel" words.	<p>The reference to biodiversity accounting and offsetting in Policy NE1 should be read in conjunction with paragraph 16.23 which describes the concept and suggests that it could become a useful delivery mechanism in the future. There are no working examples within Hartlepool, but as stated in 16.23 there have been a number of pilots.</p> <p><b>HBC will amend the wording in 16.23 to update it. Recommended new wording is to change ‘A pilot scheme has been operating with six local authorities in England and the evaluation of the pilot has provided some encouraging lessons for applying biodiversity accounting in practical situations’, to:</b></p> <p><b>‘In 2012 Defra commissioned eight biodiversity offsetting pilots in six areas and these ran until 2014. Evaluation of the pilot has provided some encouraging lessons for applying biodiversity accounting in practical situations At least one environmental consultancy is actively promoting biodiversity offsetting in the planning sector and has developed a ‘metric’ for assessing all the relevant criteria’.</b></p> <p>The following is an example of how biodiversity offsetting will become a reality during the Local Plan period. In December 2016, Natural England launched four policies which change the way that great crested newts (a European protected Species) are dealt with in planning applications. This followed a pilot in Woking Borough Council. By March 2020 Natural England will have worked with 150 Local Authorities to establish great crested newt conservation strategies for each, identifying key sites and compensation sites. Compensation sites will be managed and developers will be able to choose to use them to offset their mitigation.</p> <p>Natural England will permit the Local Authority to licence development effecting great crested newts. This will ensure that efforts are focused on newt populations and habitat creation that will bring the greatest benefits to the species, while simplifying the licensing process for developers where newts are present, saving them time and money.</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Woodland Trust	LP0023	Pub0104	<p>I would like to make a submission on your local plan publication draft consultation. This is made on behalf of the Woodland Trust, the UK's largest woodland conservation charity. Our vision is for a UK rich in woods and trees. We own and manage over 1,200 woods across the UK and we have over 500,000 members and active supporters.</p> <p>We would like strongly support para 7 in Policy NE1 (copied below), which deals with trees and woodland. We particularly welcome the strong protection given to ancient woodland by the policy. It could be improved if you were to add ancient or veteran trees into the policy and also give them a similar level of protection.</p> <p>We also welcome your commitment to planting buffer strips to protect ancient woodland from nearby development and your commitment to increasing tree cover in line with your Tree Strategy.</p>	<p>Support welcomed and comments noted. It is considered the protection offered to ancient and veteran trees within the policy is already similar to that of ancient woodland (including ASNW and PAWS), however <b>it is acknowledged the policy wording may not refer directly to 'ancient' trees and as such it is recommended to change the reference from 'aged' trees to 'ancient' trees in criteria 7.</b> In light of the comments from the Woodland Trust and in consultation with the Council's Arboricultural Officer, <b>it is recommended that an additional line should be added to criteria 7 stipulating that "For ancient or veteran trees, a buffer 15 times the stem diameter or 5 metres beyond the drip line of the leaf canopy should be maintained, whichever is the greater."</b>, in line with guidance from the Ancient Tree Forum (2013) and the Forestry Commission's Guidance Note on Veteran Trees.</p>
Gladman Developments	LP0351	Pub0118	<p>Gladman note that Policy NE1 includes a cross reference to Policy LS1. As currently drafted, Policy LS1 is insufficiently flexible to ensure that sustainable development opportunities are considered in the context of paragraphs 14 and of the Framework.</p> <p>Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.</p> <p>Paragraph 109 sets out that the planning system should contribute to and enhance valued landscapes with advice in paragraph 113 stating that local planning authorities should set criteria based policies against which proposals affecting such sites will be judged. In addition, Paragraph 113 highlights that distinctions should be made between the hierarchy of international, national and locally designated sites so that any protection is commensurate with status.</p> <p>-</p> <p>It is important to note that this advice does not suggest a ban on all development in or adjacent to these designated areas and that the weight that can be attached to any conflict with such designations should be aligned with their importance based on the hierarchy above.</p>	<p>Comments noted. With respect to the reference to LS1, please see the relevant HBC response to Gladman's comments on that section of the plan. The Borough Council considers that emerging policy NE1 (Natural Environment) is in accordance with paragraphs 109 to 125 of the NPPF.</p>

Company	Unique Ref	Pub Ref	NE1 Natural Environment	NE1 Natural Environment HBC
Natural England	LP0043	Pub0129	<p>The policy wording which seeks to protect the best quality and most versatile agricultural land is also welcomed by Natural England.</p> <p>Natural England welcomes the importance placed on the natural environment through the policy text of the Local Plan. The Plan references a detailed framework of relevant documents and management initiatives which seek to conserve and enhance the natural environment.</p>	Comments welcomed.



**Policy NE2: Green Infrastructure**

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
High Tunstall Homes	LP0060	Pub0002	<p>I refer to the above and write to make representations on behalf of our clients, Tunstall Homes Ltd, in respect of the proposed allocation of land at High Tunstall as a 'Strategic Housing Site'.</p> <p>I would confirm that we fully support Policy HSG5, 'High Tunstall Strategic Housing Site' and the associated Policies INF4, 'Community Facilities', NE2i 'Green Infrastructure' (amenity open space), and NE3, 'Green Wedges', insofar as they relate to the allocation of land at High Tunstall as a strategic housing site and the proposed development as illustrated on the masterplan (dwg ref: 14.039 P101 K) that has previously been submitted to the Council. Black &amp; white and coloured copies of the masterplan are attached for your convenience.</p> <p>In this regard we consider that the aforementioned Local Plan Policies are legally compliant and sound.</p>	Comments welcomed.
Resident	LP0270	Pub0007	<p>Also I see no mention of the parks in this plan. What are the Council's plans for Rossmere Park please. I have raised concerns with the park a few times to both the Council and my local Councillor. This area seems to be left to its own devices and no maintenance other than the one worker that's there blowing the leaves off the path into the pond to further block it up. The pond isn't far off being marsh land in places and the wildlife is not thriving in the area as it has in other years. I would hope that investment in this area would be made at least to maintain the pond area.</p>	<p>Paragraphs 16.45-16.53 refer to the Borough's Green Infrastructure network, including parks and gardens. Parks and gardens are allocated under emerging policy NE2(c) (Green Infrastructure), which seeks to resist the loss of green infrastructure, and these are identified on the proposals map. With respect to Rossmere Park, this is identified through policy NE2(c) and therefore the provisions and protections afforded by this policy apply to the park. The Council will seek planning obligation contributions towards improvements to the park from any large developments in the vicinity in accordance with emerging policy QP1 (Planning Obligations). The Green Infrastructure SPD and Action Plan set out the Council's and the Friends of Rossmere Park Group's aspirations for the park. With respect to the maintenance of the park, these concerns have been forwarded to the relevant Council section.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
R Newcomb & Sons	LP0054	Pub0017	<p>You may recall our consultation response regards our client's site sent in July 2016 and acknowledged by you in an email of 4th July 2016.</p> <p>In this representation, we had confirmed that our client's land had been incorrectly allocated under code NE2e, when in fact it is brownfield land.</p> <p>I have just reviewed the latest version of the plan, and it appears that the site has only been corrected in part. Please see below a plan showing a red line. This red line denotes the limit of my client's land and the existing developed area. As a result of this, we would like to make further comment that this allocation is revised to reflect the true land use on the ground.</p> <p>We are continuing to search for suitable end users for the site and we have a desire to sympathetically develop the site in accordance with the emerging plan. This will obviously not be possible if half of the site remains in NE2e.</p> <p>Therefore, we request that the NE2e allocation is moved south to the boundary (shown by the red line) of our client's existing brownfield land.</p> <p>Further to our conversation. We would like to propose one more amendment to the emerging local plan designation as detailed below: [See Map attachment]</p> <p>Our client owns the land to the west of the area hatched black above. We are currently undergoing appraisals for future development of the site. We would like to propose that the area of bund as hatched black is removed from the NE2e designation. This area is of limited ecological and landscape interested. It is however a limiting factor to future sustainable development of the site.</p> <p>My client is keen to enter into discussions with the Council for a proposal to remove the bund in order to facilitate development of both his land and the Council's land as a joint application. Assigning the protective status on this bund will unnecessarily limit the Council</p>	<p>With respect to the site within the ownership of R Newcomb &amp; Sons, the designation of the southern part of the site in the Publication version of the Proposals Map as NE2e (local green corridors) land appears to have been a minor error in the extent of the shape file and, as such, the Proposals Map will be amended to reflect this, removing the entirety of the site from the NE2e designation. However, with respect to the removal of the NE2e designation from the adjacent bund and green space to the east of the site, this area forms part of the local green corridor on the approach to Seaton Carew. Given that there is no definitive proposal at this time that encompasses both parcels of land and is supported by the Council, and considering the existing constraints to development, the continued designation of this land as green infrastructure is considered to be appropriate. Should this change in future and a suitable proposal come forward, this position will be reviewed at that time.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
			<p>with regards to future development of my client's land and their own. The sustainable re-development of this site would utilise the full use of the site up to Coronation Drive, which will require alterations to the bund. The best hope for a sustainable future of this brownfield site is to widen it to allow for landscaping and sound buffering on the railway edge. The bund could be recycled in order to facilitate this.</p>	
NFU North East	LP0047	Pub0020	<p>With regards to flood alleviation strategies, natural flood management can be incorporated into wider schemes to help reduce flood risk though this should be seen as a method of supplementing more traditional hard engineering structures. If Natural Flood Management methods are to be used, early engagement with relevant land owners is to be encouraged. The long term implications also need to be considered in terms of maintenance and liabilities.</p>	<p>Comments noted. The Local Plan sets out that all development must be well served by adequate infrastructure that takes into account the future demands of users. Any increased flood risk must be managed and the Borough Council will encourage management of this through Sustainable Urban Drainage Systems (SuDS). When considering new development proposals, emerging policy QP6 (Technical Matters) requires that any matters regarding flood risk, both on and off site, throughout the design life of the site, are investigated and satisfactorily addressed, whilst emerging policy NE2 (Green Infrastructure) supports and encourages green infrastructure initiatives that can help alleviate flood risk and address surface water drainage issues by incorporating Sustainable Drainage Systems (SuDS). The Borough Council considers that sustainable urban drainage is generally preferable to hard engineering schemes and that its use should be prioritised wherever it is practicable to do so. This does not preclude the use of hard engineering schemes where it is demonstrably not practicable. Emerging policy CC2 (Reducing and Mitigating Flood Risk) sets out the hierarchy of preferred approaches for surface water run-off management. The Local Planning Authority will work with applicants, the Council's Engineers, the Environment Agency, and other relevant stakeholders to identify the most appropriate flood risk management approach when determining future development proposals.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Wynyard Residents Association	LP0277	Pub0022	<p>Green Space provision</p> <p>Fully support this and would like to see more green space, the green corridor to the north of Blackwood will be cut by the outer loop road. This green space should be wider to allow an adequate thoroughfare for wildlife, particularly the deer. The loop road should carry warnings for traffic for wildlife and a maximum 20mph speed limit enforced.</p>	<p>Support welcomed and comments noted. With respect to the width of the green corridor north of Blackwood, this allocation is constrained by the Borough boundary to the south and the extant planning approvals to the north at Wynyard Woods. The Council's Ecologist has not raised any concerns with respect to this allocation within the Hartlepool Local Plan. Landscaping and ecological impacts will be considered in further detail as part of any reserved matters or full planning applications that come forward for the sites adjacent to this allocation within the Hartlepool Borough Council boundary, however any issues with respect to ecological impacts from site allocations or planning applications to the south of this allocation are within the remit of Stockton Borough Council.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Hartlepool United Supporters Trust	LP0303	Pub0049	<p>Further from my phone conversation with you I feel, as chairman of Hartlepool United Supporters Trust, must push for a far better explanation than I have been given. As we have an A.C.V. on one of the two leases in the area designated as RC8 (retail and commercial development), I get the impression that the planning department have seriously overlooked the way this area has been labelled/coloured. I am still at a loss as to why the football ground has been misrepresented (in my eyes) by the council and is not in NE2 green (outdoor sports code) the excuse I was given was this site is not open to public use, hence RC8, and that was why the skateboard park is in green as it is open to public to public use. Now that is fine until you take all the rugby grounds into the equation, which, as far as I am aware, are not open to public use, yet all of these sites are all in green (NE2). I am aware that the club are in talks with the council in the purchase of both of these leases, the mill house project and the football ground, as the council gave JPNG, the clubs owners, permission to raise funds for these projects externally, but as a fan of H.U.F.C., I would not like to see any owners both present and future owning the ground as it makes it far too easy to sell up and move as it , the land, has already been labelled for purposes other than football. I would urge you to change and re-label the football ground prior to it being forwarded to the Secretary Of State in March.</p> <p>I have attended two of the councils roll outs, and have a query about edge of town centre sites. One of them, RC8, is the one which concerns me. These are the mill house/Hartlepool United sites. Firstly the Mill House, why are the bowls club and the baths not denoted by a different code. Possibly LT1 leisure and tourism? the second one, the football ground, that surely should be an NE2d site in green. It seems very strange that these three sites are incorrectly denoted. It cannot be an oversight as there is a small green spot in the middle of this site in green, NE2c, children's play area, which is the skateboard park. If this, a small site, has been noted why have the larger three sites be overlooked?</p>	See aggregated response to the representation under Policy RC8.

