

Matters Statement

Our ref 22987/03/MHE/Dcr
Date 11 September 2017

Subject **Hartlepool Borough Council Local Plan Examination Matter 8 – High Tunstall and Quarry Farm**

1.0 Issue 1 – Site Context

Q1. What is the chronology to the identification of this strategic site and the process by which the sites were selected as a preferred strategic direction for growth?

1.1 No comment.

Q2. Should the Plan contain an indicative concept plan or require a masterplan (in addition to the phasing plan) to provide a sound basis for the strategic planning of the site and its sustained delivery during the Plan period?

1.2 No comment.

Q3. Does the Sustainability Appraisal (including Addendums) adequately assess the likely effects of the High Tunstall Strategic Site and test it against reasonable alternatives?

1.3 No - we have concerns with the information available regarding whether the Sustainability Appraisal (SA) adequately assesses the likely effects of the High Tunstall Site; and tests it against reasonable alternatives. Namely, this relates to the lack of publically available evidence explaining how sites have been assessed and, where considered suitable and deliverable/developable within the SHLAA, allocated or discounted. Without this information, it cannot conclusively be determined that the SA has adequately assessed the effects of the High Tunstall Strategic Site against other sites as there is no data available to directly compare effects.

1.4 Through our discussions with the Council's Planning Policy Team we are aware that sustainability analysis on a site by site basis is set out within the Council's SHLAA 2016 Site Database. However, this does not feature within the SA and does not appear to form part of the Examination Documents. A clear, concise and easily accessible version of this document must be published for consideration in the context of the proposed Growth Strategy and allocations presented within the Sustainability Appraisal.

1.5 We note that, in terms of sustainability (as set out within the SHLAA database and Housing SA issued to Lichfields by the Council but not currently forming part of the Examination Library) the High Tunstall Strategic Site is rated as moderately sustainable (albeit with potential to become more sustainable if considered as part of a strategic urban extension). There are a

number of other sites, Tunstall Farm Phase 2¹ included, which rank equally as well in this regard but have not been proposed for allocation. Further information on the reasoning for discounting these sites should be provided, particularly in light of our findings (as set out in our responses to Matter 3 and Matter 7) that the Council does not have a demonstrable 5YHLS.

- 1.6 Further to the above, despite the moderate sustainability rating of the High Tunstall Strategic Site, we have a number of concerns with its allocation. This site constitutes an incongruous extension to the western boundary of Hartlepool, extending far beyond the built form of the existing urban area in an unsympathetic and harmful manner. Its development and allocation will result in extensive encroachment in to the open countryside and significantly detract from the functions of the proposed strategic gap.
- 1.7 Tunstall Farm Phase 2 also scores moderately within the SHLAA database and Housing SA but is clearly a superior site for allocation and development. Whilst we acknowledge Tunstall Farm Phase 2 would also constitute development of a greenfield site outwith of the currently defined settlement boundary, it is far better related to the existing built form of Hartlepool and would not detract to such an extreme extent from the purpose of the proposed Strategic Gap.
- 1.8 Further, we consider Tunstall Farm Phase 2 is sustainably located as we have clearly presented to the Council in our previous representations and Vision Document. The site is well served by services and facilities which are available in the area, including sports facilities, schools and bus stops. Local shops including convenience stores are within a 15 minute walk from the site. The developer would also prepare a Travel Plan to support the development; and are in discussions with bus operators to ensure the highest levels of sustainable travel could be introduced.
- 1.9 We consider the allocation of the High Tunstall Strategic Site ahead of other sustainable sites which are more appropriately related to the existing built form of Hartlepool, such as Tunstall Farm Phase 2, to be unacceptable and unjustified.
- 1.10 Significantly boosting the supply of housing is vital, and Hartlepool clearly must play its part in this. To do this it is clear that Hartlepool's preference within the emerging Local Plan for new housing to be accommodated in urban extensions - with provision of 55.8% of the future housing supply over the next 15 years coming from this source². We agree that this is an appropriate approach to spatial distribution of housing within Hartlepool and therefore reasonable alternative sites to the High Tunstall Strategic Site should be considered in such locations.
- 1.11 Tunstall Farm Phase 2 offers a reasonable alternative. The site would form a sustainable urban extension, offering an excellent opportunity for provision of a high quality residential neighbourhood in a spatially appropriate location and, with substantially less negative effect than that of the High Tunstall Strategic Site.
- 1.12 Tunstall Farm Phase 2 provides areas of landscape, strategically located to ensure a high quality environmental aspect across the site, sympathetically designed within a residential development. The development would enhance the environmental aspects of the area through improvements to footpath connections within and beyond the site, and also a financial contribution to additional wider green infrastructure in close proximity to the site.

