

**Residential Design Supplementary Planning Document
Consultation Statement
July 2019**

1. Introduction

- 1.1 The Residential Design Supplementary Planning Document (SPD) has been prepared by Hartlepool Borough Council. The Draft SPD was published for public consultation over a nine week period from 12 November 2018 until 14 January 2019.
- 1.2 This Consultation Statement addresses the requirements of Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that requires Local Planning Authorities to prepare a statement setting out:
- the persons the Local Planning Authority consulted when preparing the supplementary planning document;
 - a summary of the main issues raised by those persons; and
 - how those issues have been addressed in the supplementary planning document.
- 1.3 Section 2 of this Statement outlines the consultation processes and provides details of those people and organisations that were consulted.
- 1.4 Section 3 gives an overview of the representations made within the consultation period. Appendix 1 provides a full schedule of the representations made and the Council's response to each. Where a representation has informed a revision to the SPD, this is set out.
- 1.5 Section 4 gives a brief overview of the next steps in the process of adopting the SPD.

2. Consultation Process

- 2.1 A public consultation on the Draft SPD was approved at the Regeneration Services Committee meeting of 18 June 2018.
- 2.2 The public consultation began on the 12 November 2018 until 14 January 2019.
- 2.3 139 external and internal consultees were contacted via email or letter. This included housebuilders, residents' associations, Parish Councils and adjacent Local Authorities. The statutory consultees Historic England, the Environment Agency and Natural England were consulted. A full list of the consultees is attached as Appendix 2.
- 2.4 Consultees were informed that a copy of the Draft SPD was available to view at the Civic Centre, Victoria Road, Hartlepool, and online on the Council's Planning Policy webpage. Hard copies were available on request.

3. Representations Made and Officer Responses

- 3.1 A total of 12 consultees made representations on the Draft SPD. The consultees that made representations were:

- Hartlepool Rural Neighbourhood Plan Group
- Hartlepool Borough Council Development Control team
- Story Homes
- Persimmon Homes
- North Star Housing Group
- Gleeson Regeneration
- Historic England
- Barratt Homes North East
- Home Builders Federation
- Taylor Wimpey North East
- Hartlepool Civic Society
- Bellway Homes

3.2 Representations mainly focused on a concern that the SPD would be setting out a policy requirements. Some revisions have been made throughout the SPD to be clear that it sets out best practice considerations and recommendations, rather than requirements. Several representations sought clarity in the text and layout, and appropriate revisions have been made.

3.3 Appendix 1 includes a full schedule of representations, along with an officer response and suggested SPD amendments to reflect the representation is provided at Appendix 1.

4. Next Steps – Adoption

4.1 The representations received during the consultation period have, where appropriate, been reflected in the finalised version of the SPD prior to being presented at full Council in September 2019 for adoption.

4.2 It will be important following the adoption that the SPD is kept up to date and modified to reflect any changes in government regulations and emerging opportunities across the Borough.

Appendix 1: Schedule of Representations and Officer Responses

CHAPTER 1

- What is this document?
- How to comment

What is this document?

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Rural Neighbourhood Plan Group	the Group certainly supports the aim of moving away from generic “anywhere estates” to ones that reflect local distinctiveness while being of high quality and sustainable.	Comments noted.
Story Homes	At present, the SPD states at paragraph 1.3 that it will be a material consideration but then notes that ‘Developers are advised to consider this SPD prior to the submission of a planning application and aim to incorporate design principles where possible.’ Whilst this appears to be flexible, which is welcomed, a lot of the boxes in the SPD that set out what is being sought by the Council in respect of different topics there are only a few references to provisions being ‘ <i>where appropriate</i> ’ or ‘ <i>where viable</i> ’. It is important that there is an underlying recognition in the SPD that the provisions listed are the Council’s wish list and that applications will not be refused due to failure to meet items set out in the document.	<p>Comments noted. Given that this opening paragraph itself states that developers are ‘advised’ to aim to incorporate the design principles within the SPD ‘where possible’, it is not considered that the SPD itself is particularly prescriptive or inflexible. It is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology and address these where appropriate.</p> <p>Extra information has been added within the SPD’s introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p> <p>It would be inaccurate to state that planning applications will not be refused due to failure to meet items set out in the document, as the very nature of the SPD as a material consideration means that it will be used to assist in the consideration of planning applications and therefore may contribute to reasons for refusal of applications, dependent on the level of conformity or divergence from the principles</p>

		set out in the SPD, which will ultimately be weighed up in the planning balance at planning application stage.
Persimmon Homes	According to Paragraph 1.3 of the document, the Council have also sought to introduce this SPD in accordance with statute, national and local planning policy and guidance.	Comments noted.
Persimmon Homes	<p>Introduction (Paragraphs 1.1 to 1.8)</p> <p>The Council's aim of seeking "<i>to move away from generic 'anywhere estates; that lack identity'</i>" is generally supported and is considered to align with the principles of the recently revised National Planning Policy Framework (NPPF). We would question however whether there is a need for this SPD given the policies of the Local Plan, particularly QP3, QP4, QP5 and the site-specific strategic allocations which when read as a whole appear sufficient to control the delivery of well designed buildings and spaces.</p> <p>We would therefore question the perceived for need for this SPD.</p>	Comments noted. However, the Council disagrees with the suggestion that there is no need for the SPD. Whilst policies within the Local Plan set out provisions with respect to design and other topics covered in the SPD, the SPD provides guidance on how to achieve these requirements for developers and can assist Council officers and Planning Committee Members in determining whether a specific scheme would be in accordance with the relevant policies.

How to comment

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

CHAPTER 2

- National Planning Policy and Guidance
- Local Policies and Guidance
- Building for Life 12

National Planning Policy and Guidance

Respondent	Consultation Feedback	HBC Response/Proposed Action
North Star Housing Group	As a Housing Association we welcome an expectation that design will facilitate future adaptability as this is something that we are currently reviewing ourselves. We will not be achieving full Lifetimes Homes accreditation but will be delivering the better parts of it once again, where we can, similarly with the full Building for Life 12 standard.	Comments noted.
Persimmon Homes	<p>National Planning Policy and Guidance (Paragraphs 2.1 to 2.8)</p> <p>It is important for the SPD to take account of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) to ensure that it is consistent with national policy and facilitates the delivery of sustainable development in accordance with the Framework.</p> <p>We are therefore surprised at a number of omissions from the national summary. For example Paragraph 126 of the NPPF specifically relates to SPDs and explains the role and extent that they should play guiding new development, stating:</p> <p><i>“To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”</i></p> <p>As one of only two direct references to Supplementary Planning Documents within the NPPF, we believe that this paragraph is important in the context of this document. It explains how the level of detail and</p>	<p>Comments noted.</p> <p>The Council has had full regard to both the NPPF and NPPG in preparing the SPD.</p> <p>This section of the SPD is an introduction to the wider national and local policy context in which the SPD will operate. A comprehensive list of relevant NPPF and NPPG paragraphs/chapters can be found in the appendices. The Council does not consider it necessary to reproduce these references or set out verbatim whole sections of national policy or guidance in this document.</p> <p>Paragraph 126 is referenced in Appendix 1 of the document as a relevant NPPF paragraph. The Council agrees that direct reference to this in the main body of text would be beneficial, particularly as it espouses the same objectives the Council is seeking to achieve in adopting the SPD such as providing clarity on design expectations, championing design guides/codes (e.g. Building for Life 12) and encouraging distinctive places whilst also allowing for a degree of flexibility. This section of the SPD will therefore be amended to make reference to paragraph 126 in line with the comments of Persimmon Homes.</p>

	<p>degree of prescription contained within a SPD should be tailored to the circumstances of the area and accept a suitable degree of flexibility where it is justified.</p> <p>We are also surprised that there are only four lines relating to the NPPG despite it in our view being extremely pertinent to the policy burdens the SPD is looking to introduce. As explained in detail below, the NPPG explicitly details how policies relating to the Optional Standards should be introduced through a Local Plan so that the evidence of need and full financial implications can be properly assessed and considered.</p> <p>We believe this lack of detailed assessment of the NPPF and NPPG is a crucial omission which has ultimately led to the SPD not conforming with national planning policies or guidance in its current form. The SPD therefore cannot be considered sound, or supported, until significant amendments such as those outlined below are implemented.</p>	
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Local Policies and Guidance

Respondent	Consultation Feedback	HBC Response/Proposed Action
Persimmon Homes	<p>Local Planning Context</p> <p>Following receipt of the Inspectors Final Report, Hartlepool Borough Council recently adopted its Local Plan on 22nd May 2018. Covering the period from the 1st April 2016 to 31st March 2031, the Local Plan now forms part of the Development Plan for the Borough and replaces the saved policies of the 2006 Local Plan.</p> <p>Within the Plan there are number of policies which when read as a whole are intended to inform the detailed design of residential schemes within the Borough. We understand from Paragraph 2.14 of the SPD that the document is intended to elaborate on these policies, most notably CC1, CC2, INF1, INF2, QP3, QP4, QP5, QP7, HSG4, HSG5, HSG5a, HSG6, HSG7, HSG8, HE1, HE3, HE4, HE5, NE1, NE2 and NE4 which cover a range of subjects such as climate change adaptation and mitigation, infrastructure, design and layout, access, parking and highway safety, heritage, green spaces and ecology.</p>	Comments noted.

	Paragraph 2.15 of the Consultation Draft explains how the Council have sought to produce the SPD based upon the principles of the aforementioned policies with particular attention being paid to the overall design of new housing including its energy efficiency, overall appearance and function of the area as a whole.	
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Building for Life 12

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

CHAPTER 3

- Is the development in the appropriate location?
- Is the type of development appropriate?
- What do the Council and others think?
- Submitting the application

Is the development in the appropriate location?

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	The colour of the boxes makes the text difficult to read and may not be appropriate. Reference to the emerging Masterplans for strategic sites may be useful here.	Comments noted. The colour will be removed and the text more spaced out and clear. Comments noted. Reference will be added.

Is the type of development appropriate?

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

What do the Council and others think?

Respondent	Consultation Feedback	HBC Response/Proposed Action
Historic England	We recommend including in step 3 advice that the applicant should make pre-application contact with Historic England where our interests would be affected by the proposals (see https://historicengland.org.uk/services-skills/our-planning-services/charter/when-we-are-consulted/proposals-for-development-management/)	Comments noted. In view of these comments, the Council will amend the SPD so that step 3 makes reference to the applicant engaging in pre-application discussions with Historic England (and any other relevant external consultees) where relevant.

Submitting the application

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

CHAPTER 4

- A. Creating sustainable communities
- B. Building at an appropriate density
- C. Creating accessible housing areas
- D. Creating areas that are locally distinctive and dwellings that are aesthetically pleasing
- E. Creating safe housing areas
- F. Creating healthy and visually attractive housing areas for all
- G. Creating homes that are energy efficient and considering the changing needs of residents

A. Creating sustainable communities

Respondent	Consultation Feedback	HBC Response/Proposed Action
North Star Housing Group	It is particularly agreeable to me to see your emphasis on sustainable locations, transport links and bio diversity.	Comments noted.
Hartlepool Borough Council Development Control team	The information in the diagram is useful but could be better presented – suggest bullet points.	Comments noted. The information will be set out more neatly and clearly.

B. Building at an appropriate density

Respondent	Consultation Feedback	HBC Response/Proposed Action
Historic England	We recommend making reference to the need to sustain and enhance the significance of heritage assets, which might include conservation areas or other historic areas where character is defined partly by existing residential density.	Comments noted. In view of these comments, the Council will amend this section of the SPD to make reference to the need to sustain and enhance the significance of heritage assets where character is defined partly by existing residential density.
Hartlepool Borough Council Development Control team	<p>The information in the diagrams is useful but could be better presented.</p> <p>As this document deals with all residential development, references to “house” (e.g. in the diagram and in the curtilage amenity box, and throughout the SPD) should be amended to “dwelling”.</p> <p>In the “How to provide sufficient daylight, sunlight and privacy” box, the separation distances are written as a definitive, when they are in fact minimums. This should be made clear.</p>	<p>Comments noted regarding diagrams. The information will be set out more neatly and clearly.</p> <p>Comments noted regarding use of “house”. This will be amended throughout.</p> <p>Comments noted regarding separation distances. “At least” added.</p>

	“Appropriate” should be added before “permeable paving”.	“Appropriate” added as requested.
Barratt Homes North East (BDW)	<p>Paragraph 4.13 states that ‘the Council will therefore require new housing developments to have regard to these standards when designing schemes and house types’. Details from the Nationally Described Space Standards (NDSS) are then reiterated within the blue box titled ‘How to provide adequate internal space’ and Table 1.</p> <p>In 2013, the Government launched a review of the various housing standards being implemented by Local Authorities. The review culminated in:</p> <ul style="list-style-type: none"> • The establishment via Building Regulations of mandatory baseline standards that are to be applied on all new developments across the Country; and • A series of optional standards, including minimum internal space standards for new homes <p>The enhanced standards, as introduced by the Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. Rather than be an additional policy burden, the standards were meant to assist developers and to speed up the delivery of housing. The Government confirmed that the standards were only intended to be optional. Indeed, if the Government had considered that NDSS were necessary everywhere they would have incorporated them into the Building Regulations as a mandatory requirement.</p> <p>PPG (ID 56-018) states that where a Local Planning Authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the national described space standard (NDSS). This SPD is not a Local Plan and it is therefore not considered appropriate to introduce an internal space standard through this document.</p> <p>PPG (ID 12-028) also states that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard (NDSS). This SPD is not a Local Plan and it is therefore not considered appropriate to introduce an internal space standard through this document.</p>	<p>The Council has considered the comments of Barratt Homes North East with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-20150327) in order to ‘require’ an internal space standard, these should be referred to in the Council’s Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p> <p>In view of this, and having sought further advice from the Planning Advisory Service, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within</p>