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Resident	LP0304	Pub0050	<p>I have read the consultation document appertaining to the local plan and can still see no mention of new allotment sites. We are told that there is a waiting list 1000 people, obviously with more housing planned and more people moving to the area this list will get bigger. I am of the opinion that the council have missed a golden opportunity to obtain money from the developers for the need of the residents of Hartlepool.</p> <p>I look forward to your comments on this matter.</p>	<p>The adopted Green Infrastructure Supplementary Planning Document and Action Plan provide greater detail with respect to the current provision of allotments throughout the Borough. It is acknowledged that there is at present a large waiting list for allotments within the Borough; this currently stands at approximately 200 people. Whilst there are no individual schemes for improvement or new allotment allocations identified in the Local Plan or Green Infrastructure Action Plan currently, this remains a strategic aspiration, with the Council currently considering where improvements to allotment provision could be made. The potential for provision of and improvements to allotments will also be taken into account when considering planning applications. Where considered necessary, contributions can be sought from developers as part of larger schemes through saved policy GEP9 (Developers' Contributions) of the Hartlepool Local Plan 2006 and in future through emerging policy QP1 (Planning Obligations). Emerging policy NE2 (Green Infrastructure) stipulates that the Borough Council will work actively with partners to improve the quantity, quality, management and accessibility of green infrastructure (including allotments and community gardens) and the loss of green infrastructure components will be resisted. If schemes are drawn up by the Council, or through work with community organisations, those schemes will then be incorporated in the Action Plan and will be supported in principle through emerging policy NE2.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Resident	LP0307	Pub0053	<p>Area NE2e local to the Hartlepool Reservoir indicates this area reference and also shows a red dotted line indicating Development Limits</p> <p>1 It is my understanding that outline planning permission has been granted for 54 residential homes, will the development Limits be extended and the Local Green Corridor reduced to accommodate the development?</p>	<p>The Development Limits and extent of the NE2e allocation at and adjacent to Hart Reservoir, as shown on the Publication version Proposals Map, reflect the current status of the site, with the approved housing development at Hart Reservoir represented as white land to the north and south of the NE2e designation, within the development limits.</p>
Resident	LP0308	Pub0055	<p>a minor issue really but I see no mention of the East Coast Path for walkers and cyclists (a link to the actions on tourism, sport, connectivity?) It currently connects Seaham to North Gare and I believe there are plans afoot to connect Seaton Carew to Newport Bridge. The ultimate plan is to have a footpath around the extent of the English coastline.</p>	<p>Paragraph 16.50 of the Local Plan document sets out key elements to the Green Infrastructure policy including accessibility. Within this section reference is made to Part 9 of the Marine and Coastal Access Act 2009, which has placed a duty on Natural England and the Secretary of State to create a path along the whole of the English coastline. Reference is also made to the completed section between Sunderland and the North Gare car park south of Seaton Carew, with the next section from North Gare to Filey having been approved, although currently there remain ownership and access issues along the stretch between North Gare and the River Tees. Emerging Policy NE2 (Green Infrastructure) states that the Borough Council will support initiatives to extend the England Coastal Path south from North Gare.</p>
Campaign to Protect Rural England	LP0015	Pub0074	<p>While we fully support the proposals in this proposed Policy for Green Infrastructure, we represent that it should also refer to the reports of the Natural Capital Committee for reasons in line with those we have mentioned in relation to Policy NE1. While Policy NE2 may reflect much of that concept, we represent that this should be specifically referred to so that these Reports have to be addressed in appropriate cases.</p>	<p>With regard to Natural Capital, the Council is aware of the development and increased Government emphasis on Natural Capital, highlighted with the recent publication of the fourth annual report. Whilst we are confident that the Natural Environment Chapter of Local Plan is comprehensive in detailing the natural assets within the Borough, and the NE policies aim to protect and enhance all elements of the natural environment, it is acknowledged that the preamble to the chapter could be strengthened to include reference to Natural Capital. <b>The following wording update to section 16.1 is suggested:</b></p> <p><b>“16.1 In line with the Government’s emerging Natural Capital agenda, the Borough Council recognises the important role that Hartlepool’s natural environment plays in enhancing</b></p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
				<p><b>people’s quality of life and improving quality of place. The benefits of a high quality natural environment run as a cross-cutting theme through many of the policies and proposals of the Local Plan. A high quality environment can:</b></p> <ul style="list-style-type: none"> <li>• <b>Encourage more people to live and work in Hartlepool</b></li> <li>• <b>Complement efforts to attract new economic growth and investment</b></li> <li>• <b>Help to increase the number of visitors and boost the tourism economy</b></li> <li>• <b>Provide more opportunities for leisure and recreation with consequent benefits for people’s health and well-being</b></li> <li>• <b>Support measures to adapt to and mitigate against the potential impacts of climate change”</b></li> </ul> <p>The Council is confident the detail of the policies set out in the Natural Environment Chapter help to support the key objective of the Natural Capital Committee “of being the first generation to leave the natural environment of England in a better state than that in which we found it”.</p> <p><b>In addition, the following description should be included in the glossary. “Natural capital - Natural capital refers to the elements of the natural environment which provide valuable goods and services to people. The Government focus is that the state of natural capital matters, not just because people enjoy the aesthetic elements of landscapes and wildlife of England, but because of the wide-ranging economic benefits that natural assets provide when managed well.”</b></p>
Resident	LP0322	Pub0081	5. Wildlife corridors and habitats, hedgerows and trees, as well as public rights of way need to be protected when any development is taking place, and promises need to be kept!	See response to NE1



Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Estates team	LP0340	Pub0098	The representation requests that Land at Coronation Drive (East) (NE2e), land at Coronation Drive - Promenade & Playground, Land at Brenda Road (Slag Banks) - North (NE2j), are allocated for turbines. Also requested is that Land at Macrae Road / Monkton Road, St. Begas RC Primary School Field (NE2i), Land at Saltaire Terrace (East of No's 31-38) (NE2l) and Land at Throston Grange Lane (North of No 220) should be allocated for residential. Land at Old Cemetery Road (NE2e) is requested for a residential or turbines allocation.	<p>Policy CC4: Strategic Wind Turbine Developments allocates land for wind turbine development at High Volts. This location was informed by the East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study and was also assessed in conjunction with the Borough Council's Landscape Architect. For the HBC position, regarding the Brenda Road allocation, see the response to Pub0003 under Policy CC4. The representation has not provided any supporting evidence as to why the sites requested for allocation turbine development should be supported.</p> <p>The Local Plan has allocated sufficient deliverable and developable housing sites to meet the housing requirement for the Borough, which includes a 20% flexibility buffer, over the plan period. The sites requested for residential allocation in the representation currently make a valuable contribution to the Borough's network of green infrastructure. Whilst the Borough Council attaches great importance to the delivery of housing, there is no need to diminish the valuable resource of green infrastructure in order to meet the Borough's housing requirement.</p>
Greatham Parish Council	LP0018	Pub0102	We welcome the recognition and intention to correct the clash in the designation of a small rectangle of land at Hill View which this policy includes in an allocation of amenity open space (NE2i) but which has been identified during the consultation process as a potential housing site by the Rural Neighbourhood Plan. The area has however remained identified as open space on the map provided during this consultation. Please can we see this correction undertaken as promised.	Comments noted. <b>The NE2i allocation will be removed and the site left as white land to accommodate the proposed Rural Plan housing allocation.</b>
Resident	LP0345	Pub0109	I am concerned that the football ground is not designated on the existing map as re recreational/sports facility, especially when the nearby skate park is shown as such. The town has always been led to believe that there was a covenant on the ground meaning it had to be kept for its current purpose. Although it is not an open space for people to use at their leisure, nor are the Rugby Club grounds! The town needs the football club for the revenue it brings to the	The Borough Council considers that the area as a whole has the potential for both retail and commercial development and that this designation is therefore appropriate. It will be noted that Policy RC8 includes leisure in the uses considered to be appropriate within it. However, the Borough Council acknowledges that there is a strong case for Policy LT1 Leisure and Tourism also being applied as an overlapping designation

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
			town - please amend the map to reflect what is really there and keep the football ground on the proposals map too.	<p>to this area. <b>Policy LT1 is already applicable to the Town Centre so the recommendation is that it be extended to be also applicable to the Mill House Edge of Town Centre Area.</b> If there were a proposal to re-locate the leisure centre and the bowls club then the Borough Council would consider the proposal taking all material considerations into account including whether or not there were any implications for the football club. The Borough Council does not currently have specific proposals for the football club. However, the extension of Policy LT1 to include coverage of the football club stadium, expresses the Borough Council's preference for its continued use as a football ground. The Borough Council also acknowledges that there is a strong case for the actual sports pitch i.e. the football pitch to have a separate designation from Policy RC8 and that this should be consistent with the designation that has been applied to the rugby pitches. Therefore <b>the Borough Council recommends that Policy NE2d (i.e. Green Infrastructure – outdoor sport including playing fields) is applied specifically to the football pitch and that neither Policy LT1 nor Policy RC8 apply to it.</b></p> <p>However, whilst acknowledging the strong views of Hartlepool Football Club supporters on this matter, as with all policies in the development plan, the Borough Council cannot provide a cast iron assurance that there could never be other material considerations which might take precedence over the policy. The location of the football club is accessible by public transport, which is consistent with national guidance. If there was a proposal to re-locate the football club, then this would be an important material consideration when assessing the proposal. The Borough Council has been made aware that there is interest from Hartlepool United Supporters Trust in applying for Asset of Community Value status for the football ground.</p>

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Hartlepool Rural Plan Working Group	LP0017	Pub0110	The Hartlepool Rural Neighbourhood Plan Group welcomes the response to our concern regarding a site at Greatham which is identified as a potential housing site in the Rural Neighbourhood Plan but indicated as green space on the Local Plan. Your response stated that the open space designation will be removed from the proposals map and shown as white land. The map provided with the publication stage consultation however continues to show the location as green space. The Area in question is cross-hatched around the text NE2i on the map below (see written representation).	Comments noted. <b>It is recommended therefore that the NE2i allocation should be removed and the site left as white land to accommodate the proposed Rural Plan housing allocation.</b>
Northumbrian Water	LP0241	Pub0117	With regard to Policy NE2, Green Infrastructure, we strongly support the promotion of multi-functional green infrastructure initiatives that deliver flood risk and surface water management benefits. This approach allows opportunities for innovative water management solutions to be identified and implemented, enabling a range of improvements to be achieved in addition to those delivered by more traditional solutions.	Support welcomed.
Sovereign Park	LP0260	Pub0123	See comments under Policy EMP3	See response to Policy EMP3
Historic England	LP0044	Pub0125	As we have previously commented, green infrastructure can encompass historic landscapes and assets, and can also contribute towards the setting, character and appearance of heritage assets. It would be helpful to refer to this in policy NE2 and paragraph 16.54, in particular in considering the circumstances in which GI can be lost.	Emerging policies HE1 (Heritage Assets), HE3 (Conservation Areas) and HE4 (Listed Buildings and Structures) relate to any development that may impact on a Heritage Asset (both designated and non-designated) or its setting and as such the requirements set out in these policies would apply to any proposal resulting in the alteration or loss of green infrastructure components that constitute a Heritage Asset or contribute to its setting. It is therefore felt that it is not necessary to repeat this in the wording of emerging policy NE2.

Company	Unique Ref	Pub Ref	NE2 Green Infrastructure	NE2 Green Infrastructure HBC
Natural England	LP0043	Pub0129	<p>Natural England welcomes the approach taken in considering the provision of green infrastructure as a common theme throughout policies regarding the provision of infrastructure. Policies strive to provide infrastructure which helps reduce the carbon footprint of the district, whilst at the same time advocates the use of green infrastructure provision where the opportunity arises. Natural England further encourages the provision of walk and cycleways throughout Hartlepool as a leisure provision, which is proposed to be delivered through Infrastructure policies within the Local Plan.</p> <p>The benefits of green wedges and green infrastructure are highlighted as a pro-active component in providing mitigation strategy, where new developments may present levels of recreational disturbance through walking with or without dogs near designated sites. In addition the importance of green infrastructure and their contribution to health and wellbeing of residents is also welcomed.</p> <p>In addition to the baseline commitment to sustainable development promoted by the NPPF and the strategic vision of the Local Plan document, the policy emphasis on using the natural environment as a delivery mechanism in creating quality places is welcomed by Natural England. The importance of green infrastructure and open space in addition to nature conservation is inherent within quality place making and is advocated by the Local Plan.</p>	Comments welcomed

**Policy NE3: Green Wedges**

Company	Unique Ref	Pub Ref	NE3 Green Wedges	NE3 Green Wedges HBC
High Tunstall Homes	LP0060	Pub0002	<p>I refer to the above and write to make representations on behalf of our clients, Tunstall Homes Ltd, in respect of the proposed allocation of land at High Tunstall as a 'Strategic Housing Site'.</p> <p>I would confirm that we fully support Policy HSG5, 'High Tunstall Strategic Housing Site' and the associated Policies INF4, 'Community Facilities', NE2i 'Green Infrastructure' (amenity open space), and NE3, 'Green Wedges', insofar as they relate to the allocation of land at High Tunstall as a strategic housing site and the proposed development as illustrated on the masterplan (dwg ref: 14.039 P101 K) that has previously been submitted to the Council. Black &amp; white and coloured copies of the masterplan are attached for your convenience.</p> <p>In this regard we consider that the aforementioned Local Plan Policies are legally compliant and sound.</p>	Comments welcomed
Resident	LP0082	Pub0067	<p>In five or more particular places the document refers to precautions or assurances sought by way of the phrase 'should be provided'. That is not sound specification because the phrase is open to interpretation. Those requirements would be more robustly defined by using the word 'must' instead of 'should'. Unless HBC is reserving a right to dispense with the requirements for assurances as it sees fit?</p> <p>See sections 7.44 para 1, CC5 sub para 1), RUR4 sub para 6), HE1 last para, NE3 last para.</p>	<p>With respect to the last paragraph of emerging policy NE3 (Green Wedges), whilst in determining planning applications the Borough Council will seek to ensure interpretation of natural and historic features within green wedges is improved where appropriate, this is subject to the viability of any given scheme and as improving interpretation is unlikely to be necessary in order to make a development acceptable in planning terms, it would not be appropriate for the Borough Council to refuse planning permission for development in or adjacent to Green Wedges that can demonstrate that improvements to interpretation of natural and historic features is not viable or where alternative green infrastructure enhancements are acceptable. It is therefore considered the use of the word 'should' reflects the Council's aspirations however allows for an element of flexibility in determining applications.</p>

