Hartlepool Local Planning Framework

Local Plan

Consultation Statement

July 2016

HARTLEPOOL BOROUGH COUNCIL

Hartlepool Local Plan Preferred Options – Consultation Statement – July 2016

Contents page

Chapter Number	Chapter Title	Page number
1	Introduction	3
2	Consultation Relating to the Preferred Options Stage	4

Appendix Number	Appendix Title	Page Number
1	List of attendees at Preferred Options Launch Day, two other drop in sessions and the Presentation to Head Teachers	6
2	List of those consulted at Preferred Options stage	11
3	Summary of Representations to Preferred Options and HBC Response	23 onwards.

1.0 INTRODUCTION

1.1 In accordance with the requirements of Regulation 22(c) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 this statement sets out the consultation undertaken following the preparation of the Preferred Options stage of the Council's Draft Local Plan and provides details on:

i) which bodies and persons the local planning authority invited to make representations,
ii) how those bodies and persons were invited to make representations
iii) the number of representations made and a summary of the main issues raised
iv) how any representations have been taken into account;

1.2 A consultation statement was also produced at the previous Issues and Options stage to help fully record the representations made through the development of the Local Plan.

1.3 In the interests of providing a clear and transparent process within one document and in order to meet the requirements set out within the 2012 Town and Country Planning (Local Development) (England) (Amendment) Regulations, this statement outlines the extent of the consultation carried out with stakeholders and the public during the Preferred Options stage of the Draft Local Plan.

1.4 This statement includes, as an appendix (appendix 3), information relating to the representations received at Preferred Options stage and how those representations will be considered.

1.5 Further detail on the interaction that has take place with organisations listed in Regulation 4 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, with regard to the Duty to Co-operate is also covered within this document.

1.6 A copy of this document can be found on the Council's website at www.hartlepool.gov.uk or a copy can be obtained by contacting the Planning Policy Team on 01429 284084.

2.0 CONSULTATION RELATING TO PREFERRED OPTIONS

2.1 To engage with stakeholders and residents, inform them of proposals being considered at this stage and to illustrate the steps that need to be taken to progress the Local Plan a formal consultation period began on 27th May 2016 and ran for eight weeks to 22nd July 2016.

2.2 A Preferred Options launch day was held on 6th June 2016 at the National Museum of the Royal Navy, Hartlepool (formerly the Historic Quay). The first part of the event was well attended by Councillors, officers from various Council departments, statutory consultees, consultants, landowners and business representatives. Attendees gained an overview of the Local Plan so far via a presentation and then took part in a question and answer session.

2.3 Following this there was a more informal drop in session for all residents and any other interested parties from 2pm until 7.30pm.

Advertisement of the Public Consultation period

2.4 The public consultation period was advertised in the following ways:

- Letters sent out to 3360 households
- Letters / emails sent out to all consultees on business / organisations database (appendix 2 lists who was consulted)
- Letters / emails sent out to all consultees on community organisations / residents database (appendix 2 lists who was consulted)
- Information was posted on the Council's web site
- A series of press releases were published in the Hartlepool Mail
- A double centre page of Information was published in Heartbeat which is distributed to every household in the Borough (June 2014)
- Information was posted on Hartlepool's twitter account.
- Information sheets were put in notice boards around the town and rural villages.

Copies of the Preferred Options document and draft proposals map along with the Sustainability Appraisal and Habitats Regulations Assessment were available at (other evidence base documents were all made available online and were sent out to anyone who requested a hard copy):

- The Civic Centre;
- The Borough's libraries;
- The Hartlepool Art Gallery/Tourist information Centre; and on
- The Council's website

Meetings

2.5 To disseminate information and ensure the Duty to Co-operate was met Planning Policy officers attended a wide variety of meetings and held other public drop in sessions slightly before and during the consultation period. These meetings are set out below:

- DtC Meeting with Durham County Council – 12th April 2016
- DtC Meeting with Stockton Borough Council – 13th April 2016
- DtC Meeting with Redcar & Cleveland Borough Council – 8th June 2016
- Meeting with Hart Parish Council – 13th June 2016
- North & Coastal Neighbourhood Forum – 15th June 2016
- South & Central Neighbourhood Forum – 15th June 2016
- Bishop Cuthberts Residents Association – 20th June 2016

- Meeting with landowners and agent regarding Elwick Bypass – 21st June 2016
- Meeting with Head Teachers and Chairs of Governors – 22nd June 2016
- Place in the Park Public Consultation Drop in Event – 2pm-7pm – 27th June 2016
- Meeting with Elwick Parish Council – 27th June 2016
- Meeting with Resident (Chrissie Chiles) in Elwick Village – 28th June 2016
- Local Plan Drop in Session – National Museum of the Royal Navy – 2pm-7.30pm – 7th July 2016

2.6 During all meetings minutes and/or notes were taken and if necessary, further correspondence such as e-mails took place.

2.7 In total 240 responses were received in response to the consultation the Preferred Options Local Plan.

APPENDIX ONE - LISTS OF ATTENDEES AT PREFERRED OPTIONS LAUNCH DAY, TWO OTHER DROP IN SESSIONS AND THE PRESENTATION TO HEAD TEACHERS

Launch Event, Museum of the Royal Navy – 6TH June 2016

Morning Presentation and Q&A Session

Name	Organisation
Alan Clarke	HBC- Councillor
Alyson Carr	HBC
Amy Waller	HBC
Andrew Carter	HBC
Ben Stephenson	Persimmon Homes
Bob Buchan	HBC - Councillor
Chris Scaife	HBC
Craig Temple	HBC
Dan James	HBC
David Worthington	HBC
Denise Ogden	HBC
Fiona Riley	HBC
James Hudson	Environment Agency
Jane Kett	HBC
Jane Palmer	Stockton Borough Council
Jane Tindall	HBC
Jim Lindridge	HBC - Councillor
John Cunliffe	Greatham Parish Council
John Lauderdale	HBC - Councillor
John Taylor	Hartlepool Civic Society
Joseph Lowes	Environment Agency
Julie Reed	HBC
Representative of	Tees Valley Combined Authority
Kevin Cranney	HBC - Councillor
Lyn Noble	Dalton Piercy Parish Council
Malcolm Steele	HBC
Matt Johnson	Wynyard Park Ltd
Matthew King	HBC
Mike Blair	HBC
Minna West	Clerk to Elwick Parish Council
Martin White	HCA
Neil Milligan	HCAi
Nigel Johnson	HBC
Nomusa Malinga	HBC
Paul Hunt	Persimmon Homes
Peter O'Donnell	Seneca Homes
Rachel Smith	HBC
Rod Hepplewhite	Prism - High Tunstall
Ryan Cowley	HBC
Sarah Bowman	HBC
Sarah Scarr	HBC
Steve Wilkie	HBC
Steven Carter	HBC
Trisha Lawton	HBC - Councillor
Val Lister	Hartlepool Civic Society

Zoe Rickleton	HBC

Afternoon Drop in Session

Unknown	Resident
Unknown	Resident
Unknown	Resident
Unknown	Resident
A Doughty	Resident
B Loynes	Resident
Brian Coates	Resident
C Richmond	Resident
C Spence	Resident
C W Elener	Resident
Caitlin Morton	Resident
Chris McLoughlin	Resident
D Loynes	Resident
D Young	Resident
Daniel Woodward	Resident
Dave Whitfield	Resident
Dr Parkash	Resident
E B Eton	Resident
E Plews	Resident
Ed Yuill	Landowner / Developer
Fran Johnson	Park Residents Association
G Ashley	Resident
G Johnson	Resident
G Parker	Resident
G Wilkinson	Landowner / Developer
I Ward	Resident
J Ashley	Resident
J Herbert	Resident
J Parker	Resident
Jill Whitfield	Resident
John Wyatt	Consultant
June Dormand	Resident
Keith Gorton	Resident
L Cartwright	Resident
L Mitchell	Resident
L S Elener	Resident
L Welch	Resident
Linda Thompson	Resident
M Herbert	Resident
Mr F P Hallum	Resident
Mr Pickens	Briarfields Allotments Association
Mr R A Greig	Resident
Mr Stockdale	Resident
Mr Wood	Resident

Mrs J Markwell	Resident
Mrs P Hallum	Resident
Mrs Parkash	Resident
Mrs Stockdale	Resident
Mrs Wood	Resident
N Appleyard	Resident
N Sands	Resident
N Shaw	Resident
Nick Barrett	Resident
P Briggs	Resident
P Welch	Resident
S Clark	Resident
S Doughty	Resident
S Johnson	Resident
S Stokes	Resident
W Dickinson	Resident

Presentation to Head Teachers – CETL – 22nd June 2016

Amanda Howell	Deputy, Sacred Heart
Anne Malcolm	Head, Owton Manor
Carol Bradley	Head, St Helens
Christine Brown	Chair of Governors, Grange Primary
Dave Hammond	Chair of Governors, St Helens
Fiona Riley	HBC, Planning
Grant Caswell	St Hilds School
Jo Heaton	Exec Head, Hart and Elwick
Joanne Wilson	Head, St Cuthbert's
Judy Thompson	Chair of Governors, Eskdale Academy
Julie Reed	HBC, Education
Kay Forgie	HBC, Education
Kevin Malcolm	Manor College of Technology
Leanne Yates	Head, Grange Primary
Lee Walker	Head, Barnard Grove
Mandy Hall	Head, West Park Primary
Matthew King	HBC, Planning
Mike Cooney	Head, St Bega's
Oliver Harness	HBC, Education
Pam Maughan	Governor, St Joseph's
Patricia Caroll	St Bega's
Rachel Smith	HBC, Education
Rachel Williams	Head, St Josephs
Ray Preistman	Chair of Governors, West Park Primary
Vanessa Stobart	Manor College of Technology

Place in the Park Drop in Session – 27th June 2016

A Kreston	Resident
Andrew Simpson	Resident
Anne Bolon	Resident
Brian Warnes	Resident
C Glenn	Resident
Clive Wall	Resident
D McMillan	Resident
D Sinks	Resident
Deni Crowther	Resident
Edith Harrison	Resident
G Ashley	Resident
Graeme Bilton	Resident
H Morgan	Resident
I McMillan	Resident
Ian Briggs	Resident
Ian Rollo	Resident
Jane Rollo	Resident
John O Connor	Resident
Kath Ayre	Resident
Kay Keats	Resident
Leanne Purdy	Resident
Linda Dickinson	Resident
Malcolm Ayre	Resident
P Bradley	Resident
Patricia Watson	Resident
Phil Howie	Resident
Richard Streeding	Resident
Sheila Bewick	Resident
Steven Crannage	Resident
T Ashley	Resident

Museum for the Royal Navy Drop in Session – 7th July 2016

David Barker	Land Owner / Resident
Moss Body	Resident
EG. Bunting	Resident
A. Bushnell	Resident
J. Corrican	Resident
M. Green	Resident
M. Hodgman	Resident
K. Hodgman	Resident
J. Hogg	Resident
D. Redwood	Resident
R. Panday	Consultant
F.A. Patterson	Resident
G. Reay	Resident
M. Reay	Resident
M. Self	Resident
M. Twynham	Consultant

APPENDIX 2 – LIST OF THOSE CONSULTED AS PART OF THE PREFERRED OPTIONS STAGE

Residents Groups and Individuals on Database

Contact Person	**Company Name**
Mrs Norman	3R's
Julie Hetherington	Addison/Belk/Cameron (ABC)
	All Saints Stranton
Desmond Dongo	Asylum Seeker & Refugee Group
Roni Farrow	Belle Vue Residents Association
David Hooks	Bishop Cuthbert Residents Association
Mrs Mostert	Bridge Community Association
Kath McCluskey	Brierton Allotment Association
Mr Morrish	Burbank Older Persons Group
Pat Hays	Burn Valley Allotment Association
Carol Laud	Burn Valley North Residents Association
Charlene Twidale	Central Correctors
Liz Torley	Central Estate Management Organisation (CEMO)
Sandra Chow	Chinese Association
Mrs C Thompson	Church of the Nazarene
Jean Dawking	Cobden Area
Leslea Jackson	Community Hub
Laura Wild	Deanery Youth Worker and St Hild's School Chaplain
Julie Rudge	Dent/Derwent Residents
Peter Zacharias	Derwent Grange Residents Association
Ms H Woodward	Dyke House Jackson Parents Group
Mrs Shields	Dyke House Residents Association
Pastor C Sawtell	Elim 'Living Waters' Pentecostal Fellowship
Ms Bailey	Elmtree Community Association
Robert Smith	Fens Residents Association
Alex Sedgwick	Friends of Belle Vue Centre
Mr J Cambridge	Friends of Croft Gardens
Ms Jarvis	Friends of Gibb Square
Anne Brown	Friends of Hartlepool Wild Green Spaces

Contact Person	Company Name
Sheila Coulson	Friends of Laurel Gardens
Val Woodward	Friends of Regent Square
Bill Spowart	Friends of Rossmere Park
Nicola Harman	Friends of Rossmere School
Cath & Liz Torley	Friends of Spion Kop
Joanne Fairless	Hart Gables
Mr J McDonnell	Hartfields Resident Association
Bob Steel	Hartlepool Heritage & Green Spaces Group-formerly North Linear Park Steering Group
Rev B Morris	Hartlepool Methodist Churches
Marie Starling	Hartwell
Chris Walker	Haswell Avenue Allotment Association
Rev K Banks	Headland Baptist Church
Mrs Young	Headland Carnival Committee
Mr A Hall	Headland Christian Fellowship
Mr D Geen	Headland Local History Group
Jim Ainslie	Headland Neighbourhood Plan Working Group
Steven Allison	Headland Residents Association
Mr Southcott	Heugh Gun Battery
Revd Roz Hall	Holy Trinity and St Marks
David Bentham	Hutton Avenue Resident Association
	Kilmarnock Road Family Centre
	Lancaster Court Residents Association
	Lynnfield Area Residents Asociation
Wendy Hay	Marmion Estate
Pastor R Proud	New Life Fellowship
Mr C Smith	Oak & Pine Residents Association
Glenys Thompson	ORCEL (Owton Rossmere Community Enterprise Limited)
Leslea Jackson	Owton Fens Community Association
Rev M Mathison	Owton Manor Baptist Church
Rev R Hetherington	Oxford Road Baptist Church
John Lauderdale	Oxford Road Resident Association