	<p>Furthermore, SPDs 'should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessary to the financial burdens on development'.</p> <p>The Ministerial Statement states that '...the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact is considered, in accordance with the NPPF and Planning Guidance' (NPPG (para 002 Reference ID: 56-002-20160519 and 020 Reference ID:56-020-20150327)).</p> <p>Planning Policy Guidance is clear that where Council's do propose to introduce NDSS they must '...gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans'. 'Where a need for internal space standards is identified, local planning authorities should take account of the following areas:</p> <p>Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes</p> <p>Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted</p> <p>Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.</p> <p>BDW would urge the Council to recognise that the introduction of NDSS, needs to be done properly and via the correct route (i.e. through the Local Plan). If it is to be introduced the Council must consider the following:</p> <ul style="list-style-type: none"> • Potential impact on viability • Impact of potentially larger houses on land supply 	<p>this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>"The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types."</p> <p>The following paragraph will then be added to this section;</p> <p>"It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and, where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan."</p> <p>The SPD does not contain policy requirements. This SPD provides guidance on what the Council considers to be good practice when designing residential developments however, whilst the SPD will constitute a material planning consideration in the determination of relevant planning applications within the Borough, it is clear from the outset of the SPD (paragraph 1.3) that this constitutes a guidance document only and the design principles set out within this</p>
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	<ul style="list-style-type: none"> • Issue of affordability • Size of dwellings is dictated by market demand • Introduction would narrow the choice to purchasers <p>We would urge the Council to assess the following before considering introducing NDSS:</p> <ul style="list-style-type: none"> • What housing is currently being built • Current sales rates and the need for market intervention • Existing stock and the second-hand market • Meeting needs and improving affordability Impact on housing demand within the housing market area • Deliverability rate assumptions <p>What housing is currently being built – It is important to note that in terms of the housing being built, Building Regulations provides a greater degree of flexibility and allows BDW to carefully consider the type of housing/size of housing to suit the specific housing market and local area</p> <p>In terms of current sales rates and the need for market intervention – BDW carefully considers the housing mix for each site based on the specific housing market in that area. BDW's best selling homes are those that fall below NDSS, demonstrating that there is a real demand for these homes.</p> <p>Our sales rates are strong, with a significant demand from first time buyers. This clearly demonstrates that customers are happy with the size of housing on offer. This is further reflected within Customer Satisfaction surveys, BDW maintaining the maximum five-star customer satisfaction rating for 9 consecutive years, the only housebuilder to receive this accolade for so long consecutively, awarded by the Home Builders Federation.</p> <p>Meeting needs and improving affordability – the larger size of the houses will have an impact on affordability. We would urge the Council to consider the number of first time buyers who would be priced out of the market on the introduction of NDSS and how many more households would be pushed into needing affordable housing as a result of the higher prices</p>	<p>document should be incorporated, <i>where possible</i>. It is therefore considered that the SPD allows for an appropriate degree of flexibility. None of the recommendations within the SPD are a policy requirement but are considered to be best practice approaches to achieving good design. To aid clarity on this matter, extra information has been added within the SPD's introduction to explain that the SPD contains guidance and to give acknowledgement that the SPD would not be able to be implemented as a whole. The title of each box throughout the SPD has been amended to be clear that it sets out considerations rather than as full set of requirements.</p> <p>With respect to garage sizes, these are consistent with the guidance set out within the Tees Valley Residential and Industrial Design Guide, which is used across the Tees Valley and has been in use for a number of years. Where schemes fail to achieve this minimum size for garage spaces, the Council's Highways, Traffic & Transport section will not consider this a parking space and, where schemes fail to provide the appropriate amount of off-street parking, the Council's Highways, Traffic & Transport section will likely object to any such proposals on the grounds of highway safety. It is important therefore that applicants are made aware of standards that will be used to determine their applications to ensure proposals can achieve a favourable outcome.</p>
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	<p>Impact on housing demand within the housing market area – Hartlepool should consider that it will be one of the first Council's in the North East to adopt NDSS. This will therefore result in increased house prices in Hartlepool, but not in other locations. Purchasers may therefore choose to live in other locations within the housing market area which could have serious implications on the ability of Newcastle to meet it's housing target and on it's returns from New Homes Bonus, Council tax etc.</p> <p>Deliverability rate assumptions – There needs to be consideration of the longer time it will take to build bigger houses and the implication on schemes which might now be unviable or require extensive S106 negotiations to be deliverable (e.g. those sites already purchased or where a minimum land value has already been agreed). It may also affect the deliverability of sites which need infrastructure investment to bring them forward and where dependent on a certain number of houses to facilitate this. A reduction in the number of houses, may mean the infrastructure provision needed to bring the site forward, is not deliverable. Hence, affecting the deliverability of the site. The Council must consider the implication of this on the housing target.</p> <p>On NDSS BDW would encourage the Council to recognise the larger land take such houses will require. Therefore, to deliver this would reduce the yield of sites and could have potential implications on site yields identified by the Council on identified and allocated sites, ultimately resulting in the Council failing to meet their housing targets.</p> <p>It is noted that the Housing White Paper 'Fixing our Broken Housing Market' (February 2017) outlines the Government's intention to review the NDSS. BDW would urge the Council to reconsider the introduction of NDSS. If they do decide to introduce NDSS they must review the evidence base to justify it.</p> <p>'The Government is concerned that a one size fits all approach may not reflect the needs and aspirations of a wider range of households. For example, despite being highly desirable, many traditional mews houses could not be built under today's standards. We also want to make sure the standards do not rule out new approaches to meeting demand, building on high quality compact living model of developers such as Pocket Homes'.</p>	
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	<p>In conclusion, BDW strongly object to the inclusion of the NDSS as a requirement within this SPD and recommend that any reference to an internal space standard is removed. Planning Policy Guidance is clear that where a local planning authority wishes to require an internal space standard, they can only do so by reference in their Local Plan to the NDSS. This SPD is not a Local Plan and it is therefore not considered appropriate to introduce an internal space standard through this document.</p> <p>BDW would also point out that the SPD includes a number of onerous policy requirements which will have implications on land efficiency, viability and deliverability of sites. BDW would urge the Council to consider the prescriptive nature of the requirements below and remove these requirements, or amend to make them desirable, but not essential.</p> <p>Parking – para 4.9 ‘for garages to be considered as parking spaces they should be, as a minimum 3m wide and 6 in length’</p>	
Home Builders Federation (HBF)	<p>Paragraph 4.13 states that ‘the Council will therefore require new housing developments to have regard to these standards when designing schemes and house types’. Details from the nationally described space standard (NDSS) are then reiterated within the blue box titled ‘How to provide adequate internal space’ and Table 1.</p> <p>The Council will be aware that these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. The PPG provides clear guidance in relation to these standards.</p> <p>PPG (ID 56-018) states that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard (NDSS). This SPD is not a Local Plan and it is therefore not considered lawful to introduce an internal space standard through this document.</p> <p>PPG (ID 12-028) also states that SPDs ‘should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They</p>	<p>The Council has considered the comments of the Home Builders Federation with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-20150327) in order to ‘require’ an internal space standard, these should be referred to in the Council’s Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties</p>

	<p>should not add unnecessarily to the financial burdens on development'. Again, it is therefore not considered appropriate for the NDSS to be a requirement of the SPD.</p> <p>PPG (ID 56-020) identifies the type of evidence required to introduce a policy for internal space standards. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</p> <ul style="list-style-type: none"> • Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. <p>Therefore, even if the Council were to be looking to prepare a Local Plan policy to introduce this requirement, they would need robust justifiable evidence to introduce this standard, based on the criteria set out above. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p> <p>In conclusion, the HBF strongly object to the inclusion of the NDSS as a requirement within this SPD and recommend that any reference to an internal space standard is removed.</p>	<p>that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p> <p>In view of this, and having sought further advice from the Planning Advisory Services, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>"The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types."</p> <p>The following paragraph will then be added to this section;</p> <p>"It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting</p>
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		these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and, where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan.”
Gleeson Regeneration	<p>Gleeson utilise a drive way construction comprising a permeable crushed aggregate (colloquially referred to as “gravel”) surface, behind a 1.5m tarmac apron to prevent any potential movement of material onto the adopted highway.</p> <p>In light of this Gleeson are very supportive of the Council’s desire to see car parking provided in a permeable surface as detailed within the blue box title ‘How to provide appropriate car parking’. We would suggest that this point could be bolstered by either listing potential suitable solutions (including our crushed aggregate solution), or by making mention to the joint Environment Agency/DCLG document “Guidance on the permeable surfacing of front gardens” which also lists appropriate solutions, including “gravel”.</p> <p>It is stated at Paragraph 4.13 that ‘the Council will therefore require new housing developments to have regard to these standards when designing schemes and house types’. Details from the nationally described space standard (NDSS) are then reiterated within the blue box titled ‘How to provide adequate internal space’ and Table 1.</p> <p>The Council will be aware that these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. The PPG provides clear guidance in relation to these standards.</p> <p>PPG (ID 56-018) states that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard (NDSS). This</p>	<p>Comments noted with respect to driveway construction.</p> <p>With respect to the guidance document referred to, this applies more specifically to individual householders seeking to pave over their front gardens. The Council generally wishes to discourage this as it can have a detrimental impact on the visual amenity of the property and the character of the area and it is for this reason the Council typically encourages new housing developments to incorporate adequate amounts of front garden space to avoid the creation of large swathes of hard standing. In any event, it is considered that the guidance document referred to would not be appropriate to be included in this SPD, however would likely be referred to in any future SPD guidance on residential extensions/works to existing properties.</p> <p>It is also noted that the Council’s Highways, Traffic & Transport section has previously raised concerns with movement of material from driveways constructed of loose aggregate onto the adopted highway and this approach may not be suitable for wheelchair users, the Council therefore generally discourages this type of driveway construction. The Council therefore would wish to encourage alternative means of permeable driveway construction.</p> <p>The Council has considered the comments of the Gleeson Regeneration with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-</p>

	<p>SPD is not a Local Plan and it is therefore not considered appropriate to introduce an internal space standard through this document.</p> <p>PPG (ID 12-028) also states that SPDs 'should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development'. Again, it is therefore not considered appropriate for the NDSS to be a requirement of the SPD.</p> <p>PPG (ID 56-020) identifies the type of evidence required to introduce a policy for internal space standards. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</p> <ul style="list-style-type: none"> • Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'. <p>Therefore, even if the Council were to be looking to prepare a Local Plan policy to introduce this requirement, they would need robust justifiable evidence to introduce this standard, based on the criteria set out above. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p>	<p>20150327) in order to 'require' an internal space standard, these should be referred to in the Council's Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p> <p>In view of this, and having sought further advice from the Planning Advisory Service, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>"The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types."</p>
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	<p>In this respect it is Gleeson's view that the NDSS is itself an inflexible and blunt instrument which does not take into account the different models of housebuilding each developer has.</p> <p>Gleeson's focus is on pricing homes so that they can be afforded by 90% of local couples in full time employment. To establish sales prices, the Government's ASHE (Annual Survey of Hours & Earnings) figures are used to determine the lowest wages within the Local Authority. A modest multiple is then applied to the bottom twenty percentile to calculate the level of mortgage which can be afforded by 90% of people living in the local area. This approach is to ensure that our homes are affordable, and that home ownership is obtainable to a higher proportion of the population. This sits foursquare with the overall thrust of the NPPF.</p> <p>The application of the NDSS would run entirely counter to this model and mandating that Gleeson build larger properties would inevitably push up the selling price of our homes which would be contrary to the raison d'être of the company which is to offer the potential for home ownership to those on more modest incomes (as these people would inevitably be priced out of the market by applying the NDSS). It would therefore make it difficult for Gleeson to operate in an authority which puts the NDSS in place as it fundamentally reduces the purchaser's choice and our flexibility to tailor developments to suit specific areas and needs.</p> <p>Given the above comments, Gleeson fundamentally object to this policy and believe it is unsound in being unjustified, ineffective and contrary to national policy and guidance. It would also fundamentally undermine the choice for home buyers and price out certain groups from the market. As this is the case, we believe the policy should be deleted.</p>	<p>The following paragraph will then be added to this section;</p> <p>"It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and, where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan."</p>
Taylor Wimpey North East	<p>At 4.8 it is stated – Avoid placing windows in the side elevation unless they are obscurely glazed or can be screened.</p> <p>This statement is overly prescriptive and is obstructive to principles of natural surveillance discussed elsewhere in the SPD. At the same time using gable windows on key points in a development is an opportunity to make a design statement on key corners.</p>	<p>Comments noted.</p> <p>With respect to placement of windows in side elevations, in view of the comments of Taylor Wimpey North East, the Council proposed to amend the wording of this sentence as follows;</p> <p>"Windows in side elevations can be useful in allowing light into the property and providing natural surveillance but must</p>

	<p>At 4.9 it is stated – Parking should be located to the side of dwellings to avoid visual intrusion and dominance.</p> <p>As a blanket statement this could have detrimental effect on delivering good urban design creating numerous gaps in street scenes and harming the densities that can be achieved. It would be better to request car parking to be well integrated to the design, convenient and not overly dominant. This would allow enough scope for creative design. Frontage parking if well designed does not cause visual intrusion or dominance.</p> <p>At 4.14 Reference is made to the Technical housing standards – nationally described space standard. But parts of the standards are then replicated in the text. This is unnecessary and any updates made to the space standards then immediately creates conflict. It also disregards explanatory footnotes included in the Space Standards. Any changes or introduction of space standards should be tested through reasonable and appropriate viability assessment.</p>	<p>be obscurely glazed or be screened where they would adversely impact upon the privacy of neighbours.”</p> <p>With respect to locating parking to the side of dwellings, the Council acknowledges the comments of Taylor Wimpey North East, and proposes the following amendments to this wording;</p> <p>“In-curtilage parking should be well integrated into the design of the development, conveniently located and not overly dominant or visually intrusive, with appropriate landscaping in between driveways.”</p> <p>The Council has considered the comments of the Taylor Wimpey North East with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-20150327) in order to ‘require’ an internal space standard, these should be referred to in the Council’s Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p>
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		<p>In view of this, and having sought further advice from the Planning Advisory Service, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>“The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types.”</p> <p>The following paragraph will then be added to this section;</p> <p>“It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and,</p>
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		<p>where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan.”</p> <p>Whilst it is noted Taylor Wimpey North East has concerns that replicating the standards within this document may cause conflict in future should the NDSS be amended, given that these standards are currently only a recommendation within the SPD and are not a policy requirement, it is not considered that this would cause significant issues. Furthermore, the SPD can be amended in future to reflect any changes to the NDSS if necessary.</p> <p>With respect to the NDSS footnotes, the one additional explanatory footnote that was not included in the SPD will be added to the footnotes as follows;</p> <p>“The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.”</p>
Story Homes	<p>In addition, there appear to be a number of items where the Council is seeking particular approaches to design which are inconsistent and could conflict. For example, in relation to in plot car parking it is recommended that parking is not to the front of dwellings but to the side, where any glazing should be obscure. However, elsewhere in the document it is noted that car parking should be overlooked for reasons of natural surveillance, which would be reduced from on plot due to obscure glazing. It is important that the various provisions of the document do not contradict or undermine other elements.</p> <p>How to provide sufficient daylight, sunlight and privacy</p> <p>Story Homes notes the Council's recommendations for providing sufficient daylight, sunlight and privacy but notes that some provisions are unduly restrictive. For example, the advice to 'Avoid placing windows in the side</p>	<p>With respect to locating parking to the side of dwellings, the Council acknowledges the comments of Story Homes, and proposes the following amendments to this wording;</p> <p>“In curtilage parking should be well integrated to the design of the development, conveniently located and not overly dominant or visually intrusive, with appropriate landscaping in between driveways.”</p> <p>With respect to placement of windows in side elevations, in view of the comments of Story Homes, the Council proposed to amend the wording of this sentence as follows;</p> <p>“Windows in side elevations can be useful in allowing light into the property and providing natural surveillance but must</p>