¹ Strategic Housing Land Availability Assessment (site ref. 65)

² Hartlepool Local Planning Framework - Local Plan Publication Stage Consultation Document – December 2016

- 1.13 Notwithstanding our concerns as outlined above, we are aware of the pressing need to provide new housing across the Borough. As we have clearly set out in our responses to Matter 3 (Housing Needs) and Matter 7 (Housing Land Supply), based on the Council's Supply Position and Lichfields' Objectively Assessed Need calculation, there is a shortfall of **at least** 631 dwellings within Hartlepool across the Plan Period.
- 1.14 In this context therefore, even if it is concluded the High Tunstall Strategic Site should be allocated following appropriate testing of the effects of this site against those of other appropriate alternative, there is a demonstrable requirement for further appropriate allocations in addition to that Site. Tunstall Farm Phase 2 is a suitable, available and deliverable site which should be allocated for residential development of approximately 400 homes.
- 1.15 Tunstall Farm Phase 2 is the follow-on stage from Taylor Wimpey's Phase 1 development which has progressed very well, and is due to be completed in terms of sales within the next 3 years. As per our other statements for Matters 3 and 7, Lichfields clearly disagrees with the Council's approach to identify the housing requirement and the 5 year housing land supply. Allocating Phase 2 within the Council's Plan will not only support the supply of new housing in Hartlepool, but will also assist the Council in bringing forward housing development in the difficult period the Council have identified themselves where the supply decreases considerably.
- 1.16 Tunstall Farm Phase 2 is a deliverable scheme that could come forward quickly by a national housebuilder.

Q4. Are the boundaries and the extent of the sites correctly defined? What is the extent of safeguarded land at Hart Quarry – does it affect land proposals at Quarry Farm?

- 1.17 No comment.

2.0 Issue 2 – Site Delivery

Q5. Does the infrastructure evidence demonstrate that the proposal is soundly based and can be delivered in a timely and satisfactory manner?

- 2.1 This is a matter for the Council to respond to.

Q6. What is the mechanism to fund/deliver the Elwick bypass and grade separated junction on the A19? Table 2 of the LIP at pages 17-18 refer to LGF and other possible sources, including prudential borrowing. What is the latest situation? Is there agreement from affected parties as to how this infrastructure can be funded, possibly through claw-back arrangements? Is it an unduly complex process?

- 2.2 No comment.

Q7. Is the £18million cost for grade separated junction and bypass accurate? Is the 2018 construction date and 2020 completion date at Table 2 of the LIP realistic?

- 2.3 This is a matter for the Council to respond to.

Q8. Does the transport assessment work and engagement with Highways England demonstrate that on transport grounds, the residual cumulative impact of development at this site would not be severe? (NPPF, paragraph 32) has transport modelling work assessed alternative capacities for the High Tunstall site?

2.4 No comment.

Q9. There is some local concern about impacts on the highway network in Hartlepool as a consequence of an improved third route from the A19. The LIP refers to junction improvements at Elwick Road/Park Road/Wooler Road. Is a scheme being investigated and is it necessary to accommodate the impact arising from these developments?

2.5 No comment.

Q10. Would there be capacity in infrastructure and services to serve the planning housing growth?

i) School provision

ii) Health Facilities

iii) Leisure, public open space, allotments

2.6 No comment.

Q11. Having regard to the Habitat Regulations Assessment 2016 (Document NT01/08) would suitable mitigation need to be secured to ensure no significant adverse effect on the Coastal SPAs and SAC?

2.7 No comment.

Q12. Are there any known ecological constraints? Has there been any preliminary ecological survey work? Does the scale of the site enable mitigation for farmland bird species and the establishment of green/wildlife corridors?

2.8 No comment.

Q13. Does the Plan's proposal for housing at this location take account of the proximity of the gas pipeline? [see HSE letter dated 15 July 2016 – Annex 1]

2.9 No comment.

Q14. Is the extent site consistent with the evidence on landscape (including the additional evidence on the strategic gap (EX/HBC/22&23))? Would the rural setting of Dalton Piercy be preserved?

2.10 No comment.

3.0 Issue 3 – Site Capacity

Q15. Is the SHLAA assessment realistic? How will early and appreciable delivery be secured? Is the Council’s assessment of timeframe from delivery aligned to that of the site developer?

3.1 No comment.

Q16. Does ‘approximately’ in Policies HSG5 & 5a readily translate as ‘at least’ or is 1,200 and 220 dwellings effectively the sum capacity of this area? Have alternative capacity options been appraised?

3.2 No comment.

Q17. Does the viability of the infrastructure and affordable housing provision render the sites undeliverable or justify an enlarged allocation? Has the submitted Plan struck the right balance?

3.3 No comment.

Q18. Should additional land be allocated at Quarry Farm 3 for 450 dwellings (Cecil M Yuill Ltd) in lieu of development at Wynyard Park? Has Quarry Farm 3 been appraised by the Council as part of the SHLAA, SA or strategic gap analyses?

3.4 We do not wish to comment on the specifics of these sites but want to highlight that further residential allocations are required in order to meet the Council’s housing need (as set out within our Statements on Matter 3 and Matter 7). In light of this, Tunstall Farm Phase 2 should be considered a suitable, available and deliverable site and allocated accordingly for the development of approximately 400 new dwellings.

Q19. Would additional development at the Quarry Farm location ensure the viable delivery of highway improvement works?

3.5 No comment.

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