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8th May 2017

Mrs Carole Crooks
Independent Programme Officer Solutions
9 Chestnut Walk
Silcoates Park
Wakefield
West Yorkshire
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FAO – Mr David Spencer, Inspector.

Dear Mr Spencer,

Response to Initial Observations letter on the Hartlepool Local Plan

Thank you for the letter of the 13th April which set out your initial observations on the Local Plan and the accompanying documents.

Within this letter, I have set out a response in the order the issues are dealt with within your letter. Where additional work is required, or where the answer is not currently available, I have set out the date we would envisage the information being available to the Examination. Consideration of the timings of the Hearing sessions is dealt with in the conclusion.

May I take this opportunity to thank you for your approach to dealing with these issues at this time to try and avoid issues with suspensions to the hearings.

1. Duty to Co-operate

1.1 In terms of the Duty to Co-operate, the Council recognises the importance of this and that it is incapable of modification at examination. We have noted your points raised and are producing **an Addendum to the Duty to Co-operate Statement which we will provide by the end of this week**. We would propose to add this to the March 2017 Duty to Co-operate Paper. The document updates the previous version to take account of the following issues raised:-

- Further minutes of meetings included where these were available, such as Development Plan Officers Meetings (DPOs), Planning Managers, Directors of Place to help clarify that there has been ongoing engagement on issues such as housing and to illustrate that it is in accordance with the Duty to “engage constructively, actively and on an ongoing basis”.

- Details of any memoranda of understanding
- Details of ongoing cooperation with the TVCA and its predecessor Tees Valley Unlimited. It is at this level that the Directors of Place Meetings, now known as Tees Valley Combined Authority Board Business Meetings and Transport Infrastructure Group (TIG) take place. Where available information from these discussions has been included. The meetings are more than just information sharing and consultative – they make decisions on direction of investment and priorities.
- The meetings with Durham and Stockton were at Officer level, up to Assistant Director level in the case of the meeting with Stockton. There have been discussions at a member level, however agendas / minutes are limited in this case.
- In terms of the Wynyard meetings, there has been no set timescale/frequency for the meetings – they have tended to be guided by when there was information, such as highways modelling, to discuss. A memorandum of understanding was produced, the signed copy is held by Highways England, the Addendum includes an unsigned copy. It is hoped the working group will continue post adoption to guide the developments.
- In terms of discussions about the contained housing market area, there have been discussions at DPO's meetings, at both specific Duty to Co-operate meetings with Durham and Stockton and during the discussions which formed part of the development of the Tees Valley Housing Strategy (this has been included as a document on the Core Document and Evidence Base Library). The neighbouring authorities were also contacted as part of the formation of the SHMA by Arc4 who produced the document – evidence of responses from Middlesbrough and Stockton has been included.
- There has also been ongoing discussions and engagement regarding strategies for the Teesmouth and Cleveland Coast SPA and the Durham Coast SAC. This information is provided within the Addendum. The Council has also worked with the Tees Valley Nature Partnership to assess the impacts of the policies. Information on this assessment has been included within the amended Duty to Co-operate paper.

2. Meeting Objectively Assessed Housing Needs

- 2.1 The Council notes your positive comments in respect of the SHMA Addendum to take account of the 2014 Sub National Projections. In relation to the demographic analysis prepared in 2016 by Tees Valley Unlimited / TVCA, it is the same information. Apologies for two different names being used. We have arranged a meeting with the statistician from TVCA to confirm that she is happy for it to be made available and to discuss some of the points you have raised. I believe the information is an update to the POPGROUP analysis referred to in the SHLAA which was undertaken to consider a range of options.
- 2.2 The Council will produce a ***Housing and Employment Growth Topic Paper*** as requested to aid the examination. The timing of this paper would be dependent on the availability of both the statistician and Arc4 as both will need input into the paper. It is likely that this would take a number of weeks and I would anticipate this being **available by the end of July**.
- 2.3 In respect of the other issues which you raise, not necessarily for a response at this point in time, we have sought to provide an update / information on each in terms of each matter:-

2.3.1 **Strategic Gap Soundness** – The Council were hoping that our Landscape architect could undertake this piece of work however, due to workload issues, he is unable to commit to the piece of work – as such we are currently producing a tender brief to appoint external consultants to undertake the work. Unfortunately, from discussions with the landscape architect, who is assisting in developing the brief, given **the scale of the survey work involved it is likely that this piece of work will take until the start of the summer holidays to produce.**

2.3.2 **Contingency arrangements should housing delivery not materialise** – The reason that the Council agreed with the Home Builders Federation suggestion at Preferred Options to include a 20% buffer was in the main to provide flexibility should sites stall and also to enable an element of additional affordable housing. The plan identifies an overall objectively assessed need of 4305 dwellings over 15 years.