	<p>elevation unless they are obscurely glazed or can be screened' does not take into account that in some circumstances on corner plots using non-obscured glazed windows in gable or side elevations may actually be benefits in design terms and benefit schemes to increase natural surveillance levels.</p> <p>How to provide appropriate car parking</p> <p>Story Homes recognises the need to balance encouraging sustainable transport modes with ensuring appropriate car parking in housing areas to avoid parking problems. We welcome the acknowledgement in the table following paragraph 4.9 that car parking provision should be usually be at two spaces per dwelling but it is important that flexibility is retained to allow for additional spaces per dwelling dependent on dwelling sizes.</p> <p>It is considered that the requirement for an in curtilage parking space to be 6m long as a standard unless there are constrained circumstances is excessive in comparison to standards adopted by other authorities in the North East. Durham County Council for example accepts that drives should be a minimum of 5.0m where a roller shutter garage door is provided or 5.5m where an up and over door is used. Newcastle City Council accepts that driveways with no gates or garage doors can be 5.0m in length and for standard 'up and over' door, the face of the garage should be 5.6 m in length from the back of the footway or from the edge of a shared footway. Therefore, requiring lengths of 6.0m is considered to be onerous in design terms.</p> <p>The stipulation that parking should be located to the side of dwellings to avoid visual intrusion and dominance is overly restrictive in terms of the design of residential development. Story Homes has a number of house types with integral garages which would not be able to meet this provision and would require car parking to the front of properties. In addition, we note that advising that drives should be located to the side of dwellings also affect levels of natural surveillance and amenity space to the front of properties highlighted in other parts of the SPD.</p> <p>It is considered that the provisions that parking surfaces should be permeable should not be a general design principle set out in the SPD. It may not be appropriate to include permeable parking surfaces on</p>	<p>be obscurely glazed or be screened where they would adversely impact upon the privacy of neighbours."</p> <p>Comments noted with respect to car parking provision. The SPD is a guidance document only (albeit it does constitute a material planning consideration) and therefore appropriate flexibility is built in. Planning Officers will always defer to the views of the Council's Highways team with respect to the adequacy of parking provision on any given scheme.</p> <p>With respect to in curtilage parking space dimensions, these are consistent with the guidance set out within the Tees Valley Residential and Industrial Design Guide, which is used across the Tees Valley and has been in use for a number of years. Where schemes fail to achieve these minimum sizes, the Council's Highways, Traffic & Transport section will not consider this a parking space and, where schemes fail to provide the appropriate amount of off-street parking, the Council's Highways, Traffic & Transport section will likely object to any such proposals on the grounds of highway safety. It is important therefore that applicants are made aware of standards that will be used to determine their applications to ensure proposals can achieve a favourable outcome.</p> <p>With respect to permeable paving, the Council considers that the wording of the SPD is sufficiently flexible in recommending that permeable paving should be used '<i>where possible</i>' but also alternatively or in addition to recommending a SuDs scheme be used to mitigate any increase in surface water run-off.</p> <p>The Council has considered the comments of the Story Homes with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-20150327) in order to 'require' an internal space standard, these should be referred to in the Council's Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-</p>
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	<p>developments and therefore the document should not stipulate this as a general principle to be followed. The strategy to address surface water drainage on development sites should be considered as a whole on a site wide basis rather than requiring specific features through various Council documents. This allows for greater flexibility in providing appropriate bespoke surface water drainage solutions within developments.</p> <p>How to provide adequate internal space</p> <p>Story Homes recognises the Council's aspirations regarding amenity space in dwellings but we would highlight the provisions of the Planning Practice Guidance (PPG) with regards to the type of evidence required for implementing a space standards policy. The PPG states at ID 56-020 that: <i>'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</i></p> <ul style="list-style-type: none"> · Need – <i>evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</i> · Viability – <i>the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</i> · Timing – <i>there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.</i> <p>The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. At present it is considered that there is insufficient evidence presented by the Council to support this policy approach. Whilst the Council makes reference at paragraph 4.13 to many of the new dwellings in the Borough do not meet specified Nationally Defined Space Standards (NDSSs) either overall or for bedroom sizes there is no evidence presented to support whether this is the case.</p>	<p>20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p> <p>In view of this, and having sought further advice from the Planning Advisory Service, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>"The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types."</p> <p>The following paragraph will then be added to this section;</p>
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	<p>No justification has been provided by the Council to indicate that the size of the homes being completed are considered by those purchasing them to be inappropriate or that developers are struggling to sell non-compliant homes in comparison to compliant homes.</p> <p>Story Homes concurs with the Homebuilder Federation's (HBF's) evidence that it has collated in the region that homebuilders do not have any issues or delays with selling properties with less than the NDSS, with three-bed non-NDSS compliant homes often being high selling properties on sites. As the HBF notes, the industry, knows its customers and what they want, and Story Homes would not sell homes below the enhanced standard size if they did not appeal to the market.</p> <p>The Council suggests at paragraph 4.14 that 'where new dwellings meet the gross internal floor area but fail to achieve adequate floor space in specific rooms, minor alterations to house types could enable these dwellings to meet the national space standards without significant impacts on viability.' However, there is again no evidence that making such changes will not affect the viability of proposals.</p> <p>Story Homes considers that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. We recommend that that the Council needs to give further careful consideration as to how the requirements for NDSSs, alongside the cumulative impacts of other plan policies, will impact on deliverability of sites, the Council's five year land supply and the Council's future Housing Delivery Test results.</p> <p>Overall, Story Homes, does not consider that a NDSSs approach to amenity space is justified or necessary as it is considered that local needs can be met without the introduction of the optional housing standards. We therefore recommend that the reference to NDSSs should be deleted from the SPD in order to make it sound.</p> <p>However, should the approach be retained then reference to 'subject to viability' should be added to the table to ensure the ability to take these considerations in to account and suitable transition period of not less than 18 months from the adoption of the SPD is allowed for to enable the development industry opportunity to accommodate the onerous</p>	<p>"It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and, where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan."</p> <p>The Council notes Story Homes comments with respect to NDSS being subject to viability and a transition period, however given that the NDSS has been included in the SPD as a recommendation and not a policy requirements, it is not considered appropriate to stipulate these standards are 'subject to viability' or set out a transition period as there will be no formal requirement for applicants to adopt the standards (and therefore no requirement to demonstrate where this is unviable).</p>
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	<p>requirements. It is also important that clarity is added to state that NDSS will not be sought retrospectively to those applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission (including subject to planning obligations) before the end of the transition period.</p>	
Bellway Homes	<p>Para 4.6</p> <p>The Council should recognise that the density of development is a clear constraint to viability and therefore there needs to be a clear steer from the Council at the earliest opportunity to guide the progress of development. The Council should be open to assessing viability and should be flexible in their assessment with regard to the evidence put before them. Above all else the Council should ensure development “makes the most efficient use of land” (NPPF 2018). The Council should also be able to justify their approach and requests to provide transparency and maintain trust between Council and developer.</p> <p>Para 4.7</p> <p>Rather than a defined list, the list should form a consideration for developers however development should be judged on a case by case basis as to whether amenity space requirements should be met in every instance. Inherently the list serves to benefit sales and therefore a developer should be inclined to adopt the list’s approach however it should not be binding as the SPD acknowledges that each area has its own constraints.</p> <p>Para 4.8</p> <p>There are very few instances where principle elevations do not provide adequate glazing. Many house-types arise from the developer’s national portfolio which is fixed. Such local variation to factor in more glazing is not accounted for, and certainly should not be left as ambiguous as described in the SPD for decision takers to make of what they will. Without understanding how such assessment criteria would work, Bellway recommend that this requirement should be removed.</p> <p>Para 4.9</p>	<p>With respect to paragraph 4.6, the Council acknowledges that density of development can be a constraint to viability. The Council does not consider it appropriate or practical to dictate densities through this SPD however where appropriate sets out approximate numbers of dwellings, amount of green space etc. (and therefore approximate densities) for allocated sites by virtue of the housing policies held within the Council’s adopted Local Plan.</p> <p>The layout and density of unallocated sites will be considered by the Council on a case by case basis in view of the guidance held within this document and all other relevant material planning considerations, as well as the relevant policies within the development plan.</p> <p>With respect to viability, Paragraph: 007 (Viability and decision taking - Reference ID: 10-007-20180724) stipulates that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. However in accordance with Paragraph: 002 (Viability and plan making- Reference ID: 10-002-20180724) the role for viability assessment is primarily at the plan making stage.</p> <p>Notwithstanding this, the Council would stress that the SPD does not set out requirements but is a guide. The SPD does not contain policies, but instead provides recommendations that seek to achieve good standards of design. The SPD is supplementary to the policies in the Council’s Local Plan, and provides advice for applicants and officers alike. The Council would consider that the adoption of such a document in itself, setting out the Council’s expectations, provides transparency and, as above, given that the</p>

	<p>The current combined local authority design guidance associated with parking spaces functions well and any deviation from current practice should be avoided. Bellway recommend that current practice should be adopted in the HBC Residential Design SPD to avoid confusion. Bellway object to the requirement for parking to be provided along the side of dwellings as this can have significant implications for layout efficiency and unnecessarily differs from common practice and design guidance in other local authority areas.</p> <p>Para 4.13</p> <p>Bellway fully support the views of the HBF with regard to space standards.</p>	<p>document constitutes guidance only, then an appropriate degree of flexibility can be maintained.</p> <p>Early pre-application engagement with the Council will provide a clear steer on specific sites and set out the Council's expectations with respect to any residential development to come forward on a case-by-case basis, however general design principles and approaches to good design that should be pursued are set out clearly in the SPD.</p> <p>With respect to paragraph 4.7, Bellway's comments are noted and welcomed. As above, the SPD does not set out requirements but is a guide. The SPD does not contain policies, but instead provides recommendations that seek to achieve good standards of design. The titles of each box within the document has been amended to aid clarity that they contain considerations rather than requirements, and extra information has been included within the SPD's introduction to acknowledge that implementing all recommendations would not be possible.</p> <p>With respect to paragraph 4.8, as above, the SPD does not set out requirements but is a guide. The SPD does not contain policies, but instead provides recommendations that seek to achieve good standards of design. Developers will be expected to demonstrate how they have considered this guidance only however, where the guidance has not been followed, developers should be able to demonstrate why.</p> <p>With respect to in curtilage parking space dimensions, these are consistent with the guidance set out within the Tees Valley Residential and Industrial Design Guide, which is used across the Tees Valley and has been in use for a number of years. Where schemes fail to achieve these minimum sizes, the Council's Highways, Traffic & Transport section will not consider this a parking space and, where schemes fail to provide the appropriate amount of off-street parking, the Council's Highways, Traffic & Transport section</p>
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		<p>will likely object to any such proposals on the grounds of highway safety. It is important therefore that applicants are made aware of standards that will be used to determine their applications to ensure proposals can achieve a favourable outcome.</p> <p>With respect to locating parking to the side of dwellings, the Council acknowledges the comments of Bellway Homes, and proposes the following amendments to this wording;</p> <p>“In curtilage parking should be well integrated to the design of the development, conveniently located and not overly dominant or visually intrusive, with appropriate landscaping in between driveways.”</p> <p>With respect to paragraph 4.13, please see above response to HBF comments.</p>
North Star Housing Group	<p>As a Housing Association we own our properties in perpetuity and so long term desirability/letability is important to us. Turnover within our stock is inevitable but it is exacerbated by properties being such that residents become prematurely discontented. Whilst we haven't analysed whether there is a correlation between the size/amenities of the dwelling and the reason that people terminate their tenancy, we know from feedback surveys and the conversations that our Housing Officers have with tenants that the lack of internal space; garden space and internal and external storage/storage space are reasons cited for turning down small homes in the first place, or seeking to move in to something larger after a short while eg less than 2 years.</p> <p>Our average void loss for all our properties is over £400 rent each time and our average void repair costs are £950 which doesn't include any major replacements (not necessary with newer properties). On top of that is the staff cost of dealing with a termination of tenancy, and advertising and allocating to a new tenant. Thus it is better for us to build or buy homes where people don't to move very often.</p>	<p>Comments noted. These concerns are also echoed by the Council. The Council included a recommendation that the NDSS should be adopted by developers in the SPD due to similar concerns identified by the Council's Housing team in early discussions and following a review of approved schemes in the Borough.</p> <p>For simplicity and to avoid confusion caused by the introduction of separate space standards, the Council considers the NDSS an appropriate standard to recommend however it is noted in some instance North Star consider smaller units may be appropriate.</p>

	<p>I have recently sent Story Homes my thoughts as they are considering their S106 unit design. I am replicating this here for your information. We don't insist on NDSS space standards, even for our own schemes, however we are not far off in terms of our space requirements.</p> <p><i>Info sent to Story Homes. Jan 2019</i></p> <p>We build 5 person, 3 bed houses and tend to look for around 87 m2 for a 2 storey house. The NDSS at 93m2 feels unnecessarily large</p> <p>So in summary in answer to your query, we recognise that often S106 units are smaller than we would build ourselves. If they are unacceptably small we will not bid for them. The size does not alter the rent we can charge however. A 2 bed house will attract a certain rent in a location ; a 3 bed another certain rent. This means that the price we can offer you, which is based on rental income, does not directly increase with increase in size. The valuer does not take size in to account but we make a judgement about long term lettability ; how popular the units are likely to be once it is not a brand new estate etc. If houses are small we tend to find turnover is greater and that is costly for us.</p> <p>Size wise: Below shows the NDSS and what we tend to build to, site layout and land cost dependent. I've tried to be honest in my S106 preference in the sense that in the real world developers offer us smaller units than we would like and we make a judgement based on location. If too small I will not bid but others will. I've stated a preference here, as you have asked and I've tried not to be unreasonable. I've included Hambleton Council's sizes just for information as they are currently looking at these and transfer prices.</p>									
	<table><tr><th>Unit type</th><th>National Described Space Standard m2</th><th>North Star Standard range m2</th><th>Preferred range m2</th></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Unit type	National Described Space Standard m2	North Star Standard range m2	Preferred range m2					
Unit type	National Described Space Standard m2	North Star Standard range m2	Preferred range m2							

	2 bed , 3 person bungalow	61	61-64	61-64		74	Unknown
	2 bed 3 person, 2 storey house	70	N/A	N/A		65	70 (note no details on whether 3 or 4 person)
	2 bed, 4 person, 2 storey house	79	77-79	72-77		N/A	70 (note no details on whether 3 or 4 person)
	3 bed. 5 person, 2 storey house	93	86-88	83-87		N/A	90
	<p>NB Three storey houses need to be larger to accommodate 3 floors of circulation space.</p> <p>Some local authorities might require a small number of 4 bedroomed houses. This is rare however.</p> <p>The final point I would make is we will always bid for bungalows but we are not keen on flats.</p> <p>Some of the S106 units we are offered by developers are insultingly small; the worst being 56sq m for a 2 bed house in Seaton Carew. Where S106 units are substandard in terms of size or design, we will not bid to buy them, unless the area is exceptional, as we know that by the time they are 2nd or 3rd hand properties, their desirability will have lessened from new build.</p>						
Homes England	<p>On the standards we do not have a specific set of size standards but we do use NDSS as a benchmark. In essence we would struggle to support anything which was less than 85% of NDSS.</p>				<p>Comments noted. The Council included a recommendation that the NDSS should be adopted by developers in the SPD due to similar concerns identified by the Council's Housing team in early discussions and following a review of approved schemes in the Borough.</p> <p>For simplicity and to avoid the introduction of separate space standards, the Council considers the NDSS an appropriate standard to recommend however it is noted in some instance smaller units may be appropriate.</p>		