Company	Unique Ref	Pub Ref	NE3 Green Wedges	NE3 Green Wedges HBC
Campaign to Protect Rural England	LP0015	Pub0074	<p>In our representations at the Preferred Options, we specifically commented on the lack of green belt land in the Teesside conurbation. We have again commented on this in our representations in relation to Policy LS1. While we support the principle of protecting areas as mentioned in Policy NE3, we remain of the firm view that such areas are better protected by designation as Green Belt. There is no consideration in the text as to why an unofficial designation is preferred to one that is recognised within the National Planning Policy Framework.</p> <p>We represent that serious consideration needs to be given to that in this Publication Draft and that without such consideration, this Policy is unsound.</p>	<p>Comments noted. Whilst it is accepted that section 9 of the NPPF does give the opportunity to designate green belt land within a Local Plan, there is no requirement to do so and the NPPF at other sections, such as paragraph 73, 74, and paragraphs within section 11 of the NPPF including 109, 113 and 114 all offer the opportunity to designate land for other types of green designation. HBC do not intend to allocate any Green Belt within the Borough. This policy in conjunction with the Natural Environment and Green Networks chapter will ensure that development does not occur in protected areas. Not having Green Belt is not a reason for a plan to be found unsound.</p>

Company	Unique Ref	Pub Ref	NE3 Green Wedges	NE3 Green Wedges HBC
Wynyard Park	LP0027	Pub0124	<p>In relation to Draft Policy NE3 and mindful of the substantial Green Wedge proposed at Wynyard Park, it is suggested that the inclusion of the word “ancillary” at point 2 could be removed as a playing pitch or similar could be considered the primary recreational use, whilst still retaining the openness of the area.</p> <p>The Green Wedge (draft Policy NE3) is noted on the archaeological exclusion zone, however, it should be acknowledged in both draft Policies that this allocation is only in place due to the archaeological potential of the land in question. Wynyard Park request that this element of the policy is clarified to be in place subject to future archaeological investigations.</p> <p>The proposals map shows a small area of green space to the west of the archaeological exclusion zone/proposed Green Wedge that could be confused with the Green Wedge Policy. It is important that this be removed and incorporated into the housing allocation to allow its development as part of reserved matters submissions which will ultimately accord with the objectives of the policy.</p>	<p>Point 2 of emerging policy NE3 relates specifically to the erection of ‘buildings or structures’ within the green wedge. The policy does not require the use of the land itself for recreation, leisure, sporting or other uses to be ‘ancillary’. It is considered therefore that the use of the term ‘ancillary’ in this instance is necessary as it ensures that buildings or structures proposed in the green wedges are only approved where these facilitate an existing or proposed recreation, leisure, sporting or other use compatible with the open nature of the green wedge. It is considered that a playing pitch would be an acceptable use compatible with the open nature of the green wedge however it remains that any buildings or structures within the green wedge at Wynyard would only be approved where they are ancillary to such a use, or where they satisfied one of the other four criteria set out in the policy.</p> <p>With respect to the Green Wedge at the Wynyard Park North site, both the larger open green space that forms part of the archaeological exclusion zone and the narrow strip of green land that extends into the site from the open countryside are considered to play an important role in protecting this valuable green space, providing good opportunities for enhancing footpath and cycle way links both into the open countryside and towards the adjacent urban areas, helping to improve wildlife habitats, providing more opportunities for leisure and recreation and providing a high quality environment. The Borough Council consider that the extent and location of the green wedges are necessary for the sustainable development of the housing sites at Wynyard and will not impede on the development of housing in and around these Green Wedge allocations.</p>
Natural England	LP0043	Pub0129	<p>The benefits of green wedges and green infrastructure are highlighted as a pro-active component in providing mitigation strategy, where new developments may present levels of recreational disturbance through walking with or without dogs near designated sites. In addition the importance of green infrastructure and their contribution to health and wellbeing of residents is also welcomed.</p>	<p>Comments welcomed.</p>

**Policy NE4: Ecological Networks**

Company	Unique Ref	Pub Ref	NE4 Ecological Networks	NE4 Ecological Networks HBC
Resident	LP0202	Pub0078	Why should the wild-life suffer. A neighbour of ours has already seen a fox in the garden. They are being moved out of their habitat already and this is just the small development at Quarry Farm.	The Borough Council takes very seriously the impact of development on ecology and the natural environment. Emerging policy NE4 sets out the Council's approach to maintaining and enhancing ecological networks throughout the Borough. The Council will seek to ensure that all major developments take responsibility for not only protecting what currently exists but also improves upon it. Emerging policies NE1 and NE4 require that, where appropriate, all developments maintain and enhance ecological networks in the vicinity of the proposals and, where enhancements cannot be incorporated within the site, an off-site contribution may be sought. In line with emerging policy QP6, where appropriate, all development proposals must ensure that the effects on wildlife and habitat are investigated and satisfactorily addressed, in consultation with the Borough Ecologist and other relevant consultees.
Greatham Parish Council	LP0018	Pub0102	Greatham Parish Council strongly supports this policy.	Support welcomed.



**Policy NE5: Playing Fields**

Company	Unique Ref	Pub Ref	NE5 Playing Pitches	NE5 Playing Pitches HBC
Sport England	LP0079	Pub0089	<p>Sport England has a statutory role in the planning system around the protection of playing fields for sport. NPPF paragraph 74 and Sport England’s playing field policy are based on a presumption development which results in the loss of playing. It is Sport England’s policy to oppose such development unless it is covered by one (or more) of five specific exceptional circumstances (which can be viewed here). Our expectation is also that local policies which are intended to offer protection to playing fields are as rigorous as Sport England / NPPF unless justified by local circumstances.</p> <p>We note that there is a playing field annotation on the proposals map to the plan. At first sight it appears there are some inconsistencies with some existing and lapsed playing field sites not covered at all. The two cases we would ask you to review are;</p> <ul style="list-style-type: none"> <li>- Former St.Hild School playing field on north side of King Oswy Drive</li> <li>- Playing field on east side of Catcote Road between Hartlepool VI Form College and West Hartlepool RFC’s ground.</li> </ul> <p>Policy NE5 offers protection to playing fields, bowling greens and tennis courts. In our view such a policy should only deviate from Sport England’s playing field policy and para.74 of the NPPF where local circumstances are found to warrant such an approach.</p> <p>There is a fundamental problem with standards of provision (in respect of playing pitches) that underlie their abandonment by government in the NPPF. The adequacy of playing pitch provision to meet the needs of pitch sports is a complex matter that a simple numerical standard cannot hope to capture. For example whilst the quantitative and accessibility standard might be met across the whole of the city there could still be an inadequate supply of playing pitches because;</p> <ul style="list-style-type: none"> <li>- There is an imbalance of pitches across sports;</li> <li>- There is an imbalance of pitches across age groups;</li> <li>- Pitches are of poor quality and cannot accommodate the amount of play required</li> <li>- Pitches cannot be accessed because of the access or pricing policy of the site’s owner / operator.</li> </ul>	<p>With respect to the Former St Hild’s School playing field site to the north of King Oswy Drive, this site has not been in use as a playing pitch since the closure of the school and has since been redeveloped. Planning permission was granted in 2013 for the erection of 25 dwellings with outline permission for a further 113 dwellings. A reserved matters planning application was subsequently approved in 2014 for 92 dwellings on the site in association with the previous outline approval. The development is currently under construction. The site has therefore been left as unallocated white land however the development has been included in the extant planning permission housing figures set out in emerging policy HSG1 (New Housing Provision).</p> <p>With respect to the site east of Catcote Road between Hartlepool VI Form College and West Hartlepool RFC’s ground, this has been identified as an error in the drawing of the Proposals Map and as such <b>it is recommended that the map be amended to reflect the NE2d (outdoor sport including playing fields) allocation on this site.</b></p> <p>In relation to the cross-reference in criteria 3 of emerging policy NE5 to the Open Space/Recreation Assessment, it is considered that this wording simply provides an example of an evidence base document which may inform the interpretation and implementation of this policy.</p> <p>The Council’s current Open Space, Sport and Recreation Assessment itself references the Playing Pitch Strategy. However, in view of Sport England’s comments and for completeness, <b>it is recommended that the policy wording be amended so that criterion 3 reads:</b></p> <p><b>“3) where there is up to date, robust evidence (through, for example, an Open Space/Recreation Assessment or the Playing Pitch Strategy) that demonstrates an excess provision of playing fields, or where their re-location achieves a better dispersal of provision which meets the requirements of users</b></p>

Company	Unique Ref	Pub Ref	NE5 Playing Pitches	NE5 Playing Pitches HBC
			<p>As such the cross-reference in criterion 3 of Policy NE5 should be to the Playing Pitch Strategy rather than than the standards in the Open Space/Recreation Assessment. Criterion 4 relates to school expansion or re-building. We would however suggest that such circumstances are covered by Sport England playing field policy exception E3, and are not the exclusive preserve of school site developments. Finally Sport England’s playing field policy (and para 74) allow for the development of built sports facilities provided they are greater benefit to sport than the playing field they replace. This important exception is not currently reflected in Policy NE 5.</p>	<p><b>and the local community,”</b></p> <p>With respect to criterion 4, Sport England is a statutory consultee and will be able to add further comment to specific applications through the planning application process. However, in light of Sport England’s comments, <b>it is recommended that the policy wording should be amended so that this is not the exclusive preserve of school site developments:</b></p> <p><b>“4) where a proposed development, including school expansion or re-building, takes place and the loss of some playing fields does not adversely affect the quantity, quality or use of any playing pitches or any other sporting facilities on the site.”</b></p> <p>With respect to the development of built sport facilities resulting in the loss of playing pitches, in light of Sport England’s comments and in keeping with NPPF paragraph 74, <b>it is recommended that an additional criterion be added to the policy wording that reads:</b></p> <p><b>“5) where the provision of built sport facilities will result in the loss of playing pitches, the development is of greater benefit to sport than the playing pitches it will replace and the needs for which clearly outweigh the loss.”</b></p>

**Policy NE6: Protection of Incidental Open Space**

No comments received.

**Policy NE7: Landscaping along main transport corridors**

No comments received.

**Section 12 of the Consultation Statement, covering:**

- **Comments on appendices**
- **Any other comments**

**Comments on appendices**

Company	Unique Ref	Pub Ref	Comments on Appendices	Comments on Appendices HBC
Story Homes	LP0219	Pub0090	<p>Story Homes remains concerned that the Local Plan does not include sufficient measures to monitor and implement remedial actions should policies not be achieving their intended actions. On this basis, we consider that the Plan is therefore unsound as it is not effective and not consistent with national policy. Whilst we acknowledge that paragraph 10.17 of the plans sets out that: “The Borough Council will continually monitor the delivery of housing over the plan period. If insufficient additional housing delivery is being achieved this may trigger a review of the housing policies contained in the Local Plan including a review of the housing sites identified in the plan.” We consider that this approach is greatly lacking any substantial implementation or trigger mechanism should housing delivery fall below the required rate identified in the Plan. We would expect the Council to have included Key Performance Indicators, and set out specific remedial actions at the very least. It is common practice for these measures to be clearly outlined within Local Plans, and most other north east LPAs have adopted this approach to Plan-making. Moreover, we would also strongly encourage the Council to include ‘SMART’ objectives for monitoring and responding to housing delivery. This approach would ensure that specific, measurable, attainable, relevant, and time-bound monitoring and implementation measures are in place should remedial action be required following Local Plan adoption. We urge the Council to include a Monitoring Framework within the Appendix of the Plan which lists the relevant Monitoring Indicators that will appear in the Council’s Monitoring Report which should be produced on an annual basis.</p> <p>As a minimum this monitoring process should:</p> <ul style="list-style-type: none"> <li>• assess the extent to which policies are effective</li> <li>• where these are not effective, explain why;</li> <li>• set out whether policies need to be changed; and</li> </ul>	<p>There is a separate Monitoring Framework to accompany the Local Plan, this sets out how all polices will be monitored over the duration of the plan period. The monitoring framework sets out the use SMART objectives and performance indicators.</p>

Company	Unique Ref	Pub Ref	Comments on Appendices	Comments on Appendices HBC
			<ul style="list-style-type: none"> <li>• indicate when a "trigger mechanism" criteria has been reached. We would expect the most important indicators, for example those relating to housing, to measure the achievement of policy actions relating to housing delivery within the Plan including when the "trigger mechanism" for a policy action should be implemented. Story Homes therefore reserves its position to comment on this matter further once the Council have included a Monitoring Framework within the forthcoming Plan.</li> </ul>	
Resident	LP0343	Pub0103	There is no indication in the plan (including Appendix 10) that there has been any appraisal of existing wildlife species and locations, nor of any interaction with expert wildlife groups (eg RSPB). Such bodies should be consulted as a matter of urgency.	Organisations such as RSPB, Natural England and Tees Valley Wildlife Trust have been consulted at each consultation stage of the Local Plan. The HBC ecologist has contributed to the preparation of the Local Plan.
Historic England	LP0044	Pub0125	To be based upon adequate, up-to-date and relevant evidence: As we have previously commented, the appendices and the chapter on the historic environment refers to the comprehensive set of data held by the authority, and this is supported by the excellent Hartlepool Heritage Strategy, which includes an assessment of the challenges and opportunities, positive action plans, and monitoring and review procedures. Again, we would congratulate the Council on its very positive and proactive approach to the historic environment.	Comments welcomed.

