

The following statement has been produced by Persimmon Homes Teesside in response to selected questions set out within Matter 7 of the Inspector's Matters, Issues and Questions (ref: EX/INS/15). Whilst we have not attempted to provide a response to every question, we have, where applicable, included the Inspector's Issues and Questions in **Bold** above our response for ease of reference.

**Issue 1 – Whether the proposed housing site allocations are justified, effective and consistent with national policy.**

**HSG4 South West Extension**

**Q4. Are the detailed requirements for the site clear and justified, including on-site education provision?**

1.1 Persimmon Homes supports Policy HSG4 however in the interests of accuracy we consider the following amendments necessary to reflect the current proposal which is approved subject to completion of a Section 106 Legal Agreement. Whilst it is acknowledged that the permission will hold precedence over the policy, all Reserved Matter applications will be considered against this policy and therefore it is important that the policy and the prospective permission align.

1.2 Bullet-point 3 of the policy states that 2.7 hectares of land will be set aside for Primary Education provision (Use Class D1). Whilst land measuring 2.7 hectares has been identified towards the centre of the site, following comments from the HSE received as part of the application process regarding the gas pipeline which runs north to south through the site it has been necessary to identify this land for both educational use and playing pitches. We therefore suggest the following amendment to the policy:

*"Safeguarded land (~~2.7 hectares~~) for a 1 form entry Primary Education provision School (Use Class D1) in accordance with policy INF4..."*

1.3 The additional reference to a '1 form entry primary school' will also clearly identify the on-site education provision and align the policy with paragraph of 8.23 of the Publication Plan.

1.4 Following our comments to the Publication Local Plan (Ref: Pub0115), it is acknowledged that the Council propose a modification to the fourth bullet-point of the Policy (MM/CHP10/03). The modification however fails to fully reflect our suggestions put forward at the publication stage. We therefore continue to suggest that the policy reads as follows:

*"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."*

1.5 This amendment is necessary as the link road connecting the Southern Access Road with the Northern Access Road can only be delivered on adjoining land.

The application and proposals for this first phase of the South West Extension therefore cannot deliver the link road, only safeguard a route for it.

**Q5. Are the boundaries and extent of the site correctly defined?**

1.6 Again, in the interests of accuracy, Persimmon Homes consider the following amendments to Diagram 1 necessary to ensure that the boundaries and extent of the site are correctly defined and presented:

- The Northern Access Road, identified by the blue dotted line, should be contained entirely within the redline of the site.
- The vehicular link provided on the Southern Access Road linking the site with Moffat Road is now no longer proposed following discussions with the Hartlepool Borough Council and local bus service providers. This link will be pedestrian only now and should therefore be removed from Diagram 1 in order not to mislead adjacent and future residents.

1.7 We have no issues with the boundaries or the extent of the site currently defined on the Proposals Map.

**Q6. Are there reasonable alternatives for a larger allocation at this location?**

1.8 There are clearly reasonable alternatives for a larger allocation at the South West Extension, as evidenced by the strategic allocation on the site within the 2013 Local Plan prior to its withdrawal. The site was draft allocated for 2,500 dwellings, of which circa 2,200 units were expected to be deliverable over the plan period. Within this Plan the larger site was identified as being of '*strategic importance*' and described at the time within the Council's Hearing Statement to the Matter 3A as:

*"the most available, sustainable, suitable and deliverable collection of SHLAA sites that had the potential to be delivered as strategic housing site due to:*

- *Sequentially preferable location on urban edge;*
- *Availability and deliverability;*
- *Close proximity of existing employment locations;*
- *Close proximity to existing services (retail, education, health etc);*
- *It's strategic size and capacity, given the critical mass needed to deliver the overall housing need and transport and community infrastructure;*
- *Easy access to the A689 trunk road, and;*
- *Ability to integrate green infrastructure to existing links."*

1.9 These comments and statements were made within the context of the NPPF and therefore it is Persimmon Homes view that the site continues to be the most available, sustainable, suitable and deliverable urban extension. This wider allocation at the South West Extension was subsequently found to be a sound by an Inspector<sup>1</sup> following the Public Examination in 2013.

---

<sup>1</sup> Hartlepool Local Plan Examination Note from Inspector (15 October 2013): Outline of modifications required for soundness

**Persimmon Homes**  
Matter 10 – Other Housing Sites  
Hartlepool Local Plan

---

- 1.10 Whilst naturally it is Persimmon Homes' preference for the whole site to be allocated within the current Plan for residential development, it is noted that the Council are now pursuing a different spatial strategy and the Plan, as it stands, lacks flexibility in the form of a buffer and appropriate review mechanisms to address any under-supply throughout the Plan Period. In this regard, Persimmon Homes would consider it appropriate to identify the remaining South West Extension Land as safeguarded / reserved land which would come forward later in the plan period should the appropriate monitoring mechanism be triggered following the under-supply of housing. Given the acceptance by the Council that the wider Hartlepool South West Extension land would form part of future plans beyond the current plan period, we see no harm identifying the site as safeguarded or reserved land within this plan to come forward in later phases should the need arise. This will ensure that the long-term expansion of the town continues to be 'plan-led' in accordance with the core principles of the planning system, should the Council's five year land supply position falter.
- 1.11 A Deliverability Document has subsequently been submitted with our representations to the Publication Local Plan. This statement details 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. The statement demonstrates that the second phase is sustainable as well as suitable, available and achievable.
- 1.12 Previously highway concerns relating to the capacity of the A19 which restricted the Hybrid Application in terms of numbers are in the process of being addressed by Highways England with the widening works between Norton and Wynyard expected to be complete by 2022<sup>2</sup>. The completion of the works would facilitate the wider development of the site on par with the previous allocation whilst also allowing the link road from the A689 to Brierton Lane to be implemented.
- 1.13 As safeguarded or reserved land, the site would only come forward if the need arose and therefore it would not prejudice existing preferred allocations. As the trajectory below demonstrates, the current site is forecast to start in 2018 and is estimated to be completed by the end of 2026/27. This clearly highlights excess capacity within the site to delivery units over the plan period to the end of 2031.