<p>Persimmon Homes</p>	<p>How to provide appropriate car parking (Table at Paragraph 4.9)</p> <p>We are concerned by the use of the term ‘usually’ within the first bulletpoint of the Table at Paragraph 4.9. Whilst the point explains situations where the parking provision may be reduced, the term ‘usually’ also allows for the parking standards to be increased at the Council’s discretion. This is particularly concerning as it does not provide certainty to developers or interested parties. As the use of the word ‘usually’ is unlikely to be accepted by an Inspector in a Local Plan examination, the guidance on parking standards should be amended to clearly set out and justify the expectations from a development to remove any ambiguity.</p> <p>Despite the Council previously accepting alternative standards, the remainder of the table also requires in-curtilage car parking spaces to measure 6m X 3m with parking spaces “<i>located to the side of dwellings to avoid visual intrusion and dominance</i>”. Alongside a further requirement which stipulates that that for garages to be considered as a parking spaces they should be, as a minimum 3 metres wide and 6 in length, the SPD is looking to introduce extremely prescriptive design requirements which we feel are unjustified and untested despite the obvious layout implications.</p> <p>As this ‘guidance’ will be used in the decision-making process, it is imperative that all requirements are justified with the appropriate consideration given to the impacts resulting from inefficient layouts and the resultant viability implications. We therefore suggest that further dialogue with the development industry is crucial on this and other matters of the SPD before the document is progressed.</p> <p>Nationally Described Space Standards (Paragraph 4.10 to 4.14)</p> <p>Of greatest concern to Persimmon Homes is the Council’s intention to introduce the Nationally Described Space Standards (NDSS) via the back door through an SPD without any engagement with the development industry or evidence to demonstrate need for such optional standards. Such an approach is unlawful and will seriously jeopardise the future deliverability of sites.</p>	<p>Comments noted. Striking the correct balance of flexibility and necessity across a range of design recommendations is inherently difficult. Indeed, the Council notes Persimmon Homes’ comments that raise concerns about the potential for ambiguity on one point and concerns on the introduction of prescriptive design requirements on another.</p> <p>The parking standards set out are considered to be broadly in line with the Tees Valley Residential and Industrial Design Guide and Specification.</p> <p>Persimmon Homes describes using the term ‘usually’ for the number of parking spaces as too ambiguous but then feels the Council is being too specific in the sizes of parking spaces expected. It is therefore unclear whether Persimmon considers that the Council should adopt more prescriptive parking standards or that the parking standards should be more flexible.</p> <p>The term ‘usually’ is used to allow flexibility and to accommodate schemes in areas where parking is not as critical e.g. in the town centre in proximity to public transport and town centre services. The Council’s Highways team will be involved in the planning decision-making process and will be able to advise on a case-by-case basis.</p> <p>The size of in-curtilage and garage spaces is given as this is typically the minimum size at which the Council’s Highways team will count such a space as off-street parking. Whilst Persimmon Homes may wish to provide space below this established standard, it is unlikely that the Council’s Highways team will consider this acceptable parking provision and therefore the SPD recommends that these standards are adopted to avoid objections from the Council’s Highways team (and the resulting delays in the planning application process).</p>
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	<p>The Council have a recently adopted Local Plan. Whilst the plan contains policy governing matters such as design and housetype needs and provision, at no point throughout the plan is a reference to the Nationally Described Spaces Standards (NDSS) made within either the policies or supporting text.</p> <p>There is clearly a policy vacuum within the Local Plan relating to NDSS and as set out within paragraph 56-018 of the NPPG, where a local planning authority wishes to require an internal space standard <i>“they should only do so by reference <u>in their Local Plan to the nationally described space standard.</u>”</i> This aligns with the Written Ministerial Statement of 25th March 2015 which confirmed that <i>“the optional new national technical standards should only be <u>required through any new Local Plan policies</u> if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”</i>.</p> <p>As there are no references within the Local Plan to the NDSS, the Council do not have the ability to secure, or request schemes to be constructed in accordance within the standards. Whilst it may be suggested that the references to the NDSS within the SPD are just ‘guidance’, as we are currently experiencing this ‘guidance’ will undoubtedly influence the decision making process leading to either a refusal of a scheme based upon its housetype mix or the imposition of a condition applying NDSS to future reserved matters. The Residential Design SPD therefore contains statements in the nature of policies which pertain to the development and use of land which the Council wishes to encourage. In accordance with Part 6 of The Town and Country Planning (Local Planning) (England) Regulations 2012 the policies should therefore be subject to public consultation (Regulation 18 & 19) before being submitted to the Secretary of State for independent examination.</p> <p>To be introduced via a Local Plan, paragraph 56-020 explains the process which needs to be followed, stating:</p> <p><i>“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</i></p>	<p>With respect to locating parking to the side of dwellings, as above, the Council proposes the following amendments to this wording;</p> <p><i>“In curtilage parking should be well integrated to the design of the development, conveniently located and not overly dominant or visually intrusive, with appropriate landscaping in between driveways.”</i></p> <p>With respect to viability, Paragraph: 007 (Viability and decision taking - Reference ID: 10-007-20180724) stipulates that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. However in accordance with - Paragraph: 002 (Viability and plan making- Reference ID: 10-002-20180724) the role for viability assessment is primarily at the plan making stage.</p> <p>Notwithstanding this, the Council would stress that the SPD does not set out requirements but, constitutes ‘guidance’. The SPD does not form part of the development plan and does not contain policies, and is therefore not subject to the same level of scrutiny and examination. Instead the SPD provides recommendations and guidance that seeks to achieve good standards of design. The SPD is supplementary to the policies in the Council’s Local Plan and provides advice for applicants and officers alike. Developers will be expected to demonstrate how they have considered this guidance only however, where the guidance has not been followed, developers should be able to demonstrate why.</p> <p>The Council has considered the comments of Persimmon Homes with respect to the Nationally Described Space Standards (NDSS). The Council acknowledges that (as set out in Paragraph: 018 - Reference ID: 56-018-20150327) in order to ‘require’ an internal space standard, these should be referred to in the Council’s Local Plan and (in accordance with Paragraph: 020 - Reference ID: 56-020-</p>
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	<ul style="list-style-type: none"> • <i>need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</i> • <i>viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</i> • <i>timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”</i> <p>It is clear from the above that the optional NDSS are to be introduced on a ‘need to have’ rather than ‘nice to have’ basis with appropriate hurdles put in place via the NPPG to ensure that the standards are introduced only when there is an evidenced ‘need’. Consideration also needs to be given to the viability and timing implications of introducing such standards meaning that an Examination in Public is the only appropriate forum to consider these matters. We do not believe that these hurdles have been addressed and therefore the threshold for the introduction of such a policy has not been achieved within the Local Plan, or evidence base supporting this SPD.</p> <p>Persimmon Homes stress that the proposed requirements set out in this draft SPD cannot be sought without evidence gathering, policy formulation, viability testing and ultimately EiP. If the SPD therefore continues to be pursued, this section of document should be deleted in its entirety and explored only through a Local Plan review in accordance with the NPPG.</p>	<p>20150327) local planning authorities should provide justification for requiring internal space policies and should take account of need, viability and timing.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), it is acknowledged that this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development. That being said, evidence collected by the Council to date has shown that an appreciable proportion of the new homes in the Borough fall short of the NDSS and, with respect to affordable housing units in particular, it is understood that Homes England will often not provide support for properties that fail to achieve at least 85% of the NDSS and Registered Providers within the Borough have experienced issues renting such small properties due to inadequate internal space for tenants.</p> <p>In view of this, and having sought further advice from the Planning Advisory Service, the Council feels that recommending that new developments apply the NDSS, through the Residential Design SPD, is an appropriate way in which to combat the downward trend in the size of new homes and the negative implications of this by <i>encouraging</i> developers to build new homes that provide sufficient internal space for new occupants, using the NDSS as a recognised standard.</p> <p>Whilst the Council therefore does not intend to remove all reference to the NDSS within the SPD, the wording within this section will be amended to remove the following sentence from paragraph 4.13:</p> <p>“The Council will therefore require new housing developments to have regard to these standards when designing schemes and house types.”</p> <p>The following paragraph will then be added to this section:</p>
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		<p>"It is acknowledged that in order to make all new housing developments comply with the NDSS, these requirements must be set out and fully evidenced through a policy within the Council's Local Plan. The NDSS are not set out within the Council's recently adopted Local Plan (2018) and are therefore not a policy requirement. Furthermore, it is acknowledged that certain circumstances may preclude new housing developments from adopting the NDSS and the Council therefore wishes to maintain a flexible approach to internal space standards through this SPD. However, in order to encourage the construction of new homes that provide sufficient internal space for new occupants, the Council recommends that applicants consider adopting these standards (as set out in the following tables) when designing housing schemes and house types, wherever possible. These space standards can also be used as a benchmark to understand whether developments in Hartlepool are providing appropriate internal space and, where schemes are consistently underperforming, this will assist the Council in deciding whether to adopt the NDSS in future through a revision to the Local Plan."</p>
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C. Creating accessible housing areas

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	The information in the diagram is useful but could be better presented.	Comments noted. The information will be set out more neatly and clearly.
Taylor Wimpey North East	At 4.18 it is stated – Differentiate between paths and roads. This generic statement contradicts the use of shared surfaces as included in the Tees Valley Residential and Industrial Design Guide and Specification which is referred to.	<p>This section of the SPD provides guidance on how to incorporate safe access and easy movement around developments.</p> <p>With respect to shared surfaces, these are clearly only appropriate in some instances; the Tees Valley Residential</p>

	<p>It is also stated that placed obstacles, such as rocks or vegetation, should be used to ensure areas such as open space and pavements are kept vehicle free. It is our intention that good design should ensure this and that placed obstacles should be a last resort.</p>	<p>and Industrial Design Guide states that shared surfaces 'provide vehicular access to no more than 15 dwellings and must not attract through traffic.' In all other instances the statement at 4.18 referred to remains relevant and does not preclude the use of shared surface where appropriate, particularly given that a shared surface isn't purely 'path' or 'road'. When designing and considering proposals, consideration should be given to the nature of the use of the highway and whether it is intended to be a shared surface. Notwithstanding this, it is considered that the provision of a shared surface would not necessarily prohibit the use of multiple hard standing treatments to differentiate between different uses (e.g. pedestrian areas, cycle lanes, parking areas, etc.).</p> <p>Differentiating between paths and roads in other instances (for example through using a mix of hard standing materials or landscaping to provide a visual break) not only creates a safer environment by providing visual or physical separation between pedestrians and vehicular traffic, but can also create a more visually attractive environment, by avoiding swathes of monotonous/homogenous hardstanding (typically tarmac) where footpaths are adjoined to roads and parking areas, and can also avoid antisocial parking (i.e. cars parking on footpaths/pedestrian areas). This principle is set out in Building for Life 12 and for the reasons set out above the Council considers it entirely appropriate that it should remain in the SPD.</p> <p>Taylor Wimpey North East's intention to use good design to ensure areas such as open space and pavements are kept vehicle free is noted and welcomed, and the Council agrees that this is preferable over using placed objects; however it should be acknowledged that this may not always be possible. The recommendation will be amended to:</p> <p>"Where there is an identified risk that vehicles may use areas such as open space and pavements, minimally used, well designed and sensitively placed obstacles, such as</p>
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		rocks or vegetation, can ensure that areas are kept vehicle free.”
Story Homes	<p>How to incorporate sustainable travel options</p> <p>Story Homes notes that the Council’s aspirations for providing opportunities for charging electric and hybrid vehicles. However, the recommendation for pursuing these opportunities does not provide any indication of what may or may not be sought in terms of type or quantum of provision and therefore lacks clarity for developers to assess emerging proposals. Providing such infrastructure has a significant cost implication to schemes and therefore any provisions should be only sought where appropriate and viable.</p> <p>How to incorporate safe access and easy movement around the area</p> <p>Whilst the Council recommends that well designed and placed obstacles, such as rocks and vegetation, can help to ensure that areas such as open spaces and pavements are kept clear of vehicles it is not always necessary, desirable or viable to provide such arrangements and flexibility should be possible in respect to these items.</p> <p>How to cater for service vehicles and visitors</p> <p>Story Homes recognises that the inclusion of visitor parking within schemes can be necessary and desirable to maintain streetscenes and permeability within sites. We recognise the Council’s recommendation that ‘designated visitor bays are provided’ but this lacks any indication of what proportion of spaces may be sought.</p>	<p>Comments noted. There are no formal national or local electric charging point standards, and need for such infrastructure is likely to vary depending on location, nature of surrounding uses, etc. The Council do not consider it appropriate to specify type or quantum of provision, but do feel it important to flag up in this SPD that that matter would require consideration when development is delivered. The Council would agree that provision should only be made where appropriate.</p> <p>To aid clarity in this respect, extra information has been added within the SPD’s introduction to explain that the SPD contains guidance and to give acknowledgement that the SPD would not be able to be implemented as a whole. The title of each box throughout the SPD has been amended to be clear that it sets out considerations rather than as full set of requirements.</p> <p>The Council agrees that using placed objects should not be considered the most desirable option in keeping areas vehicle free; however in some cases it may be the most appropriate option. The recommendation will be amended to:</p> <p>“Where there is an identified risk that vehicles may use areas such as open space and pavements, minimally used, well designed and sensitively placed obstacles, such as rocks or vegetation, can ensure that areas are kept vehicle free.”</p> <p>This SPD provides guidance on what the Council considers to be good practice when designing residential developments however, whilst the SPD will constitute a material planning consideration in the determination of relevant planning applications within the Borough, it is clear from the outset of the SPD (paragraph 1.3) that this constitutes a guidance document only and the design</p>

		<p>principles set out within this document should be incorporated, <i>where possible</i>. It is therefore considered that the SPD allows for an appropriate degree of flexibility.</p> <p>With respect to designated visitor bays within schemes, whilst an element of visitor parking is always recommended, the quantum of this that may be appropriate on any given site will be dependent on a number of site specific factors, including access to public transport and the availability of public parking close to the site. The Tees Valley Residential and Industrial Design Guide states that 'the Council will take the availability and proximity of public parking facilities into consideration when determining the provision of visitor parking,' and as such developers should also have regard to these factors when considered how many visitor parking bays to incorporate into schemes.</p>
Bellway Homes	<p>Para 4.17</p> <p>Bellway have concerns about how sustainable travel options and incorporation of them into schemes will be assessed. As referenced in the comments associated with section 4.6 above, there needs to be a clear steer from the Council at the earliest possible opportunity whilst ensuring they remain flexible to alternatives based on the evidence put before them. The Council should also be able to justify their approach and requests to provide transparency and maintain trust between Council and developer.</p> <p>Para 4.18</p> <p>This section of the SPD is an example of a well-defined and justifiable approach to residential design and it acknowledges other areas of expertise which are required to be consulted on to finalise detail. This approach should be replicated throughout the SPD.</p> <p>Para 4.19</p>	<p>Comments noted. The Council would encourage early pre-application engagement that will provide a clear steer on specific sites and set out the Council's expectations with respect to any residential development to come forward on a case-by-case basis, however general design principles and approaches to good design that should be pursued are set out clearly in the SPD.</p> <p>The Council considers that its approach in paragraph 4.17 provides examples of how applicants can incorporate sustainable travel options into schemes whilst at the same time allowing for an appropriate degree of flexibility in how this is achieved. The Council will remain flexible to alternatives based on evidence presented to it. Ultimately, the onus is on the applicant to demonstrate how schemes encourage or incorporate sustainable travel options, however the SPD provides examples of ways in which this can be achieved.</p> <p>With respect to paragraph 4.19, when considering development proposals, Development Control and</p>