## Any other comments

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
Resident	LP0266	Pub0001	<p>Frankly I'm consultation weary. From what I've seen over the past 5 years is that whenever I engage in a consultation after viewing any draft plan. The final ratified plan is precisely the same as the draft plan, thus rendering my input and the input of countless others, a pointless waste of time.</p> <p>Given that our council leader is a dictator and not a leader who inspires others I have no faith in any form of consultation coming out of HBC. I understand it's not council officers fault, but the fault of the cabal of dictators who run out council for personal gain. For these reasons I'm not going to waste my time.</p>	Disagree. There have been significant changes between the Preferred Options document and the Publication stage. The local planning authority takes the consultation exercises very seriously.
High Tunstall Homes	LP0060	Pub0002	<p>Please note that on behalf of our clients, Tunstall Homes Ltd, I wish to be notified at the address below (e-mail would suffice) of the following:</p> <ul style="list-style-type: none"> <li>• The submission of the local plan for independent examination under section 20 of the Act,</li> <li>• The publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act</li> <li>• The adoption of the local plan.</li> </ul>	Noted. Note support for policies INF4 (Community Facilities), HSG5 (High Tunstall), NE2(i)(Green Infrastructure) and NE3 (Green Wedges). We also note that you consider the plan to be legally compliant and sound.
Resident	LP0268	Pub0005	<p>Any point in this money and time wasting exercise other than giving the privileged few to hold meetings to propose meetings about a meeting to discuss how best to fritter away more money on more artists impressions on the new look seaton Carew etc.....why not just give the Wilko family all the proposed budget because the present clowns on this council can't do anything until all of the property they own is demolished ....you can propose regeneration all day long and then sit back and do nothing which is what this council excels at..Mr.G.Thompson (just another tired victim oops tax payer)</p>	Comments and concerns noted

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
Resident	LP0269	Pub0006	This should read UNHAPPY VALLEY as it has been destroyed,all the undergrowth and trees have been removed and now people with shotguns are removing the wildlife from the valley,do you lot know whats going on ,and if you do why are you allowing it to continue ,? The only reason I can think of is that it is going to be easier for the developer to build more houses once the valley is destroyed and the wildlife cleared, you should be ashamed of yourselves.	Comments noted.
Resident	LP0263	Pub0009	I also feel that the timing of the introduction of such plans is underhand especially over the busy Christmas period when thoughts and effort is primarily focused upon planning for Christmas. The extremely lengthy document would, indeed, take many hours to read and digest and I certainly did not think that such proposals would closely follow the defeat of the previous ones. It does make me think that this was the intention of the timing.	The Council extended the consultation period to 8 weeks (2 weeks beyond the statutory requirement) in order to allow for the Christmas period.
Health and Safety Executive	LP0211	Pub0010	HSEs advice given on 15 July 2016 remains.  No further comments to make.	Response acknowledged.
Resident	LP0271	Pub0011	Figure 2: Hartlepool Local Plan 2006 Proposals Map  THE MAP DOES NOT SHOW THEFULL EXTENT OF CORONATION DRIVE SITE OR THAT IT IS COVERED BY GN3 legend states PROTECTED GREEN SPACES AND COASTAL	This is part of the Seaton Carew SPD and not part of the Publication Document. As noted under Hsg3 comment above it is considered it would have been helpful for the extract to have covered the Coronation Drive Site - when the SPD is updated we will update the map.
Fens Residents Association	LP0011	Pub0012	Please provide notification to the address above of the submission of the plan for examination, the publication of the recommendations of the examination and the adoption of the local plan.	Noted - Fens Residents Association will be notified of the Submission of the Plan and other key points in the production of the plan.

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
R Newcomb & Sons	LP0054	Pub0017	<p>I also request that we are notified at the below address of the following:</p> <ul style="list-style-type: none"> <li>• The submission of the local plan for independent examination under section 20 of the Act,</li> <li>• The publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act</li> <li>• The adoption of the local plan.</li> </ul> <p>Please acknowledge receipt of this email and let me know if this has been an oversight in creation of the plan or whether it has been intentional to restrict the site in this way.</p>	Noted, you will be notified of the Submission of the Plan and other key points in the production of the plan.
Resident	LP0050	Pub0018	<p>In relation to the timing of the consultation 9 December to 3 February clashes with the Christmas Period when people are focused on festive preparations and so actual time available to review such a hefty document is limited.</p> <p>The plan appears to be reactionary rather than visionary, for example my expectations would be to have a clear vision statement as to how we would like the town to look and the type of 'new' industry that we would like to attract and then once the plan is adopted to put a strategy together to achieve these objectives. When I asked the question at the consultation session at the Baltic Suite I was advised that HBC tend to respond to companies who approach them with ideas. Surely HBC should have a clear vision of what HBC would like to attract for inward investment and the impact that this would eventually have on the town. I can appreciate it is difficult to attract investment but without a visionary plan clearly outlining objectives attracting investment becomes almost impossible.</p>	<p>Comments noted. With respect to the timing of the consultation period, The Council is required to have the final version of the Local Plan ready for submission to the Secretary of State by March 2017. Notwithstanding this, the Council extended the consultation period to 8 weeks (2 weeks beyond the statutory requirement) in order to allow for the Christmas period.</p> <p>With respect to attracting investment, it is considered that the policies set out within the Local Plan form the strategic framework that supports and facilitates the sustainable economic growth of the Borough over the Plan period. The Local Plan seeks to provide a broad range and choice of employment land, support regeneration initiatives and encourage inward investment in sustainable locations in line with the wider aims and objectives of strengthening the economy set out in local and sub-regional plans, strategies and programmes, including the Tees Valley Strategic Economic Plan, the Hartlepool Economic Regeneration Strategy 2011-2021 and the Hartlepool Vision and Regeneration Masterplan.</p>
Landowner (Southbrooke Farm)	LP0278	Pub0019	We have now submitted our application ref number : PP-05753478 and therefore should you have any queries please feel free to contact us	Note new application has been submitted. See comments under LS1 above regarding concerns over the change in the proposed allocation.

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
Resident	LP0280	Pub0024	Another thing that is causing concern is the councils alleged idea to charge for parking in Seaton Carew, I find this wrong on a several levels. Firstly people will end up parking on other roads or on estates causing traffic congestion, secondly the council says it wants to help people stay healthy but the beach will end up another place where you have to pay to visit and if it puts just one person or many off taking that walk it will be against that policy and could have knock on effects to the health service and peoples wellbeing. Also you say you are trying to get tourists to visit the area and parking charges are very unlikely to help this in any way.	Proposals for parking charges within Seaton Carew are not within the remit of the Local Plan. Your comments and concerns with respect to this have been forwarded to the Community Safety and Engagement Team as the relevant Council department. Any further queries or comments with respect to this matter should be directed to parking@hartlepool.gov.uk
Network Rail	LP0250	Pub0054	Network Rail has very few comments to make on the policy principles set out in the chapters of the plan. Generally we are content that the principles accord with those set out in the NPPF and further explained in the National Planning Practice Guidance.	Note general support for the principles set out within the Plan and that they generally accord with national guidance.
Resident	LP0308	Pub0055	I would like to congratulate the authors on pulling together a comprehensive plan which was actually quite easy to follow. It made me realise (because I'd forgotten) how much good there is about the town in which I live. I can see that there are a number of areas that people might take issue with if it affects them directly but as a complete document it gives a very balanced and well thought out strategic view.	Comments welcomed.
Coal Authority	LP0042	Pub0058	Although a Coalfield Authority Hartlepool has no coal mining legacy issues and no surface coal resource. On this basis the Coal Authority has no comments to make on the Local Plan Publication Stage Document.	Noted.



Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
Resident	LP0082	Pub0067	Following the public consultation phase, it is unfortunate that your process model does not include for a second consultation reprint to ensure your edits/changes include and correctly interpret community opinion garnered from the consultation events before going to publication.	The Local Plan process is set out in national legislation.
Canal and River Trust	LP0319	Pub0076	The Trust does not have any ownership within the Hartlepool Borough local authority area covered by the Local Plan, as such the Trust have no comments to make on the document. It is not necessary to consult us further as the document progresses.	Noted
Resident	LP0320	Pub0077	<p>Pursuant to 'The Publication Stage' of the 'Hartlepool Local Plan' my wife and I received a letter inviting observations on the proposed initiatives intended, inter alia, to: "build on the unique issues and opportunities facing the Borough including expanding the town's economy, providing a range and choice of housing and improving and enhancing its natural and heritage assets". Having recently moved into a property in the centre of the town we were understandably interested in the following observations:</p> <p>As these observations accord with sentiments inscribed within the plan, inasmuch as they intimate ways to better promote security for local residents, are intended to generate a more focused response to property maintenance whilst instilling an awareness of social responsibility within private sector landlords, I would commend them for your consideration.</p> <p>Section 12 of the 2003 Act inserts a new s 218A into the Housing Act 1996. In essence it obliges local housing authorities, housing action trusts and RSLs to prepare, publish and keep under review policies and procedures on anti-social behaviour and to make them — and summaries of them — available to the public. Anti-social behaviour in this context has the same meaning as in the new ss 153A and 153B of the Housing Act 1996 (inserted by s 13 of the 2003 Act). Accordingly, it means conduct:</p> <p>(a) which is capable of causing nuisance or annoyance to any person and which directly or indirectly relates to or affects the housing management functions of a relevant landlord.</p>	Noted

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
Resident	LP0202	Pub0078	It is probably in your favour that the government has relaxed its planning guide-lines. I hope that for once our views will be listed to.	All representations are taken into consideration.
Potters Farm	LP0321	Pub0079	I do hope you will consider our concerns moving forward with the Hartlepool Local Plan.	All representations are taken into consideration.
Resident	LP0216	Pub0080	I would like take this opportunity to make it known to the planning department at Hartlepool, that I have spoken to people my neighbours who have only moved into Bilsdale Road within the last 18 months; who have said other than my husband and me making them aware of these said wind turbines had no knowledge of the planned development. Also in the next road Kildale Grove still today there are people unaware of the plans to develop the land on Brenda Road. So however HBC planning department think they are making people aware of what is going on in the town I can assure you that it is not adequate.	As part of the consultation on the Publication Local Plan, the Borough Council wrote to every household in the Borough informing them of the consultation and of the topics covered by the Local Plan including energy generation.
Homes and Communities Agency	LP0063	Pub0084	Strategic Issues and Options for Hartlepool The HCA considers the Hartlepool Local Plan Publication Draft to be unsound in a number of areas. Having reviewed our response to the Preferred Options Consultation we feel that the potential shortcomings identified have not been adequately addressed in the Publication Draft. Whilst recognising that there have been some amendments to the strategic policies in the Publication Draft from the Issues and Options Consultation, the overall thrust of the documents are the same. Therefore we wish to reiterate the points raised in our response to the Issues and Options Consultation where we feel there are relevant to the soundness of the Publication Draft.  Response to Local Plan Preferred Options Consultation This section provides the HCA's response to the Hartlepool Local Plan Preferred Options Consultation Document. HCA comments on sections 1 -3 (Introduction; the Local Plan in Context; the Borough of Hartlepool) Paragraph 3.9 states that there is a shortage of affordable and	HBC notes that the HCA has re-stated it's comments from the Preferred Options Stage - the responses to those issues raised are covered within the Preferred Options Consultation Statement. = – the comments contained within the Consultation Statement still stand with the exception of the comments raised regarding 5 year supply. The Council considers that, given the stage in production of the Local Plan, it can currently demonstrate a 5 year supply. The Council is currently updating the October 2015 Planning Framework Document to update the position in relation to the 5 year supply and the weighting which can be given to the emerging policies in light of the recent consultation on the Publication version of the Local Plan.  The Council does not consider there to be a deficit of housing sites, and despite discounting a number of existing planning permissions, where there are doubts over delivery, still considers that the proposed sites within the Local Plan along with other extant permissions enable the Council to be in a position to demonstrate a five year supply even when 20% is frontloaded from the back end of the plan period. This is set out within Table 7 within the Publication Local Plan and further detail will be set out

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
			<p>executive housing in the borough and a need to provide new homes to meet the demands of growth in household formation and to support economic growth. It outlines that sites are available within the existing built up area of the town to meet some of this demand; however, there is a need for some development on Greenfield land to meet these requirements and to support the economic growth ambitions of the Borough.</p> <p>The HCA disagrees with this statement. Underused sites such as North Burn (currently a 'white land' agricultural site) that lie within the conurbation are available for the development of housing. The development of such sites would reduce the amount of Greenfield land lost to development. The delivery of starter and market residential development would help assist to meet the aims of the Hartlepool Local Plan by delivering much needed housing and supporting the local construction industry.</p> <p>HCA comments on sections 4 (Spatial Vision, Themes and Objectives) The HCA agrees with the themes of the Local Plan Preferred Options Report, particularly with regards to housing provision and strengthening the local economy. The HCA also agrees in principle with the Council's ambition for growth and economic development in Hartlepool. We consider that to achieve economic growth it is imperative that a range of appropriate development is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level.</p> <p>HCA comments on section 5 (The Presumption in Favour of Sustainable Development) The HCA agrees with statement in the Preferred Options Report that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The presumption strongly encourages planning authorities to allow development, without delay, which meets the development needs of the area. The Council cannot demonstrate a</p>	<p>in the updated Planning Framework document.</p> <p>Other housing proposals contained within the Local Plan are in more sustainable locations than North Burn.</p> <p>Where infrastructure is needed to support those sites, the benefits would be far wider than supporting just one site – for example the new grade separated junction and bypass at Elwick will not only support the housing development, it will also improve highway safety at Elwick by closing the central reserves, it will take large amounts of traffic out of Elwick village making it far safer for residents and it will help to provide a third route into Hartlepool from the A19 thus helping to re-profile traffic movements and reducing some of the congestion on the A689 and the A179. Spending £18million on the grade separated junction and bypass to the benefit of a large proportion of the Borough is considered far more appropriate than spending £25m to provide access to North Burn on its own. As such, the Council considers the Local Plan to be sound.</p>

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			<p>5 year land supply; therefore the provision of housing should be viewed as a key development need of the area that supports the sustainable development of Hartlepool.</p> <p>North Burn presents a genuine opportunity to deliver a substantial residential led mixed-use development in a sustainable location. By not developing the site, which is located on the edge of the conurbation, is forcing virgin Greenfield and greenbelt sites to be developed which is unsustainable. The inclusion of a proportion of Starter Homes within a mixed use development on the site further adds to the site's sustainability by delivering much needed homes for young people with supporting retail and leisure uses.</p> <p>HCA comments on section 6 (The Locational Strategy) The HCA supports the locational strategy for housing provision, which seeks to prioritise economically viable, brownfield land and other suitable and available sites inside the existing urban areas for new housing.</p> <p>But, like the Council, is mindful that "keeping future development within these limits could protect the attractive open countryside around Hartlepool but would severely constrain the opportunities for providing economic growth and a wide choice of housing". To meet the needs of the increased 5 year supply (with the additional 20% due to past challenges in meeting expected build rates) it will be essential for the LA to look beyond the brownfield sites in the urban core.</p> <p>The HCA believes that North Burn offers an excellent potential site. The site is currently agricultural land (presently allocated as an employment site but identified by the LA as being suitable for de-allocation due to an oversupply of employment land in the borough). North Burn sits on the edge of the conurbation, it is not a Greenfield site and is not within the Greenbelt and so fits within the Locational Strategy set out by the Council. The site adjoins the A19 and its southern boundary adjoins industrial land uses and is close to the Wynyard Park.</p>	