Contact Person	Company Name
Fran Johnson	Park Resident Association
Debbie Wilks	Queen's Meadow Residents
Barry Wilkinson	Resident
Dr Pickens	Resident
Mrs I Ryder	Resident
Mr & Mrs Ogle	Resident
Mr & Mrs P A Wood	Resident
Mr Brahimi	Resident
Mr J W Dickinson	Resident
Mr R Dixon	Resident
Mrs P Harkness	Resident
Mr F Sturrock	Resident
John Herbert	Resident
Mrs Steel	Residents Association of Clavering and Hart Station (RACHS)
Stephen Akers-Belcher	Rift House Community Action Team
Christopher Akers-Blecher	Rift House East residents Association
Tom Stewart	Rossmere Residents Group
	Salvation Army Citadel
Fr L Rogers	St Aidan and St Columba
Christine Szary	St Cuthbert's Friendship Group
	St George's United Reformed Church
Revd C Collison	St Hilda's Church
Revd S Locke	St James the Apostle
Fr N Jennings	St John Vianney/St Mary RC Church
Revd Captain Allinson	St John's Greatham/Holy Trinity Seaton Carew
Sally Ringwood	St Joseph's Social Group
Fr M Griffiths	St Joseph's/St Cuthbert's RC Church
Revd L Butler	St Luke's
Revd J Burbury	St Mary Magdalene Hart/St Peter Elwick
Fr Buttery	St Oswald’s
Revd G Buttery	St Oswald's Church

Contact Person	Company Name
Fr A Tuckwell	St Patrick/St Teresa RC Church
Revd R Masshedar	St Paul's
	St Thomas More RC Church
Evelyn Leck	Stockton Road Area Residents Association
Ms Glew	Tweedies Residents Association
Mrs Barker	West View Friendship Group
Diane Atkins	Wynyard Residents Group

Organisations on Database (these were consulted by email if email address present or by post if no email)

Contact Person	Company Name
Ian Thurlbeck	@ retail
	Able UK Ltd
	Accent North East
	Airport Planning and Development
	Ambulance HQ
	Amec UK
	Anchor Housing Association
	Ancient Monuments Society
	Andrew McCarthy Associates
John Wilson	Appletons
Janine Laver	Arcus Consultancy Services
	Area Commissioning Group
Mike McNamara	Asda
David Loughrey	ASP Associates
	Avant Homes
	Avondale Centre
	B3 Architects
	Banks
Mr L Walker	Barnard Grove Primary School
	Barratt Homes (David Wilson Homes)
	Barton Wilmore
James Hall	Barton Wilmore
	BDP Planning
	Bellway Homes
	Berkeley DeVere
	Big Tree Planning
Jo-Anne Garrick	Bilfinger GVA
Mrs D Rickaby	Billingham Town Council
Peter Marshall	Biz Space
	BNP Paribas Real Estate UK
Antonia Murillo	Bond Dickinson

Contact Person	Company Name
	BREEAM
	British Butterfly Conservation Society
	British Telecommunications plc
	British Wind Energy
Mrs J Thomas	Brougham Primary School
	Camping and Caravan Club
	CAMRA
Charles Hardcastle	Carter Jonas
Ms J Collins	Castle Eden Parish Council
Mr A Chapman	Catcote Academy
	CBRE
	Cemex UK Operations Ltd
Liz Torley	Central Estate Management
	CETL (Centre for Excellence in Teaching and Learning)
Graham Alton	Changing Futures North East
	Citizens Advice Bureau
K Riensema	Civil Aviation Authority
Miss H O'Brien	Clavering Primary School
	Cleveland Buildings Preservation Trust
	Cleveland College of Art and Design
	Cleveland Cycling Campaign
	Cleveland Emergency Planning Unit
	Cleveland Fire Brigade HQ
Mr R Cains	Cleveland Industrial Archaeology Society
	Closing the Gap
	Colliers CRE International
	Compassion in World Farming
	Council for British Archaeology
	Council for the Protectionj of Rural England
Jane Harrison	Country Landowners Association
Mrs G Gibson	CPRE
	Crown Estate
	Cunnane Planning
David Brocklehurst	Cussins (North East) Ltd
Sophie Chapman	Dalton Parish Council
David Stovell	David Stovell and Millwater
	Davis Planning Partnership
Mr H J Williams	Dean and Chapter of Durham Cathedral
Mr M J Means	Defence Land Agent
	DEFRA
Jim Hutchison	Defra Flood Management Division
	Deloitte
	Dennis Dowen Associates
	Department for Transport
Jen Beardsall	DePol Associates
Faith Folley	Development Planning Partnership

Contact Person	Company Name
Nic Allen	Devereux Architects
Mark Dransfield	Dransfield Properties Ltd
Andrew Cole	DTZ
	Dunlop Heywood
Noel Jackson	Durham Bat Group
N Benson	Durham Heritage Coast
	Durham Tees Valley Airport
Mr A Jordon	Dyke House Sports and Technology College
Paul Newman	EDF British Energy
Christine Blythe	EDF Energy
Alex Jackman	EE
Mrs C Bradley	Eldon Grove Academy
Minna West	Elwick Parish Council
Mrs Jobson	Elwick Women's Institute
Mr C Hughes	Endeavour Housing Association
Dr P Surman	Energy Workshop
Paul Lynn	Engineering Consultant
Ian Lyle	England & Lyle
	English Golf
Mr S Hammond	English Martyrs RC School & Sixth Form College
	Environment Agency
Mrs E Killeen	Eskdale Academy
George Woodward	EWS
	Fairhurst
Mr P Cornforth	Fens Primary School
Mr J F Irvine	Fishburn Parish Council
	Forestry Commission
	Four Housing
	Friends, Families and Travellers
	G L Hearn
	Garden History Society
	Gentoo
Stephanie Linnell	George F White
	Georgian Group
Philip King	Gerald Eve
	Gladman Developments
Chris Dodds	Gleeson Homes (North East Teesside)
Mrs S Sharpe	Golden Flatts Primary School
	Grand Central Railway
	Grand Hotel
Mrs L Yates	Grange Primary School
Mrs N Dunn	Greatham C of E Primary School
Mr John Cunliffe	Greatham Parish Council
	Greg Cavey
Mrs Johnson	Grindon Parish Council
Daniel Robinson	Gus Robinson

Contact Person	Company Name
James Barr	GVA
	Halcrow Group Limited
Kieran Power	Hallam Land Management
	Hammond Suddards
Mrs J Heaton	Hart Community School
Mr R Gray	Hart Parish Council
Mrs Lawson	Hart Station Women's Institute
	Hartlepool Ahmadiyya Muslim Association
Mrs M Smith	Hartlepool Archaeological Society
Jack Hanlon	Hartlepool Boys Brigade
	Hartlepool Centre for the Deaf
Mrs V Lister	Hartlepool Civic Society
Mr D Hankey	Hartlepool College of Further Education
	Hartlepool Countryside Volunteers
	Hartlepool Cricket Club
Alan Walker	Hartlepool Crime Prevention Panel
Mr D A Herbert	Hartlepool Cycle Club
Mrs A Swift	Hartlepool Girl Guides Association
	Hartlepool Golf Club
	Hartlepool Heritage and Green Spaces Group
The Editor	Hartlepool Mail
	Hartlepool Marina
	Hartlepool People Limited
Ms Zeba Alam	Hartlepool Salaam Community Centre
	Hartlepool Sixth Form College
Mr J Rodgers	Hartlepool Sports Council
Mr K J Ensell	Hartlepool Water
Ms M Starling	Hartwell Residents Association
Tracey Bell	Haswell Parish Council
Gillian Elliston	Headland Parish Council
	Health and Safety Executive
Carol Johnson	Healthwatch
Sean Hedley	Hedley Planning Services
	Helios Real Estate
Mr M Tilling	High Tunstall College of Science
Chris Bell	Highways England
	Historic England
	HM Inspector of Nuclear Installation
Mr D McKnight	HMS Trincomall Trust
Mrs A Baines	Holy Trinity C of E Primary School
	Home Group Limited
	Homes and Communities Agency
	Housing 21
Suzanne Crispin	Husband and Brown Limited
Mrs J Collins	Hutton Henry Parish Council
	HVDA

Contact Person	Company Name
	Hyams & Brownlee
Mr P S Gill	ICI
Andrew Windress	ID Planning
	INCA
Mr S Grundy	Indigo Planning
Stephen Carnaby	Intelligent Plans and Examinations (IPE) Ltd
Ian Butler	J & B Fuels
A Pailor	J J Hardy & Sons Ltd
Ted Jackson	JacksonPlan Limited
Steve Parfit	JDR Cables
Mrs J Loomes	Jesmond Gardens Primary School
	Jomast Construction Limited
	Jones Day
	Jones, Lang & Laselles
	JWPC
	Kebbell Developments
	Keepmoat NE
Ian Prescott	Keepmoat Partnership
Mrs A Darby	Kingsley Primary School
	La Farge Aggregates
	Lambert Smith Hampton
	Landmark Information Group
	Langtree Properties
	LARA Motor Recreation
	Leebell Developments Limited
	Legato Properties
	Lidl
	Limes Development
	Linden Homes
	Local Dialogue
	Lorne Stewart PLC
Simon Medler	Lovell
Mrs M Fairley	Lynnfield Primary School
	Mandale Properties
Mrs A Malcolm	Manor Community Academy
	Marine Planning Team
Mr Christopher McGough	McGough Consultants
	McInally Associates
	McNicholas Bros
	Mecca Bingo
	Middlesbrough Borough Council
Mark Rycraft	Middleton Grange Shopping Centre
	Miller Homes
	Mineral Products Association
	Ministry of Defence
Mrs L A Wardle	Monk Heselden Parish Council

Contact Person	Company Name
	NACRO
	Nathanial Lichfield and Partners
	National Farmers Unit
	National Federation of Gypsy Liaison Groups
	National Grid
	National Planning Casework Unit
Marney Harris	Natural England
Tony Rivero	Network Rail
	New Deals for Communities Truct
Mrs C Nowell	Newton Bewley Parish Meeting
	NHS Hartlepool and Stockton-on-Tees
	NHS Property Services North
Andrew McMinn	NHS Property Services North East
	Niromax
Michael Hepburn	NLP
	North East Chamber of Commerce
	North of England Civic Trust
	North Star Housing Group
The Editor	Northern Echo
	Northern Gas Networks Ltd
Keith Blenkinsopp	Northern Powergrid
	Northumbrian Water
Mike Leech	Nuclear Generation - EDF
	Office for Nuclear Regulation
	Peacock & Smith
Neil Foster	Persimmon Homes
G L Glover	Pipeline Manager
	PlanInfo
	Planning Potential
Gary Baker	Planning Strategy Officer
Ben Fox	Planware Ltd
	Posford Duvivier
Alison Baines	Prism Planning
	Railway Housing Association
	Raymond Barnes
	Regeneris Consulting Limited
Mr Alan Hardwick	rg+p LTD
	RIBA North East
Christopher Akers-Belcher	Rift House East Residents Association
Mr D Turner	Rift House Primary School
	River Green Developments PLC
Steve Biddle	Road Haulage Association
	Robert Turley Associates
	Roger Etchells & Co
	Rokeby Developments
	Ron Greig Estate Agency

Contact Person	Company Name
Mrs L Pawley	Rossmere Primary School
	Royal Mail Group
	RPS
	RSPB
Brian Walker	Rural Neighbourhood Plan Group
Mr J Cook	Sacred Heart RC Primary School
	Safe in Tees Valley
	Sanderson Weatherall
Trevor Adey	Savills
	Savills
	Sean McLean Design
	Seaton Carew Golf Club
	Seaton Carew Sports and Social Club
Dr J Ayre	Sedgefield Town Council
	Shrewsbury House
	Signet Planning
	Smiths Gore
	Society for the Protection of Ancient Buildings
	Spawforths
	Sport England
Mrs Z Westley	Springwell School
Christine Doel	SQW
	SSA Planning Limited
Mrs L Scott	St Aidan's C of E Aided Memorial Primary School
Mr M Cooney	St Bega's RC Primary School
Mrs J Wilson	St Cuthbert's RC Primary School
Ms Carole Bradley	St Helen's Primary School
Ms T Gibson	St Hilds Church of England Secondary School
Mr J Hardy	St John Vianney RC Primary School
Mrs R Williams	St Joseph's RC Primary School
Mrs J Heaton	St Peter's Elwick C of E VA Priamary School
Miss M Frain	St Teresa's RC School
Richard Stephenson	Stephenson Johnson Riley
Laura Ross	Stewart Ross Associates
Economic Growth and Development Services	Stockton Borough Council
	Stonham
	Storey Edward Symmonds
	Story Homes
Mr N Nottingham	Stranton Academy
	Stratus Environmental
	Strutt & Parker
Mr K Sharpe	Student Support Centre
	Sustrans
	Taylor Wimpey North East
	Taylor Wimpey North Yorkshire
Robin Daniels	Tees Archaeology

Contact Person	Company Name
	Tees Valley Arts
Beryl Bird	Tees Valley Local Access Forum
Dr S Antrobus	Tees Valley Nature Partnership
Mr D Clarke	Tees Valley North District Scouts
	Tees Valley Rural Community Council
	Tees Valley Unlimited
	Tees Valley Wildlife Trust
	Teesmouth Field Centre
	Terence O'Rourke PLC
	Tesco
	Tetlow King Planning
Rachael Bust	The Coal Authority
Annette Elliott	The Co-operative Group
	The Crown Estate
	The Crown Estate
The Guiness Trust	The Guiness Trust
	The Home Builders Federation
David Granath	The Hospital of God at Greatham
	The Marine Conservation Society
	The Planning Bureau
Steve Carnaby	The Planning Inspectorate
D Leyshon	The Ramblers Association
J. C. Culine MBE	The Showmen's Guild of Great Britain - Northern
Rose Freeman	The Theatres Trust
Matthew Brindley	The Traveller Movement
	The Victorian Society
Mr S Bedding	The Wharton Trust
Nick Sandford	The Woodland Trust
	Thirteen Group
Jane Evans	Three
Mr M Atkinson	Throston Primary School
	Tony Thorpe Associates
Geoffrey Price	Trimdon Foundry Parish Council
Mrs A Delandre	Trimdon Parish Council
Bethany McQue	Turley Associates
Rebecca Robson	Turley Associates
	Twentieth Century Society
	UNITE
	URS Infrastructure & Environment UK LTD
	Valuation Office Agency
	Vodafone and O2
	Walsingham Planning
Robert Atkin	Ward Hadaway
Mrs J Brough	Ward Jackson C of E Primary School
Jon Horsfall	Waterway Manager
	Wates Development

Contact Person	Company Name
Miss A Hall	West Park Primary School
Ms V Evens	West View Advice and Resource Centre
Mrs C Haylock	West View Primary School and Sports Academy
Mr D Wise	West View Project
	White Young Green
Mr G Reid	Wingate Parish Council
C M Evenson	WM Morrison Supermarkets plc
Mr P Healey	Wolviston Parish Council
	Woolerton Dodwell
	WSP Development
Ms L Russell	WYG
Chris Musgrave	Wynyard Park Limited
Mr Iain Wright MP	

Where there were new housing allocations proposed on greenfield land (which did not benefit from Planning Permission) it was decided to send consultation letters to nearby residences to inform them of the consultation on the Preferred Options Local Plan. In total 3,360 letters were sent out to households.

APPENDIX 3 - Summary of Representations to Preferred Options and HBC Response

The comments and responses are set out in the following sections, these detail the comments received and how they are taken forward in the Publication Local Plan. Each section is page numbered individually and includes a list of policies covered at the beginning of each chapter.