	<p>Bellway would advocate setting defined parameters to avoid any doubt or confusion which are currently recognised as standard practice. Bellway recommend that this detail is further consulted on in the future.</p>	<p>Planning Policy officers defer to the Council's Highways team for technical advice/requirements on matters of highway safety, who provide comments in view of the requirements set out within the Tees Valley Residential and Industrial Design Guide. It is not considered necessary or prudent to be so prescriptive with respect to these matters in this SPD, as the Council's Highways team and the relevant emergency services will ultimately determine whether a scheme is acceptable with respect to service vehicles and visitor parking, in view of the existing guidance document. With respect to designated visitor bays within schemes, whilst an element of visitor parking is always recommended, the quantum of this that may be appropriate on any given site will be dependent on a number of site specific factors, including access to public transport and the availability of public parking close to the site. The Tees Valley Residential and Industrial Design Guide states that 'the Council will take the availability and proximity of public parking facilities into consideration when determining the provision of visitor parking.' and as such developers should also have regard to these factors when considered how many visitor parking bays to incorporate into schemes. As above, ultimately the onus is on the applicant to demonstrate how schemes have catered for service vehicles and visitors, however the SPD provides examples of how this can be achieved to the Council's satisfaction.</p>
Persimmon Homes	<p>Tees Valley Residential and Industrial Estate Design Guide and Specification (Paragraph 4.15)</p> <p>The SPD states that "<i>residential developments should be built in accordance with the Tees Valley Residential and Industrial Estate Design Guide and Specification.</i>" Whilst it is accepted that the Tees Valley Design Guide has long been used by the Tees Valley Local Authorities to inform and guide highway design on schemes, we note that this guidance is contradictory to the information contained within the Table at Paragraph 4.9 of the SPD which contains different set of residential parking standards.</p>	<p>Comments noted. The SPD does take a steer from the Tees Valley Residential and Industrial Design Guide and Specification. Table 4.9 has been reviewed and whilst the parking standards set out are considered to be broadly in line with this document, some amendments have been made regarding the recommended number of spaces per home for clarity, as follows: Paragraph 4.9: "usually 2 spaces per dwelling for one, two and three bedroom homes, and 3 spaces for four and above bedroom homes." This would match the TV Design Guide's specification.</p>

	<p>The SPD therefore lacks clarity should be amended to remove the ambiguity and avoid setting out potentially contradictory advice.</p> <p>Visitor Parking (Paragraph 4.19)</p> <p>The table associated within Paragraph 4.19 of the SPD aims to ensure the designated visitor bays are provided within residential development. Again this guidance/requirement is contradictory to the statement within the Paragraph 4.15 which states that “<i>residential developments should be built in accordance with the Tees Valley Residential and Industrial Estate Design Guide and Specification</i>”.</p> <p>We note that the Tees Valley Design Guide does not stipulate a requirement or need for visitor parking bays within residential developments in the borough with neither the Design Guide nor the SPD identifying a ratio or level of visitor parking bays to be provided. The SPD therefore lacks clarity to be effective, contains contradictory guidance, and fails to provide any justification for this newly emerging need for visitor parking bays on schemes within the borough.</p>	<p>The SPD’s recommended in-curtilage space length of 6m (but can be reduced to 5m in constrained circumstances) within the SPD mirrors that set out under 7.15 of the TV Design Guide.</p> <p>The TV Design Guide does not set out a width for in-curtilage parking spaces. The SPD recommends 3m wide but in constrained circumstances this may be reduced to 2.4m. This uses the TV Design Guide’s recommended garage width (3m) and car park space width (2.4m) and has been supported by the Council’s Highways team. The Council believe this to be an appropriate approach to the recommended dimensions.</p> <p>The Council does not consider that because the Tees Valley Design Guidance and Specification may be silent on certain design matters that this precludes the Local Planning Authority from providing its own guidance in the interests of good design, or that any additional guidance provided by the Council would be contradictory.</p>
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D. Creating areas that are locally distinctive and dwellings that are aesthetically pleasing

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	<p>The information in the green box is useful but the colour makes it difficult to read.</p> <p>Under “Boundary Enclosures”, it’s important to consider the appropriateness of the boundary in relation to the dwelling’s position within the street scene. For example, on key routes it may be appropriate for a higher quality design or use of landscaping. This is a consideration for both front and rear gardens.</p>	<p>Comments noted regarding green box. This will be reformatted.</p> <p>Comments noted regarding boundary enclosures. This was touched upon in the recommendations box under “Rear Gardens” but has now been revised and also added under “Front Gardens”. Further information has also been added to the supporting text.</p>
Historic England	<p>Whilst the general direction of paragraphs 4.20-4.23 is welcome, some of the wording weakens the historic environment requirements found in legislation, the National Planning Policy Framework (NPPF), and Local Plan policies to which this document is supplementary. Phrases such as “wherever possible” (4.20) and “consider and ... reflect” (4.21) are too</p>	<p>Comments noted. Reference to ‘wherever possible’ in paragraph 4.20 will be removed.</p> <p>With respect to use of the terms “consider and...reflect” within paragraph 4.21, this section of the SPD relates to</p>

	<p>weak compared to requirements such as to “pay special attention to” for conservation areas (Planning (Listed Buildings & Conservation Areas) Act 1990) and “give great weight to” for all heritage assets (NPPF paragraph 193). The bullet point in the box on page 16 which reads “Retain and enhance heritage assets where possible” goes against the clear requirements set out in legislation, the NPPF and the Local Plan on how to handle the impact of proposals on the significance of heritage assets. This section of the guidance should be re-worded to make stronger reference to higher level requirements for proposals that would affect the significance of heritage assets (both designated and non-designated), including that derived from their setting.</p> <p>You could consider comparing the contents of the green box with advice in toolkits such as the following to ensure historic environment aspects are suitable addressed: Building In Context (see below), Understanding Place: Historic Area Assessments (Historic England, 2017), and Your Place Matters: Community Planning Toolkit for the Future of Rural Buildings and their Setting (Historic England and Worcestershire County Council). In particular, the setting of heritage assets should be referenced in the box.</p> <p>We also recommend making reference to the following two Historic England Good Practice Advice Notes when guiding developers in assessing the impact of proposals on heritage assets and their setting: Managing Significance in Decision-Taking in the Historic Environment, GPA 2 (2015) and The Setting of Heritage Assets, GPA 3 (2017 2nd edition).</p>	<p>local distinctiveness generally (not just in relation to heritage assets) and therefore applies to all areas of the Borough. There are no statutory requirements to pay special attention or give great weight to local distinctiveness generally and as such it is not considered appropriate to use this, or similar terminology, in this context. However, the Council acknowledges Historic England’s concerns and as such proposes to include additional wording in this section of the SPD as follows: “When designing residential schemes that would affect heritage assets or their settings, harm to their significance should be avoided. When considering the impact of a proposed development on the significance of a designated heritage asset, the Council will give great weight to the asset’s conservation, in line with paragraph 193 of the NPPF.”</p> <p>With respect to the bullet point in the box on page 16 which reads “Retain and enhance heritage assets where possible”, reference to “where possible” will be removed. A footnote will be added to this box to read “Any harm to, or loss of, the significance of a designated or non-designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification, in line with paragraphs 194, 195, 196 and 197 of the NPPF.”</p> <p>The advice on assessing characteristics of sites and their surroundings is considered broadly in line with the suggested toolkits. Historic England advice and the Building in Context toolkit has now been added to the SPD for user reference. References to heritage assets within this box has now been amended to “heritage assets and their settings”.</p> <p>Comments noted with respect to Historic England Good Practice Advice Notes and these will be added to section 2 of the SPD (How This SPD Links to Other Plans, Policies and Guidance).</p>
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Barratt Homes North East (BDW)	<p>BDW would also point out that the SPD includes a number of onerous policy requirements which will have implications on land efficiency, viability and deliverability of sites. BDW would urge the Council to consider the prescriptive nature of the requirements below and remove these requirements, or amend to make them desirable, but not essential.</p> <p>Boundary enclosures – para 4.24 - front boundary enclosure requirements are very prescriptive e.g. same bricks as main building with the same pointing methods and incorporate artistic impressionism and local/artwork where appropriate</p>	<p>This SPD provides guidance on what the Council considers to be good practice when designing residential developments however, whilst the SPD will constitute a material planning consideration in the determination of relevant planning applications within the Borough, it is clear from the outset of the SPD (paragraph 1.3) that this constitutes a guidance document only and the design principles set out within this document should be incorporated, <i>where possible</i>. It is therefore considered that the SPD allows for an appropriate degree of flexibility. None of the recommendations within the SPD are a policy requirement but are considered to be best practice approaches to achieving good design.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p>
Hartlepool Civic Society	In particular, we greatly welcome and fully support the Council championing Local Distinctiveness and Architectural Interest (para 4.23 p 16) which is a key aim of the Society.	Comments noted.
Story Homes	<p>Design stage: how to create local distinctiveness and architectural interest</p> <p>It is noted that the Council recommends using vegetation as boundaries. However, Story Homes notes that this may not always be the most appropriate approach in design terms. It may often be more appropriate for more robust boundaries including fencing and walls at appropriate scales to ensure defensible spaces and legible spaces.</p> <p>The Council also makes reference to using windows and wall to glazing ratios reflective of the area and use bay, bow or feature windows where</p>	<p>Comments noted. Wording with respect to using natural vegetation as boundaries will be removed. A reference to the different appropriate boundary treatments (including fences, walls and vegetation) is included at 4.24 and this is considered sufficient.</p> <p>Comments noted with respect to windows and wall to glazing ratios, however current wording is considered to be sufficiently flexible. To aid clarity, the recommendation will be amended to:</p>

	<p>design allows. Whilst this is aspirational, it may be difficult to achieve in areas where properties were built to different standards which cannot be achieved e.g. Building Regulations. Whilst developers may have opportunities to use certain house types that reflect such scenarios the Council should be mindful that where this is not possible seeking amendments to house types is not a simple process and can have significant implications on viability and site delivery.</p> <p>Similarly, the recommendation to incorporate porches, canopies (similar to any within the surrounding area if appropriate) as they assist in signifying an entrance and create a buffer to the outside is similarly onerous. It may not always be appropriate to provide porches and canopies on dwellings and plot purchasers may not wish to have them. Therefore, a blanket approach to incorporating such features should be avoided and provision made where appropriate in design and viability terms.</p> <p>Story Homes has a careful approach to selecting high quality and sustainable materials for development as it is an important part to ensuring that the properties and streetscenes we deliver are of a high standard. We will aim to use locally sourced materials but will always need to maintain flexibility as to sourcing materials from a business perspective to ensure viability of and quality of our products.</p> <p>How to provide appropriate boundary enclosures</p> <p>Boundary treatments are an important component of ensuring high quality design for plots and streetscenes which are important to Story Homes. However, the Council should recognise that in setting parameters for boundary treatments, particularly to the front of properties that they are appropriate in terms of design and quantum and that excessive requirements are not sought within schemes. For example, seeking bespoke artistic based treatments can be unviable. The provision of railings to the front of too many plots within a scheme can be unnecessary in design terms diluting visual interest and adding significant build costs to schemes. Therefore, a judicious and pragmatic approach should be allowed for.</p> <p>How to incorporate public art</p>	<p>“Use windows and wall to glazing ratios reflective of the area and use bay, bow or feature windows where they are appropriate to the area and design allows.”</p> <p>Whilst it is appreciated there may be viability implications, the Council still believe there should be a presumption that local character and distinctiveness should be appropriately reflected in new residential developments.</p> <p>Comments noted with respect porches and canopies. Wording will be amended to read; “Consider using porches and canopies where design allows (particularly where these are prevalent in the surrounding area), as these can assist in signifying an entrance and create a buffer from the inside to the outside (particularly where properties do not provide an entrance hallway at ground floor).”</p> <p>Comments noted with respect to materials. The recommendation will be amended to read “Be locally sourced, where practicable and appropriate.”</p> <p>This SPD provides guidance on what the Council considers to be good practice when designing residential developments however, whilst the SPD will constitute a material planning consideration in the determination of relevant planning applications within the Borough, it is clear from the outset of the SPD (paragraph 1.3) that this constitutes a guidance document only and the design principles set out within this document should be incorporated, where possible. It is therefore considered that the SPD allows for an appropriate degree of flexibility. None of the recommendations within the SPD are a policy requirement but are considered to be best practice approaches to achieving good design.</p> <p>Extra information has been added within the SPD’s introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it</p>
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	<p>Whilst inclusion of public art in schemes is often an aspiration it must be recognised that it is not a fundamental element to achieving quality places to live. Therefore, the Council must recognise that seeking public art within many developments should not be considered a necessity in the context of wider site viability and delivering quality design.</p>	<p>sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p>
Bellway Homes	<p>Para 4.23</p> <p>Bellway acknowledge that good design is paramount to adding to a sense of place and achieving a legacy high quality development, however we are particularly concerned that the SPD goes as far to recommend where materials should be sourced from. National builders usually have 'go to' suppliers and having the planning process dictate source of materials can have serious implications for businesses. Instead developers should be able to justify the merits of their material choice based on aesthetics alone, rather than location of their source. Bellway object to this approach and consider it wholly impractical. The Council should provide the clearest of advice early on in the process with regard to design to allow developers to factor this into the scheme's viability. It is not acceptable to brush over such fundamental cost implications for consideration late on in the determination process, or worse, prior to the commencement of development via condition. The Council need to fully justify their approach to requesting material specifications over and above the 'norm' for the area which could not have been foreseen by the developer.</p>	<p>Comments noted. The recommendation will be amended to read "Be locally sourced, where practicable and appropriate."</p>

E. Creating safe housing areas

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	<p>The information in the diagram is useful but could be better presented.</p> <p>"security of dwellings and their curtilage" box – the reference to perimeter access is more appropriate to commercial property than residential. Suggest amending to "boundary enclosures".</p>	<p>Comments noted. The information will be set out more neatly and clearly.</p> <p>Comments noted regarding "perimeter access". This will be amended to "boundary enclosures".</p> <p>Comments noted regarding anti-graffiti measures. "at ground floor level" removed.</p>

	<p>“safe public spaces and landscaping” box – suggest that anti-graffiti measures should not be considered for ground floor areas only; all areas of a building/wall may be susceptible.</p> <p>“safe public spaces and landscaping” box – suggest removal of reference to groups of youths. The use of the space for anti-social behaviour is the potential problem in this case.</p>	<p>Comments noted regarding secluded spaces. Sentence amended to “Landscaping and planting should not create secluded places which could be used for anti-social behaviour”.</p>
Hartlepool Civic Society	<p>Of important interest to the Society is maintaining the character and architectural style of the Borough's heritage where such contradictions are of concern. For example – para 4.29 (p18/19) – the bullet point to avoid locating footpaths along rear of properties can be contrary to the traditional layout of some of our most historic communities as well as the aim of encouraging pedestrian versus vehicular use. Further, in para 4.30 – defensive space can be considered at odds with the dominant form of Victorian Hartlepool which is the terrace directly on to the pavement. Similarly – in para 4.31 – advising the avoidance of render used abutting public spaces, perhaps with the understandable aim of discouraging graffiti, flies in the face of what can be found throughout the Borough with minimal evidence of the graffitiist's 'art'.</p> <p>Some of the guidance should perhaps only be applied in a specific way, depending on the location to preserve local distinctiveness unless an issue or problem is of serious concern.</p>	<p>This SPD provides guidance on what the Council considers to be good practice when designing residential developments however, whilst the SPD will constitute a material planning consideration in the determination of relevant planning applications within the Borough, it is clear from the outset of the SPD (paragraph 1.3) that this constitutes a guidance document only and the design principles set out within this document should be incorporated, <i>where possible</i>. It is therefore considered that the SPD allows for an appropriate degree of flexibility. None of the recommendations within the SPD are a policy requirement but are considered to be best practice approaches to achieving good design.</p> <p>It is therefore recognised that there may be instances in which some of the guidance set out in the SPD is not applicable or should not be followed, including instances where the form of development is dictated by the character of the immediate area.</p>
Taylor Wimpey North East	<p>At 4.31 it is stated – External pipes should be made flush or concealed to discourage climbing.</p> <p>This is not practical as such a generic requirement which in its current form could be applied to every rainwater down pipe. Each situation should be considered on its own merits as to whether this is required.</p> <p>Locks, bars and bolts, security lighting and intruder alarms should be fitted where appropriate.</p>	<p>With respect to the table at paragraph 4.31, comments noted- the SPD will be amended so that the text in this table reads:</p> <p>“External pipes should be made flush or concealed to discourage climbing., where possible”</p> <p>Given the reference to locks, etc. is clear that such provision would not always be appropriate, it is considered acceptable to leave the reference as it is.</p>

