

# Hartlepool Local Plan Examination in Public Inspector's Matters Issues and Questions

## Representations on behalf of Mr H Tones

### Matter 7 Housing Land Supply

**Issue 1 – How does the Plan meet the full OAN for market and affordable housing in the housing market area, including identifying a supply of specific, deliverable sites sufficient to provide 5 years' worth of housing and a supply of specific, developable sites for housing for years 6-10 and where possible years 11-15 ?**

We consider the very small 68 dwelling 'buffer' between the 6199 identified housing supply sites compared to the minimum dwelling requirement of 6150 in Table 7 is insufficient to ensure adequate flexibility in the supply of housing land, nor even perhaps to ensure that the minimum of 6199 dwellings are delivered within the plan period. Any slippage or lack of delivery from one of more sites could well result in under-delivery. It is our experience that inevitably there will be some slippage on some sites. This is more likely to be true of larger sites where the large scale up front infrastructure works are required. Some flexibility might be provided by windfalls although these are unlikely to be large scale and little evidence is provided by the Council to justify any such allowance. There is therefore an explicit need to allocate additional housing sites, such as our client's site East of Easington Road to ensure a robust supply.

In the light of the above we consider that a non-implementation allowance of at least 10% should be applied to the housing requirement figure and that additional sites, such as our client's site East of Easington Rd, Hartlepool are allocated to make up the difference

The Council has experienced persistent under delivery of housing and that a 20% buffer should be applied to the 5 year housing requirement and the Sedgfield approach should be adopted .

We would agree with the HBF that:

- The housing figure should not be staggered;
- The plan should contain a policy mechanism that would trigger plan led corrective measures to ensure a deliverable supply of housing; and
- The plan should not contain a phased or stepped housing requirement.

We would strongly agree that the plan should include an additional buffer of housing sites for supply. This is considered essential to ensure that the projected housing requirement is met in full in the future, unlike in recent years; to provide choice and flexibility in the market; and meet help affordable housing requirements. Past delivery rates in Hartlepool are not a good indicator of future rates as they were heavily constrained by both a low level of allocations in previous local plans and an over-reliance on large scale strategic allocations that simply failed to materialise and deliver any housing.