Section 1 of the Consultation Statement, covering:

- Introduction
- The Local Plan in Context
- The Borough of Hartlepool
- Spatial Vision, Themes and Objectives
- Policy SUS1: The Presumption in Favour of Sustainable Development
- Policy LS1 Locational Strategy
- Policy CC1: Minimising and adapting to Climate Change
- Policy CC2: Reducing and Mitigating Flood Risk

Introduction

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
Park Residents Association	LP0014	DP0187	To encourage and facilitate more residents of the town to take an active part in this process it would be helpful if there was a document produced that gave an insight into the top line / key elements of the Local Plan. Many people felt it was too onerous when faced with a tome of 260 pages and thus gave up before they started. Residents welcome the proposed improvement in the transport networks and road infrastructure and feel this must take place prior to the commencement of any large scale developments. We support the proposed safer access from the A19 through Elwick, however this is referred to within the document as a third access into the town. We have grave concerns that this will become a preferred route and will be accessible to all, including HGV's. The road from Dunston Road roundabout along to the already over capacity junction at Elwick road / Park road is very narrow in places, with limited visibility for vehicles wishing to join this road from the various side roads (West Park, Egerton	Noted. Noted. It is recognised that the bypass and grade separated junction will need to be installed early in the plan period. Support for safer junction on A19 at Elwick noted. The new bypass and route into Hartlepool from the A19 at Elwick will have a weight limit placed on it to prevent the use by HGV's other than for work traffic to the development sites. The Local Infrastructure Plan has been developed to consider infrastructure improvements necessary in line with the proposals within the Local Plan and will be used to ensure that, where appropriate, the necessary mitigation is put in

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			Road, Park Drive and Park Avenue). The level of traffic will increase considerably as the developments already approved are completed. The overcapacity junction at Elwick / Park road must be addressed before any further development is granted. Park Avenue is already used as a short cut / rat run in order to save time at this junction and this will increase in time. We would like to see an inclusion of a real, workable solution to this problem to ensure that the inadequate infrastructure is not further burdened to the detriment of safety and the well being of the residents.	place in line with development.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council has considered the Draft Local Plan and is pleased to see that the needs and wishes of rural communities have been taken into consideration within its strategic approach.	Noted.
EDF energy	LP0019	DP0227	Hartlepool Local Planning Framework – Local Plan Preferred Options EDF Energy is one of the United Kingdom's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables and energy supply to end users. Hartlepool Power Station is a major employer within the Hartlepool administrative area, and produces low carbon electricity which is provided to the national transmission network. EDF Energy welcomes the supportive nature for large scale investment in growth industries, including a high value low carbon economy, which runs as a theme throughout the document.	Support welcomed.
Historic England	LP0044	DP0213	Thank you for consulting Historic England on the Hartlepool Local Plan Preferred Options. As the Government's statutory adviser on all matters relating to the historic environment in England, we are pleased to offer our comments. We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, conserved and enjoyed. We have previously commented in detail at the Issues and Options stage of the Local Plan, and provided advice on establishing policies for the historic environment. The Historic England Good Practice Advice in Planning Note 1 provides further guidance on the Historic Environment in Local Plans, and can be accessed from our website at	Noted. Support welcomed.

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/ . The National Planning Policy Framework (NPPF) sets out in various places the requirements for Local Plans in respect of the historic environment. In particular: • The need to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment; • Be based upon adequate, up-to-date and relevant evidence, which would include sufficient information to assess the significance of heritage assets; • Contain strategic policies to deliver the conservation and enhancement of the historic environment; • Identify land where development would be inappropriate because of its historic significance. In commenting upon the Plan, we have considered each of these elements in turn, in addition to commenting upon more specific details. Clear and positive strategy for the historic environment: The draft plan contains an excellent strategy for the historic environment, and we commend the Council on how it has integrated heritage considerations throughout the plan. For example, the historic environment is included in sections relating to: the spatial vision and objectives; the re-use of buildings; renewable energy; planning obligations; design; technical matters; advertisements; and rural tourism. In addition, the plan contains a very thorough and detailed chapter and set of policies on heritage, and is supported by an excellent draft Strategy for the Historic Environment. Adequate and relevant evidence: The chapter on the historic environment refers to the comprehensive set of data held by the authority, and this is supported by the draft Strategy for the Historic Environment which includes an assessment of the challenges and opportunities, positive action plans, and monitoring and review procedures. Again, we would congratulate the Council on its very positive and proactive approach to the historic environment.	

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			Strategic policies for the historic environment: While the historic environment is clearly referenced throughout the plan, including within the spatial objectives, we are unclear which of the plan policies would be considered its strategic policies, or whether all the policies are to be considered as such? The NPPF refers to the need to identify strategic priorities in paragraph 156, and states that Neighbourhood Plans must be in 'general conformity with the strategic policies of the Local Plan' (paragraph 184 of the NPPF). It would therefore be helpful to clarify this within the Local Plan document. Identification of areas where development would be inappropriate: The draft Strategy for the Historic Environment provides an initial assessment of development sites allocated within the plan, providing an 'evidential starting point for the consideration of the impact of development on heritage assets'. This is an excellent initial stage. However, it is unclear how this will be cross-referenced, or included within, the Strategic Housing Land Availability Assessment (SHLAA). The current SHLAA document supporting the plan is dated from 2014, and therefore pre-dates the Historic Environment Strategy. In setting out its methodology for assessing the suitability of sites, including the identification of constraints, the only mention of heritage assets is in reference to the consultation with English Heritage. The historic environment is not cited as being checked at the site survey stage (paragraph 3.18), or when assessing suitability (paragraph 3.32). There clearly needs to be cross-referencing between the two documents, and as the SHLAA is updated, it needs to integrate the historic environment into the assessment methodology, and utilise the initial assessments carried out within the Historic Environment Strategy. For information, Historic England has produced guidance on The Historic Environment and Site Allocations in Local Plans. This is available from our	

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			website at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ . Our more detailed comments, according to page and paragraph/policy number, are set out below.	
Persimmon Homes (Teesside)	LP0045	DP0209	RE: Representations on the Hartlepool Local Plan Preferred Options Consultation Document (May 2016) on behalf of Persimmon Homes (Teesside) As one of Britain's largest and best-known housebuilders Persimmon Homes welcome the opportunity to submit representations on the Hartlepool Local Plan Preferred Options Consultation Document. It is hoped that these representations will assist Hartlepool Borough Council in the production of their Emerging Local Plan which will play a pivotal role directing future development over the next 15 years. Persimmon Homes have a long established history within the borough having in the past assisted the Council in the production of their SHLAA and earlier iterations of the Local Plan whilst recently successfully developing a variety of sites across the town. We have sought to develop greenfield sites such as those at Middle Warren and Seaton Sands as well as brownfield opportunities at the Former Foggy Furze Library and Britmag. This dual approach demonstrates Persimmon's willingness to help the Council meet its housing needs and has resulted in the company delivering a large proportion of the town's new housing over the past 20 years. We are therefore keen to work with the Council to ensure that it takes forward a sound Local Plan that can sustainably meet the aspirations of the town and its residents. We therefore request the Council accept this letter as our formal submission to the Preferred Options Consultation Document, duly made within the required timescales. For the purposes of clarity the comments contained within this letter are	Noted.

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			raised in the order in which they appear within the Local Plan Preferred Options Document. Home Builders Federation Representations First and foremost Persimmon Homes fully endorse the Representations made on behalf of the Home Builders Federation and request Hartlepool Borough Council fully consider the issues raised within their correspondence. The HBF is the principal representative body of the housebuilding industry in England and Wales and their representations reflect the views of their membership which account for over 80% of all new housing built in England and Wales in any one year, including a large proportion of the new affordable housing stock. It is therefore imperative that the views of the HBF are given significant weight during the consultation process. In addition to the issues raised by the HBF, Persimmon Homes would like to take this opportunity to re-emphasise our own concerns with Local Plan document whilst also reiterating our philosophy to work with Local Authorities to produce sound, deliverable plans.	
High Tunstall Homes	LP0060	DP0017	We act for Tunstall Homes Ltd and currently have lodged with the Council an application for outline planning permission for the construction of up to 1,200 homes and associated infrastructure and local facilities on land to the south of Elwick Road, High Tunstall, Hartlepool (HBC ref: H/2014/0428). On behalf of Tunstall Homes Ltd we make representations with regards to Policies LS1 (Locational Strategy), HSG5 (High Tunstall Strategic Housing Site) and NE3(5) (High Tunstall Green Wedge). We support the latter two Policies but have issues with Policy LS1.	Noted.
Resident	LP0082	DP0040	Section 1.8 In your quote “Hartlepool will be a thriving, respectful, inclusive, healthy, ambitious and outward-looking community, in an attractive and safe environment, where everyone is able to realise their potential.” I wish to say that this effectively contradicts the outcome of the proposed intent to create another wind farm on the edge of Seaton Carew village. Industrial	Your concerns regarding the impact on the attractiveness of the skyline are noted. Please see comments under Policy INF7 to see how the issue of Wind Turbines has been addressed.

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			scale windfarms (due to their impact on the residents' skyline) do not render a locality attractive in any sense and thereby conflict with the aims of the HBC statement. Section 1.6 Chart 2: Key Stages Leading to the Adoption of the Local Plan (estimated timescales as outlined in the Local Development Scheme) – your simplified flow chart. After 'consideration of responses' there is no amendment or review phase before proceeding to publication document, and even after consultation on the publication document there is no feedback path to incorporate necessary amendments. This strongly suggests HBC may elect to ignore pertinent comments or challenges to the plan from residents and act unilaterally. The stated timeframe July to September for consideration of responses is also incorrect since it is now July 2016 and the consultation persists till the 22nd leaving only 9 days till August. So whilst the chart suggests 3 months for consideration of responses, the real timeframe is somewhat less and may place HBC in line for criticism if the offered timescales are effectively reduced to an unpublished period undisclosed to the public.	The process of reviewing the comments made at Preferred Options Consultation, including the production of this Consultation Statement, is how the comments are assessed and consideration is given to how those comments should be used in the preparation of the next Stage, the Publication Stage. Where a change is agreed to it is highlighted within this document. The reason no period for consideration of representations received at Publication Stage is as the Planning Inspectorate treat the document at Publication Stage as the final document for the inspector to consider – the Inspector is given all of the representations at Publication Stage and considered how they believe the document should be updated in light of those comments. In practice the Authority will also go through the comments and will produce an amended "Submission Version" plan with the changes made where we agree with the comments – this helps the Inspector to see where the Authority agrees with suggested changes but the Inspector does not necessarily have to agree with these changes.
HCA	LP0086	DP0044	Full report and maps provided - please refer to. See for all.	Note submission from the HCA including report and maps.
Middlesbrough Council	LP0209	DP0168	Middlesbrough Council supports and welcomes the aims and objectives of the Preferred Options Local Plan. The Council recognises the challengers that Hartlepool faces, specifically in relation to an oversupply of low demand terraced housing, and the need for a more balanced housing offer.	Support noted and appreciated.
Resident	LP0218	DP0180	Page 1 – 1.1 Local Development Scheme "endorsed in October 2017" ? 2015 in para 1.5.	Typo noted. Agree to make change.
Story Homes	LP0219	DP0181	Story Homes supports the Council's intention to ensure that the Local Development Framework (LDF) is developed within the context of sustainable development. We consider that the	Support that the plan is being delivered in line with the Sustainable Development Principles of the NPPF noted and appreciated.

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			emerging Plan's spatial vision, objectives and core policies must proactively respond to National Policy which seeks to support long term sustainable growth. In particular, substantial consideration should be given to the National Planning Policy Framework (NPPF) which sets out the significance of the presumption in favour of sustainable development and stipulates that LPAs must plan positively for growth and underpin emerging local plans with robust evidence bases.	
Resident	LP0220	DP0182	In the light of the Referendum results, and the likelihood that national policy objectives may change, will the Council be further revising its housing growth targets? I am pleased to note that improvements to transport networks and road infrastructure are recognised as necessary. This is vital.	The housing figures within the Local Plan will be reviewed and updated within the Publication Document to reflect the build out of planning permissions over recent months and also to reflect new planning permissions granted by the Authority and by the Planning Inspectorate on Appeal. The result of the Referendum is not currently known in terms of its impact on national guidance and therefore we have to adhere to the current framework. Support for transport and road infrastructure improvements noted and appreciated.
Resident	LP0230	DP0194	Section 1.1 refer to delivery framework being endorsed in October 2017 I suspect this should be October 2015.	Typo noted. Agree to make change.
Home Builders Federation	LP0234	DP0200	1. Thank you for consulting with the Home Builders Federation (HBF) on the Hartlepool Local Plan: Preferred Options consultation. 2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock. 3. The HBF is keen to work with the Council to ensure that a sound plan which assists the Council in meeting its growth objectives can be produced. In this regard we would welcome further engagement in the production of the plan. The following comments are provided to assist the Council in producing the plan. Plan Period 7. The NPPF clearly states (paragraph 157) that Local Plans should be	Noted and happy to engage with you to ensure the plan is sound. The plan period is 15 years from 2016 until 2031. Agree to make this specific within the introduction to the plan. The evidence base that supports the Local Plan is all based on a period up to 2031 and therefore it would not be possible for us to plan beyond that without impacting upon the need to update evidence, resulting in a delay in the production of the Local Plan. As the NPPF also suggests that weight can be given to the Local Plan from Publication Stage it is considered acceptable that a plan period from 2016 until 2031 is acceptable as

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			drawn up over an appropriate timescale, 'preferably a 15 year time horizon'. The end date of the plan is identified as 2031. This would only provide a maximum 13 year time horizon, post adoption, if the current timescale identified within the 2015 Local Development Scheme (LDS) can be met. To ensure that the plan is consistent with the national preference and to provide sufficient certainty for the development industry and residents it is suggested that a later end date be considered. 8. Whilst the end date of the plan is clearly identified the start date is far more elusive. It is presumed that it is 2016, due to the foreword of the consultation document suggesting it is a 15 year plan. The need to clearly set out a base date is important for the purposes of calculating the housing requirement, the housing trajectory, the five year land supply, and consideration of whether it is necessary to address any backlog in delivery. 9. The HBF suggest that the plan provide a time horizon of at least 15 years post adoption and clearly set out the base date of the plan.	policies within the Publication Stage will begin to hold weight in October this year. Housing figures and completions during 2016 will be monitored and recorded as the first year of the plan – this is reflected within Table 7 of the Preferred Options Document which illustrates and indicative delivery of housing over the plan period, using existing planning permissions within the early years of the plan.
Northumbrian Water	LP0241	DP0207	Thank you for the opportunity to provide a consultation response to the Hartlepool Council Local Plan Preferred Options Draft. As a statutory consultee for policy, Northumbrian Water (NW) offers a considered response to various elements of the Local Plan. We have reviewed the Local Plan Preferred Options consultation in detail and we set out comments below on the topics which we feel are of relevance or have an impact on us, as the statutory sewerage undertaker for the region. Where possible we will separate out our comments by topic, or by policy heading for your ease of reference. We will also, where it is appropriate to do so, provide information relating to our assets and investment programmes which may be of interest to you in the policy formulation. General Observations We fully support the aims and objectives of Hartlepool Borough Council contained within the plan and we will look to work with the Council any way in which we can to help support the delivery of the vision for the borough. In terms of the local plan document we agree with many of the statements and policies which may have an impact upon us as a stakeholder in the region. We have made several suggestions on ways that we feel could improve the policies contained within the plan, particularly	Noted – NWL comments on policy CC2 will be considered under that that particular policy response.