	<p>We consider it would be more prudent to refer to Building Regulations Part Q which would then allow for future updates to those regulations.</p> <p>At 4.33 it is stated – Locate spaces so they do not cause undue disturbance to any nearby residential properties.</p> <p>This should be carefully balanced with the need for overlooking to provide natural surveillance and therefore it would be more appropriate to design spaces to minimize disturbance rather than controlling the location.</p> <p>Consider locking parks and open space at night. This is not usually practical and will depend on the quality of design and indeed management arrangements.</p>	<p>Comments noted with regards to locating spaces. The recommendation will be amended to: “Design spaces to avoid disturbance to nearby residential properties.”</p> <p>Comments noted with regards to locking parks. The recommendation will be amended to: “Locking parks and open space at night may be beneficial where there this would prevent an identified potential problem.”</p>
Story Homes	<p>How to build in natural surveillance</p> <p>Story Homes notes that the Council states that blank elevations facing onto public areas should be avoided yet this could be avoided by appropriate use of windows in such elevations. This highlights the issue with provision in the section of the SPD that relates to ‘How to provide sufficient daylight, sunlight and privacy’ where it is recommended to ‘Avoid placing windows in the side elevation unless they are obscurely glazed or can be screened’. This does not take into account that in some circumstances on corner plots using non-obscured glazed windows in gable or side elevations may actually be a benefit in design terms and benefit schemes to increase natural surveillance levels. This should be acknowledged in the same way as for bay and corner windows in the same box.</p> <p>The recommendation to allow views into and out of the site needs to be qualified with where appropriate as in certain circumstances there may be requirements for screening of the site which could be inconsistent with this to provide clarity.</p> <p>The recommendation that windows and doors should face and open out into public areas and the street is not feasible for all doors and windows on dwellings. It is recommended that this is revised accordingly.</p>	<p>Comments noted.</p> <p>Under daylight, sunlight and privacy considerations, the recommendation on side elevation windows has been amended to be clear that obscure glazing or screening would only be applicable when the window would represent an adverse impact upon privacy. Reference to “side elevation windows” has been added to this box alongside bay and corner windows.</p> <p>Comments noted with regards to views into and out of the site. The intention was to discuss the safety of pedestrians and their routes rather than a discussion of a larger scale design approach. The recommendation has been amended to: “Pedestrian routes should be as direct and straight as possible to allow for views of the route ahead and eliminate hiding places.”</p> <p>Comments noted regrading natural surveillance and windows and doors. The recommendation has been amended to: “It should be possible to view the surrounding public outdoor space from within a dwelling.”</p>

	<p>The design guide refers to the consideration of street lighting but this is carried out under a s.38 process separate from planning and whilst consideration can be given at the design stage by a developer it should not form part of the planning determination process.</p> <p>How to create defensible space</p> <p>Care needs to be given to the use and treatment of buffer zones between spaces to avoid complicating the legibility of spaces through the introduction of too many features.</p> <p>The provision suggesting the introduction of physical barriers ‘where dwellings are positioned in close proximity to highways and public areas’ does not identify what the Council considers to be close proximity. The suggestion that these barriers provide additional privacy to ground floor windows is contradictory with the recommendation of ensuring boundary treatments at the front of plots are not too high so as to block natural surveillance elsewhere in the SPD. By limiting this height it is questionable how much additional privacy is gained from the recommendation. However, it is noted that such features would contribute to an extra sense of security.</p> <p>How to build in security of dwellings and their curtilage</p> <p>It is unclear what extent of external pipes should be made flush or concealed as it would not be feasible to ensure certain items such as downpipes are provided in such a manner for buildability and maintenance reasons.</p> <p>The recommendation that windows and doors should face and open out into public areas and the street is not feasible for all doors and windows on dwellings. It is recommended that this is revised accordingly to provide clarity.</p> <p>How to create safe parking options</p> <p>The provision that car parking should be visible from properties would conflict with the stipulation elsewhere in the SPD that parking should be</p>	<p>Comments noted regarding street lighting. The Council believe it is beneficial to include the reference given that street light location should form part of a holistic approach to development design.</p> <p>The recommendation regarding physical barriers for privacy has been removed as it duplicated the intent of the recommendation on buffer zones. The comments on buffer zones are noted. This recommendation has been simplified, with reference added to ensure appropriateness to the site/property context.</p> <p>With respect to the table at paragraph 4.31, comments noted- the SPD will be amended so that the text in this table reads: “External pipes should be made flush or concealed to discourage climbing, where possible”</p> <p>Comments noted on door and window placement. The recommendation has been amended to: “Dwelling entrances should be located where they would benefit from natural surveillance and it should be possible to view the surrounding public outdoor space from within a dwelling.”</p> <p>Comments noted with regards to car parking. The recommendation to locate parking to the side of properties has been amended.</p> <p>Comments noted with regards to locking parks. The recommendation will be amended to: “Locking parks and open space at night may be beneficial where there this would prevent an identified potential problem.”</p>
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	<p>located to the side of dwellings and that side elevations should not have windows in them unless they are obscure glazed. A more pragmatic and consistent approach to parking arrangements, including the recognition of parking being acceptable to the front of plots, particularly where integral garage house types are appropriate, is needed throughout the SPD.</p> <p>How to create safe public spaces and landscaping</p> <p>Story Homes notes the Council's advice to consider locking parks and open spaces at night but it is questioned how effective this would be. It would be unlikely that boundary treatments will be so substantial given the provisions of the SPD to deter people wishing to access such areas even if they are locked. This also requires the open space to be fully enclosed as well which could be a cost implication for developers and management companies.</p>	
Bellway Homes	<p>Para 4.31</p> <p>Requesting external pipes to be of a certain design can significantly constrain the development and is an undue and overly burdensome request. Bellway object to this approach.</p>	<p>Comments noted. The SPD will be amended so that the text in this table reads: "External pipes should be made flush or concealed to discourage climbing., where possible"</p>

F. Creating healthy and visually attractive housing areas for all

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Ecologist	Reference should also be made to the provision of under road walkways for animal movement.	Comment noted. Reference added.
Taylor Wimpey North East	<p>At 4.36 it is stated – Locate open space so that it does not create undue disturbance (i.e. noise and loss of privacy) to any nearby residents.</p> <p>This is an unnecessary restriction on location that contradicts the intentions of ensuring natural surveillance. Location of open space will be determined by many other factors and it would be better to suggest the design of open space and adjacent residential areas should limit disturbance.</p>	<p>Comments noted. The recommendation now reads: "Design spaces to avoid disturbance to nearby residential properties."</p> <p>Comments noted regarding allotments. Paragraph 4.38 now reads: "...major developments should explore the need for the provision of allotments..."</p>

	<p>4.38 & 4.39 – The Hartlepool Jan 2015 Open Space, Sport & Recreation Assessment showed that there was a surplus of allotment provision in some areas. Although there was evidence to suggest unmet demand from waiting lists there was also evidence that provision matched or exceeded both Thorpe Standard and NSALG standards for provision.</p> <p>Therefore, we consider it is not adequate to include generic statement that major developments should consider the provision of allotments either on site or off site through provision of commuted sum without reference to an up to date needs assessment.</p>	<p>This provides clarity that the provision should be based upon evidenced need.</p>
Story Homes	<p>How to provide good quality open space</p> <p>The provision in the SPD to 'Maintain existing trees, hedgerows and water features' should be caveated to be 'where appropriate and feasible' as there may be situations where the retention of such features would be detrimental to the quality of the proposals e.g. poor quality or diseased trees/hedgerows.</p> <p>Story Homes notes the provision for the use of a variety of paving in areas of open space but depending on the location and type of space this could need to be adoptable and therefore flexibility will need to be had to the s.38 requirements of the Council on materials and maintenance through the adoption process.</p> <p>It is unclear from the SPD what would be considered to be excessive overshadowing of open space from dwellings and whether this would affect all types of open space.</p> <p>Story Homes notes that the Council's recommendation that proposals 'Ensure open spaces are well and appropriately lit' could conflict with what is deemed appropriate elsewhere in the SPD e.g. certain areas like SANGS should not be lit due to ecological requirements.</p> <p>How to provide appropriate cycle parking and storage</p> <p>Story Homes recognises the importance of encouraging cycling. However, the SPD primarily relates to residential development and</p>	<p>Comments noted. The recommendation now reads: "Maintain existing trees, hedgerows and water features where appropriate and feasible".</p> <p>Comments noted regarding paving. The recommendation has been amended to: "Incorporate appropriate paving where needed."</p> <p>The recommendation regarding excessive overshadowing has been removed.</p> <p>Comments noted regarding lighting open spaces. The recommendation has been amended to: "Where needed, ensure open spaces are appropriately lit."</p> <p>Comments noted regarding cycle parking. Paragraph 4.40 sets out that the advice relates to provision within the public areas that are delivered as part of housing developments. It is considered appropriate that the recommendations remain within the SPD.</p> <p>Comments noted regarding street furniture. The Council would agree; the recommendations do not demand anything more than is necessary.</p> <p>The SPD's text regarding biodiversity is considered reflective of the NPPF and Local Plan. To allay any</p>

	<p>therefore it is less likely that public cycle parking areas will need to be included in schemes at locations such as local shops (as referenced in paragraph 4.40).</p> <p>How to provide appropriate street furniture</p> <p>The provision of street furniture should only be required where it is appropriate given the form and scale of development proposed. The inclusion of street furniture should not be pursued by the Council unless absolutely necessary.</p> <p>How to incorporate biodiversity</p> <p>Story Homes notes the provisions of paragraphs 4.42 and 4.43 which state that the Council is seeking to ensure overall biodiversity gains are achieved. However, the National Planning Policy Framework (NPPF) only states at paragraph 174 that Councils should 'pursue opportunities for securing measurable net gains for biodiversity.' This sets a requirement to try to achieve this rather than necessitating it. Therefore, a flexible and pragmatic approach to net gains should be applied by the Council in respect of the SPD.</p> <p>Whilst it is noted that the Council recommends the inclusion of street trees this can often create issues with the adoption of roads under s.38 due to future maintenance provisions. Care needs to be had so as not to require provisions such as this which could create issues for other procedural requirements needed to deliver developments.</p> <p>How to incorporate biodiversity into dwellings and their curtilage</p> <p>Whilst Story Homes notes the importance of incorporating biodiversity into dwellings it is important to ensure that this is balanced with design and viability components of schemes. The inclusion of green roofs or walls, living walls, climbing plants (that require regular maintenance) or sedum matting will often not be practical as part of developments. Care also needs to be had about the inclusion of features such as garden trees as it is difficult to control their future retention on plots which are privately owned.</p>	<p>concerns, paragraph 4.43 will be reworded to say that new development <u>can</u> contribute to a net biodiversity gain, rather than <u>will</u>.</p> <p>Comments noted with regards to street trees. It is acknowledged that street trees won't always be appropriate, in the same way that hedgerows and other recommendations within this box also may not be. The SPD is a guidance document that highlights matters that could be considered in achieving good quality design. It would not demand the delivery of a feature that would not be possible or appropriate. This would apply to concerns regard garden trees, green roofs, etc.</p> <p>The SANGS section has been revised to specify what sites have been identified within the Local Plan for delivery on on-site SANGS. It is not possible to set out thresholds of when a SANGS would be required as it would depend upon the likely effects of a development, rather than its size. However, the revisions make it clearer that SANGS would only be feasible on sites of a sufficient scale to accommodate it as part of overall site deliverability, otherwise, off-site contributions may be required.</p> <p>The size and distance requirements within the SANGS design considerations have been remove to make the delivery of SANGS less prescriptive.</p>
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	<p>How to integrated a SANG into the site</p> <p>Story Homes notes the provisions proposed by the Council in relation to the provision of Suitable Alternative Natural Green Space (SANGS). The SPD does not set out the details of minimum site thresholds that will necessitate the provision of SANGS or sets out whether sites will be expected to provide a minimum of 2 Ha of SANGS onsite which could be a significant constraint.</p> <p>The specification of requiring SANGS to be 50m from an A road to reduce the intrusion of vehicular noise could also unduly restrict the connectivity of the SANGS. The restriction of 50m does not take into account site specific considerations where a shorter distance might be acceptable.</p> <p>The requirement for at least one option of a 2.5km route does not specify whether this should be located on-site or through connectivity to a wider network. Greater clarity is required in the SPD to give applicants guidance and comfort.</p> <p>Whilst the Council specifies that it is desirable for SANGS to be undulating this will be dependent on the topography of the site. Whilst it may be possible to create varying levels within the site depending on the need for any cut and fill as part of the development programme there could be substantial costs involved which could affect the viability of schemes. In addition, if the use of existing open space is proposed for use as SANGS amending the levels and affecting existing open space could affect flood risk, biodiversity and other features.</p> <p>The proposals for SANGS to potentially have artwork or monuments in them also has the potential to add significant costs to developments. Therefore, such provisions should only be considered where it can be demonstrated that they would not affect the viability of the overall development scheme.</p>	
Bellway Homes	<p>Para 4.36</p> <p>Bellway recommend changing the wording to “maintain existing trees, hedgerows and water features – where possible”.</p>	<p>Comments noted. In view of Bellway’s comments the Council agrees to amend the wording of this sentence to read as follows:</p>

		"Maintain existing trees, hedgerows and water features, where appropriate and feasible."
North Star Housing Group	It is particularly agreeable to me to see your emphasis on sustainable locations, transport links and bio diversity.	Comments noted.
Persimmon Homes	<p>How to provide good quality open space (Table at Paragraph 4.36)</p> <p>Whilst Persimmon Homes do not dispute the fact that schemes should be required to provide good quality open space, we believe the Table at Paragraph 4.36 lacks any form of detail which would be useful to inform the design of a development. For example, no definition or clarity is provided as to what a 'useable size and shape' of open space consists of, or the amount of open space that a development is expected to deliver. Without this information, the SPD fails in its purpose of informing the design of development proposals prior to the submission of a planning application.</p> <p>Formal Play Space (Table at Paragraph 4.37)</p> <p>Again, whilst we do not dispute the fact that in some instances a scheme will be required to provide a formal play space, the SPD does not contain sufficient information for an assessment of whether a play space is required on or off-site, nor the minimum acceptable size it should be. This lack of information renders the table largely useless prior to the submission of a planning application.</p> <p>How to integrated a SANG into the site (Table at Paragraph 4.47)</p> <p>Whilst we accept that the table is useful in informing the design of SANGs, we would suggest that further information is provided within the supporting text to identify where the evidence behind the areas and distances stipulated within the Table have been taken from. Without such justification, we cannot make a thorough assessment of the appropriateness of the figures identified within the Table. We therefore recommend that further dialogue is held with the development industry to consider and agreed these figures prior to progressing with the SPD.</p>	<p>Comments noted. The recommendation now reads: "Provide space that is a suitable size, shape and design for its intended purpose."</p> <p>The SPD sets out a suite of recommendations that the Council believe should be considered in shaping development proposals. It does not set out specific requirements. In this respect it would not be possible nor desirable to provide specific detail.</p> <p>SANGS – the size and distance requirements within the SANGS design considerations have been remove to make the delivery of SANGS less prescriptive.</p>