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			<p>HCA comments on section 10 (Housing)  The Local Plan Preferred Options document states that the local authority needs to deliver 6,000 units between 2016 and 2031. Paragraph 10.4 refers to the SHMA (2015) stating that an appropriate housing target would be approximately 325 net additional dwellings. Paragraph 10.6 states that there has been a record of under delivery of housing.</p> <p>As a result, the requirement for housing provision over the first five years of the plan timescale has increased by an additional 20%. This essentially means that the Council needs to demonstrate a 6 year supply. Furthermore, paragraph 10.12 states that the SHLAA and SHMA work has led to the preferred housing sites being listed to include "an extension to the existing Wynyard area".</p> <p>The Council cannot demonstrate a five year supply of deliverable housing land. There is a significant deficit of housing sites and whilst we are aware that certain strategic sites are being promoted elsewhere, there is a need for a varied supply to ensure the targets are met (and exceeded – housing supply figures should not be viewed as a maximum target). Any sites identified must be demonstrably deliverable in terms of availability, suitability and viability. The HCA as a Government agency are committed to delivering an element of Starter Homes on their residential developments, including North Burn. This would provide a mix of housing, including homes for young first time buyers who are currently restricted from the market due to high house prices and lack of available housing for such buyers. This would also assist Hartlepool Borough Council to meet housing targets that are currently unmet.</p> <p>HCA comments on section 11 (Strengthening the Local Economy)  The HCA agrees in principle with the ambition of the Council for growth and economic development in Hartlepool.</p> <p>We consider that to achieve economic growth it is imperative that a range of appropriate development is supported in sustainable</p>	

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			<p>locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level. The HCA believes that a mixed use development would enhance the housing offer within the town and allow for a sustainable community with a range of employment opportunities.</p> <p>Conclusion</p> <p>The HCA accepts that North Burn will not be viable in current or foreseeable market conditions as an employment site. This is the basis for the proposed re-allocation of North Burn as a housing led mixed use development. We note that North Burn is not included in the Local Plan Publication Draft as a proposed allocated site for either employment or housing.</p> <p>HBC cannot demonstrate a five year supply of deliverable housing land. As a publically owned site of great significance in the Tees Valley sub-region, due to its proximity to the A19, Wynyard Park Business Village and the South West extension, we feel that the local plan has the greatest opportunity of being found sound if North Burn is allocated as 'mixed use' land. The HCA as a government agency is committed to delivering an element of Starter Homes on their residential developments, including North Burn.</p> <p>This would provide a mix of housing, including homes for young first time buyers who are currently restricted from the market due to high house prices and lack of available housing for such buyers and would also assist Hartlepool Borough Council to meet currently unmet housing targets.</p> <p>The Hartlepool Local Plan Publication Draft is heavily reliant on strategic housing sites to deliver the housing identified as necessary for the sustainable growth of the borough. High Tunstall represents nearly 20% of the overall housing target for the plan period. We perceive this as a significant risk to the Local Plan given the uncertainties arising from landownership, infrastructure delivery and funding which apply to High Tunstall. North Burn by contrast is in a single landownership and the enabling infrastructure can be funded via the HCA Single Land Programme.</p>	

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			<p>The forthcoming Housing White Paper is expected to place a premium on the delivery of housing in the short to medium term and the HCA as the Government Agency tasked with housing delivery is well placed to ensure the supply of homes to facilitate the sustainable growth of Hartlepool. Ultimately housing targets should be viewed as a minimum required to ensure the provision of adequate housing for an identified population but do not need to be viewed as a cap above which growth cannot occur.</p> <p>North Burn offers an opportunity to create a sustainable community at Wynyard and we do not necessarily hold to the view that the sustainable growth of Hartlepool needs to be a binary choice between North Burn and High Tunstall. However, if HBC seek to adopt the Local Plan in its current form and de-allocate North Burn we have concerns about the deliverability of High Tunstall such that we feel the Local Plan Consultation Draft is unsound.</p>	
Resident	LP0010	Pub0086	<p>Once again the residents of this Town have been contacted to give their views on the next stage of the Local Plans development. The people of this Town have had over six years of giving their views prolonged by this Committee System who replaced the elected Mayor in May 2013, who decided to withdraw the existing Local Plan claiming it did not resonate with local people, the truth is it did not resonate with Hartlepool Borough Council planners because land at Quarry Farm was removed from the blue print following over 1000 objections.</p> <p>Mentioning council tax this Council squandered £1 .5million pound by withdrawing the previous Local Plan, as long suffering full council taxpayers for 49 years in this Town we should be entitled to know how much has been squandered on this current Local Plan.</p>	The previous emerging Local Plan was withdrawn for the reasons publically stated at the time.

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Resident	LP0088	Pub0086	<p>Once again the residents of this Town have been contacted to give their views on the next stage of the Local Plans development. The people of this Town have had over six years of giving their views prolonged by this Committee System who replaced the elected Mayor in May 2013, who decided to withdraw the existing Local Plan claiming it did not resonate with local people, the truth is it did not resonate with Hartlepool Borough Council planners because land at Quarry Farm was removed from the blue print following over 1000 objections.</p> <p>Mentioning council tax this Council squandered £1 .5million pound by withdrawing the previous Local Plan, as long suffering full council taxpayers for 49 years in this Town we should be entitled to know how much has been squandered on this current Local Plan.</p>	The previous emerging Local Plan was withdrawn for the reasons publically stated at the time.
Resident	LP0325	Pub0087	<p>This email is to mention reference to my contributions (below) at an earlier occasion and other concerns that I have/had when airing them with planning staff (and other elected members). Which I have are as still valid.</p> <p>Arising from my investigations regarding the survivability and sustainability of Hartlepool as directly required to the Climate Change Act 2008, and other UK and United Nations accords and acceptances, I have contacted the following Government offices below.</p> <p>From their commentary I shall enquire to planning how this impacts to the 2016 Local Plan.</p> <p>Thank you for your acceptance of this submission.</p> <p>References of government departments that have direct oversight with survival and sustainability:</p> <p>The involved government departments contacted: Minister for State Housing, Planning &amp;; - <a href="https://www.gov.uk/government/people/gavin-barwell">https://www.gov.uk/government/people/gavin-barwell</a></p>	We note that your main concern is to do with the safety of the public in Hartlepool with regard to Health and Safety zones and nuclear zones and the societal risk associated with installations located in the south of the Borough. The Health and Safety Executive and the Inspectorate for Nuclear Regulation have both been consulted as part of the consultation on the Publication Local Plan.



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			<p>(Appointed Minister of State for Housing, Planning and Minister for London at the Department for Communities and Local Government on 17 July 2016).</p> <p>- <a href="https://www.parliament.uk/biographies/commons/Gavin-Barwell/3955">https://www.parliament.uk/biographies/commons/Gavin-Barwell/3955</a>.</p> <p>&amp;</p> <p>Note -</p> <p>Parliament select committee - Communities and local government:  <a href="http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/">http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/</a></p> <p>Cleveland emergency planning:  Ch. Emergency Planning, Hartlepool:  Attention - Stuart Marshall.  - <a href="https://www.gov.uk/guidance/local-resilience-forums-contact-details">https://www.gov.uk/guidance/local-resilience-forums-contact-details</a>  - <a href="http://www.clevelandemergencyplanning.info/information-for-residents/">http://www.clevelandemergencyplanning.info/information-for-residents/</a></p> <p>UK Office of nuclear inspection:  - <a href="http://www.onr.org.uk/">http://www.onr.org.uk/</a>  Attention - ONRenquiries@onr.gov.uk  Attention to the person responsible for assisting with FOI information requests</p> <p>UK Office of Health and Safety executive:  Graham Watson,  HM Acting Principal Inspector of Health and Safety,  Chemicals, Explosives and Microbiological Hazards Division  Health and Safety Executive  H 02030282600 (switchboard) 02030282622 (Direct)  07879661463  graham.watson@hse.gov.uk  BP6301 Alnwick House, Benton Park View, Benton Park Road,  Newcastle upon Tyne NE98 1YX</p>	

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			<p>=====  Message Received: Oct 08 2013, 04:03 PM  From:  To:  Cc:  Subject: message of complaint to Mr Ward concerning the Hartlepool Core 2025 strategic plan inspection</p> <p>Hartlepool,  8th October 2013</p> <p>To the inspector of the Hartlepool core strategy 2025:</p> <p>Attn: Mr Kevin Ward:  Ref Inspection of Core Strategy 2025 HBC Planning Dept:</p> <p>Subject: Complaint concerning contributions made by certain participants.</p> <p>Preamble to complaint:  This email concerns the Core 2025 inspection and in particular contributions arising from the meetings through January and September. I have a complaint; that distinctly revealed itself because of the "participants with declared interests" (i.e. for profit agents). This complaint is greater than your brief, it concerns the management of your remit as given, which should be (if I am not incorrect) "apolitical, unbiased, and comprehensive" - therefore concerns possible pressures that could arise from the Housing Ministers' department and its publications.</p> <p>At the outset, I shall remark that I have no interest (financial or otherwise) in the outcome of the proposals made by the Hartlepool planning department of the HBC or the "interested" parties. Also accepting that there is no audio record of the rhetoric and an assumption that the submissions made to the "inspection" will remain on the HBC website, as it will require testing of the "evidence" and the equity to the constituency.</p> <p>Following my earlier contributions to the inspection and since the</p>	

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			<p>January meetings, I have attempted to gain an understanding of how much information would be required to be unbiased, comprehensive and informed. Therefore, considering these issues arising from the discussions by the interested parties it was noticeable factors could be considered as mute, nuanced or biased.</p> <p>Noticing whether game playing in attitude and “for advantage” (note one person remarking about “how things will play out”) within the discussions by the interest groups showed opportunities to bias. Also, whether “responsible” people were “unaware” of certain matters throughout your inspection was evident; this alone is an implicit and Laissez-faire “permitted” fault (by either historical permission or convenience). (Note to external agreements and government departments’ documents and statutes).</p> <p>Having collected an amount of information available from government (UK &amp; EU), NGO and alternative possibilities I am aware of defects concerning the briefing papers that shaped policies as espoused presently. (Note I consider that I have been able to demonstrate sufficient understanding on local and geo-social possibilities from my earlier contributions).</p> <p>Having invested some +2000hours to this matter, I have now accepted to be able to be unbiased it requires a good understanding of UK &amp; EU government documentation (many webpages available) plus the ability to work through orthodox and controversial alternative possibilities. Achieving this would be a significant mind achievement for any individual; it suggests a requirement of committed scholars being able to notice, integrate and remedy changes as they appear enroute. For someone, unaided, to notice whether the discussions by the “stakeholders” used methods to control the discussion and therefore bias the legitimacy and agenda is a fundamental task.</p> <p>I have assumed it includes independence and a required knowledge, wisdom and clarity of the differences between speculation and the principles on which a locally sustainable base is achievable. In addition, it would require freedom to test against the equity of a sustainable future as different to a socially stable</p>	

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			<p>future (references as below). Therefore, I must consider that if your office is not able to promote alternate possibilities then displaying enablement to the wider populace it will be insufficient to assist the individual's ability to choose a sustainable choice.</p> <p>Introduction to basis and nature of the complaint: 1. What is and what is not an unbiased, moral and an ethical framework for reliable judgement has not had a comprehensive hearing: This requires more than what is tied to the "evidences" made by the participants that discussed their "understandings" to you. In addition, it suggests that it requires ethical integrity, integration and provability to the standards by integration of government departments such as Defra, DECC and department of Health.</p> <p>2. It is evident that Stakeholders make submissions for particular reasons and gained an overt and dominant permission: The stakeholders' common expectation(s) and their control of the present and futurity of the nations' perspective is a serious concern. There are many "possibilities" known (unfortunately mostly elsewhere), these are not new or manifestly radical.</p> <p>This suggests that opportunity cost and the counterfactual is to all intents and purpose being withheld and shaped which is social engineering to dependence and therefore, I argue, a significant concern. Which produces a question; is it required that the innocent individual to know when there is fault and bias on a dominant position? I would assume that Aarhus Convention would bind those who are responsible to its management.</p> <p>3. National and Local government analysis on what could be is beyond the average and alert person. Also evidence of active process by the participating people of your inspection was not significant to be noticeably equal: Close examination of web search of government and their affiliated department publications reveal that there is controversy and legitimation. There seems to be no facility for people to notice poor outcomes or the ability to check, remedy and alter actioned political decisions. History has images of dissent suppression or</p>	

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			<p>management and no real evidence of improvement because of it.</p> <p>4. Accountability and the possibility to remedy post a defacto “permission” may not be achievable if edicts are made on the “development to a particular level of defined profit”:</p> <ul style="list-style-type: none"> <li>i. Opportunity cost(s) lost to remedy are noticeable from the numerous occasions where opportunists have been able to fix situations by design.</li> <li>ii. A community attempting to choose certain possibilities requires knowledge, awareness and a process.</li> </ul> <p>This suggests engagement procedures without reticence and reluctance. Any search of the internet knowledge base reveals that this is apparent.</p> <ul style="list-style-type: none"> <li>iii. The non-engagement by councillors towards the hearings suggests problems, embedded conflict of interests (note BBC - radio4/worldservice and other media). This illustrates difficulties to pursue any real engagement on sustainability and integrative ideas as within “other possible and alternative ideas” – which other places have achieved (via either recently or a long time ago).</li> <li>iv. Recent local and national events have shown numerous conflicting issues thereby illustrating the outcome of biased, limited or non-action by responsible people. The references as within the UK and EU govt. raise concerns to good informed consent.</li> </ul> <p>5. [From the government publications noticeable via the web] it can be remarked, that if our ancestors were able to do so much with so little then what happened to notice their legacy - both good and bad:</p> <p>It could be argued that advertising and lobbying companies has been used to “sell” ideas, communities are then constrained against what would have been a preferable choice and thereby create a positive influence (note to WHO).</p> <p>The complaint:</p> <ul style="list-style-type: none"> <li>1. Mr Ward there is ample evidence from history (both recent and medium-term) to notice that effective and alternative ideas are possible, the ideas proposed by those who want to profit from our</li> </ul>	