An allowance for replacement of demolitions (assuming 50% on site windfall replacement) is then added, and a 20% buffer of the OAN to allow a contingency should sites stall. This was one of the factors why the annual housing target was over a quarter higher than the OAN. It is considered that this will not only allow flexibility, but will also help to achieve the Governments' aspiration to boost significantly the supply of housing.

The monitoring framework will be used as a tool, along with the Council's Housing Sites Monitoring information to ascertain whether delivery has fallen below the planned levels. Given that the Housing requirement is a minimum and not a ceiling there are a number of ways in which additional housing is likely to be and could be delivered over the plan period. At a Tees Valley level the TVCA are producing a Public Sector and Brownfield Register which identifies potential housing sites which may end up benefitting from permission in principle – many of these smaller, brownfield sites are not included in the plan delivery due to concerns within the SHLAA over deliverability. The Combined Authority and the local authorities will be working to identify funding streams, through agencies such as the Homes and Communities Agency (HCA), to provide grant funding through investment such as the Estates Regeneration Fund, to bring forward some of these sites. The Council will also be producing its own Brownfield Land Register which may also assist in the provision of additional smaller sites.

2.3.3 **Monitoring Framework** – Was it available for consultation with the plan? Whilst the monitoring framework had been completed and was available at the time of the consultation on the Publication Local Plan, it was not listed as a consultation document on the website. We are happy for it to form an Appendix to the plan if required.

2.3.4 **Timing, Viability and Delivery of High Tunstall**

The Council has been working closely with the developers of both High Tunstall and Quarry Farm to consider the infrastructure deliverability and viability of the sites. These discussions will continue and will help to inform the viability work to be produced, as discussed later in this letter.

2.3.5 **The Scale of Housing Growth at Wynyard**

The Council considers the scale of growth proposed, sitting alongside the prestige employment site and the proposed community facilities is needed to help create a sustainable community in that location. Given that the properties command prices at the higher end of the market within the Tees Valley, it is considered that the development has the potential to support the associated infrastructure growth. Ongoing work is continuing between the developers, their transport consultants,

Highways England and both Stockton and Hartlepool Borough Councils to assess the combined highway impacts of developments within Hartlepool and Stockton to help firm up on the necessary infrastructure improvements needed. Given the scale of the infrastructure the quantum of housing proposed is needed to ensure the developments are deliverable. If the housing numbers were reduced, it would bring into question the deliverability of the infrastructure which in turn would impact on the sustainability of the proposals. The developers have stated in meetings that the improvements can be paid for along with the other developer contributions and will re-affirm this at the examination.

2.3.6 **The latest evidence on demolitions and replacements**

As noted within the Local Plan, the demolitions were calculated using the average demolitions over the last ten years but giving consideration to the high levels of early 1900's terraced properties which remain in the town centre area, some of which is in need of renewal. Given that the Council does not want to blight areas, it has not published any of its thoughts on these areas and, unlike the 2006 Local Plan, has not included a specific boundary on the proposals map for the Housing Market Renewal Policy. As you will appreciate this is an extremely delicate matter which needs to be handled carefully. **To aid the examination, the Council will look to produce a paper to identify some broad areas where intervention could occur. The Council will aim to produce this paper by mid August** (It is likely this paper will need endorsement through the Committee system prior to providing it to the examination). The recent announcement of funding streams such as the Estates Regeneration Fund is encouraging in terms of looking to regenerate the inner areas of towns and cities. The Council continues to work closely with Registered Providers, in particular Thirteen Group, who are also able to bid for funding and often seek to bring forward regeneration of these inner area sites for much needed affordable properties. Other options may include deals with developers to deliver elements of their affordable provision off site, on regeneration sites.

2.3.7 **The Durability of a 5.04 year housing land supply**

The Council notes that this is a marginal supply; however, this is greatly impacted by the frontloading of the 20% via the Sedgefield method. A change to the Liverpool method, as supported by the Secretary of State in a number of recent decisions, could help to spread out the housing delivery more equally, whilst at the same time meaning the 5 year supply was more durable. The Council are happy to explore these options if this was something that would help to create more certainty over the 5 year supply and ultimately if it was felt necessary to find the plan sound.

