

Date: 23<sup>rd</sup> August 2017  
Consultee ID: LP0005 / Pub0108  
Matter 2

## **HARTLEPOOL LOCAL PLAN EXAMINATION**

### **Matter 2 – Spatial (Locational) Strategy**

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 2 of the Inspector's *Schedule of Matters, Issues and Questions* (exam ref: EX INS 15).
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 3<sup>rd</sup> February 2017. The HBF has also expressed a desire to participate in the examination hearing sessions.

***Issue 1 – Does the overall spatial strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?***

***Q8 Is the delineation of the strategic gap reasonable in terms of its primary objectives in Policy LS1? Are there any comments on the suggested amendments in the Council's evidence (EX/HBC/22 – pages 46-54) to the proposed strategic gap? Does the Council intend to propose any modifications to reflect these suggested amendments?***

3. The evidence suggests further increases to the scale of the strategic gap. It is, however, unclear why such increases are required. There is no evidence provided of significant development pressure within these areas and as such no indication that the extension is justified or required.

***Q9 Does the strategic gap evidence lend support to the Home Builders Federation suggestion [representation Pub0108] and others that there are areas of lesser value (or higher capacity) that could serve as contingency or reserve areas?***

4. Yes, the *Strategic Gap Assessment* (exam ref: EX/HBC/22) does indicate that some areas of the strategic gap are of lesser value. This evidence not produced until July

2017. It is therefore unclear how the Council concluded upon the proposed strategic gap boundaries. Given that some areas do not completely fulfil the strategic gap criteria the inclusion of these areas would appear unjustified.

***Q13 What is the purpose of the New Dwellings Outside of Development Limits SPD? Will it introduce policy content that ought to be in the Local Plan?***

5. Within our comments upon the Publication version of the plan we expressed concern in relation to the number of references to SPD within the policy text. The NPPF (paragraph 153) clearly states;

*“...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...”*

6. Whilst it is noted that the *New Dwellings Outside of Development Limits SPD* already exists this will require updating. The HBF considers that SPDs should not be specifically referenced within policy text, to ensure they are not given policy status, and it should be explicit that they are provided solely to assist applicants to make successful applications.

Yours sincerely,

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