<b>South West Extension Housing Trajectory</b>		
<b>Year</b>	<b>Annual Yield</b>	<b>Cumulative Yield</b>
2017/18	0	0
2018/19	30	30
2019/20	80	110
2020/21	150	260
2021/22	150	410
2022/23	150	560

---

<sup>2</sup> Highways England: <http://roads.highways.gov.uk/projects/a19-norton-to-wynyard/>

**Persimmon Homes**  
Matter 10 – Other Housing Sites  
Hartlepool Local Plan

---

2023/24	175	735
2024/25	175	910
2025/26	175	1085
2026/27	175	1260
2027/28	175	1435
2028/29	175	1610
2029/30	175	1785
2030/31	175	1960

- 1.14 The annual yields have been calculated based upon the potential of the site to accommodate, once established, two Persimmon Homes outlets, a Charles Church outlet and potentially a separate housebuilder outlet on top of elements of Senior Living and Self-Build. We therefore expect the first phase of the development to be completed in the year 2026, meaning that if development were to continue on the site, the site has the potential to deliver an additional 700 units within the remaining years of the plan. This makes it the perfect candidate for a reserved site to provide flexibility within the plan to adapt to changing market conditions in line with the NPPF.

**Q7. Are there any comments on the Council's suggested changes in response to the Persimmon Homes representation [Pub0115]?**

- 1.15 Notwithstanding our comments to Question 5 above, Persimmon Homes support the suggested changes detailed by amendment MM/CHP10/02.
- 1.16 In terms of the change detailed by modification MM/CHP10/03, we do not consider the amendment to be sufficient for the reasons outlined within our response to Question 4 above. In order for the policy to be clear, justified and representative of the approval (subject to Section 106), the additional amendments outlined within our response above are necessary.

**Q8. Can the Council confirm that safety measures at the A689/Dalton Back Lane junction are not necessary for the development of the site in the Plan to proceed?**

- 1.17 It is noted and acknowledged that this question is primarily directed to the Council, however we consider it important to draw attention to the fact that the Hybrid Planning Application for 1,260 units was accompanied by a detailed Transport Assessment which comprehensively assessed the impact of the proposed residential and non-residential uses associated with the scheme on the operational and safety characteristics of the surrounding highway and transport networks. The Transport Assessment concluded:

*"the TA has focussed on ensuring that the emerging masterplan proposals deliver sustainable development from a highways and transport perspective, in full compliance with transport-related policy at both National and Local level.*

*The TA has demonstrated that through a deliverable package of interventions including a robust Movement & Access Strategy, Travel Plan as well as a*

*comprehensive package of off-site sustainable transport and highway improvement measures, travel demand generated by the masterplan proposals can be accommodated on the surrounding highways and transport networks up to and beyond the full completion of the proposed development."*

- 1.18 In specific respect of the Dalton Back Lane junction, the Assessment found there to be no operational requirement for any amendments to the A689 Stockton Road / Dalton Back Lane / Front Street junction, noting:

*"From Table 8.6 it can be seen that under Year 2023 'base + development' traffic flow conditions the A689 / Dalton Back Lane / Front St, Greatham staggered 'T' priority junction will continue to work well within capacity during the weekday AM and PM peak periods with minimal changes in queue lengths when compared with the Year 2023 'base' flows."*

- 1.19 As part of the Planning Application process, the contents of the TA have been assessed in detail by the Council's Traffic and Transportation Department and Highways England. As noted within the Committee Report of the 15<sup>th</sup> October 2015, neither party raised objections subject to a number of appropriate conditions which Persimmon Homes have agreed to.

- 1.20 The concerns with the A689 / Dalton Back Lane are nonetheless noted and as illustrated within Persimmon Homes Phase 2 Deliverability Document relating to the South West Extension and outlined within paragraph 4.29 of the Transport Assessment, improvements to the junction area proposed as part of any further development, beyond the current proposals. The identification of the wider South West Extension land as safeguarded / reserved land to come forward as part of the Plan's review mechanism could therefore have positive implications from a highways perspective and this junction in particular.

**Q9. 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 – Annex1]**

- 1.21 Similar comments to those contained within the HSE letter dated the 15<sup>th</sup> July 2016 were received as part of the planning application process on the 15<sup>th</sup> October 2015 (Ref: H/2014/0405). Initially objections were received advising that *"the risk of harm to people at the proposed development is such that HSE's advice is that there are sufficient reasons, on safety grounds, for advising against the granting of planning permission in this case."*

- 1.22 The basis of the concerns was due to the presence of sport pitches and formal play areas located within the inner zone of the gas pipeline. The HSE confirmed however that if all the sports pitches and play areas were to be sited beyond the inner zone boundary (15 metres from the pipeline), they would not advise against the granting of planning permission.

- 1.23 It was subsequently agreed via email between the Case Officer and the HSE on the 21<sup>st</sup> October 2015 that the objection could be overcome via a suitably worded planning condition requiring the proposed design and siting of the

playing pitches and play areas to be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. This matter and condition was subsequently picked up within the Committee Report of the 16<sup>th</sup> December 2015 and conditions 32 and 33 respectively.

- 1.24 Discussions have continued with the Case Officer with plans produced and due to be attached to the Section 106 detailing the revised locations of the sport pitches, beyond the inner zone boundary of the gas pipeline. The proposals area therefore considered to take suitable account of the HSE's comments so much so that the objection from the HSE to the scheme has now been removed.