The Council previously included its 5 year supply within a Planning Framework Document which included an assessment of Policy weighting. It is proposed to separate this into two documents which we are currently preparing to give an update following the Publication consultation to provide an up-to-date **policy weighting position document**, reflective of outstanding issues on emerging policies, along with a **separate document to provide an update on the 5 year supply** following the end of the financial year. **We would aim to produce these by mid August, which reflects the need for the documents to be endorsed by Committee.**

2.3.8 **The basis for the 20% figure as a buffer for affordable housing delivery as part of the housing requirement**

This is discussed above under the contingency section, however, further detail and clarification will be set out in the Housing and Economic Growth Topic Paper.

3. Sustainability Appraisal

- 3.1 Following your comments on this section, we forwarded on the Scoping Report which we apologise for missing off the examination library. Within the email that contained the scoping report we outlined where we considered some of the points raised within your observations had been covered. Hopefully once you have had time to consider the scoping report you will agree that a number of the issues raised have been covered within the Scoping Report.
- 3.2 In relation to your points raised regarding a “do nothing” option and also in terms of assesses “reasonable alternatives” (which may include some of the sites put forward at Preferred Options), it is agreed further work is needed to make this information transparent. As part of the SHLAA an exercise was undertaken to broadly assess in sustainability terms those sites not taken forward. An exercise was also undertaken to assess some alternative options for the bypass. In terms of assessing any options which were put forward during the Publication Stage, can we clarify whether you would want to see these assessed? – the Sustainability Appraisal was produced to appraise those policies which formed part of the Publication version. No further work was undertaken between then and Submission as the Council submitted the Publication version along with some proposed changes suggested within the Regulation 22 Consultation Statement. **The Council propose to produce an Addendum to the Sustainability Appraisal** which sets out why the growth strategy within the Publication document is considered the most sustainable and appropriate option and why the other reasonable alternatives were discounted, along with an explanation of why a do nothing scenario is neither practical nor sustainable for Hartlepool. As with the Sustainability Appraisal, we would use a multi-disciplinary team to undertake these assessments. **The Council would propose to produce this document by the end of July.**
- 3.3 If, following your assessment of the information within the Scoping Report and the email which accompanied it you are of the view that other points you made within your initial observations remain relevant and necessary, the Council will look to include that information within the Addendum.

4. Neighbourhood Planning

- 4.1 In regards to the Neighbourhood Planning queries and observations, we have produced the attached position statement on Neighbourhood Planning. It includes:-
- A map which identifies the boundaries of the 3 Neighbourhood Plan areas
 - An update as to where each Neighbourhood Plan is at
 - What the anticipated timescales are for each Neighbourhood Plan, with the Rural Plan being the most advanced; their plan is currently being considered by an Independent Examiner
 - An explanation of the inter-relationship between the Rural Plan and the proposals within the Hartlepool Local Plan specifically at Elwick, Hart, High Volts, High Tunstall and the South West Extension
 - An explanation of the dynamic between the Wynyard Neighbourhood Plan and the Hartlepool Local Plan
- 4.2 We will also forward on the latest versions of each document and ensure they are added to the Examination Library.