Company	Unique Ref	DP Ref	Introduction	Planning Policy Response
			around the management of flood risk. We believe that Policy CC2 does not clearly define the Council's intention to manage flood risk and creates uncertainty as to the purpose of the policy. We have detailed suggestions below on how we feel the wording of Policy CC2 could be improved.	
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	Cecil M Yuill Ltd generally welcomes the Local Plan's overall vision for the Borough up to 2031 and, in particular, the desire to 'maximise quality housing choices and health opportunities to meet, in full, the current and future needs of all residents'.	General support for Vision noted.
			Also welcomed is the recognition that retaining future development within previously defined settlement limits would severely constrain the opportunities for providing economic growth and a wide choice of housing, including affordable and high cost low density housing. The recognition that the previous strategy based on compact urban growth through the development of mixed use regeneration areas and brownfield land is no longer tenable is supported as is the sustainable growth strategy outlined at paragraph 6.8 of 'balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area with growth delivered alongside infrastructure improvements which allow Hartlepool to grow in a sustainable manner'.	Support for general growth strategy noted.
			Cecil M Yuill Ltd also welcome the Council's position, at paragraph 6.12, of identifying that the western extension of housing development beyond the existing limits can be developed in a sustainable form, but importantly ensuring that strategic gaps between the town and surrounding villages are sufficiently maintained.	Support noted.
			Further, at paragraph 6.13, Cecil M Yuill Ltd support 'controlled western expansion of the town into greenfield land adjacent to the existing boundary of the built up area'.	Comment noted and addressed below.
			However, whilst this overarching locational strategy for future development is broadly supported there remain issues within the Local Plan Preferred Options which Cecil M Yuill Ltd consider need to be satisfactorily addressed if the plan is to be found sound.	

Local Plan Context

Company	Unique Ref	DP Ref	Local Plan in Context	Planning Policy Response
Wynyard Park	LP0027	DP0223	Paragraph 3.7 -page 10 - As stated in the covering letter, Wynyard Park request that their land to the north of the A689 be de-allocated for employment use. This is mindful of the lack of demand for prestige employment in recent years development and the significant oversupply of employment land.	Wynyard Business Park will play an important sub-regional and regional role in encouraging new inward investment to the Tees Valley, including Hartlepool. It is critical to retain a portfolio of land that includes high quality business sites so that local authorities can respond positively to investment requirements over the next 15 years.
Homes and Communities Agency	LP0063	DP0020	Paragraph 3.9 states that there is a shortage of affordable and executive housing in the borough and a need to provide new homes to meet the demands of growth in household formation and to support economic growth. It outlines that sites are available within the existing built up area of the town to meet some of this demand; however, there is a need for some development on greenfield land to meet these requirements and to support the economic growth ambitions of the Borough. The HCA disagrees with this statement. Underused sites such as North Burn (currently a 'white land' agricultural site), within the conurbation are available for the development of housing. The development of such sites would reduce the amount of greenfield land lost to development. The delivery of starter and market residential development would help assist to meet the aims of the Hartlepool Local Plan by delivering much needed housing and supporting the local construction industry.	North Burn is a greenfield site in the countryside. In the 2006 Local Plan it is an allocated employment site, however the ELR which has been commissioned to support the development of this Local Plan has identified North Burn as a site which should be de-allocated from the employment portfolio. The site is some 6 miles from the main conurbation of Hartlepool and could not be considered as being within the conurbation. Also it is not clear how allocating North Burn, a greenfield site, would reduce the amount of greenfield lost to development.
Home Builders Federation	LP0234	DP0200	Duty to Co-operate 4. The Council is required to ensure that it has discharged its requirements upon the duty to co-operate (the duty) in relation to the plan prior to submission. Compliance with the duty is an iterative process and requires	Comments regarding the Duty to Co-operate noted. The Council will produce a document which illustrates how “The Duty” has been met, however, this will not be until Submission Stage in February. There is no legal requirement on the

Company	Unique Ref	DP Ref	Local Plan in Context	Planning Policy Response
			more than meetings. The Council must demonstrate what actions have been taken and the outcome of these actions (PPG ID 9-010 and 9-011). 5. The consultation document provides brief reference to the duty at paragraph 2.9 and the Annual Monitoring Report 2014 – 2015 identifies that meetings are taking place. It is, however, unclear what is being discussed and what, if any, actions are being considered. To ensure that the Council provides this evidence in a clear and transparent manner it is suggested that a separate evidence base document be provided. This should outline the meetings and discussions that have taken place, the actions and outcomes as well any agreements between the Council and other organisations. This document should, ideally, be produced at the next stage of consultation to allow comment prior to submission of the plan. 6. The key concerns of the HBF relate to housing need and delivery. The HBF would anticipate specific detail in relation to these matters within any duty to co-operate documentation.	Authority to do so until that stage. This process was followed during the process of the "Withdrawn" plan previously and was accepted by the Planning Inspector during that Examination in Public. The document will cover housing issues and how any cross border issues have been considered, including consideration of housing market areas.

The Borough of Hartlepool

Company	Unique Ref	DP Ref	The Borough of Hartlepool	Planning Policy Response
Resident	LP0082	DP0040	Section 3 Whilst a SWOT analysis has been tabulated, these are normally a high level view. I respectfully suggest it may benefit HBC to also consider a STEP (Social, Technical, Economics and Political) analysis format to drill down a little on the opportunities and threats.	The SWOT analysis is deemed to be acceptable and covers the key issues which the Local Plan needs to address. Elements of the STEP are however covered within the Sustainability Appraisal which assesses the plan as a whole and are therefore considered.
Resident	LP0201	DP0159	- 2 typos to put right in case this table is used again 1) Gross weekly pay, 2105 should be 2015. 2) Causes of Death, stoke should be stroke.	Typos noted. Agree to make change.
Resident	LP0218	DP0180	Population figures/estimations seem to be a bit erratic – eg 3.1 (page 9) 92,670 mid 2013 goes down to 92,600 by mid 2014 in Table 1 (page 11), but by Table 2, Hartlepool SWOT Analysis (page 13) the expanding population is given as a strength while the recent stabilization of population levels is presented as an opportunity (this would appear contradictory).	Note comment. The small change between 2013 and 2014 is relatively minor. Historically Hartlepool had seen a drop in population, some of which was due to the closure of industry in the town which had seen the population drop in the late 90's to approximately 89,600. The population is however forecast to rise to 96,800 by 2032.
HCA (Oakesway)	LP0086	DP0044	Paragraph 3.9 states that there is a shortage of affordable and executive housing in the borough and a need to provide new homes to meet the demands of growth in household formation and to support economic growth. It outlines that sites are available within the existing built up area of the town to meet some of this demand; however, there is a need for some development on greenfield land to meet these requirements and to support the economic growth ambitions of the Borough. The HCA disagrees with this statement. Underused sites such as Oakesway, within the urban area are available for the development of housing. The development of such sites would reduce the amount of greenfield land lost to development. The delivery of starter and market residential development would help assist to meet the aims of the Hartlepool Local Plan by delivering much needed housing and supporting the local construction industry.	The HCA's views are noted but the Council considers that the Local Plan clearly demonstrates that some Greenfield land releases are necessary to meet the housing requirement over the next 15 years. A number of previously developed sites within the urban area have been identified as suitable for housing and in addition a number of significant developments have secured permission or are under construction on previously developed land in the Borough. Hartlepool does not have previously developed sites that are suitable for housing. There are a number of sites in the south east of the town that are undeveloped but these are within a largely industrial area subject to various development constraints and where the ability to create high quality residential environments would be extremely difficult. With regard to Oakesway industrial estate, this was designated as an Enterprise Zone in 2012 to support

Company	Unique Ref	DP Ref	The Borough of Hartlepool	Planning Policy Response
				development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. Further discussion with the Council's inward investment team has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable residential environment and community within the constraints of the site.

Spatial Vision

Company	Unique Ref	DP Ref	Spatial Vision	Planning Policy Response
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Spatial Vision for Hartlepool. We would respectfully suggest that to Enhance the Economy and Strengthen Communities and Wellbeing, then rural transport need to be high on the agenda. Increasingly young and old alike in rural areas are suffering isolation due to lack of public transport. Access to health, legal and other professional services as well as access to basic commodities are severely restricted when there is no affordable means of getting into the town.	Support welcomed. Agree that improving transport links in the rural area is important and should be given an appropriate level of priority. Hartlepool Borough Council works closely with the Tees Valley Combined Authority and other stakeholders to develop initiatives that will improve rural public transport. These include the Tees Valley Bus Network Improvement Group securing European and other funding for sustainable transport measures such as improved cycle and walking routes as well as community transport projects.
Wynyard Park	LP0027	DP0223	The Local Plan vision which seeks to "meet in full, the current and future needs of all residents" is welcomed and supported. However, in line with comments made by the HBF it is considered that additional housing allocations will be needed in order to ensure that meets are definitely• met and to allow for sufficient flexibility during the plan period. Wynyard Park is already a prime location for residential development and would be able to deliver this additional housing.	Noted. Sites have been put forward across the borough to meet the needs.
Highways Agency	LP0029	DP0196	Highways England did not have any concerns with the spatial vision as set out in the previous Core Strategy. It is noted that some minor amendments have been made, however these do not present any concern and we can continue to be supportive of the vision.	Noted.

Company	Unique Ref	DP Ref	Spatial Vision	Planning Policy Response
Historic England	LP0044	DP0213	Page 13, SWOT Analysis: We welcome the recognition that heritage assets are one of the Borough's strengths. However, with a number of assets on the Heritage at Risk register, these could also potentially be a weakness, although they also provide significant opportunity for future regeneration.	Noted. SWOT analysis to be updated to reflect comment.
Persimmon Homes (Teesside)	LP0045	DP0209	Local Plan Spatial Vision, Themes and Objectives Persimmon Homes are generally supportive of the majority of the vision, themes and objectives set out within Section 4 of the Preferred Options Document however we believe that greater emphasis should be placed upon growth and the need and demand for new housing. The term growth does not appear within the Council's vision, themes or objectives despite it forming one of the core elements of the NPPF. A greater indication of growth within the vision, themes or objectives would embed this philosophy throughout the whole document and ensure that the Plan is more reflective of the core aims and principles of the NPPF. It is equally important that the Council acknowledge the needs and demands for housing in line with Paragraph 47 of the NPPF. Persimmon Homes believe that this can be further re-emphasised with the following minor amended to the vision: "…maximised the quality and supply of new housing choices and health opportunities to meet, in full, the current and future needs and demands of all residents…" It is also important that the Council's objectives are clear. Persimmon Homes believe that there is the potential for residents to interpret Spatial	Support in general for the majority of the vision, themes and objectives noted. Agree to make reference to growth within the objectives. It is considered that the text is adequate as currently drafted and there is no need for the word demand.

Company	Unique Ref	DP Ref	Spatial Vision	Planning Policy Response
			Objective 8 to mean that all housing must be affordable within the borough which is simply not the case. If the Borough is to meet its objectives a key element of this is the delivery of housing of all sizes, types and tenures. We therefore suggest that the Objective is amended to read as follows: "To improve the choice, quality and affordability of all housing types and tenures."	Agree to make change.
Resident	LP0096	DP0054	Some good ideas but getting necessary funding could be an issue.	Noted.
Story Homes	LP0219	DP0181	Story Homes recognises and generally supports the emerging Local Plan spatial objectives which reflect the social, economic and environmental aspirations of national policy. In particular, we attach great weight to the importance of Objective 9 which sets out to '...improve the choice quantity and affordability of housing'. This objective links to the Plans vision which seeks to maximise the quality of housing choices and health opportunities to meet the current and future needs of residents. However, we consider that Section 4 lacks any significant spatial dimension. We would expect a more robust and measured approach to the sustainable growth of settlements within Hartlepool to be set out within Section 4. In light of the above, we consider that the Council should seek to clearly set out its requirements and aspirations for specific settlements throughout the Borough and set out an appropriate settlement hierarchy over the next plan period. From a developers perspective, adopting this approach from the outset is generally perceived as good practice and ensures that sustainable development is focused in key spatial locations from the outset.	Strong support for Objective 9 noted and appreciated. It is not considered necessary to have a spatial hierarchy of settlements within the Local Plan. The plan has allocated sites (including existing planning permissions) for a total of 6,072 dwellings. As we are meeting our housing need and allocating sites to do this there is no need for a hierarchy. If there are windfall developments during the plan period these will be expected to be within the Urban area or Village Envelopes but there is no need to specify a hierarchy between the villages and the urban area.

Company	Unique Ref	DP Ref	Spatial Vision	Planning Policy Response
Resident	LP0220	DP0182	Due to the excessively high percentage of working age people in Hartlepool who are receiving benefits, the Plan's objective to develop educational and training facilities is of paramount importance. There also needs to be recognition that the cycle of benefits dependency needs to be tackled.	Noted.
Resident	LP0221	DP0183	Overall I find the plan has some sound ideology and arguments however I would like to raise some comments which may, or may not be relevant to this particular consultation purpose.	Noted, concerns recorded under specific sections below.
Teesmouth Bird Club	LP0227	DP0191	The requirement of the plan to liaise with and compliment local plans of adjacent boroughs and counties should be a feature.	Whilst this process is undertaken, it is not considered necessary within this section of the Local Plan.
Home Builders Federation	LP0234	DP0200	Vision 12. The overarching messages within the plan vision are generally supported, particularly the reference to; "….maximised quality housing choices and health opportunities to meet, in full, the current and future needs of all residents..." 13. But the vision is considered to lack spatial dimension. There is no clear statement on how and where the Council anticipates the borough to grow and develop over the next 15 years or the roles it anticipates for specific settlements or areas.	General support for the overarching messages within the Vision noted. The Vision is an ambitious, yet realistic statement, covering a wide range of issues – it is not considered appropriate to give detail on the specifics of growth or the roles of settlements within the Vision. This is more a locational issue which is covered in the Locational Strategy.
Brenda Road Holdings Ltd	LP0244	DP0212	We are broadly in agreement with the stated aims and objectives for the plan period. We particularly note and welcome (at para 2.12) the reference to the Hartlepool Vision document which aims to revitalise the town and attract new business, leisure and retail facilities particularly the plans for Seaton Carew. To achieve this we would encourage Hartlepool Borough Council to adopt a more "joined up" approach to planning, economic regeneration and land	Broad support for aims and objectives noted and support for reference to the Hartlepool Vision noted. The various teams within the Council work closely together to ensure that where there are development opportunities we ensure that developers are given a co-ordinated response – this is done through the Councils One Stop Shop process which helps to give developers the range of advise in relation

Company	Unique Ref	DP Ref	Spatial Vision	Planning Policy Response
			management. Our experience with our application is that unless the departments of the council work effectively together the town can become hostile to potential inward investment. Hartlepool has a great deal of underused buildings and brownfield sites which could be utilized or redeveloped to create new businesses or homes.	to their proposals to ensure that, where appropriate, they can be brought forward successfully.
Landowner (Southbrooke Farm)	LP0254	DP0228	1.1 We have been instructed by Cecil M Yuill Ltd to submit representations, on their behalf, to the Hartlepool Local Plan Preferred Options. 1.2 Cecil M Yuill Ltd generally welcomes the Local Plan's overall vision for the Borough up to 2031 and, in particular, the desire to 'maximise quality housing choices and health opportunities to meet, in full, the current and future needs of all residents'.	General support for Vision noted, in particular the support to meet the housing needs.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support welcomed.