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			<p>town are constraining to “dependence and short-term ideas”: this is unsustainable.</p> <p>2. Recently China has noticed that it needs to change towards a different politics away from single ideas of “growth”. This suggests that (along with recent events in our country) alternative ideas have a place to be portrayed and given opportunity to flourish. Unless, that is, this is an agenda of geo-political gambits for gain. Therefore, either way, the Core 2025 plan for Hartlepool will need a flexible, free and wise action plan that produces participation and alternatives to cater for external issues: these factors were not aired throughout the hearings.</p> <p>3. I have noticed that there are a number of statements of intent, which the UK Government (not a political matter) have accepted. From the presumptions of the participants raises questions on achievability; then our town and thereby others (by implication) may not be able to be responsible enough to match these agreements: These issues were not noticeably obvious equal within the hearings.</p> <p>I thank you for your attention to this complaint. I would have preferred further in-depth analysis to this email but other factors hinder knowing the effects and agendas pressures of others.</p> <p>Having noticed that there are particular EU Commissions, I must now check to see if there is a clear thought on the governance of Aarhus and the 20/20/20 requirements, because the UK and the rest of the world have sustainability needs too.</p> <p>I have noticed an amount of government documents available if they are comprehensive they should be able to suggest a sustainable and survivable plan for Hartlepool as against a stable plan. I look forward to noticing how they can suggest this possibility. I have no idea of whether your department is able to notice the validity to the matters I am drawing to light here - as although it is a local issue it has national and international consequences.</p> <p>Therefore, Mr Ward your government department has the burden; acting to approve an “in favour of development as to the suggestions made by certain participants”, without enabling knowledge offers opportunities to fracture sustainability and suggests short-term gain and global corporate needs. In addition,</p>	

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			<p>it suggests an inability to create a reducing impact on or improvement to our (commons) environment.</p> <p>References:</p> <p>1 EU Aarhus:  <a href="http://ec.europa.eu/environment/aarhus/index.htm">http://ec.europa.eu/environment/aarhus/index.htm</a> (note in particular; -  - <a href="http://ec.europa.eu/environment/urban/pdf/iem.pdf">http://ec.europa.eu/environment/urban/pdf/iem.pdf</a>  -  <a href="http://ec.europa.eu/environment/consultations/ir_aarhus_en.htm">http://ec.europa.eu/environment/consultations/ir_aarhus_en.htm</a>  )</p> <p>2 UK Govt. housing “policies”:</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223992/0_SDIs_final__2_.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223992/0_SDIs_final__2_.pdf</a>  Communities and local govt.: (messages via Mark Prisk and Grant Shapps)  <a href="https://www.gov.uk/government/speeches/housing-speech-by-mark-prisk">https://www.gov.uk/government/speeches/housing-speech-by-mark-prisk</a> &amp;</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/8518/1846533.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/8518/1846533.pdf</a></p> <p>3 Brief examples of the many others (note to an unknown amount of how many policy/briefing papers there may be circulating within govt. depts.) e.g. -  <a href="https://www.gov.uk/government/policies/making-sustainable-development-a-part-of-all-government-policy-and-operations">https://www.gov.uk/government/policies/making-sustainable-development-a-part-of-all-government-policy-and-operations</a>  <a href="https://www.gov.uk/government/policies/increasing-the-number-of-available-homes/supporting-pages/empty-homes">https://www.gov.uk/government/policies/increasing-the-number-of-available-homes/supporting-pages/empty-homes</a>  UK empty houses and empty bedrooms &amp; etc for other available govt webpages &amp; websites.  <a href="https://www.gov.uk/government/policies/increasing-the-number-of-available-homes">https://www.gov.uk/government/policies/increasing-the-number-of-available-homes</a>  <a href="http://www.uklanddirectory.org.uk/brownfield.asp">http://www.uklanddirectory.org.uk/brownfield.asp</a> (“Area of West midlands available to brownland”).</p> <p>4 UK Govt. Food supply:</p>	

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			<p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69250/pb13515-ep-food-supply.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69250/pb13515-ep-food-supply.pdf</a></p> <p>5 Specific references (revealing difficulties noticing to 20/20/20, Rio/Rio+20, etc.):</p> <ul style="list-style-type: none"> <li>- <a href="http://www.bis.gov.uk/foresight">http://www.bis.gov.uk/foresight</a> &amp; also for food and sustainability – e.g. <a href="http://www.bis.gov.uk/foresight/MediaList/foresight/media%20library/BISPartners/Foresight/docs/energy/~media/BISPartners/Foresight/docs/energy/stepping-stones-to-sustainability-dec-2000.ashx">http://www.bis.gov.uk/foresight/MediaList/foresight/media%20library/BISPartners/Foresight/docs/energy/~media/BISPartners/Foresight/docs/energy/stepping-stones-to-sustainability-dec-2000.ashx</a></li> <li>- <a href="mailto:iea@iea.org.uk">iea@iea.org.uk</a> [note; – “Road to Serfdom”, “The Future of the Commons” and “Abundance of Land Shortage of Housing”].</li> <li>- <a href="http://www.ifs.org.uk/">http://www.ifs.org.uk/</a></li> </ul> <p>6 Geo-political influences and awareness; that is whether “local sustainability” impacted on by external influences:</p> <p>Global debt indicators:</p> <ul style="list-style-type: none"> <li>&gt; <a href="http://www.debtbombshell.com/">http://www.debtbombshell.com/</a></li> <li>&gt; <a href="http://www.worldometers.info/">http://www.worldometers.info/</a></li> <li>&gt; <a href="http://www.nationaldebtclocks.org/">http://www.nationaldebtclocks.org/</a></li> <li>&gt; <a href="http://www.eudebtclock.org/">http://www.eudebtclock.org/</a></li> </ul> <p>Worldwide indicators on financial and fiscal responsibility (i.e. social dominating powers):</p> <p>UK:</p> <p><a href="http://www.dmo.gov.uk/">http://www.dmo.gov.uk/</a> (note <a href="http://budgetresponsibility.org.uk/">http://budgetresponsibility.org.uk/</a>)</p> <p>USA</p> <p><a href="http://www.whitehouse.gov/omb/">http://www.whitehouse.gov/omb/</a> and -&gt; <a href="http://georgewbush-whitehouse.archives.gov/omb/expectmore/rating/notperform.html">http://georgewbush-whitehouse.archives.gov/omb/expectmore/rating/notperform.html</a> note example -</p> <p><a href="http://www.whitehouse.gov/omb/expectmore/summary/10002150.2004.html">http://www.whitehouse.gov/omb/expectmore/summary/10002150.2004.html</a></p> <p><a 624="" 83="" 881"="" 959="" href="http://georgewbush-&lt;/a&gt;&lt;/p&gt; &lt;/td&gt; &lt;td data-bbox="></a></p>	



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			<p>whitehouse.archives.gov/omb/expectmore/rating/perform.html  <a href="http://www.whitehouse.gov/open">http://www.whitehouse.gov/open</a>  China:  <a href="http://en.wikipedia.org/wiki/Chinese_financial_system">http://en.wikipedia.org/wiki/Chinese_financial_system</a>  note to concerns; -  <a href="http://www.brookings.edu/research/papers/2013/07/01-china-financial-system-elliott">http://www.brookings.edu/research/papers/2013/07/01-china-financial-system-elliott</a>  <a href="http://www.ft.com/cms/s/2/533a6374-1fdc-11e3-8861-00144feab7de.html#slide0">http://www.ft.com/cms/s/2/533a6374-1fdc-11e3-8861-00144feab7de.html#slide0</a></p> <p><a href="http://www.lse.ac.uk/IDEAS/publications/reports/pdf/SR012/yueh.pdf">http://www.lse.ac.uk/IDEAS/publications/reports/pdf/SR012/yueh.pdf</a>  [Sic - "...China could reduce its exposure to the volatility of the world economy by following a path to strengthen both internal and external demand, which would increase the portion of growth driven by domestic demand even as trade expands in absolute terms. Such restructuring will allow China to continue to benefit from global integration, which includes learning from the technological advancements of developed economies, and to continue its 'catch up' growth, while maintaining a larger base of domestic demand to shield it from the worst excesses of external shocks..."]</p> <p>Europe:  Note –  1. For EU it is difficult to notice clear “open democracy fiscal responsible policy and documentation”.  2. Gaining a good understanding for each European country would be a major task and Multilanguage requirement.</p> <p>7 Background information aides, utilising wiki pages to assist perception awareness:  Concepts concerning governance and to govern:  <a href="http://en.wikipedia.org/wiki/Social_contract">http://en.wikipedia.org/wiki/Social_contract</a>  <a href="http://en.wikipedia.org/wiki/Social_judgment_theory">http://en.wikipedia.org/wiki/Social_judgment_theory</a>  <a href="http://en.wikipedia.org/wiki/Prisoner%27s_dilemma">http://en.wikipedia.org/wiki/Prisoner%27s_dilemma</a></p> <p>Concepts to notice whether corporate power infringes human and natural need:</p>	

Company	Unique Ref	Pub Ref	Any Other Comments	Any Other Comments HBC
			<p> <a href="http://en.wikipedia.org/wiki/Opportunity_cost">http://en.wikipedia.org/wiki/Opportunity_cost</a>  <a href="http://en.wikipedia.org/wiki/Decision_fatigue">http://en.wikipedia.org/wiki/Decision_fatigue</a>  <a href="http://en.wikipedia.org/wiki/Dual-use_technology">http://en.wikipedia.org/wiki/Dual-use_technology</a> </p> <p>           Concepts that the principles to notice regarding UN and EU agreements could be infringed:  <a href="http://en.wikipedia.org/wiki/Suppression_of_dissent">http://en.wikipedia.org/wiki/Suppression_of_dissent</a>  <a href="http://en.wikipedia.org/wiki/The_Engineering_of_Consent">http://en.wikipedia.org/wiki/The_Engineering_of_Consent</a> </p> <p> <a href="http://en.wikipedia.org/wiki/Manufacturing_Consent:_The_Political_Economy_of_the_Mass_Media">http://en.wikipedia.org/wiki/Manufacturing_Consent:_The_Political_Economy_of_the_Mass_Media</a> </p> <p>           Concepts to suggest we can be empowered without law and be within the WHO/UN:  <a href="http://ec.europa.eu/environment/index_en.htm">http://ec.europa.eu/environment/index_en.htm</a>  <a href="http://en.wikipedia.org/wiki/World_Health_Organization">http://en.wikipedia.org/wiki/World_Health_Organization</a>  <a href="https://en.wikipedia.org/wiki/Victim_blaming">https://en.wikipedia.org/wiki/Victim_blaming</a> </p>	

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Sport England	LP0079	Pub0089	<p>While the National Planning Policy Framework has radically simplified the Planning system in England, a central tenet of Plan-making remains that the plan must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>The NPPF explains that Local Planning Authorities should set out the strategic priorities for the area, including strategic policies to deliver ...(inter alia)</p> <ul style="list-style-type: none"> <li>• the provision of health, security, community and cultural infrastructure and other local facilities</li> </ul> <p>Paragraph 171 falls within the section of the NPPF that sets out advice on the evidence base that Plans need, and deals with Health and Well-Being. It advises;</p> <p>“Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation, and places of worship), including expected future changes and any information about relevant barriers to improving health and well-being.”</p> <p>This advice is amplified in the section of the NPPF that deals with promoting healthy communities. Paragraph 73 states;</p> <p>“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.”</p> <p>In light of the above, it is Sport England’s policy to challenge the</p>	Comments noted.

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			<p>soundness of Local Plan and Local Development Framework documents which are not justified by;</p> <ul style="list-style-type: none"> <li>- an up to date playing pitch strategy (carried out in accordance with a methodology approved by Sport England)</li> <li>- an up to date built sports facilities strategy (carried out in accordance with a methodology approved by Sport England).</li> </ul> <p>By up to date Sport England means undertaken within the last 3 years for a Playing Pitch Strategy, and within the last 5 years for a Built Facilities Strategy.</p> <p>Hartlepoons' Playing Pitch Strategy was adopted in December 2012 having been undertaken in line with Sport England's recommended methodology.</p> <p>Hartlepoons' Indoor Sports Facility Strategy was adopted by the Council in November 2013 having been undertaken in line with Sport England's recommended methodology.</p> <p>Whilst the latter strategy remains up-to-date, the former document is now out-of-date. As such the Local Plan's evidence base for sport is not complete. Hartlepool Council has however recently appointed consultants to undertake updated versions of both strategies. Planning policy staff make up part of the Steering Group overseeing their preparation and as such Sport England is reassured that the Council is addressing this concern, and is optimistic that there will be an interative relationship as the respective documents and the Local plan are progressed.</p>	

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RSPB - Northern England Region	LP0253	Pub0091	<p>1. The RSPB has had the opportunity to review the Hartlepool Borough Council (HBC) Local Plan (Publication Version) (Plan) Consultation Document and the associated Habitat Regulations Assessment (HRA). The RSPB previously (22 July 2016) provided comment on the HBC Draft Local Plan (Draft Plan) and associated draft HRA. We are pleased to see that our comments have been taken into consideration and, in part, implemented in the HRA. Where our recommendations have not been implemented, our previous comments still stand. Our further comments are restricted to:</p> <ul style="list-style-type: none"> <li>• The HRA</li> <li>• Policy LS1 – Locational Strategy</li> <li>• The combined employment policies</li> <li>• The combined housing, recreation, leisure and tourism policies</li> </ul> <p>Please note that a lack of comment on any other aspect of the Plan should not be interpreted as support.</p> <p>AND</p> <p>2. The RSPB considers that the Plan is unsound as it lacks detail in the HRA, and insufficient assessment of the potential for policies to have an adverse effect on European Sites. The HRA document requires improvement before conclusions that policies would have no adverse effect on the integrity of European sites can be reached. This raises questions about the deliverability of the Plan and therefore, its effectiveness.</p> <p>AND</p> <p>3. Our headline concerns are detailed below:</p> <ul style="list-style-type: none"> <li>• There is a potential for employment (EMP) policies to have an adverse effect on the Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar and the proposed extension to the SPA (pSPA) through individual or combined land allocations, on (or near) sites that are within (or functionally linked to) the SPA either through direct habitat loss or through indirect displacement/disturbance of SPA interest features. This is not adequately assessed in the HRA.</li> <li>• There is a potential for combined leisure, retail and tourism policies to have an adverse effect on the SPA through an increase in recreational disturbance arising from tourists/visitors. This is not adequately assessed in the HRA.</li> <li>• Information provided in support of the proposed mitigation</li> </ul>	<p>1. HBC notes that previous comments may still stand, but is satisfied that all relevant points have been covered.</p> <p>AND</p> <p>2. HBC will address the issues raised by RSPB in order to make the Local Plan sound and legally compliant.</p> <p>AND</p> <p>3. HBC will update the HRA, following RSPB consultation comments, including re-screening of identified policies (alone and in combination). HBC agrees that it would be sensible to include the proposed Teesmouth and Cleveland Cost SPA extension (pSPA) in its HRA, even though the formal consultation has not started and will amend the HRA. Document changes will be clearly marked.</p> <p>AND</p> <p>4. HBC agrees. Mitigation measures have been devised which include a menu of options, of which dog control is just one. These will be secured through stronger Local Plan wording in policy LS1.</p> <p>AND</p> <p>5. HBC agrees that the TEP is not an effective means of delivering mitigation for recreational disturbance and will amend the HRA accordingly, with greater detail regarding suitable delivery plans. Changes will be clearly marked.</p> <p>AND</p> <p>6. Comments welcomed.</p> <p>AND</p> <p>7. Comments welcomed.</p> <p>AND</p> <p>8. HBC agrees that greater detail is required regarding suitable delivery plans to deal with mitigation for recreational disturbance and will amend the HRA accordingly.</p> <p>AND</p> <p>9. HBC suggests adding additional wording to the paragraph 6.26 of the Locational Strategy.</p> <p>WORDING: Recreational disturbance can result from new housing, but also from new leisure and tourism opportunities. Mitigation, for the recreational disturbance of European site birds, needs to be effective and should be chosen from a range of diverse and flexible measures. These include, but are not limited to, Sustainable Alternative Natural Green Space (SANGS), a financial</p>