5. Habitats Regulations Assessment

- 5.1 We note your concerns in relation to the current position in relation to the Habitats Regulations Assessment stage 1 screening and then stage 2 appropriate assessment and the outstanding issues with Natural England and the RSPB who are of the view that the published plan is unsound and not legally compliant.
- 5.2 The Council will liaise with Natural England (and RSPB) to confirm that, in light of our proposed changes, they are able to withdraw their concerns and find the plan sound. We will ask for confirmation of this point in writing as requested. If any further changes to main mods are considered necessary we will work with them to agree these changes.
- 5.3 In terms of whether there are established mitigation frameworks for the SPA and SAC which obligations can contribute towards implementing, at present, contributions which have been secured as part of planning applications have been restricted to the provision on SANGS adjacent to the development – to date this has always been favoured by Natural England as it was considered this would minimise the numbers of people taking their dogs to walk at the SPA. The Council will work with Industry Nature Conservation Association (INCA) and consult Natural England and other relevant organisations, such as the Durham Heritage Coast, to produce **a framework of where financial contributions could be directed. We will aim to produce this by mid August.** The framework could be split into schemes within Hartlepool and schemes outside of the Borough which may need agreement with Durham County Council. Contributions towards dog wardens and information boards are some of the ways in which impact on the SPA could be minimised.
- 5.4 We will ensure that we liaise with Natural England over the SPA designation at Philips Tank Farm / Greenabella Marsh (EMP4) to ensure the issues can be successfully dealt with at the Hearing sessions.
- 5.5 In terms of whether mitigation should be a sub-section of Policy LS1 or a specific Policy within the Natural Environment chapter, we will discuss this with Natural England. Previously they had requested it was incorporated within the Locational Strategy so that it applied to all policies within the Plan. The Council is happy to support either method.
- 5.6 The Council proposes to update the Planning Obligations SPD to include a section on environmental mitigation. Policy QP1 (Planning Obligations) sets out the areas for which contributions will be sought. We consider that the use of the SPD to set out more detailed information on the contributions is in line with paragraph 153 – only contributions which are considered necessary to make developments acceptable in planning terms, such as those requested by statutory bodies such as Natural England, are included within the SPD. The SPD is not used to introduce any additional contributions not required by Policy QP1. The impact upon development viability will be considered within the viability paper. The Council is not proposing to implement CIL. Planning Obligations are considered to be far more appropriate than CIL in the North East as it provides a more flexible approach. Planning Obligations give the opportunity to look at developments on a case by case basis and to work with the developers to secure contributions most needed. The Council has in place systems to monitor the number of contributions towards a discrete infrastructure project to ensure the pooling restrictions are not exceeded. Mitigation towards the SPA/SAC would be monitored in the same manner.

- 5.7 The Council will liaise with Natural England and RSPB to prepare a statement of common ground / position statement which identifies where issues have been resolved and where, if any, there are still outstanding areas of dispute.

6. Gypsies and Travellers

- 6.1 Your assessment of the situation in relation to Gypsy and Travellers, as set out in the GTAA, is a fair summary of the situation.
- 6.2 The Council believes that the change in definition of Annex 1 of the Planning Policy for Traveller Sites (PPTS) to remove the word permanent from the description does change the previously assessed hypothetical need. A total of 4 of the “hypothetical” need identified (3 from bricks and mortar and 1 from bricks and mortar through family formation) are those that have been in bricks and mortar for more than a temporary period and in the Council’s opinion could be discounted from the previously identified need.
- 6.3 The Council had assumed that the provision would be private. This was because it was not envisaged that the need would ever materialise into a demand and therefore did not consider it necessary to investigate the implementation of a public site.
- 6.4 The 2013 site would have been delivered as a public site via Homes and Communities Agency funding. If a need ever did materialise the Council would explore delivery options with the HCA if private delivery was not a viable option.
- 6.5 The Council firmly believes that the identified need is purely hypothetical, and given the change in the definition in Annex 1 of the PPTS is even less likely to ever materialise into a demand. The inclusion of the criteria based policy would ensure if a need ever did materialise the application could be effectively dealt with via the Policy.
- 6.6 There has been no official equalities impact assessment undertaken as part of the plan but the Sustainability Appraisals covers a range of social factors which would be considered as part of an EIA. **The Council could undertake a specific EIA on the Plan by the end of June if required.**
- 6.7 It is the understanding of the Council that section 124 of the Housing and Planning Act relates to non-gypsy caravan needs. The Plan has not currently assessed those needs.
- 6.8 In addition to the consultation on the plan and sections 4 and 8 of the 2014 GTAA the only other discussions regarding Gypsy and Traveller provision has been through the DPO’s meetings. This is referenced in the Addendum to the Duty to Cooperate Paper.
- 6.9 With respect to unauthorised encampments since 2014, figures from the Council’s Environmental Enforcement Team indicate there have been a total of 21 recorded unauthorised encampments with a total number of caravans across these sites of 140.
- 6.10 The Council’s Environmental Enforcement Team has advised that general observations would indicate that there are very few genuine travellers in attendance in Hartlepool. Many of the minor number of caravan encampments are either local or have a local family connection to Hartlepool. They are generally attending for a reason or passing through, such as for a family wedding or in conjunction with a local fair or other regional event (i.e. Appleby Horse Fair; Newcastle Hoppings Funfair).