Themes and Objectives

Company	Unique Ref	DP Ref	Themes and Objectives	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England are generally supportive of the spatial objectives, which are noted to largely remain unchanged from the previous Core Strategy. We therefore continue to be particularly supportive of Objective 16, which promotes the provision of a safe, efficient and sustainable transport network, accessible to all and Objective 17, which seeks to strengthen wider transport links. This objective is particularly pertinent to Highways England given the implications for the Strategic Road Network (SRN) and is therefore addressed further in response to relating policies LS1, INF1 and INF2.	Support welcomed.
Historic England	LP0044	DP0213	Page 14, Spatial Vision: We welcome and support the recognition that the historic environment is a key component of an 'attractive and safe environment', and that the Local Plan vision seeks to protect, manage and enhance the historic environment. Page 16, Spatial Objectives: We welcome and support the objectives 11 - 15.	Noted. Support welcomed.
R Newcomb & Sons	LP0054	DP0011	Allocation of our client's land under NE2 goes against the local plan's ambitions to 're-use previously developed land and buildings'.	Although we will amend proposals map to remove NE2e allocation and make it white land to reflect site formed the building and compound for the landfill site. It is not considered a suitable site for housing development due to the former use of the site / adjacent land as a landfill site and more importantly the very close location to the bad neighbour uses area at Sandgate Industrial Estate.
Homes and Communities Agency	LP0063	DP0020	The HCA agrees with the themes, particularly with housing provision and strengthening the local economy. The HCA also agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. We consider that to achieve economic growth it is imperative that a range of appropriate development is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level.	Comments and support noted. The Local Plan will acknowledge that targets for growth should be seen as a minimum rather than a ceiling but this must also be seen within the context of achieving sustainable development.
Resident	LP0082	DP0040	Section 4, table 3	Proposed changes to Policy INF7 are proposed below under

Company	Unique Ref	DP Ref	Themes and Objectives	Planning Policy Response
			Hartlepool's Ambition' Themes column 3 items 11-15. Should not include INF7. This suggests a drive to implement a locally unpopular technology that will prove uneconomic in small windfarms once subsidies are removed in early 2017. For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan.	the relevant section. However do not agree that reference to INF7 should be removed as wind turbines do help to meet the Objective 13 to reduce the impacts of Climate Change.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support welcomed.
HCA (Oakesway)	LP0086	DP0044	The HCA agrees with the themes, particularly with housing provision and strengthening the local economy. The HCA also agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. We consider that to achieve economic growth it is imperative that a range of appropriate development sites is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level. The SWOT analysis indicates successful allocation of Enterprise Zones, although these have not all delivered, for instance at Oakesway which has remained undeveloped for around 30 years. This demonstrates that the site is unviable for employment development, despite the site being marketed as a Local Enterprise Zone since 1st April 2012 and prior to this as an industrial site	The HCA's support for the Councils ambitions for growth and economic development are noted and welcomed. With regard to Oakesway industrial estate, this was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. Further discussion with the Council's inward investment team has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable

Company	Unique Ref	DP Ref	Themes and Objectives	Planning Policy Response
				residential environment and community within the constraints of the site.

Presumption in Favour of Sustainable Development – Preamble

Company	Unique Ref	DP Ref	SUS1 Pre-amble	Planning Policy Response
Homes and Communities Agency	LP0063	DP0020	The HCA agrees with statement that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The presumption strongly encourages planning authorities to allow development, without delay, which meets the development needs of the area. The Council cannot demonstrate a 5 year land supply, therefore the provision of housing should be viewed as a key development need of the area which supports the sustainable development of Hartlepool. North Burn presents a genuine opportunity to deliver a substantial residential led mixed-use development in a sustainable location. Not developing the site which is located on the edge of the conurbation is forcing virgin greenfield and greenbelt sites to be developed which is unsustainable. The inclusion of a proportion of starter homes within a mixed use development on the site further adds to the sites sustainability by delivering much needed homes for young people with supporting retail and leisure uses.	Noted. One aim of the Local Plan is to propose allocating enough land for the development of housing for the next 15 years. The 5 year land supply issue only needs considering in the plan so far as to illustrate that it can be illustrated that an additional 20% (frontloaded from the later stages of the plan) can be accommodated in line with the NPPF – this is illustrated at Table 7. This representation would appear to consider North Burn a brownfield site. This is incorrect, and whilst North Burn has had an employment allocation on it for some years, no development has ever taken place here and it is a greenfield site on the periphery of Wynyard, not the main conurbation of Hartlepool. The site would also need a new junction constructed on the A19 at a cost of some £15-£20m which, to date, Highways England has been opposed to in such close proximity to the A19/A689 junction; it should also be noted that this junction would only benefit North Burn as opposed to the benefits the junction and bypass at Elwick would have. It is for these reasons that the sites proposed in the Preferred Options are considered more sustainable, beneficial and appropriate than the site at North Burn.
Story Homes	LP0219	DP0181	As previously stated, Story Homes generally supports this section which seeks to ensure sustainable development and address social, environmental and economic gains in a cohesive manner. It is of paramount importance that the emerging Plan stipulates that planning applications that accord with policy should be approved without delay.	Support in general for this Section noted. Not considered any further reference is needed – the Policy stipulates this point.
Teesmouth	LP0227	DP0191	Sustainability should be defined as an absolute term - one cannot have	Sustainability in planning terms is defined in the NPPF and

Company	Unique Ref	DP Ref	SUS1 Pre-amble	Planning Policy Response
Bird Club			partial or temporary sustainability anymore than something can be said to be quite unique. For example the provision of a bus service on a temporary basis to a village cannot be used to create the concept of sustainability to facilitate a developer's quest for housing projects in a hitherto unsustainable location.	allows the three strands to be considered in decision making.
Stovell & Millwater Ltd	LP0247	DP0216	At paragraph 5.3 the LPPOCD states "all three aspects are mutually dependant and local authorities should seek social, environmental and economic gains jointly and simultaneously". We believe it would be worth noting that in some cases the gains in some aspects may not always be significant and that gains in one area could mitigate the lack of reward in other aspects.	This section is reflective of the Planning Inspectorates model policy regarding the Presumption in Favour of Sustainable Development. The Local Plan has to set out the policy framework – the role of balancing and weighting the various elements will be undertaken at planning application stage.

Presumption in Favour of Sustainable Development – Policy

Company	Unique Ref	DP Ref	SUS1 Sustainable Development	Planning Policy Response
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Presumption in favour of Sustainable Growth as set out in the Local Plan. In particular, we are pleased to see the introduction of an Urban Fence and Strategic Gaps between the urban development and rural communities, in line with the Rural Neighbourhood Plan.	Support noted.
Wynyard Park	LP0027	DP0223	This draft Policy is welcomed, in line with the principles of the NPPF.	Support noted.
Highways Agency	LP0029	DP0196	Highways England is supportive of the general principle of taking a positive approach towards the presumption in favour of sustainable development as promoted by the National Planning Policy Framework and therefore have no particular concerns with this policy.	Support welcomed.
Historic England	LP0044	DP0213	Page 17, Policy SUS1: We welcome this policy and the supporting text, which explains the principle of sustainable development. The NPPF also notes that pursuing sustainable development involves seeking positive improvements in the quality of the historic environment (paragraph 9). Planning should always seek to secure high quality design and should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations (paragraph 17). We would particularly commend the Council on the strong emphasis on sustainability and the need to reduce carbon emissions, which is evident throughout the plan.	Thank you. Support welcomed.
R Newcomb & Sons	LP0054	DP0011	Removing the allocation of NE2e from our client's land will open up the re-use of the brownfield land therefore allowing the opportunity for sustainable re-development of the site.	Although we will amend proposals map to remove NE2e allocation and make it white land to reflect site formed the building and compound for the landfill site. It is not considered a suitable site for housing development due to the former use of the site / adjacent land as a landfill site and more importantly the very close location to the bad neighbour

Company	Unique Ref	DP Ref	SUS1 Sustainable Development	Planning Policy Response
				uses area at Sandgate Industrial Estate.
Resident	LP0258	DP0233	I believe this potential development does not meet the needs of local residents of Hart Village as it will compromise future generations to live in a small village environment which is the main reason most local Hart Village people now living in Hart paid a premium price to do so. The increase of daily car usage down the main road to a extra 75+ extra cars using the main street as access / regress (Approx 1 to 2+ cars per household) will disrupt the day to day living of every resident of the village and have a detrimental affect on road safety to young and old. This is partly due to the Village having no Post Office or Shop, therefore driving to the nearest location will entail the use of a car over a 24 hour period. There will also be a negative economic factor associated with a new development in Hart Village as it WILL have a negative affect on housing prices associated with approx 100 to 200+ (2 to ? People per household).	The addition of 50 new dwellings in the village is not considered to jeopardise the village character of Hart Village. The Local Plan proposals will help to deliver an element of affordable housing to the village as part of a wider mix – this is something that through previous planning consultations the local residents were keen to see. It will also bring other, much needed, investment in the village infrastructure including a new play area, green space and linkage improvements, investment in the village hall and school and possibly improvements to the local road network on the A179. The additional traffic is not considered of a level which would lead to Highway colleagues opposing the developments.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan.	Support welcomed.
HCA (Oakesway)	LP0086	DP0044	The HCA agrees with statement that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The presumption strongly encourages planning authorities to allow development, without delay, which meets the development needs of the area. The Council cannot demonstrate a 5 year land supply, therefore the provision of housing should be viewed as a key development need of the area which supports the sustainable development of Hartlepool. Oakesway is currently unsustainable due to the underuse of the site for employment development, despite marketing of the site for over 30 years. Not developing the site, which is located within the conurbation, is forcing green field and green belt sites to be developed, which is unsustainable. The development of proportion of starter homes on the site further adds to the sites sustainability by delivering much needed homes for young people.	The HCA's support for the Councils approach reflecting sustainable development are noted and welcomed. With regard to Oakesway industrial estate, this was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. Further discussion with the Council's inward investment team

Company	Unique Ref	DP Ref	SUS1 Sustainable Development	Planning Policy Response
				has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable residential environment and community within the constraints of the site.

The Locational Strategy - Pre-amble

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	Option 6.11 – We support the limit to development as indicated by the red doted line on the map provided and would like to see the emphasis on brownfield first. (as the Society has said in a number of consultation responses - an excellent sustainable site for housing would be Oakesway, where no commercial interest has been shown in this location for over 20 years) The High Tunstall Development proposal will result in even more traffic congestion between the new houses and the rest of the town area. The urban road network is not fit for purpose to accommodate the increase in traffic from the new development, let alone an improved access from the A19 via an Elwick by-pass. Option 6.12 The Society supports strategic gaps as indicated on the Local Plan Maps. Option 6.19 – It is vital that the Town Centre and Retail Centres are supported and that car parking provision is maintained. Option 6.20 – the Society supports promoting Leisure and Tourism and continue utilising the existing geographical and historical features. Option 6.24 – The Society wholeheartedly supports this proposal to preserve and enhance heritage assets. Option 6.25 – Green infrastructure – green wedges should be maintained and enhanced – they should become a feature of developments – and should be maintained. Options 6.26 The Society supports this option particularly as there is increasingly becoming a limited area and the natural environment	Support for the Limit to Development noted. The SHLAA assessed all brownfield sites within the urban limits and proposed a number of sites considered appropriate – discussions are currently taking place regarding Oakesway and the possibility of allocating a small parcel at the north west of the site are being considered for approximately 50 or so dwellings. Further development though could jeopardise the successful operation of the existing developments on site, many of which have 24 hour operations and employ over 700 people. The issues regarding the impact of growth on infrastructure are recognised by the plan. Where future growth is going to have an impact on infrastructure the Local Infrastructure Plan highlights where improvements and investment will be needed. Where mitigation to infrastructure is needed, development will be required to pay for it. Noted. New green wedges have been proposed at Golden Flatts, Wynyard, High Tunstall and the South West Extension. Support welcomed.

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			would be safeguarded.	
Park Residents Association	LP0014	DP0187	Residents fully support the proposal in option 6.11 to control future development to land within the Urban fence and also the creation of strategic gaps as stated in option 6.19. We are also in favour of promoting Leisure and Tourism and utilising the existing geographical and historical features of the town (Option 6.20) Options 6.24-6.26 are fully supported by residents and seen as a positive move towards a pleasant and interesting environment for residents to enjoy.	Support welcomed.
EDF energy	LP0019	DP0227	Nuclear Power Stations. EDF Energy supports the recognition in the Hartlepool Local Planning Framework – Local Plan Preferred Options document that Hartlepool is identified in national policy1 as being a potentially suitable site for the deployment of a new nuclear power station. EDF Energy wishes to highlight that deployment of new nuclear facilities is not dependent on closure of existing nuclear power stations. We believe that the Local Plan should not refer to any new plant as a 'replacement' power station. Furthermore, it is not the case that 'a new power station will need to be operational before decommissioning can begin on the existing power station'. Consequently, it should not be the case that a review of the Local Plan may be required in the event that it is not be a like for like replacement. EDF Energy, therefore, requests amendments to paragraphs 6.16 and 6.17 as follows, as well as the deletion of 'replacement' from paragraph 11.18: Original text 6.16 If chosen for a new power station it is likely that there will be a period of increased activity in the area as a new power station will need to be operational before decommissioning can begin on the existing power station. It is however recognised that this is one of the	EDF Energy's comments are noted and the suggested changes to the text will be incorporated in the next version of the Local Plan.