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			<p>strategy is insufficient to allow an assessment of its efficacy in negating the potential effects of increased recreational disturbance arising from combined housing (HSG) policies. HRA Stage 1 Screening. The RSPB does not agree with the screening decisions regarding some policies within the HRA (Stage 1 B screening) which have been assessed as having no likely significant effect (LSE) on the SPA. Nor do we agree with the conclusion of the Appropriate Assessment (AA) – that (subject to measures detailed within the AA being implemented) the Council can conclude that the Plan will not lead to adverse effects on SPA.</p> <p>AND</p> <p>4. The HRA (Section 7.3 pages 82 to 83) details the measures that HBC already undertake (some in lieu of Section 106 agreements arising from already consented development). These include Foreshore Management; dog control; public awareness and bird disturbance monitoring. These are all legitimate measures that could be included within a wider strategic mitigation strategy (further details below). However, HBC has not yet assessed the efficacy of Public Space Protection Orders (PSPOs) in controlling dogs. This will be included within a review of Dog Control Orders - required under new legislation by the end of 2017. Until this review has been completed, it is not yet possible to evaluate whether PSPO's will be effective in mitigating disturbance by dogs on the SPA arising from developments which have already been consented or potential impacts of Plan policies.</p> <p>AND</p> <p>5. The HRA (Section 7.4 page 84) summarises how financial contributions from developers might be spent to mitigate for recreational disturbance. These measures include financial contribution to established schemes/projects. HBC should satisfy itself that the aims, objectives and outputs of the projects will meet the need to mitigate specifically for the impact arising from housing policies i.e. recreational disturbance. For example, the primary focus of the Tees Estuary Partnership (TEP) is to develop a holistic and collaborative approach to promoting the needs of existing and potential future industrial development and nature conservation interests.</p> <p>Whilst a collaborative and estuary-wide solution to recreational disturbance is to be welcomed, and may form part of the TEP's</p>	<p>contribution to the management of coastal issues and information packs. In delivering development, applicants should be required to demonstrate how this type of mitigation will be detailed, how costs have been identified for delivery and should also demonstrate a level of comfort that such initiatives can be delivered effectively and that a suitable delivery method has been identified.</p> <p>Mitigation will be delivered through established frameworks. For example, financial contributions will be used to implement the Durham Heritage Coast Management Plan (2017-2025) management actions.</p> <p>Information and interpretation panels relating to the Teesmouth and Cleveland Coast SPA and Ramsar will be delivered as part of a refreshed European Marine Site Management Plan which INCA will initially co-ordinate.</p> <p>AND</p> <p>10. HBC has a separate Local Plan Monitoring Framework maintained by the Local Plan Monitoring Officer.</p> <p>AND</p> <p>11. HBC agrees that the TEP is not an effective means of delivering mitigation for recreational disturbance and will amend the HRA accordingly, with greater detail regarding suitable delivery plans. Changes will be clearly marked. HBC will increase the level of collaboration with neighbouring Local Planning Authorities.</p> <p>AND</p> <p>12. HBC notes this advice and has liaised with R&amp;CBC. As RSPB says, their Foreshore Management Plan is, as yet, undeveloped and therefore un-tested. HBC will consider the template for its own Local Plan mitigation, which aims to use more than one delivery plan.</p> <p>AND</p> <p>13. HBC notes the conclusion. It has addressed the issues raised in the representation.</p> <p>AND</p> <p>14. HBC notes these requests.</p>

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			<p>work going forward, the TEP is unlikely to provide an effective and timely solution to the Council’s mitigation needs in respect of the Plan.</p> <p>AND</p> <p>6. However, we particularly welcome that the continuation of wardening of the Little tern breeding colony at Crimdon is recognised as an essential element of the mitigation package in addition year-round SPA wardening to include provision for the wintering assemblage.</p> <p>AND</p> <p>7. We also note the examples of how mitigation has been secured and/or suggested from consented and submitted planning applications or enquiries. These include: SANGS; information leaflets, interpretation boards, wardening. The RSPB agrees that the range of measures above could be effective in avoiding or mitigating for recreational disturbance of SPA species.</p> <p>AND</p> <p>8. However, further evidence and detail as to how these measures would be delivered is required before the efficacy of the mitigation package can be assessed in adequately mitigating the impact of increased recreational disturbance upon the interest features of the SPA. Therefore, we do not agree with the conclusion that, with the above proposed mitigation and precautions in place, the Plan can be assessed has having no adverse effect on the SPA.</p> <p>AND</p> <p>9. RSPB Recommendations</p> <p>What we would like to see is a cohesive, evidenced, package of measures which form a wider mitigation strategy - designed to include account of the combined impacts arising from (if applicable) employment, housing, leisure, tourism and retail policies. In order for the strategy to be effective, a clear audit trail is required which provides a link between the potential impacts from Plan policies (through the HRA process) and appropriate mitigation measures. Therefore, it must be based on a robust assessment of the mitigation requirements; be designed and delivered to ensure that the mitigation is fit for purpose and secured in ways that ensure long term management and protection of the SPA and its interest features.</p> <p>AND</p>	

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			<p>10. Monitoring. The RSPB recommends the production and implementation of a monitoring strategy alongside the mitigation strategy to monitor and evaluate its effectiveness. Monitoring is vital to allow assessment of how well the plan is meeting biodiversity targets in respect of European sites. These targets should be informed by the conclusions of the AA and any mitigation (or compensation) measures considered necessary by the Local Authority to meet the requirements of the Habitats Directive. A key part of the monitoring plan is to ensure that European sites are not being adversely affected by development provided for in the plan.</p> <p>By ensuring the information is fit for purpose any European site deterioration arising from the implementation of the policies or allocations, or problems with a mitigation scheme, can be identified and addressed at the earliest possible stage - limiting the further harm done. As a minimum this will require key pieces of information including:</p> <ul style="list-style-type: none"> <li>• The conservation condition of the European site and the reasons for that condition</li> <li>• The location and scale of relevant development identified during the AA process and</li> <li>• The location, scale and effectiveness of mitigation measures identified in the plan.</li> </ul> <p>An effective strategy would keep a track of:</p> <ul style="list-style-type: none"> <li>• The receipt of payments towards mitigation</li> <li>• The number and location of houses (and other relevant development) being delivered</li> <li>• The location and rate of mitigation delivery</li> <li>• The level of use of the SPA for recreation at the outset and of the housing/leisure development</li> <li>• The population and distribution of the birds that use the SPA both at the outset of development delivery and over time.</li> </ul> <p>AND</p> <p>11. Collaboration. The RSPB recognises the efforts made to date by the collective LPAs to collaborate in respect of their local plans through the N2K Coast Sites Network and through the Tees Estuary Partnership (TEP).</p> <p>Paragraph 7.4.1 of the HRA states that financial contribution may be used to fund existing coastal management plans including the</p>	



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			<p>TEP. The TEP Habitat Framework may provide opportunities for a strategic approach to the management of the SPA in the future. However, the habitat framework process is in its early stages and considerable work is required before a useable and effective framework can be delivered.</p> <p>AND</p> <p>12. Redcar and Cleveland Borough Council is currently developing their Foreshore Management Plan (FMP) in support of their Local Plan, which proposes a range of measures for the management of recreational impacts, including wardening; zoning; use of byelaws; protocols for fencing and interpretation. Whilst further evidence and detail is required before the efficacy of the FMP can be assessed in adequately mitigating the impact of increased recreational disturbance upon the interest features of the SPA, we believe that the FMP may serve as a useful template for HBC in considering the impacts of its own Plan.</p> <p>AND</p> <p>13. Conclusion</p> <p>There is insufficient assessment within the HRA of the potential for Plan policies to have an adverse effect upon the Teesmouth and Cleveland Coast SPA/pSPA/Ramsar. There is lack of detail regarding measures to avoid and/or mitigate potential adverse effects.</p> <p>Because the likely effectiveness of the mitigation is central to the deliverability of Plan policies, the RSPB believes that the Plan, as written, does not provide adequate information to enable the soundness of the Plan to be evaluated under paragraph 182 of the National Planning Policy Framework.</p>	
Redcar & Cleveland Borough Council	LP0261	Pub0095	Having reviewed the document and considered it in the light of Redcar and Cleveland's emerging Local Plan, we have identified no outstanding issues between our authorities and are supportive of the approach taken. We consider that the Duty To Cooperate h	Comments welcomed.

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Landowner	LP0338	Pub0096	Could you please indicate the procedure that we would need to follow to pursue this matter further.	<p>The comments submitted through the Local Plan consultation process have been considered and responded to by the Council (See HBC response under policy EMP3 with respect to this representation). These comments, along with the Council's response, will be reviewed by the Planning Inspector through the Examination process.</p> <p>Notwithstanding this, should you wish to pursue the proposal further, you may submit a planning application to the Council. However, given the previous pre-application advice provided and in view of the status of the site within both the adopted Hartlepool Local Plan 2006 and the emerging Local Plan, it is unlikely the proposal would be supported by the Council. You may appeal against any such determination to the Secretary of State and the Council's position would again be reviewed with respect to the application.</p>
Resident	LP0339	Pub0097	I would also question why the current levels of proposed development were not identified in the previous Local Plan and why the last Plan prepared at significant costs to Council Tax payer's was mysteriously abandoned a situation that led to a Planning "Free for All" due to the loss of protection afforded by the previous Plan.	The previous emerging Local Plan was not adopted by the Borough Council for the reasons publically stated at the time.

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Estates team	LP0340	Pub0098	<p>Further to our previous representation (details below for info) I would like to make a further representation on these sites, in particularly the land at Macrae Road/ Monkton Road. I've attached an indicative plan of how the site could be laid out (see written representation for plan). The plots are based on other new build properties/ plots that have been built in the town in recent years.</p> <p>Please let me know if you need plans sending through, as they are they the same ones that were attached to my email of 1st July 2016.</p> <p>(See written representation for table showing allocations in the Publication Local Plan and Estates thoughts for possible allocation.</p> <p>Regards</p> <p>Estates</p> <hr/> <p>From: Estates  Sent: 01 July 2016 12:12  To: Planningpolicy  Subject: Local Plan Consultation  Importance: High</p> <p>Hello</p> <p>Further to the recent Local Plan Consultation we have discussed the proposed allocations and we have a few thoughts. Would you be able to consider the following amendments please (even if only for parts of the sites shown below if the whole is not considered suitable) (see written representation for table).</p> <p>The plan below shows an indicative location for each of these sites. The actual detailed boundaries should be taken from the individual plans above (see written representation to Preferred Options for map).</p>	See response under Policy NE2.

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Environment Agency	LP0031	Pub0101	<p>We have reviewed the Local Plan and consider that it is legally compliant and that it complies with the Duty to Cooperate. However, we do not consider that the Local Plan is sound. We have assessed the local plan to be unsound for reasons which have been set out below.</p> <p>We have identified that some of the allocated employment and retail sites in the Local Plan are located in flood zones 2 and 3. These sites are referenced in the following local plan policies:</p> <p>EMP3: General Employment Land  EMP4: Specialist Industries  EMP5: Safeguarded land for new Nuclear Power Station  EMP6: Underground Storage  RC3: Innovation and Skills Quarter  RC7: Lynn Street Edge of Town Centre Area  RC12: The Marina Retail and Leisure Park  RC14: Trincomalee Wharf Retail and Leisure Park</p> <p>A number of local plan allocations that are within flood zones 2 and 3 have not been assessed in the council's Strategic Flood Risk Assessment (SFRA), which was published in 2010. We identified in our previous response to the preferred options consultation (July 2016) that the current SFRA (2010) needed to be updated to take account of these sites and in particular reflect the new climate change allowances which are now in place.</p> <p>In respect of local plan making, Section 167 of the National Planning Policy Framework (NPPF) states that "Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues that the assessment must cover."</p> <p>The employment and retail sites in flood zones 2 and 3 are also not supported by a Sequential Test. A Sequential Test is required to be undertaken as outlined in the Planning Practice Guidance: Flood Risk and Coastal Change, which details that in preparing the Local Plan "the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of</p>	<p>An update to the SFRA and a sequential test (in the context of flood risk) are currently being undertaken.</p>

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			<p>accommodating development which is not exposed to flood risk.”</p> <p>We previously identified at issues and options stage (July 2014) that the council should be able to provide evidence that a sequential approach to growth has been taken to steer development away from areas at risk from flooding and that sequential and exception tests should be applied at the earliest possible stage of the planning policy process.</p> <p>Notwithstanding the above, we acknowledge that a number of our other recommendations from the preferred options consultation have been taken on board at the publication stage.</p> <p>We are in support of the update to the SFRA and application of the sequential test to allocated sites, which the council are currently undertaking. We wish to be kept informed of future progress on the Hartlepool Local Plan, in particular, the production of the SFRA and sequential test information.</p> <p>We would be happy to assist the council, where possible, to review any documents/information when they become available. This information will hopefully contribute to resolving the concerns detailed above and subsequently be included in the local plan prior to it's consideration at examination.</p>	
Residents	LP0343	Pub0103	<p>The plan is necessarily lengthy and dense - later versions should be provided in an additional summary form for those without sufficient leisure time for deeper study - this can only improve the extent to which Hartlepool's inhabitants can be engaged in the consultation.</p>	Comments noted.