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G. Creating homes that are energy efficient and considering the changing needs of residents

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	For clarity it may be beneficial to have the energy efficiency and the adaptable homes information within separate sections as they cover different matters.	Comments noted. The two topics will be separated.
Barratt Homes North East (BDW)	<p>BDW would also point out that the SPD includes a number of onerous policy requirements which will have implications on land efficiency, viability and deliverability of sites. BDW would urge the Council to consider the prescriptive nature of the requirements below and remove these requirements, or amend to make them desirable, but not essential.</p> <p>Composting facilities – para 4.53 – composting facilities within the kitchen/utility and/or garden</p> <p>Water efficiency – para 4.55 – greywater recycling and rainwater harvesting</p>	<p>Comments noted. Paragraph 1.3 states that developers are 'advised' to aim to incorporate the design principles within the SPD 'where possible', it is not considered that the SPD itself is particularly prescriptive or inflexible. It is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology and address these where appropriate.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p>
Home Builders Federation (HBF)	<p>Paragraph 4.57 provides guidance on providing an adaptable home. The HBF have concerns that many of the proposals identified within the blue box titled 'How to create an adaptable homes' are elements that are contained with the Building Regulations requirements for an M4(3) home.</p> <p>PPG (ID:56-008) states that 'where a local planning authority adopts a policy to provide enhanced accessibility or adaptability the should do so only by reference to Requirement M4(2) and / or M4(3) of the options requirements in the Building Regulations and should not impose any additional information requirements or seek to determine compliance with these requirements, which is the role of the Building Control Body'.</p>	<p>The Council has considered the comments of the HBF with respect to adaptable homes. The Council acknowledges that it would not be possible to implement such standards without appropriate evidence and, in accordance with the NPPG, the standards should be contained within policy.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development.</p> <p>However, the Council feel it appropriate to highlight these standards and given the SPD sets out guidance rather than</p>

	<p>Again, PPG also identifies the evidence that is required to introduce a policy in relation to higher accessibility, adaptability and wheelchair housing standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.</p> <p>The HBF does not consider that the Council has the necessary evidence to support this requirement, and the HBF consider that local needs can be met without the introduction of the optional housing standards. Whilst the HBF support the provision of accessible and adaptable homes and would not object to the Council supporting their provision. The HBF do strongly object to the SPD as currently written with the inclusion of the Adaptable Homes requirements within this SPD and recommend that any reference to adaptable homes is removed.</p>	<p>requirements, believe it appropriate that the standards remain within the SPD as recommendations.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p>
Hartlepool Civic Society	<p>Finally, Para 4.51 very wisely looks at sustainability issues - demolition and rebuilding is wasteful, especially where perfectly sound structures could instead be refurbished and modernised. It might also consider the pros and cons of plastic joinery versus wood.</p>	<p>Comments noted. Whilst the pros and cons of plastic and wood could be a useful area to explore, it is not considered that a specific focus on those two materials should be included in the SPD at this time.</p>
Taylor Wimpey North East	<p>4.49 – Solar Gain</p> <p>Much of this section is too specific and therefore unnecessary as it refers to elements of detail which is covered under separate building regulations legislation. Locating car parking and garages to the north of dwellings as well as avoiding North facing gardens would be a restriction that would be severely harmful to efficient land use and viability.</p> <p>Glazing specification, insulation and air tightness are already covered within building regulations.</p> <p>At 4.50 it states – Consideration should be given to locating windows away from busy routes to minimise noise and pollution to the development.</p> <p>This contradicts other aspects of the SPD and good urban design relating to designing to minimise crime through natural surveillance.</p>	<p>Comments noted. Whilst several aspects of the SPD may be covered under Building Regulations, the Council believe it useful to highlight these matters so they can be considered as part of a holistic design approach.</p> <p>References to garages/parking to the north of the dwelling and north facing gardens have been revised to remove what could be unrealistic recommendations.</p> <p>The recommendation on window location has been removed from 4.50.</p> <p>Comments noted on sustainable materials. The sentence on carbon has been revised. The Council acknowledge the issues housebuilders may face in sourcing materials; however, to highlight the sustainability benefits of using of recycled and reused materials is considered positive.</p>

	<p>Such a blanket policy proposal needs a sound evidence base and viability assessment.</p> <p>4.51 - Sustainable Materials</p> <p>Much of this section is unnecessarily detailed in the creation of materials such as bricks and some of it is inaccurate such as '<i>...in the process of making the materials carbon is often omitted.</i>' The supply of materials can often be difficult and any policy that could impede or delay essential housing delivery needs to be very carefully considered.</p> <p>4.55 – Water Efficiency is already covered with latest Building Regulations.</p> <p>It is suggested for Greywater recycling that suitable space should be provided within curtilage for a water butt. Greywater which has already been used for washing is likely to contain chemicals which will be harmful for some aspects of general re-use such as on a garden unless properly treated. I think this is confused and incorrect. Water butts on their own are suitable for rainwater harvesting not Greywater without treatment.</p>	<p>These are recommendations rather than policy requirements.</p> <p>Comments noted regarding greywater. The suggestion has been removed.</p>
Story Homes	<p>Key solar gain design principles</p> <p>It is welcomed that the Council recognises at paragraph 4.49 that whilst seeking to maximise solar gain it needs to be balanced as one consideration in a wider design approach to sites. Overly focussing on this aspect of a larger scale development could compromise the overall schemes including detrimentally limiting density and impinging on the quality of layouts and should be avoided. Therefore, whilst it is desirable to seek to achieve this it should only be maximised where feasible and appropriate.</p> <p>Maximising natural daylight design principles</p> <p>Whilst it is important to ensure appropriate daylight is achieved in properties this must be balanced with the need to ensure that properties and layout are viable and ultimately deliverable. It may not be viable to amend house types on larger schemes to have more glazing on</p>	<p>Comments noted regarding solar design. Some amendments have been made to the recommendations that may have represented unfeasible approaches. Overall however, it is important that attention is paid to maximising solar gain and to include these considerations within the SPD is appropriate. Likewise regarding comments on natural daylight.</p> <p>Comments noted on sustainable materials. The Council acknowledge the issues housebuilders may face in sourcing materials; however, to highlight the sustainability benefits of using of recycled and reused materials is considered positive. These are recommendations rather than policy requirements.</p>

	<p>southern elevations, or integrate light shelves or sun pipes which are non-standard features. It is important that the Council recognises that appropriate levels of daylight are likely to be achievable without such features.</p> <p>Sustainable materials design principles</p> <p>It is acknowledged that maximising the use of reclaimed and recycled materials as well as using local sources has sustainability benefits. However, it is important that the Council recognises that whilst endeavours can be made to utilise such products in developing larger new sites it is not generally commercially viable to rely on them being able to be sourced in the quantum and timescales necessary. Therefore, the use of sustainable materials should only be encouraged rather than being a necessity.</p> <p>Waste facilities design considerations</p> <p>The Council has suggested that where possible developers are encouraged to provide space for composting facilities within the kitchen/utility and/or garden. Whilst Story Homes appreciates the Council's aspirations we would caution seeking to provide such items through planning which will not necessarily be desired by the future occupiers. There is anecdotal evidence that where such features have been sought e.g. under the Code for Sustainable Homes that plot purchasers have queried whether they are necessary as they do not wish to have them provided by the developer. Therefore, it is welcomed that this and other elements are only features where this is encouraged and not a more formalised requirement.</p> <p>Water efficiency design considerations</p> <p>Whilst Story Homes notes the Council's aspirations with regards to greywater and rainwater harvesting it is not practical to design for suitable spaces within and external to buildings for the location of storage tanks and water butts respectively. There is no indication of the size of storage that the Council is seeking and the design and cost implications for building and plot layouts to accommodate them.</p>	<p>Comments noted regarding composting facilities. As suggested, these are recommendations that the Council encourage rather than policy requirements.</p> <p>Comments noted regarding greywater. The suggestion has been removed.</p> <p>The Council has considered the comments of Story Homes with respect to adaptable homes. The Council acknowledges that it would not be possible to implement such standards without appropriate evidence and, in accordance with the NPPG, the standards should be contained within policy.</p> <p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development.</p> <p>However, the Council feel it appropriate to highlight these standards and given the SPD sets out guidance rather than requirements, believe it appropriate that the standards remain within the SPD as recommendations.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p> <p>The first sentence of paragraph 4.58 has been removed to avoid confusion.</p>
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	<p>There is also anecdotal evidence that where such features have been sought e.g. under the Code for Sustainable Homes that plot purchasers have queried whether they are necessary as they do not wish to have them provided by the developer. Therefore, such elements should only be features which are encouraged to be provided where appropriate and viable.</p> <p>How to create an adaptable home</p> <p>As with the provision of NDSS dwellings the Council has not demonstrated the rationale for the provision of adaptable homes or considered the cost implications of the adaptable features set out in the 'How to create an adaptable homes' section of the SPD. Whilst some may be easier to accommodate than others some features internal to dwellings would necessitate the time consuming re-design of house types and have cost implications for developments which may not be recoverable through sales values creating viability issues.</p> <p>In addition, there is a lack of clarity over what is meant at paragraph 4.58 by 'The Council does not expect all new homes to incorporate dementia friendly design elements, but the Council does expect developers to go some way to assist in addressing future adaptability'. This implies that whilst it may not require all dwellings it could still seek substantial proportions and the wording provides no certainty to developers as to how to address this matter.</p> <p>It is considered that it is unnecessary to make significant allowances for adaptability in emerging schemes but if the Council is going to proceed on this basis then it should consider the need, viability and timing of the introduction of any measures. Failure to do so could have significant consequences and significantly impact on the rate of delivery of housing in Hartlepool.</p>	
Bellway Homes	<p>Para 4.49</p> <p>It is impossible for all housing to adhere to the considerations set out in this section. It is not certain how the Council can police such a requirement and therefore Bellway recommend that this is omitted.</p>	<p>Comments noted regarding solar design. Some amendments have been made to the recommendations that may have represented unfeasible approaches. Overall however, it is important that attention is paid to maximising solar gain and to include these considerations within the SPD is appropriate.</p>

		<p>The Council would stress that the SPD does not set out requirements but is a guide. The SPD does not contain policies, but instead provides recommendations that seek to achieve good standards of design. The SPD is supplementary to the policies in the Council's Local Plan, and provides advice for applicants and officers alike.</p>
North Star Housing Group	<p>For energy efficiency I would like to see a requirement of 10% thermal efficiency above Building Regulations as B Regs will continue to move upwards in this regard , (we are not achieving this ourselves at present but we are reviewing this).</p> <p>As a Housing Association we welcome an expectation that design will facilitate future adaptability as this is something that we are currently reviewing ourselves. We will not be achieving full Lifetimes Homes accreditation but will be delivering the better parts of it once again, where we can, similarly with the full Building for Life 12 standard.</p>	<p>Comments noted. The Council encourage an attempt to be made to improve the fabric of buildings 10% above what is required by Building Regulations within Local Plan QP7 <i>Energy Efficiency</i>.</p>
Persimmon Homes	<p>Key solar gain design principles (Table at Paragraph 4.49)</p> <p>Another common concern throughout the document is that some statements and tables contained within the SPD are overly prescriptive and lack any form of flexibility to allow alternative approaches on a case by case basis. The layout or design of a scheme can be influenced by many different factors. It is therefore important that the SPD allows a balance to be achieved between these factors by not focusing solely upon one key matter, for example in this instance solar design principles. Such a restricted focus artificially reduces the flexibility of a scheme to respond to other constraints and opportunities.</p> <p>A more flexible approach in the wording is therefore required throughout the document to allow schemes to protect efficiency, and thereby viability, whilst responding to site-specific circumstances so as not to unnecessarily sterilise development.</p> <p>How to create an adaptable homes (Table at Paragraph 4.58)</p>	<p>Comments noted regarding solar design. Some amendments have been made to the recommendations that may have represented unfeasible approaches. Overall however, it is important that attention is paid to maximising solar gain and to include these considerations within the SPD is appropriate.</p> <p>Whilst several aspects of the SPD may be covered under Building Regulations, the Council believe it useful to highlight these matters so they can be considered as part of a holistic design approach.</p> <p>The Council has considered the comments of Story Homes with respect to adaptable homes. The Council acknowledges that it would not be possible to implement such standards without appropriate evidence and, in accordance with the NPPG, the standards should be contained within policy.</p>

	<p>Persimmon Homes are concerned that many of the matters identified within the Table at Paragraph 4.58 are issues covered by the Building Regulations. The Government has sought to rationalise the many differing existing standards into a simpler, streamlined system to reduce burdens and help bring forward much needed new homes.</p> <p>Additional standards in relation to water and access can only be introduced when local planning authorities have gathered evidence to demonstrate there is a need for these additional standards in their area, and justified setting appropriate policies through their local plan. In all other instances local planning authorities cannot seek additional technical standards over and above the building regulations.</p> <p>Rather than repeating the building regulations, which all development is required to achieve, we therefore recommend that this section of the SPD is deleted to avoid unnecessary repetition.</p> <p>How to incorporate dementia design principles (Table at Paragraph 4.60)</p> <p>Again, based upon the Government's review of the planning system, the local planning authorities cannot seek additional technical standards over and above the building regulations. Whilst Persimmon Homes accept that a mix of housing should be delivered to achieve an overall balanced housing stock that meets local needs and aspirations in accordance with Policy HSG2 of the Local Plan, it is unclear from the supporting evidence the scale of need for dementia friendly housing within the borough. Without this evidence it is difficult to understand the justification behind the guidance, the role it will play in determining planning applications and the exact requirements of the guidance.</p>	<p>Given that the Council has only recently adopted its Local Plan (May 2018), this would be something that would have to be fully explored through the next review of the Local Plan in order to be a requirement of all new development.</p> <p>However, the Council feel it appropriate to highlight these standards and given the SPD sets out guidance rather than requirements, believe it appropriate that the standards remain within the SPD as recommendations.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p>
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APPENDICES

- Appendix 1: List of relevant NPPF paragraphs
- Appendix 2: List of relevant NPPG sections
- Appendix 3: List of relevant 2018 Local Plan policies
- Appendix 4: Useful websites for applicants
- Appendix 5: Glossary
- Appendix 6: Contact List

Appendix 1: List of relevant NPPF paragraphs

Respondent	Consultation Feedback	HBC Response/Proposed Action
Historic England	Paragraphs 193-197, 200 and 201 of the NPPF should also be referenced in relation to the historic environment. Without them, we do not recommend describing the appendix as being comprehensive in paragraph 2.6.	Comments noted. The list of relevant NPPF paragraphs in Appendix 1 will be amended to include reference to paragraphs 193-197, 200 and 201.

Appendix 2: List of relevant NPPG sections

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

Appendix 3: List of relevant 2018 Local Plan policies

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

Appendix 4: Useful websites for applicants

Respondent	Consultation Feedback	HBC Response/Proposed Action
Historic England	We recommend including www.building-in-context.org as a useful website. Building In Context has been created by Historic England and Design Council CABE to allow developers, communities and local authorities to enhance new development proposals so that they respond well to the historic area, local context and wider surroundings.	Comments noted. Reference to the Building in Context website added.