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			most important local employers and there appears to be support in general from the community within Hartlepool. 6.17 As it is a scheme of national significance, the ultimate decision on whether to permit the development of a new power station will not be taken by the Borough Council and as such no dedicated policy is included within this plan, this is based on the assumption that the new nuclear power station is a 'like for like' replacement of the existing nuclear power station, should this not be the case a review of the Local Plan may be required. However, as part of the consultation process the Council will assess any future development against the other policies within this plan as a consultee in the national process. Proposed text 6.16 Any new build in this location would comprise a large scale and technologically complex construction project. Once operational it would make an important contribution to the UK's future needs for low carbon, secure and affordable energy. 6.17 As it is a scheme of national significance, a decision on whether a development consent order should be granted would be made by Government once an application has been submitted to and considered by the Planning Inspectorate. The Government's decision on whether to grant consent, or not, will be informed by national policy, a detailed environmental impact assessment prepared by the applicant, a local impact report prepared by the relevant local authority (identifying any positive, neutral and negative impacts of the project), and any other matters considered important and relevant. In preparing its local impact report, the local planning authority would appraise the proposed development's compliance with local policy and guidance, albeit there is no requirement for local authorities to include dedicated policies for NSIP projects within their local plans.	
Environment Agency	LP0031	DP0190	Biodiversity We welcome the introduction of a proposed new green corridor at	Support welcomed. Additional wetland will be considered once plans for the greed

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			Golden Flatts as detailed in Section 6.25 of the Local Plan. There may be opportunities to create some additional wetland habitat to complement the drainage channel and the ponds found locally in the area to the south.	wedge come into fruition.
Historic England	LP0044	DP0213	Page 19, Paragraph 6.9: While we welcome the inclusion of national and locally protected heritage sites in the list of known and anticipated constraints, the NPPF (paragraph 169) also notes that local planning authorities should use their evidence base to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. In addition, non-designated or protected heritage assets may also be a constraint, as noted by paragraph 135 of the NPPF. Page 22, Paragraph 6.24: While we welcome this intention, it might be improved by referring to preserving and/or enhancing the significance of heritage assets, including any contribution made by their setting. The NPPF (paragraph 126) also refers to the opportunities for wider benefits, including putting them to viable use, and making a positive contribution to local character and place.	Noted. Additional references to be included. Noted. Paragraph to be reworded to suggested changes.
Persimmon Homes (Teesside)	LP0045	DP0209	Strategic Gaps Paragraph 154 of the NPPF states that "only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan". It is Persimmon Homes opinion that the current Strategic Gap designation identified on the Proposals Map does not align with this principle of the NPPF and should therefore be amended. Paragraph 6.12 of the Preferred Options Document makes the first and one of only a few references within the plan to 'strategic gaps' stating: "The western extension of housing development beyond the existing limits can be developed in a sustainable form, however it is imperative	The Strategic Gap has been included within the plan to avoid the coalescence of the urban area with the surrounding villages. This is also imperative to help safeguard the identity of the villages, in particular at Hart Village and Greatham Village which are both in close proximity to the existing urban area. The strategic gap though is also considered necessary along the full extent of the urban area taking into account the housing growth at the South West Extension and High Tunstall and the movement of the urban area towards the villages of Elwick and Dalton Piercy. The strategic gaps proposed are also reflective of the Rural Neighbourhood Plan which is progressing towards Examination at present. The inclusion of the Strategic Gap makes it clear that housing growth within those areas will not be considered appropriate and is very

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			to maintain the strategic gaps between the town and the surrounding villages, particularly in the vicinity of Hart and Greatham." With no specific policy directly relating to the 'strategic gaps' in terms of their form, function or purpose, it is unclear how any designation on the proposals map should be interpreted. This is compounded by Appendix 1 of the plan which contains the Glossary of Terms and states that strategic gaps have "no defined minimum or maximum but they should be of an acceptable size to ensure that the urban area does not encroach on the rural area". The designation is therefore vague and does not a clearly indicate how a decision maker should react to a development proposal. It also appears to Persimmon Homes that the Council have employed a blanket approach identifying the full western edge of Hartlepool as a strategic gap. This approach is totally unnecessary and unjustified as a strategic gap adjacent to the majority of the western edge of the town will have no functional role protecting nearby settlements from Hartlepool over and above the protection already afforded by the designated Settlement Limits. Nevertheless it must be noted that on the basis that the Council propose the use of strategic gaps to protect the surrounding villages from the urban area, the allocation of High Tunstall appears completely illogical and contrary to this designation. Located at a point on the urban fringe closest to Elwick Village, the proposed development is of a size that will reduce the existing separation distance between the two settlements by 1km or approximately 45%. The site therefore represents a significant incursion into the open countryside and this therefore raises significant concerns in respect to the consistency and justification behind the Council's proposed approach within the plan. The strategic gaps should therefore be restricted to only those areas where they would make a justifiable contribution to the preservation	clear to the decision maker. It is not considered there is a need for either a separate policy or a separate evidence base to justify the strategic gap, however the wording regarding the Strategic Gap within Policy LS1 will be strengthened. Agree to amend wording within the Glossary regarding what a Strategic Gap is. The use of the strategic gap between both High Tunstall and the South West Extension and the villages to the west and to the south is necessary to maintain the separate identity and amenity of settlements and to stop the urban area coalescing with the villages. High Tunstall is very similar to the South West Extension as it is identified as a greenfield extension to the town to support housing growth over the plan period. Both sites will see the Limits to Development changed to reflect the proposed extent of the development which will accommodate housing growth over the plan period. The Strategic Gap will cover the area of land to the west of both developments. Both sites represent significant incursions into the countryside which exist today however both are necessary due to limited sites for housing within the urban area.

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			of the smaller settlements around the town. Any such designation should be clearly defined and supported by the appropriate Policy detailing how the designation should be interpreted.	
Resident	LP0046	DP0001	I agree with proposal for an Elwick Bypass and a new interchange on the A19. However it is self evident that in time (especially with the High Tunstall development) Elwick Road will need to be included in this plan.	Support for bypass and junction on A19 noted. As part of the detailed design works for the bypass, opportunities to improve Elwick Road will also be considered.
Resident	LP0048	DP0004	1. Para 6.2 states growth has been controlled. This is not the case when comparing growth to infrastructure capacity. Growth has exceed the infrastructure capacity in many areas, particular road infrastructure. 2. The proposed housing development at Wynyard will not maintain the green belt stance required nor will it enhance the area without associated infrastructure development, not in the locale, but in the feeder routes of the A19 and A1. 3. Prestige employment and maintaining green belt facilities, tress etc at Wynyard are not complimentary. Generally, since the hospital development is unlikely to go ahead, focus should, be on securing the new power station in Hartlepool and supporting this with housing and infrastructure development in the proximity of the power station	The issues regarding the impact of growth on infrastructure are recognised by the plan. Where future growth is going to have an impact on infrastructure the Local Infrastructure Plan highlights where improvements and investment will be needed. There is no green belt at Wynyard. There are rural areas outside of settlement boundaries. The highways and infrastructure impacts of proposed development will have to be mitigated for those developments to be acceptable. The Council are continuing to liaise with EDF energy and the Government in terms of the power station and the Local Plan will reflect the support the Council has for a new power station.
R Newcomb & Sons	LP0054	DP0011	Paragraph 6.7 identifies a shortfall of 2,000 homes in the area to be allocated. Removing this site from NE2e would open up the site for re-development to assist in the delivery of the housing trajectory. Policy LS1 allows for new housing developments on deliverable brownfield sites, therefore, increasing the importance of removing the current landuse allocation on the proposed plan for this site.	We will amend proposals map to remove NE2e allocation and make it white land to reflect site formed the building and compound for the landfill site. The Plan has proposed sites which are considered to be in more appropriate locations for housing development than the site to the south of Newburn Bridge. It is not considered a suitable site for housing development due to the former use of the site/adjacent land as a landfill site and more importantly the very close location to the bad neighbour uses area at Sandgate Industrial Estate.
Resident	LP0096	DP0054	The port area should be better developed as the deep water berth has a large area which is no longer in use.	The designation of the port as an Enterprise Zone will hopefully stimulate further investment and development.

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
Resident	LP0201	DP0159	6.4 There should be a flexible approach to the future use of Victoria Harbour. PD Ports could find that its intentions for offshore wind development do not go as well as hoped for. This could provide a lot of brownfield opportunity if the door is still open.	Whilst it may be true that in the future PD Ports could make a business decision which moved away from the renewables aspirations it would not be appropriate to plan for this as there is currently no certainty that it would happen – this could in turn impact on the deliverability of the Local Plan.
Resident	LP0217	DP0179	3) The Marina area has undoubtedly helped to attract more day visitors to Hartlepool, and long may it continue, but this does not translate into the much coveted inward migration of mobile professionals and blue collar companies deemed necessary to provide the required economic growth to sustain, or even justify, the highly speculative proposal of 6000 new houses over 15 years. Aforementioned migrants are much more likely to gravitate towards Wynyard, for obvious reasons - it has been identified as a Prestige Employment Site/Business Park and the housing development there will be for executive dwellings. Most Hartlepudlians do not perceive Wynyard as being part of the Borough, and it is not relevant to the regeneration of Hartlepool, save for the obvious Council Tax contributions to the Borough's coffers.	The Local Plan does not suggest that day visitors to the Marina are used to help calculate the migration levels which may be expected over the plan period. The Strategic Housing Market Assessment (SHMA) looks at population and growth over the plan period. The Local Plan Preferred Options has then used the Objectively Assessed Need (OAN) from the SHMA and has made adjustments to account for demolitions and past under supply to inform the total dwellings needed over the plan period. Wynyard does form part of the Borough of Hartlepool and is an area of anticipated growth within the housing and employment sectors.
Story Homes	LP0219	DP0181	Story Homes generally supports the plans aim to ensure sustainable growth over the next plan period. However, we reiterate that the emerging Plan should be more forthcoming in terms of its preferred spatial strategy for new housing provision and its general future locations for strategic development. We acknowledge that future growth plans will respond to a broad spatial strategy of urban growth and expansion in areas adjoining the existing built up area at set out within Policy LS1; however, we consider that this strategy should make reference to a range of specific settlements and give consideration to the spatial hierarchy of the rest of Hartlepool's towns and villages.	It is not considered necessary to have a spatial hierarchy of settlements within the Local Plan. The plan has allocated sites (including existing planning permissions) for over 6,000 dwellings. As we are meeting our housing need and allocating sites to do this there is no need for a hierarchy. If there are windfall developments during the plan period these will be expected to be within the Urban area or Village Limits to Developments but there is no need to specify a hierarchy between the villages and the urban area.
Resident	LP0236	DP0202	6.21 Hartlepool needs clean air monitors and displayed to the public. 6.22 Too many landfills.	Noted but this is not within the remit of the Local Plan. This Local Plan does not propose any more Landfill sites, minerals and waste applications are considered in accordance with the Minerals and Waste DPD`s.
Stockton Road	LP0237	DP0203	6.21 Hartlepool needs clean air monitors and displayed to the public. 6.22 Too many landfills.	Noted but this is not within the remit of the Local Plan. This Local Plan does not propose any more Landfill sites, minerals and waste

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
Residents Association				applications are considered in accordance with the Minerals and Waste DPD`s.
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	6.21 Hartlepool needs clean air monitors and displayed to the public. 6.22 Too many landfills.	Noted but this is not within the remit of the Local Plan. This Local Plan does not propose any more Landfill sites, minerals and waste applications are considered in accordance with the Minerals and Waste DPD`s.
Resident	LP0239	DP0205	6.21 Hartlepool needs clean air monitors and displayed to the public. 6.22 Too many landfills.	Noted but this is not within the remit of the Local Plan. This Local Plan does not propose any more Landfill sites, minerals and waste applications are considered in accordance with the Minerals and Waste DPD`s.
Brenda Road Holdings Ltd	LP0244	DP0212	We note the comments at paragraphs 6.5 and 6.6 stating that 'Assessment of other alternative large brownfield regeneration sites indicated that there are few viable alternatives to Victoria Harbour for housing' and that the existing strategy based on compact urban growth through the development of mixed use regeneration areas on brownfield land is no longer tenable. We would disagree. The site at Brenda Road will deliver 580 homes and must be considered as a significant piece of housing land that will help Hartlepool achieve its housing targets. Whilst it is accepted that some development will be necessary outside of the urban fence we would contend that there are several opportunities for the council to develop windfall sites within the urban area which have not been fully explored.	The land at Brenda Road which was subject to the planning application known as Seecah Village which was approved on appeal was changed on the Proposals map to white land and had the previous employment designation removed during the Preferred Options Stage.
Stovell & Millwater Ltd	LP0247	DP0216	At paragraph 6.2 & 6.3 of the LPPOCD it discusses the previous strict position with regard to development outside of the limits to development. It goes further to identify a potential negative economic effect of such a stance if the position was maintained and also the effect of 'cramming' within the limits. It would seem to us the LPPOCD and accompanying proposals map would create the same situation that the plan warns against. Paragraph 6.6 identifies the current position that compact urban growth of regeneration areas on brownfield land is no longer tenable. Paragraph 6.7 considers the task of housing delivery before the Council which has been influenced by the preparation of the SHLAA	It is not considered that the approach that the Preferred Options document outlines would result in cramming as the Urban Fence line will be redrawn to contain sufficient housing sites to cover the housing need. By extending the urban fence boundary the Preferred Options allows for some new development both adjacent to the existing urban area and also within the villages and at Wynyard helping to provide a range of sites through the plan period. We believe planning strategically and having larger strategic sites which are capable of providing infrastructure to meet the needs of the development is perfectly acceptable and disagree with your viewpoint. The delivery of smaller sites makes it far more difficult to

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			and SHMA. They highlight a need for approximately 6000 dwellings between 2016 and 2031 with 4000 of these brought forward through extant planning permissions. The rest would be brought forward through large strategic sites. We do not believe the strategic housing site approach is correct as a matter of planning principle. It seems to us that it relates mainly to deliverability. We believe it is preferable to have a more dispersed housing pattern with a number of smaller sites. It is easier to integrate into the existing urban fabric and brings more social and economic advantages. Paragraph 6.8 advocates a strategy of balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth. These areas would obviously be the most sustainable but the only areas available are large strategic sites. Strategic housing allocations perpetuate the domination of the volume house builders, limit the opportunities for other types of housing providers and concentrate economic and social benefits to a limited area. Paragraph 6.12 states "it is imperative to maintain the strategic gaps between the town and the surrounding villages, particularly in the vicinity of Hart and Greatham villages". We believe the sentiment behind the idea is worthy however the proposals map identifies the majority of land to the west of Hartlepool as a strategic gap. The only exception being the extensions of the town at High Tunstall and the South West Extension. We realise this has been done as the Council believe they have an adequate housing supply already identified. However, it would seem to us this idea could become restrictive in the sustainable development of Hartlepool. The supply assumes that all identified sites will be brought forward and deliver the quantum of housing identified. It is unreasonable to assume that all sites will actually deliver in their entirety. It would be possible to develop some land with the strategic gap and still maintain gaps between the town and the surrounding villages.	provide the necessary infrastructure to meet the needs of the population and is therefore not seen as deliverable. Whilst having two larger strategic sites is likely to lead to larger housebuilders delivering them, it is considered that the plan also includes some smaller sites which local builders could look to take forward. Some of these may include sites which have planning permission secured but which have not got a builder associated with them. The Preferred Options plan proposed to allocate sites (including existing planning permissions) for a total of 6,072 dwellings. As we are meeting our housing need and allocating sites to do this if there are windfall developments during the plan period these will be expected to be within the Urban Area or Village Envelopes – the Strategic Gaps will help to protect against the coalescence of the urban area and the villages and there is no requirement for further housing within those areas during the plan period. It is considered that the sites that have been forward within the plan are considered deliverable and as such do not feel the use of the strategic gap or limits to development is unduly restrictive.