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HBF	LP0005	Pub0108	<p><b>Duty to Co-operate</b></p> <p>The Council is required to ensure that it has discharged its requirements upon the duty to co-operate (the duty) in relation to the plan prior to submission. Compliance with the duty is an iterative process and requires more than meetings. The Council must demonstrate what actions have been taken and the outcome of these actions (PPG ID 9-010 and 9-011).</p> <p>The Council's Duty to Co-operate Statement highlights that meetings and discussions have taken place over strategic cross-boundary issues. The key concerns of the HBF relate to housing need and delivery. On these issues it is noted that Hartlepool is identified as being its own Housing Market Area (HMA) and therefore intends to meet its own housing needs. Whilst this is not disputed Hartlepool also shares strong cross-boundary relationships with other neighbouring authorities, particularly those within the Tees Valley. Indeed the Tees Valley has previously been considered a single HMA. Hartlepool is also a member of the Tees Valley Local Combined Authority. Given these close relationships and the economic ambitions of the Combined Authority<sup>1</sup> it is unclear whether sufficient regard has been paid to the housing and economic needs of the wider Tees Valley area and whether other authorities will require assistance in meeting their housing needs.</p> <p>In terms of housing supply it is noted that the Council continues to have discussions regarding the Wynyard site.</p> <p>In conclusion the HBF does not doubt that Hartlepool has undertaken significant cross-boundary work. It is the efficacy of this work and its translation into the plan. The current evidence base does not provide sufficient guidance in this regard.</p> <p>Use of Supplementary Planning Documents (SPDs)</p> <p>8. There is significant reference to the use of SPD in various policies throughout the Local Plan (e.g. QP1, QP3, QP4, QP5, QP7, RUR1, etc). The LDS and Chart 1 of the plan identify that 8 SPDs are to be provided, a number of which have already been produced. The Council will have to review any existing SPDs post Local Plan</p>	<p>The representation does not dispute that the Borough of Hartlepool forms a single housing market area but is unclear nonetheless if sufficient regard has been given to wider housing and economic needs of the Tees Valley area. There have been meetings between HBC officers and officers from authorities in the Tees Valley, as well as Durham County Council, regarding the Duty to Co-operate. These meetings have included discussion of housing and economic issues.. As the Duty to Co-operate Statement makes clear, there is also Tees Valley forums such as the Planning Managers group at which housing and economic issues are regularly discussed. These discussions have included regular updates on work to determine housing requirements. None of the other Tees Valley authorities have identified that they have an unmet housing need which would require assistance from another authority in order to meet that need. Every authority is planning positively to meet its own need and it is considered therefore that the concerns expressed by the HBF are without foundation. It is acknowledged that the Council will have to review any existing SPDs post Local Plan adoption to ensure they are still in conformity and assist in the interpretation of Local Plan policies.</p>

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			<p>adoption to ensure they are still in conformity and assist in the interpretation of Local Plan policies.</p> <p>9. The Council should also resist utilising SPDs as a vehicle for introducing policy requirements and burdens outside of the formal plan making process. The NPPF (paragraph153) clearly states;</p> <p>“...Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development...”</p>	
Resident	LP0217	Pub0113	<p>My earlier letter concentrated on the limitations of the Plan in terms of its lack of detail regarding content, chronology and proposed execution. This has now been clarified by an HBC staff member at a drop-in session.</p> <p>It is now apparent that the plan is, intentionally, a high level document to facilitate understanding of its general concept in keeping with Government guidelines. It is a statement of intent, and certainly not a detailed design plan.</p> <p>Exceptions to this comprise the Regeneration Masterplans for Church Street, Seaton Carew and Centre for Skills and Innovation, Waterfront and Town Centre where specific design proposals are currently under preparation, I believe.</p>	Comments noted.

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Galliford Try	LP0349	Pub0114	<p>National Planning Policy</p> <p>The National Planning Policy Framework (the 'Framework'/'NPPF') outlines how the production of development plans is to be undertaken. The overarching theme of the NPPF is a presumption in favour of sustainable development which should be seen as a "golden thread running through both plan-making and decision-taking". In particular paragraph 14 of the Framework states that for plan-making this means that:</p> <ul style="list-style-type: none"> <li>• Local planning authorities should positively seek opportunities to meet the development needs of their area;</li> <li>• Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: <ul style="list-style-type: none"> <li>o any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</li> <li>o specific policies in this Framework indicate the development should be restricted. Paragraph 182 of the NPPF focusses on examining local plans, and states that: A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is: <ul style="list-style-type: none"> <li>• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</li> <li>• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</li> <li>• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> </li> </ul> </li> </ul> <p>These representations assess the relevant Draft Policies of the HLP against the NPPF, with a specific focus on the compliance with Paragraphs 14 and 182 but also considering other more detailed NPPF policies where appropriate.</p>	Comments noted.



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Persimmon Homes (Teesside)	LP0045	Pub0115	<p>First and foremost we wish to fully endorse the representations made by the Home Builders Federation (HBF). The HBF is the principal representative body of the house-building 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 imperative that the views of the HBF are given significant weight during this consultation process.</p> <p>It is noted that there is significant reference to the use of the use of Supplementary Planning Documents (SPDs) within various policies throughout the plan. The Council will need to review these SPDs post Local Plan adoption to ensure they still conform and assist in the interpretation of plan policies. It is essential however that the Council do not use this as a vehicle for introducing addition policy requirements and financial burdens outside of those tested as part of this plan making process.</p> <p>Persimmon Homes are supportive of the need for a new Local Plan within the Hartlepool area however, as set out above, we consider that there are still a number of key areas which require focus and re-examination before the emerging Local Plan can be considered sound. We will therefore endeavour to work with the Council to resolve these matters to ensure that the aspirations and policies of the plan are positively prepared, justified, effective and consistent with national policy.</p> <p>On this note, both Persimmon Homes and the Leebell Consortium are happy to discuss further any of the comments made within this representation and would request to be kept informed of future consultations upon the Hartlepool Local Plan and any of the supporting documentation.</p> <p>We would also kindly wish to place on record our intention to participate at the examination in order to ensure that the concerns outlined above are addressed in full.</p>	<p>It is noted that whilst SPDs may need updating, the Borough Council will not use these to add financially onerous requirements to development.</p>

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Northumbrian Water	LP0241	Pub0117	<p>At this point, we would like to reiterate our support for the inclusion of a dedicated section relating to climate change and the promotion of a proactive partnership approach to these opportunities and challenges. Northumbrian Water are keen to take a partnership approach to sustainable water management by working with key stakeholders across the region, and we welcome that the Local Plan reflects a similar desire.</p> <p>We welcome that foul and surface water management is recognised within Table 5, which details key utilities issues, and can confirm that we would have no significant issues to raise with regard to wastewater infrastructure. Having said this, we continue to recommend that Northumbrian Water are contacted early in the planning process to agree a suitable drainage strategy, as previously discussed. We also support that this section reaffirms the requirement for all new housing, employment and industrial sites to incorporate sustainable drainage systems. We look forward to continuing to work closely with the Borough Council to ensure the alignment of investment in water and wastewater infrastructure with development in the Borough.</p>	Comments welcomed.
Gladman Developments	LP0351	Pub0118	<p>Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for planning to deliver the homes, jobs and thriving local places that the country needs. Every effort should be made to objectively identify and meet the full housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.</p> <p>This submission provides Gladman’s representations on Hartlepool Borough Council’s Publication Stage Local Plan, which has been published for consultation from Friday 9 December 2016 until Friday 3 February 2017. Through this response, Gladman have highlighted a number of issues that will need to be given careful consideration in the finalisation of the Plan, in particular: the need to work collaboratively across local authority boundaries; the need for greater flexibility in the context of the presumption in favour of</p>	Comments noted. HBC consider that the methodology used for the SA has been robust, justified and transparent.

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			<p>sustainable development; and, the requirement for the Local Plan to be based on an up-to-date and proportionate evidence base. Gladman wish to be given the opportunity to discuss the concerns that have been highlighted in these representations at any associated examination hearing sessions.</p> <p>The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. To be consistent with national planning policy and provide an appropriate basis on which to plan for Hartlepool’s housing needs, the Local Plan will need to be tested at Examination to ensure that it has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The four tests which the Local Plan must meet should be considered in order to draft the Plan for the next stage of consultation. The four tests of soundness are outlined as follows:</p> <ul style="list-style-type: none"> <li>- Positively prepared</li> <li>- Justified</li> <li>- Effective</li> <li>- Consistent with national policy</li> </ul> <p>INTRODUCTION</p> <p>Context</p> <p>Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development’s representations on the Hartlepool Publication Stage Local Plan, December 2016 (The Plan). It is noted that this consultation is made under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (The Regulations). The Plan has been published for consultation between Friday 9 December 2016 and Friday 3 February 2017.</p> <p>The Framework sets out four tests that must be met for Local Plans to be considered sound.</p> <p>In this regard we submit that in order to prepare a sound plan it is fundamental that it is:</p> <ul style="list-style-type: none"> <li>• Positively Prepared — The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from</li> </ul>	

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			<p>neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p> <ul style="list-style-type: none"> <li>• Justified —the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.</li> <li>• Effective — the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</li> <li>• Consistent with National Policy — the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</li> </ul> <p>Gladman requests that it is given the opportunity to discuss these representations further at the Examination in Public. A summary of the issues and concerns raised in relation to the Plan are summarised in Table 1 below (see written representation):</p> <p>Sustainability Appraisal  In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.</p> <p>The Hartlepool Local Plan should ensure that justified its policy choices are clearly justified through the results of the SA process. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Hartlepool Local Plan’s decision making and scoring should be robust, justified and transparent.</p>	

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Historic England	LP0044	Pub0125	<p>We have previously commented in detail, both at the Issues and Options stage of the Local Plan, and on the Preferred Options in July 2016, and thank the local authority for taking on board so many of our earlier suggestions.</p> <p>To identify strategic policies for the historic environment: The Plan clearly contains robust and extensive policies for the historic environment, and we commend the council on these, and consider that the plan is sound on this basis. However, the NPPF refers to the need to identify strategic priorities in paragraph 156, and states that Neighbourhood Plans must be in ‘general conformity with the strategic policies of the Local Plan’ (paragraph 184 of the NPPF). We have previously commented that, while the historic environment is clearly referenced throughout the plan, including within the spatial objectives, we are unclear which of the plan policies would be considered its strategic policies, or whether all the policies are to be considered as such. It might be helpful to state this somewhere at the outset, to provide clarity for the Neighbourhood Planning process.</p> <p>The identification of areas where development would be inappropriate: The Hartlepool Heritage Strategy provides an initial assessment of development sites allocated within the plan, providing an ‘evidential starting point for the consideration of the impact of development on heritage assets’. This is an excellent initial stage, and is referenced within the plan (at paragraph 15.14).</p> <p>As we noted previously, it would be helpful to ensure cross-referencing between this and the Strategic Housing Land Availability Assessment (SHLAA). As the SHLAA is updated, it needs to integrate the historic environment into the assessment methodology, and utilise the initial assessments carried out within the Historic Environment Strategy.</p> <p>Page 204, The Historic Environment: As we have previously commented, the policies for the historic environment are extremely comprehensive, and we welcome and support the very positive and proactive approach taken by the council, and look</p>	<p>Comments welcomed.</p> <p>With respect to strategic policies, the comments identified by Historic England have been responded to under the relevant policy section in this consultation statement.</p> <p>With respect to cross referencing between the Heritage Strategy and SHLAA, the Heritage Strategy includes a site assessment of all housing sites within Appendix 1 of the strategy. In addition the SHLAA process considered the impact on heritage assets through the site assessment process.</p> <p>With respect to the Monitoring and Review of the Local Plan, the Local Plan is accompanied by a separate Monitoring. This sets out how all polices will be monitored over the duration of the plan period. The monitoring framework sets out the use SMART objectives and performance indicators.</p>

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			<p>forward to working with you to help deliver the plan in the future.</p> <p>Monitoring and Review: We have previously commented that there is currently no reference within the plan of how it will be monitored and reviewed? The draft Strategy for the Historic Environment has included a number of actions which might help to inform a more strategic monitoring programme for heritage assets, including the setting of key targets.</p>	
Natural England	LP0043	Pub0129	<p>Habitat Regulations Assessment</p> <p>The general detail and approach to the Habitat Regulations Assessment provided with this submission is welcomed. However Natural England disagree with the vulnerability and mitigation provision assessment of the Durham Coast Special Area of Conservation (SAC). The proximity of the designated site to the boundary, being within the 6km buffer zone used to assess recreational disturbance is applicable here. Cross administrative border working, which seeks to protect designated sites which are in common use by residents of both administrative areas for recreational purposes should be considered in determining mitigation strategies.</p>	HBC will update the HRA. Document changes will be clearly marked.
Resident	LP0367	PUB0143	<p>Address not clear - Wynyard Steet doesn't exist in Stockton. Contacted number provided - person who answered hung up so unable to gain additional details.</p>	Noted.
Resident	LP1133	Pub0909	<p>Why always pick on Seaton Carew, we are Surrounded by rubbish tips, off shore dismantling rigs which also got through. The smell from the new car park is disgusting, in particular in summer. They also got rid of the Youth Centre. Private houses built. Seaton Carew always seems to be on the back burner/ it is supposed to be a Holiday Resort</p>	Comments noted.
Resident	LP1194	Pub0970	<p>P.S. Although this is a generic petition, I have previously voiced my objections.</p>	Comments noted.
Resident	LP1251	Pub1027	<p>Full address not provided</p>	Noted.