Appendix 5: Glossary

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

Appendix 6: Contact List

Respondent	Consultation Feedback	HBC Response/Proposed Action
No comments received	None	N/A

ANY OTHER COMMENTS

Respondent	Consultation Feedback	HBC Response/Proposed Action
Hartlepool Borough Council Development Control team	Some consideration could be given to layout/formatting of the SPD to make it clearer. For example, the box headings could be enlarged similarly to the formatting of the Local Plan.	Comments noted. The formatting will be reviewed and amended where appropriate.
Barratt Homes North East (BDW)	Barratt Homes North East (BDW) would like to thank Hartlepool Council for the opportunity to comment on the Hartlepool Residential Design SPD. However, we do wish to express our disappointment that no consultation was undertaken with ourselves, or other major housebuilders, before the publication of this SPD. Planning Policy Guidance is clear that the preparation of Local Plans and SPDs must be informed by '...effective engagement and consultation with local communities, businesses and other interested parties' (Para 029, ID: 61-029-20180913).	The exercise undertaken from November 2018-January 2019 was a consultation of interested parties (including housebuilders) and Barratt Homes North East have been directly consulted through this process. The SPD has not yet been formally adopted, and this consultation process has been carried out with the aim of seeking the views of interested parties, like BDW, on the draft SPD and amending the document where appropriate. The Council would consider this consultation exercise to be effective engagement and consultation, as advised in the Planning Practice Guidance.
Home Builders Federation (HBF)	<p>Firstly, there are issues of clarity within the SPD, it is not always clear what is being required of development. The document would be greatly improved if it was clear what was a requirement and what is guidance, and further information was provided to justify the requirements.</p> <p>It is considered that the Council should take into consideration any implications the requirements of this SPD may have on the viability of a development. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.</p>	<p>Comments noted. Paragraph 1.3 states that developers are 'advised' to aim to incorporate the design principles within the SPD 'where possible', it is not considered that the SPD itself is particularly prescriptive. The SPD therefore does not seek to set out requirements, and it is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology that may have inadvertently arisen and address these where appropriate.</p> <p>It is the policies within the Local Plan that set out requirements with respect to design and other topics covered in the SPD; the SPD simply provides guidance on how to achieve these requirements for developers and can assist Council officers and Planning Committee Members in determining whether a specific scheme meets these requirements.</p>

		<p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p> <p>The Council is conscious that some of the guidance in the document would potentially have implications for viability if implemented by developers, however given that the SPD is a guidance document setting out recommendations and not policy requirements, it is not considered appropriate to stipulate these recommendations are 'subject to viability' as there will be no formal requirement for applicants to adopt the recommendations (and therefore no requirement to demonstrate where this is unviable). That being said, the nature of the SPD as a material consideration means that it will be used to assist in the consideration of planning applications and therefore may contribute to reasons for refusal of applications, dependent on the level of conformity or divergence from the principles set out in the SPD (where such divergence is considered great enough to constitute a conflict with an identified Local Plan policy), which will ultimately be weighed up in the planning balance at planning application stage.</p>
Hartlepool Rural Neighbourhood Plan Group	<p>In general the Residential Design SPD would be a positive addition to the Planning Documents for the Borough.</p> <p>The villages in the Borough each have their own identities which residents indicated as being of great importance during our consultations. It would be useful therefore if somewhere in the SPD reference is made to the Neighbourhood Plan and Village Design Statements which provide valuable detailed guidance for our villages. Village Design Statements currently exist for Dalton Piercy, Elwick and Greatham.</p>	<p>Comments welcomed. Reference will be made within the SPD to relevant Neighbouring Plan policies and Village Design Statements in section 2 and in the appendices.</p>

Hartlepool Civic Society	<p>The Society has studied the Consultation Document and we are generally in support of the Residential Design SPD which aims to raise design standards.</p> <p>There are some minor points to be found throughout the document which appear to be contradictory and therefore interpretation and/or prioritising will be essential.</p>	Comments noted. The SPD has been reviewed in light of all comments made and any misleading or contradictory points have been amended.
Taylor Wimpey North East	<p>We support the general principles of the Residential Design SPD and the council's aspirations for creating sustainable communities of good design. This aligns with our own placemaking aspirations to create attractive and successful places where our customers will live, grow and thrive, places that will be valued by the community over the coming years and endure.</p> <p>Notwithstanding this however we find some aspects of the SPD to be overly specific and duplicative of other regulations and policy detail which may change over the timespan of this SPD and become contradictory. It is also considered that significant aspects of the proposed policy to have limited justification and we fail to see any evidence base. We provide the following comments in respect to the detail of the proposed SPD;</p> <p>We have also been in discussion with the HBF who have made separate representations on our behalf dated 14/01/19 which elaborate further on some of these issues.</p> <p>Taylor Wimpey North east are a key stakeholder in the District and welcome further proactive discussions around this proposed policy document. Although we support the general principles of the proposed Hartlepool Residential Design SPD we hope that the above comments are taken on board to ensure that useful and appropriate guidance comes forward. It is essential that the proposed policies are considered in the context of housing delivery and viability.</p>	<p>Comments noted. Paragraph 1.3 states that developers are 'advised' to aim to incorporate the design principles within the SPD 'where possible', it is not considered that the SPD itself is particularly prescriptive. The SPD therefore does not seek to set out requirements, and it is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology that may have inadvertently arisen and address these where appropriate.</p> <p>It is the policies within the Local Plan that set out requirements with respect to design and other topics covered in the SPD; the SPD simply provides guidance on how to achieve these requirements for developers and can assist Council officers and Planning Committee Members in determining whether a specific scheme meets these requirements.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p> <p>The Council is conscious that some of the guidance in the document would potentially have implications for viability if implemented by developers, however given that the SPD is</p>

		<p>a guidance document setting out recommendations and not policy requirements, it is not considered appropriate to stipulate these recommendations are 'subject to viability' as there will be no formal requirement for applicants to adopt the recommendations (and therefore no requirement to demonstrate where this is unviable). That being said, the nature of the SPD as a material consideration means that it will be used to assist in the consideration of planning applications and therefore may contribute to reasons for refusal of applications, dependent on the level of conformity or divergence from the principles set out in the SPD (where such divergence is considered great enough to constitute a conflict with an identified Local Plan policy), which will ultimately be weighed up in the planning balance at planning application stage.</p>
Story Homes	<p>Story Homes welcomes the Council setting out design principles in the SPD but requests that greater clarity is given as to the weight that the details it contains will be given in the consideration of planning applications.</p>	<p>Comments noted. Paragraph 1.3 states that developers are 'advised' to aim to incorporate the design principles within the SPD 'where possible', it is not considered that the SPD itself is particularly prescriptive. The SPD therefore does not seek to set out requirements, and it is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology that may have inadvertently arisen and address these where appropriate.</p> <p>It is the policies within the Local Plan that set out requirements with respect to design and other topics covered in the SPD; the SPD simply provides guidance on how to achieve these requirements for developers and can assist Council officers and Planning Committee Members in determining whether a specific scheme meets these requirements.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it</p>

		sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.
North Star Housing Group	<p>I welcome the SPD proposals. I believe that homes of all tenures should be such that we as developers/owners and owners/residents can rightly be proud of and should be such that they enable people to live contently for as long as they choose to occupy the premises.</p> <p>In terms of the other elements of the SPD I largely agree with it all in terms of guidance to aspire to in all developments.</p> <p>In short I welcome an expectation of good design upon all developers because I feel that the size and amenity of the lower end of the volume builder portfolio is now, often, not fit for purpose. As a Housing Association we try to achieve good design but I recognise that we too are site and cost constrained. I hope that through good communication with Planning Officers there will always remain scope for negotiation on a scheme by scheme basis where necessary.</p>	Comments noted.
Persimmon Homes	<p>Persimmon Homes welcome the opportunity to submit representations on the Hartlepool Borough Council Residential Design Supplementary Planning Document Consultation Draft of November 2018.</p> <p>We acknowledge that a Supplementary Planning Document (SPD) can be useful tool to provide further guidance for development on specific sites, or on particular issues such as design. We also note that they are capable of being a material consideration in planning decisions but as they do not form part of the development plan, they can not be used as a mechanism to introduce additional policy requirements beyond those contained within the adopted Local Plan.</p> <p>For the reasons outlined within this letter, with specific reference to the attempted introduction of the Nationally Described Space Standards, it is necessary to register our strong objections to this Supplementary Planning Document. We are particularly concerned in relation to its need, approach, content, detail, status and potential use. We therefore</p>	<p>Comments noted. Paragraph 1.3 states that developers are 'advised' to aim to incorporate the design principles within the SPD 'where possible', it is not considered that the SPD itself is particularly prescriptive. The SPD therefore does not seek to set out requirements, and it is not considered necessary to repeat this terminology in every section of the SPD however the wording of each section will be reviewed to identify any contradictions in terminology that may have inadvertently arisen and address these where appropriate.</p> <p>It is the policies within the Local Plan that set out requirements with respect to design and other topics covered in the SPD; the SPD simply provides guidance on how to achieve these requirements for developers and can assist Council officers and Planning Committee Members</p>

	<p>trust that the Council will accept this letter as our formal submission to the Residential Design SPD, duly made within the required timescales.</p> <p>General Comments</p> <p>Notwithstanding the comments outlined below, we believe that the SPD would benefit from an alternative format in terms of its layout and presentation. In its current form we believe that the SPD does not clearly differentiate between the supporting text, the actual areas of guidance and any formal policy requirements. Greater clarity in this respect would aid with the application of the SPD and its guidance by planning officers and developers.</p> <p>We also believe that the clarity of the SPD would be strengthened if greater reference were made between the areas of guidance and the related planning policies contained within the Local Plan. This would illustrate how the guidance correlates with the various policy of the plan, and vice versa, and in the process greater evidence the justification behind the associated costs and burdens.</p> <p>Conclusion</p> <p>Whilst we welcome the opportunity to provide comments on the draft Residential Design SPD, it is with regret that we must write such a strongly worded objection to the document. As set out above, we are alarmed by proposed SPD, particularly in its attempt to introduce a requirement for the Nationally Described Space Standards which is clearly contrary to national guidance on the matter.</p> <p>As explained above, whilst there are a number of the high level principles of the document which we agree with, we are concerned that its approach, content, details, and eventual use in the planning system has the potential to undermine allocated site efficiency, deliverability and marketability. A number of the statements and tables contained within the document are either extremely prescriptive or completely lack in the necessary detail thereby giving the Council free reign to make requests at their discretion. The document as a whole is therefore appears ineffective, unjustified, untested with little known input from the development industry whom it will primarily affect.</p>	<p>in determining whether a specific scheme meets these requirements.</p> <p>Extra information has been added within the SPD's introduction to explain that the SPD contains guidance and acknowledgement of best practice. The title of each box throughout the SPD has been amended to be clear that it sets out considerations aimed at achieving a high quality of development rather than as a full set of requirements which cannot be deviated from.</p> <p>The Council is conscious that some of the guidance in the document would potentially have implications for viability if implemented by developers, however given that the SPD is a guidance document setting out recommendations and not policy requirements, it is not considered appropriate to stipulate these recommendations are 'subject to viability' as there will be no formal requirement for applicants to adopt the recommendations (and therefore no requirement to demonstrate where this is unviable). That being said, the nature of the SPD as a material consideration means that it will be used to assist in the consideration of planning applications and therefore may contribute to reasons for refusal of applications, dependent on the level of conformity or divergence from the principles set out in the SPD (where such divergence is considered great enough to constitute a conflict with an identified Local Plan policy), which will ultimately be weighed up in the planning balance at planning application stage.</p>
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	<p>We therefore strongly object to the Council introducing the SPD as a quasi-legal document which will simply lead to confusion on status for developers, planning officers and local communities. We feel this approach would be at odds with national policy and guidance.</p> <p>As a national house-builder with a keen local interest, we are eager to ensure a suitable planning framework is established in Hartlepool. Persimmon Homes are therefore happy to assist the Council in moving this document forward whilst re-iterating our commitment to delivering high quality design on our sites throughout the Borough.</p> <p>We trust that our comments will be of assistance.</p>	
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Appendix 2: List of Stakeholders Consulted during Consultation

Middlesbrough Council	National Planning Casework Unit
Darlington Borough Council	Northern Powergrid
Redcar and Cleveland Council	Network Rail
Durham County Council	North East Chamber of Commerce
Stockton-on-Tees Borough Council	Northern Gas Networks
Chair of Planning Committee, Hartlepool Borough Council	Northumbrian Water
Vice Chair of Planning Committee, Hartlepool Borough Council	RSPB
Chair of Regeneration Committee, Hartlepool Borough Council	Tees Wildlife
Vice Chair of Regeneration Committee, Hartlepool Borough Council	EDF Energy
Homes England	Tees Wildlife
The Crown Estate	CPRE
Avant Homes	Sustrans
Linden Homes	Rural Neighbourhood Plan Group
Persimmon Homes	The Woodland Trust
Wynyard Park	Met Office
Story Homes	Durham Bird Club
Natural England	Cleveland Emergency Planning Unit
Environment Agency	Archaeology Officer, Hartlepool Borough Council
Historic England	Building Control Manager, Hartlepool Borough Council
Highways England	Principal Housing Officer, Hartlepool Borough Council
British Wind Energy	Principal Housing Officer, Hartlepool Borough Council
Civil Aviation Authority	Heritage and Countryside Manager, Hartlepool Borough Council
Cleveland Police	Airport Planning and Development Ltd
Cleveland Fire Brigade	SSA Planning
Department for Transport	DPDS
Families First	Dowen
Anglican Water	Dunlop Heywood

G L Hearn
Hyams and Brownlee
Manners & Harrison
Turley
RPS Group
SJR Architectural
BDP Planning
Energy Workshop
Hedley Planning Services
Nathaniel Lichfield and Partners
Prism Planning
Walsingham Planning
WYG
H & H Land and Property Limited
BDP
Arup
Home Builders Federation
Stovell & Millwater Ltd
Hansteen Holdings PLC
Dalton Piercy Parish Council
Headland Parish Council
Elwick Parish Council
Hart Parish Council
Castle Eden Parish Council
Grindon Parish Council
Haswell Parish Council
Hutton Henry Parish Council
Monkhesleden Parish Council
Trimdon Parish Council
Trimdon Parish Council

Wolviston Parish Council
Newton Bewley Parish Council
Greatham Parish Council
Hartlepool Civic Society
Community Hub
Headland Local History Group
Residents Association of Clavering and Hart Station (RACHS)
Hartlepool Heritage & Green Spaces Group
Greatham Resident Association
Park Resident Association
St Cuthbert's Area Residents Association
St Cuthbert's Friendship Group
Wynyard Residents Group
Lynnfield Area Residents Association
Fens Residents' Association
Sport England
Bowcliffe Leeds Ltd
Marrons Planning
Taylor Wimpey UK Ltd
RIBA
Guinness Trust
Four Housing
Ward Hadaway
idPartnership
North Star Housing Group
Thirteen Group
Gus Robinson
Gentoo Group
Endeavour Housing Association
Barratt Homes

White Young Green
ELG
Savills
Wynyard Homes
Hartlepool Asian Association
Headland Residents Association
Newton Bewley Parish Meeting
Avant Homes

Bellway Homes
Hartwell Residents Association
Home Group Limited
Keepmoat NE
Leebell Developments Limited
Rift House East Residents Association
Tees Valley Combined Authority
Teesmouth Bird Club