Company	Unique Ref	DP Ref	LS1 Pre-amble	Planning Policy Response
			The strategic gap that has been identified would be the most sustainable location for new housing. We believe that such a restrictive policy could threaten the viability of Hartlepool moving forward. This could be addressed by providing some flexibility within the policy to allow sites on the edge of development to be considered through the LPPOCD.	
Landowner (Southbrooke Farm)	LP0254	DP0228	1.3 Also welcomed is the recognition that retaining future development within previously defined settlement limits would severely constrain the opportunities for providing economic growth and a wide choice of housing, including affordable and high cost low density housing. The recognition that the previous strategy based on compact urban growth through the development of mixed use regeneration areas and brownfield land is no longer tenable is supported as is the sustainable growth strategy outlined at paragraph 6.8 of 'balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area with growth delivered alongside infrastructure improvements which allow Hartlepool to grow in a sustainable manner'. 1.4 Cecil M Yuill Ltd also welcome the Council's position, at paragraph 6.12, of identifying that the western extension of housing development beyond the existing limits can be developed in a sustainable form, but importantly ensuring that strategic gaps between the town and surrounding villages are sufficiently maintained. 1.5 Further, at paragraph 6.13, Cecil M Yuill Ltd support 'controlled western expansion of the town into greenfield land adjacent to the existing boundary of the built up area'. 1.6 However, whilst this overarching locational strategy for future development is broadly supported there remain issues within the Local Plan Preferred Options which Cecil M Yuill Ltd consider need to be satisfactorily addressed if the plan is to be found sound.	Support for growth strategy noted and appreciated. Support for sustainable western extension noted as well as recognition that strategic gaps can be maintained. Support noted. Additional issues of concern noted and addressed below.

The Locational Strategy - Policy

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
Campaign to Protect Rural England	LP0015	DP0199	CPRE welcomes the continuation of the "urban fence" and "strategic gaps" in the Locational Strategy as a means to ensure the openness of the countryside, the distinctiveness of individual settlements and the prevention of urban sprawl. We are however, disappointed and bewildered that the LPA (and neighbouring LPAs in the Tees Valley) have not chosen to designate a strategic Green Belt around Tees Valley. So far as we can determine, the framework adopted mimics Green Belt features closely. and it would seem simpler - and more easily understood by the general public - if a strategic Green Belt were adopted instead. We note that Tees Valley is one of only two conurbations in England without a strategic Green Belt.	Support welcomed. Noted. HBC do not deem it necessary to designate a green belt around the borough. HBC deem that the limits to development and strategic gaps will protect the open countryside and prevent the coalescence with adjoin areas.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Locational Strategy would urge the Borough Council to strictly enforce constraints on development on flood plains, and to ensure developers always use the latest technologies to reduce the impact of their development on the environment. We are still very concerned about developments at the north-west end of the town, already approved, and those included within the Local Plan, specifically at High Tunstall. These will see a huge increase in the number of vehicles using our rural roads to access the A19, and have a major impact on the villages of Elwick and Dalton Piercy. Elwick Parish Council would therefore urge the Borough Council not to approve any further development until a By-Pass is open around Elwick.	Concerns regarding development in areas of flood risk noted. HBC always consults the Environment Agency both in plan preparation and decision making on planning applications to ensure flood risk is minimised and mitigated. Concern over scale of development in the area noted. It is hoped that the infrastructure improvements we are seeking will help to ensure improvements in the operation and safety of the roads in the area and a significant reduction of traffic within Elwick village given the introduction of the new bypass. Planning colleagues dealing with the applications will continue to liaise with highway colleagues and Highway England to consider proposals put forward by the developer. The current

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
				stance is that no development can occur prior to the bypass.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council strongly supports the stated aim of the policy to protect the rural area. Urban fence and Limits to Development (para 6.11) are welcome and supported along with the strategic gaps. The key on the map indicates 'limits to development' which includes a line around the villages but the policy talks of the urban fence. As urban is defined in the dictionary as of city or town. The Parish Council questions whether it is clear that limits to development include lines around the villages as well as the urban area even with the explanation in 6.11. The Glossary does include a definition for village Envelopes perhaps the definition of Urban Fence should make it clear that it includes Village Envelopes if that is indeed the case.	It is agreed that the terminology currently used in the Preferred Options document and accompanying proposals map is somewhat confusing. The Local Plan and proposals map will use the term 'limit to development' to define the extent of the urban area and the villages.
			Greatham Parish Council welcomes and supports the omission of the extension of the urban fence around the former "Centura Works" (previously RHM/Cerebos). The site is isolated from the rest of the urban area with no access from the urban area. The only access is via a long winding country lane which runs through Greatham village. It correctly stands isolated in the rural area.	Support welcomed.
			The strategic gaps (para 6.12) especially that which would protect the distinct identity of Greatham village is welcome and supported by Greatham Parish Council. Further the council supports green infrastructure including green wedges, particularly with regard to mitigating against potential effects on landscape and the environment. The strategic gaps are mentioned in relation to the Urban Fence; however for them to be meaningful this would also need to apply to the villages through village envelopes which are not mentioned.	Support welcomed.
			The Parish Council is very concerned regarding the allocation of North Graythorp for specialist industries which can include those of hazardous and polluting nature. This area is very close to Greatham which already too frequently tolerates unusual odours, strange noises and glowing or	The North Graythorp area is within the consultation zone distances of a number of hazardous installations and has been

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			throbbing red skies. Light pollution is a concern which is not addressed. There should be a limit to the number and diversity of specialist industries and greater policing of the effects on neighbouring residential areas. Protection of the heritage and natural assets of the area is welcomed. Greatham and the whole rural area have an important role to play. There is more to the heritage of the area than maritime and Christian – there is a significant Industrial heritage – perhaps it would be sufficient to say the Borough has a rich heritage and refrain from trying to pin it down to two facets.	identified as suitable for similar developments for a number of years. Such industries remain subject to a number of strict controls and regulations imposed by the Environment Agency, the Borough Council and others to reduce impact on neighbouring uses. The Health & Safety Executive imposes consultation distance zones around hazardous installations to restrict the types of development permitted nearby.
Wynyard Park	LP0027	DP0223	With reference to paragraph 6.13 (page 20) and draft Policy LS1 - Wynyard Park welcome the allocation of 500 dwellings at Wynyard Park and welcome the opportunity to continue working with Hartlepool to deliver a sustainable community in the future. However, there are concerns that this approach will act as an unnecessary impediment to growth during the forthcoming plan period. Four major housebuilders comprising Taylor Wimpey, Barratt, Avant and Storey Homes are either constructing dwellings on site or seeking planning consent for additional development and as such it is envisaged that the allocated quantum of development could be delivered within the first 10 years of the plan period and further growth would then be halted in the final part of the plan period until the next plan review.Indeed, it is considered that there is scope to allocate an additional 232 dwellings at Wynyard Park (as requested in previous representations and as discussed positively in recent meetings)in order to plan positively and maintain a continuous supply of housing land in an area of high demand. With regard to the reference to Wynyard as a prestige employment site within this draft Policy, the reference to a smaller allocation of 35ha is preferable to the 54ha allocation described in draft Policy EMP1. However, Wynyard Park object to the principle of allocating this site for employment land as the NPPF clearly states that:	Support for allocation of 500 dwellings at Wynyard noted. Also note desire to create a sustainable community. The delivery of jobs and community infrastructure alongside the housing is considered crucial to achieve this. HBC notes the discussions which have been ongoing, and on the proviso that Wynyard Park are able to cost up and show in deliverability terms that the additional road infrastructure mitigation can be paid for, agree to include additional 232 dwellings. Given recent discussions regarding community infrastructure to make Wynyard a sustainable location it is considered that these additional houses will help in terms of the viability of building a one form entry primary school, possibly on the former hospital site, along with facilities such as sports pitches, play provision, MUGA's, walking routes and a range of facilities within the local centre.On the proviso the additional highway mitigation can be provided to allow the additional 232 dwellings the employment area will be reduced to reflect this. Wynyard Business Park has an important sub-regional and

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose" (paragraph 22) There is no reasonable prospect of achieving this quantum of employment development at Wynyard Park and as such the plan is overly aspirational in this regard and un-sound, in the respect that it prevents positive growth where it is required i.e. via housing delivery. Further details are set out in the covering letter.	regional role in encouraging new inward investment to the Tees Valley including Hartlepool. It is critical to retain a portfolio of land that includes high quality business sites so that the local authorities can respond positively to investment requirements over the next 15 years. If the site were marketed for employment purposes it is extremely likely that there would be business interest in investing in the area – Wynyard Park have expressed to us how successful they have been at attracted investment into the employment area in Wynyard 1 – there is no evidence to suggest that this area could not be equally as successful. If the employment allocation wasn't included there would be a lesser requirement for housing over the plan.
Highways Agency	LP0029	DP0196	Some amendments have been made to the locational strategy compared to the previous Core Strategy, which now has a less central urban focus with stronger support for locations on the urban periphery and greenfield locations. Paragraph 6.8 supports this approach, stating that most expansion will be 'concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth'. In general, Highways England is supportive of locating development in the most sustainably accessible locations, where access to a variety of sustainable modes of transport, employment opportunities, services and facilities is at its greatest. Such locations tend to be within more central urban locations. However, we welcome that paragraph 6.8 also states that the intention is to ensure that, 'growth occurs in a controlled way and is delivered alongside infrastructure improvements which allow Hartlepool to grow in sustainable manner.' This is particularly pertinent to proposals such as the new bypass to the north of Elwick Village and the creation of a new grade separated junction at the A19 to create a further access point into	Comments noted.

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			Hartlepool, which we have commented on in response to the relevant policies and the Local Infrastructure Plan (LIP). We note that the proposed strategic housing locations generally remain the same when compared to the previous Core Strategy, albeit the scale of development differs and a couple of sites have changed. We note that the South West extension has reduced from 2500 dwellings, whilst Wynyard has increased to 500 dwellings and High Tunstall has been added with 1200 dwellings proposed. It is noted that there have been small increases proposed for Elwick and Hart which do not individually present any concerns and we note that Upper Warren has been removed. and most importantly so has the North Burn site, which we previously objected to in relation to the Core Strategy. With regards to the provision of employment development, Highways England previously raised concern that while the policy identified specific sites, it did not identify the scale of development supported in these locations. We therefore welcome that this iteration of the Plan identifies the quantum of development proposed for each location. However, the following comments, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, highlights the need for further information to be provided to ensure that the spatial strategy is fully understood and that the evidence base supporting the Plan fully explores the potential influences at the SRN: • While the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements, it is not possible to determine the overall employment aspiration or understand specifically the contributions of the identified sites to the overall requirement.	Noted. The Borough Council will provide additional evidence regarding employment land sites to Highways England so that the implications on the strategic road network can be fully assessed.

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			• The scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	
Historic England	LP0044	DP0213	Page 23, Policy LS1: The second paragraph of this policy refers to Green Infrastructure (GI). It is worth noting that GI can both include, as well as enhance, a significant number of heritage assets. Historic landscapes, parks, gardens and cemeteries can all be designated heritage assets in their own right. In addition, the setting of a heritage asset can contribute to its significance, and this setting can often include elements which could be defined as GI. It might be helpful to include reference to the importance of GI to the historic environment in this section. Towards the end of this policy, there is reference to the protection and enhancement of the built and natural heritage assets. It might be helpful to also refer to their significance, including any contribution made by their setting.	Noted. Cross reference will be made between the Historic Environment and Natural Environment Chapters of the plan.
Persimmon Homes (Teesside)	LP0045	DP0209	The policy sets out the growth strategy for Hartlepool in a spatial manner. The strategy is based upon “balanced urban growth with expansion being concentrated in areas adjoining the existing built up area and adjacent to areas of strong economic growth but ensuring growth occurs in a controlled way and is delivered alongside infrastructure improvements which allow Hartlepool to grow in sustainable manner.” Persimmon Homes welcomes the general approach of the strategy and applauds the Council’s pragmatism in accepting that the existing urban area does not have the capacity to accommodate in full the town’s future housing needs and therefore greenfield release on the urban fringe will be	General support for the approach taken in terms of the spatial strategy noted.

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			necessary. We do however have a number of concerns with the proposed sites identified for residential development. These concerns will be addressed in further detail in respect of Policy HSG1 New Housing Provision but we simply do not believe that the most logical and sustainable sites have been identified for development given the potential options.	
High Tunstall Homes	LP0060	DP0017	We have previously submitted representations on behalf of Tunstall Homes against the Hartlepool Rural Neighbourhood Plan, Consultation Draft (May 2015) and in particular against the proposed 'Green Gap' between Elwick village and the western edge of the proposed High Tunstall development. We are concerned to note the 'Green Gap' proposed in the Draft Neighbourhood Plan to the immediate west of the High Tunstall site is now proposed as a 'Strategic Gap', running westwards to Dalton Back Lane. In our opinion Dalton Lane/Dalton Back Lane provides a more logical and stronger boundary for a buffer between the proposed High Tunstall development and the villages of Elwick and Dalton Piercy, the strategic gap then being proposed to run for a distance (as determined by HBC) to the west of the public road, rather than following field boundaries which have already being compromised over the northern half of the proposed Stategic Gap at this location. Revising the boundary of the Strategic Gap would have three benefits: a more logical and sustainable eastern bolundary with the western boundary providing greater protection against the eastern spread of Elwick village; allowing for additional green space, sport and recreational provision that might be required as part of the High Tunstall development; and allowing for future housing to be provided to the immediate west if the High Tunstall development site to meet future housing needs/requirements of the Council.	Given that the proposed plan is the plan for the next 15 years, it is not considered that further housing to the west of the proposed High Tunstall boundary would be needed or deliverable (given the quantum of development in the area and considered annual build out rates) within the plan period. As such it is wholly reasonable to include the strategic gap policy from the edge of the Masterplan site. The Masterplan for High Tunstall (currently being considered by Development Control Officers) has the same boundary as the allocation within the Local Plan - we have not seen anything to support the fact that further green space, sport and recreational provision would be made outside of that boundary – however if anything did come forward it may be likely that it would be an appropriate countryside use and would be permitted within the Strategic Gap anyway.
Homes and Communities Agency	LP0063	DP0020	The HCA supports the locational strategy for housing provision which seeks to prioritise economically viable, brownfield land and other suitable and available sites inside the existing urban areas for new housing. But, like the	Note support for locational strategy. This representation would appear to consider North Burn a