Visits are therefore routinely just for a few days with the longest recorded stay during this period being for 6 days in April 2015 at Tees Bay Retail Park. The largest unauthorised encampment recorded in this period comprised 30 pitches at the former Jackson's Landing site in July 2016.

- 6.11 This information has been taken from the recorded welfare sheets the officers complete when attending the site and information has been either voluntarily offered by the travellers or has been taken from officer observations made at the time of the visit. Encampments are often on private land where Council Enforcement Officers still carry out the welfare assessment but would then inform the land owner who would deal with any eviction.

7. Plan wide Viability

- 7.1 We note your comments in relation to plan wide viability. In terms of the advice contained at paragraph 10-004-20140306 of the Planning Practice Guide, we consider that the testing that was undertaken, and is included as an Appendix to the Planning Obligations SPD, was produced with an “understanding of local economic conditions and market realities” as required. The assessments were not formally consulted on as it was produced using up-to-date information from developments which had occurred in Hartlepool and was therefore reflective of prices which had been provided from developers within the town. The reason the assessments were based on Greenfield sites was that it was known that the vast proportion of developments likely to come forward were for Greenfield sites, particularly along the western edge of the Borough. Many of the sites contained within the Local Plan already have planning applications submitted, some of which have been in since before the adoption of the Planning Obligations SPD, for example High Tunstall was validated in October 2014.
- 7.2 Whilst many of the assumptions made within the assessment were relatively “broad brush” they are still considered valid in a market which has seen a rise in the average new build price in the Borough. The Council has continued to assess viability assessments submitted within Planning Applications since that time. The benefit of operating under the s106 system rather than the CIL system ensures that we can still take a flexible approach to assessing developer contributions.
- 7.3 Unfortunately the work only made allowances for relatively minor highway improvements (site access etc) and did not allow for the scale of highway infrastructure improvements identified within the Local Plan. As the plan has developed and it has become apparent that the bypass and grade separated junction is necessary to support the growth of the town, the deliverability and viability of sites has been discussed regularly with the developers as well as other stakeholders to assess delivery options. In order to allow the housing to come forward at an early stage the Highway improvements need to take place prior to 2020. The Council secured £600k of Growing Places Funding from the TVCA to develop up a detailed design (which is work currently being undertaken by the Councils engineers and which is almost complete and will firm up the overall costs) and to start land assembly for the route which has involved close working with the farmers impacted by the proposed route. Given the estimated £18million costs of the works the Council has explored a range of delivery options as it is aware of the impact it will have on development viability. The best case scenario is that the Council are able to secure grant funding for the works, however, if the funding is repayable this would need to be built into the s106 legal agreements with the developers to ensure it can be repaid. Options for funding that have, and continue to be investigated, include Local Growth Fund, HCA funding options such as the Housing Infrastructure Fund and the

National Productivity and Investment Fund. As a back-up option the Council has informally committed to securing the money via prudential borrowing (this stance will be formalised by taking a report through the committee system and getting agreement from full Council) to deliver the infrastructure works. The Council would then work with the developers to ensure repayment over the build out period.

- 7.4 A Policy level deliverability assessment has not been undertaken to include either the highway costs at Elwick/bypass or at Wynyard. The costs in the Affordable Housing Economic Viability Assessment did not include the infrastructure costs at Wynyard or at Elwick. Whilst the developers have always considered that the sites were still deliverable with these costs added, in a pro-rata manner, it is acknowledged that the viability of sites needs to be considered in a flexible manner, on a case by case basis. The level of grant funding will have a major impact on any assessment. The sites are all considered deliverable, when flexibility over developer contributions is factored in, and the developers have verbally agreed they are willing to appear at the examination to discuss viability.
- 7.5 The Council has continued to undertake viability assessments since the adoption of the Planning Obligations SPD which has enabled the Council to maintain an up-to-date picture of land values, development costs and planning obligation costs.
- 7.6 **Developer involvement** – A Developer/Agent workshop was held as part of the SHLAA work in June 2014. The database of sites was circulated to the SHLAA steering group in May 2014 for consideration and a workshop was held in June 2014. The workshop considered each site in turn and participants decided if they were satisfied with an initial assessment regarding suitability and availability. The workshop played a critical role in the assessment process and issues on sites were fully debated. Participants were asked to provide their views on achievability, and specifically:
- Whether, and when, each site might be expected to come forward for development, given its location, characteristics and potential constraints; and
 - The estimated number of dwellings which could be expected to be accommodated on the site.

The steering group for the SHLAA work had the following representatives:

- Taylor Wimpey
- Persimmon Homes
- Bellway
- Gus Robinson Development
- Thirteen Group (a North East social housing organisation)
- Hartlepool Borough Council Planning Policy
- Hartlepool Borough Council Development Management
- Hartlepool Borough Council Estates
- Hartlepool Borough Council Housing Services

If it would be beneficial we could provide a copy of the SHLAA database for your use, but would not propose including this as an evidence base document. The transport infrastructure mentioned within the SHLAA is covered within the Local Infrastructure Plan in terms of improvements needed, however this does not include scheme prices as the view was taken that this quickly becomes outdated.

8. Additional Technical Evidence

- 8.1 **SFRA** – The Council have appointed consultants JBA Consulting to provide the technical evidence as to whether the sites within the Local Plan can be developed safely and to enable the Environment Agency to be in a position where they are able to withdraw their concerns and to consider the plan sound – The Council, JBA and the Environment Agency have, and continue to liaise closely on the production of the evidence. We have received comments from the Environment Agency regarding the Sequential Test and we are currently considering their comments with a view to finalising it. JBA are currently working on the technical elements of the Exceptions Test and have proposed that this work will be ready by the end of May. **The Council will then complete the Exceptions Test work and seek formal confirmation from the Environment Agency that they are able to withdraw their objections to the plan by the end of July.** We will confirm any necessary wording changes which would form main modifications and produce a statement of common ground if necessary.
- 8.2 **SHLAA** – There has not been any update to the SHLAA to date. It is unlikely that there would be any update to this document prior to the Hearing sessions. The Saved Policies 2006 Hartlepool Local Plan Planning Policy Framework Justification Document (HLP02/3) is the latest published document which considered a five year supply. A detailed assessment of planning permissions and Local Plan sites was undertaken to form a view on the 5 year supply to inform the production of the Publication Local Plan, however this was not published. That assessment was undertaken in November 2016. In order to make it available to the examination the Council is proposing to take it through Planning Committee and Regeneration Services in June for endorsement.
- 8.3 **Inspectors Report from Withdrawn Local Plan** – As the Local Plan was withdrawn, the Inspector of the previously withdrawn Local Plan, Kevin Ward, never produced a full report on the Local Plan. The Council received a document entitled Outline of Modifications Required for Soundness – this document was a list of bullet points of key changes the Inspector deemed necessary to make the plan sound. It was following the receipt of these findings that the Council withdrew the Local Plan. A copy of the Inspectors Outline Modifications was forwarded to you, via the Programme Officer, on the 13th April.
- 8.4 **HSE** – Provided alongside this letter is a copy of the HSE's July 2016 advice. Where concerns were highlighted which could impact on proposals within the town, meetings took place to ascertain if any changes to the plan were necessary. For example where the HSE highlighted a gas network at High Tunstall, a meeting took place with the gas pipeline operators and the plan was updated to include a green buffer zone in which housing development could not occur.

9. Proposed Modifications to the Plan

- 9.1 Your comments in relation to “main” and “additional” modifications are noted. We propose to produce a Modifications Document which will have a separate section for each type of modification. The document will include those changes proposed within the Regulation 22 Consultation Statement as well as the typos and errors picked up in the document HLP01/7, and proposed changes to, the Publication version of the Local Plan. **We will produce the Modification document, which will be a live document, by the end of May.**

- 9.2 Document HLP01/6, Local Plan Minor Amendments to Publication Proposals Map (proposed changes from the Publication version), is the document which catalogues changes which have been necessary as a result of agreed changes to the plan and to correct errors which have been noticed. We will continue to treat this as a live document as well.

10. Conclusions

- 10.1 Hopefully some of the additional information that we have provided will help to answer a number of your queries regarding the plan. There are still however a number of areas of work identified where further work is needed as identified within this letter. Presuming that you are comfortable with the proposed timings of the additional work outlined in the letter, it is clear that the earlier proposed timings for the hearing sessions will not be achievable and your proposal for the hearings during late September early October would appear the most logical time for the hearings. We have provisionally booked the rooms at the Hartlepool College of Further Education for three weeks from the 25th September.
- 10.2 I trust the information provided within and accompanying this letter will help to clarify some of your queries and I look forward to hearing from you with confirmation you are comfortable with the timeframes for the additional work needed.

Yours sincerely



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