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			Council, is mindful that "keeping future development within these limits could protect the attractive open countryside around Hartlepool but would severely constrain the opportunities for providing economic growth and a wide choice of housing". To meet the needs of the increased 5 year supply (with the additional 20% due to past challenges in meeting expected build rates) it will be essential for the LA to look beyond the brownfield sites in the urban core. The HCA believes that North Burn offers an excellent potential site. The site is currently agricultural land (presently allocated as an employment site but identified by the LA as being suitable for de-allocation due to an oversupply of employment land in the borough). North Burn sits on the edge of the conurbation, it is not a greenfield site and is not within the Greenbelt and so fits within the Locational Strategy set out by the Council. The site adjoins the A19 and its southern boundary adjoins industrial landuse and is close to the Wynyard Park.	brownfield site. This is incorrect, and whilst North Burn has had an employment allocation on it for some years, no development has ever taken place here and it is a greenfield site on the periphery of Wynyard, not the main conurbation of Hartlepool. The site would also need a new junction constructed on the A19 at a cost of some £15-£20m which, to date, Highways England has been opposed to in such close proximity to the A19/A689 junction; it should also be noted that this junction would only benefit North Burn as opposed to the benefits the junction and bypass at Elwick would have. It is for these reasons that the sites proposed in the Preferred Options are considered more sustainable, beneficial and appropriate than the site at North Burn.
Resident	LP0220	DP0182	Whilst agreeing that the proposal for a bypass to the north of Elwick, together with the grade separated junction on the A19, is very positive from a safety point of view, there will be very significant congestion problems created coming into Hartlepool if Elwick Road was to become a "third" main access point into the town. Due to the above average %age of obese adults in the town, presumably there is also a problem with obese children. Are there any specific plans to address this ?	Support for bypass and grade separated from a safety point of view noted. The Local Infrastructure Plan which accompanies the Local Plan addresses improvements to local network junctions in the Elwick Road area. The developer will be expected to submit a traffic impact assessment and undertake any works to increase capacity and flow within the local networks. Some improvements to the Elwick Road / Wooler Road / Park Road junction have already been secured as part of the Tunstall Farm Planning application which will increase the functionality of the junction. HBC are seeking to provide play and leisure facilities across the borough to help all residents and visitors remain/become

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
				active. HBC are also seeking to restrict the number of hot food takeaways.
Resident	LP0230	DP0194	Page 23 LS1. I would suggest that a third high quality and safe access from the A19 into Hartlepool will create significant pressure on Elwick Road as it comes past Ward Jackson Park down to Wooler Road as some people coming from the South will start using it instead of the A689 even before the High Tunstall housing development is completed. I believe the narrowing and the slight rise of Elwick road just before the Cricket Club and Ward Jackson Park could become a dangerous bottleneck and therefore a widening of this section should be planned. The junction of Elwick Road and Wooler Road is already an issue which should be addressed, the current position encourages a lot of traffic to take an alternative route along Park Avenue to The Parade and down to the White House roundabout in my opinion a more dangerous route because of school children, mothers with young children and the elderly crossing two very wide junctions. At a minimum I believe LS1 should reflect the need for the improvements in the junction of Wooler Road and Elwick Road to be linked to any planned bypass of Elwick and preferably prior to commencement of the bypass.	Concern regarding the local road network, in and around Elwick Road and Ward Jackson Park, as a result of the bypass and new Elwick junction noted. The Local Infrastructure Plan which accompanies the Local Plan addresses improvements to local network junctions in the Elwick Road area. The developer will be expected to submit a traffic impact assessment and undertake any works to increase capacity and flow within the local networks. Some improvements to the Elwick Road / Wooler Road / Park Road junction have already been secured as part of the Tunstall Farm Planning application which will increase the functionality of the junction. Agree to make amendment to first paragraph of LS1 to include local network improvements in conjunction with the delivery of the bypass.
Home Builders Federation	LP0234	DP0200	Strategic Gaps The consultation document, paragraph 6.12, references strategic gaps. These are also referred to within a number of policies. The plan does, however, lack any policy upon this issue. This is likely to create significant ambiguity in terms of their interpretation and how development proposals within the gaps will be considered. It is therefore recommended that an appropriate policy is provided which provides this clarity. The HBF would also expect to see an evidence based approach to strategic gaps which provides justification for their location and extent. It is recommended that they are restricted to areas where they would make a justifiable contribution to the preservation of the smaller settlements	The Strategic Gap has been included within the plan to avoid the coalescence of the urban area with the surrounding villages. This is also imperative to help safeguard the identity of the villages, in particular at Hart Village and Greatham Village which are both in close proximity to the existing urban area. The strategic gap though is also considered necessary along the full extent of the urban area taking into account the housing growth at the South West Extension and High Tunstall and the movement of the urban area towards the villages of Elwick and Dalton Piercy. The strategic gaps proposed are also reflective of the Rural Neighbourhood Plan which is

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			around the town.	progressing towards Examination at present. It is not considered there is a need for either a separate policy or a separate evidence base to justify the strategic gap, however the wording regarding the Strategic Gap within Policy LS1 will be strengthened.
Northumbrian Water	LP0241	DP0207	We are pleased to see that the Council has recognised areas of flood risk and critical drainage areas, as set out in paragraph 6.9, as a potential constraint to development and that careful consideration will be taken regarding development sites that are constrained by flood risk. Further to this we support the statement set out in paragraph 6.10 that "land should be capable of adequate surface and foul mains drainage". We have worked with the council during the production of the Local Infrastructure Plan (LIP) to advise on the location of our assets in relation to development sites contained within the local plan and listed potential connection points into the sewerage network. We have also identified when new infrastructure will be required to accommodate development sites coming forward. It should be noted that the core principles set out in paragraph 6.10 relating to the adequate surface and foul mains drainage are not reflected within policy LS1: Locational Strategy. We recommend that these core principles are incorporated within policy LS1 in order to make adequate surface and foul mains drainage a requirement across the Borough.	Support for paragraphs 6.9 and 6.10 noted and continued support of Northumbrian Water in preparing the Local Plan and the Infrastructure Plan is much appreciated. It is considered that this reference is not needed within the Locational Strategy Policy as, whilst it has been a crucial element in helping to identify appropriate sites, it is not, in itself a locational issue – to ensure that developments which come forward have adequate surface and foul mains drainage this is covered in Policy QP6, Technical Matters.
Stovell & Millwater Ltd	LP0247	DP0216	As we have already discussed we have some reservations over the restrictive nature of this policy as the only potential housing sites that could be brought forward are large strategic sites. As we have suggested there is no certainty that all the allocated sites would be developed and that there should be scope for further sites to come forward alongside existing development as long as it accords with the rest of the plan. Also we believe any site of historical significance should be considered under a	The site discussed is not a preferred option for housing development. The council has identified alternative sites which it believes are more sustainable and meet the towns housing needs over the duration of the plan. It is acknowledged that there is a pending planning application for housing development on this site, should this be approved this policy will be updated to reflect this along with any other

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			different policy and not part of the strategic gap. In relation to Hart Reservoirs which the Council have identified as having local significance we believe the only prospect of this industrial heritage site being retained is by allowing some development to take place. As it stands if the site is left within the strategic gap and development is refused there could be no prospect of this asset being maintained. We believe given the unique considerations of the site it would be beneficial to its heritage survival that it be removed from the strategic gap. We would also question the sustainable merits of allocating a strategic site at Wynyard. This is not a site that is close to Hartlepool and has infrastructure problems which would effect is suitability and deliverability. It would seem to us that the policy contradicts the advice preceding it. The advice advocates sustainable growth but the policy restricts this and in the case of the Wynyard allocation goes against it.	relevant planning applications which may be granted in the coming months. The Historic Environment chapter within the plan details a policy on Heritage at Risk, whilst this does reference wider development as a means of developing and enhancing heritage assets, this may not be appropriate in all circumstances. Whilst it is agreed that, at present, Wynyard is not as sustainable as areas adjoining the existing urban area and does have some infrastructure issues associated with it, through the allocation of the Prestige Employment allocation, development of high quality housing and associated infrastructure (including community provision such as a primary school, playing pitches, children's play and a local centre along with highway infrastructure improvements and cycle and walking links to Hartlepool as well as a bus connection to neighbouring areas), it is considered that Wynyard can be made into a sustainable community.
Sovereign Park	LP0260	DP0235	Support and comment: Hansteen is concerned that the Council has not taken the opportunity presented by the Local Plan to review all the employment allocations, thoroughly. For example, officers have continued to ignore the evidence showing employment development on the land at Sovereign Park is unviable. The continued allocation of this land for employment use does not accord with the guidance set out in NPPF, which encourages LPAs not to continue to allocate land for employment where there is no realistic prospect of such development taking place within the plan period. Hansteen is broadly supportive of policy LS1, but questions why so many	The Council commissioned an Employment Land Review which was published in December 2014. This did thoroughly review all the employment land allocations and made a number of recommendations. The employment land allocations in the Local Plan are based on the outcome of the Review which forms part of the evidence base. Further comment on Sovereign Park is given in the section on economy / employment land policies. The Local Plan does identify a number of previously developed

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
			housing allocations are made up by greenfield sites, in less sustainable locations. It is also a concern that these greenfield allocations come ahead of the reuse of the previously developed land at Sovereign Park, particularly given the context of discussions that have been ongoing for a number of years between council officers (including the estates department) and Hansteen in relation to a joint development of the land for housing, accessed from Seaton Lane.	sites as suitable for housing but the number of such sites that present opportunities to create sustainable development and a high quality living environment are limited. Previously developed sites within the industrial areas of south east Hartlepool are subject to a number of constraints that render them unsuitable for housing purposes.
HCA (Oakesway)	LP0086	DP0044	The HCA supports the locational strategy for housing provision which seeks to prioritise economically viable, brownfield land and other suitable and available sites inside the existing urban areas for new housing. This will ensure that the development of greenfield sites is reduced. Oakesway is a key example of an accessible, suitable and available brownfield site, located within the existing urban area which could accommodate housing development. Not developing the site which is located within the conurbation is forcing greenfield and greenbelt sites to be developed which is unsustainable.	The HCA's views are noted but the Council considers that the Local Plan clearly demonstrates that some Greenfield land releases are necessary to meet the housing requirement over the next 15 years. A number of previously developed sites within the urban area have been identified as suitable for housing and in addition a number of significant developments have secured permission or are under construction on previously developed land in the Borough. Hartlepool does not have previously developed sites that are suitable for housing. There are a number of sites in the south east of the town that are undeveloped but these are within a largely industrial area subject to various development constraints and where the ability to create high quality residential environments would be extremely difficult. With regard to Oakesway industrial estate, this was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a

Company	Unique Ref	DP Ref	LS1 Locational Strategy	Planning Policy Response
				number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. Further discussion with the Council's inward investment team has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable residential environment and community within the constraints of the site.

C1: Minimising and adapting to Climate Change – Pre-amble

Company	Unique Ref	DP Ref	CC1 Pre-amble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	We find that the chapters covering Climate Change, Quality of Place and the Natural Environment include aspirations and aims which deserve support and endorsement from residents and their representatives. Indeed, if they are ultimately to influence development for the better, these chapters are supportive of the additional measures and amendments needed and which we set our below. We consider them absolutely essential for the best outcomes, not only for residents of the Fens Estate and future residents of the South West Extension (SWE), but for all of Hartlepool.	Support noted.
Environment Agency	LP0031	DP0190	There is an opportunity within Section 7.8 of Chapter 7 (Minimising and adaptation to climate change) to promote the green roof initiative, in particular, for industrial units but also in new housing developments.	Noted. It is not possible to list all initiatives linked to tackling climate change, many initiatives will be referenced in subsequent SPD`s and on a case by case basis when negotiating with applicants.
NFU North East	LP0047	DP0003	• We welcome the authority's positive approach to encourage renewable forms of energy as the agricultural industry continues to provide renewable energy both for our own sector and export to the wider network, helping deliver a low carbon economy. • With continued change to government policies, renewable forms of energy production are still increasing in popularity in the rural sector (especially when linked to farm use).	Support and comments on sector support for renewables noted.
Resident	LP0048	DP0004	The Council recognises the need to encourage the use of more sustainable modes of transport and reduce the number of car journeys as they area major contributor to C02 emissions. One of the best ways of achieving this is to ensure all traffic moves freely at all times. This means reducing the traffic crawl along the A19/A689/A171 at all times. Onshore wind farms will not help this aim. They are inefficient and costly without government subsidies, plus they are a visual disaster in areas where green belt areas are desired. The best solution will be to extend the nuclear power station capacity at Hartlepool. Recycling is good but the refuse collection systems employed by Hartlepool	The Council seeks to ensure that traffic flows freely at times, Hartlepool has a relatively congestion free road network when compared the rest of the Tees Valley and the UK. The Council also seeks to ensure car use is reduced and more sustainable modes are chosen through a package of sustainable transport improvements such as improving walking and cycling links. On shore wind is one option that the Council has to consider I providing clean energy. The Council will consider all renewable proposals on a case by case basis and take into account visual impact when determining applications. Land for a new nuclear

Company	Unique Ref	DP Ref	CC1 Pre-amble	Planning Policy Response
			Borough do not encourage this	power station has been safeguarded. Noted. HBC are operating a new recycling system with the hope that it will make things better/easier for residents.
Resident	LP0082	DP0040	Section 7.11 On waste disposal, it says 'If waste is not recycled it is usually disposed of in landfill sites which can result in the release of greenhouse gases which contribute to climate change.' Is this a change to HBC waste incineration policy?	No, the text states what happens to waste if it is not recycled. In most instances HBC general waste does go to the energy from waste plant, in very rare instances it will go to landfill. The information in paragraph 7.11 is in general terms. However if there is a change to the HBC waste approach then waste could go to landfill. The general sentence is to make the reader aware of the positive reasons that waste should be recycled.
Resident	LP0096	DP0054	Recycle and reuse wherever possible, some green ideas are not worth it.	Comment noted
Resident	LP0201	DP0159	7.8 The South West Extension requires more than one area of flood shelving to allow for climate change and the loss of permeable land. We have seen that in other parts of the country flood prevention measures have failed against all expectations. Although SUDS are planned in, extra shelving would prove to be a cost effective way of demonstrating that everything possible has been done to reduce flood risk. The shelving would also be a part of the green wedge sympathetic to wildlife and ecology.	An outline application is minded to be approved for the SWE, residents views regarding flooding were investigated during the application process. Measures to include additional flood shelving and a bund were explored but the measures proposed were deemed acceptable by the Environment Agency and The Council. There are a number of measures in place that can assist in climate change mitigation such as an extensive green wedge, tree plating and sustainable transport measures.
Northumbrian Water	LP0241	DP0207	As a water and sewerage company we recognise the challenges associated with climate change and are continuingly working towards new and innovative solutions to protect our customers from the effects climate change may have on the sewerage network. Our research shows that our biggest challenge will be rain falling more quickly. We are preparing for this challenge by investing in a weather radar, remote monitoring of the sewer network and working with others in the industry. This will help us to understand and manage any problems. It is pleasing to see the Council has identified that a pro-active partnership action is required to manage climate change and that they are willing to work with partners to introduce new initiatives to address climate change. As the statutory sewerage undertaker we welcome the opportunity to work with Hartlepool Council to discuss and develop new ways of	Noted. Support welcomed.

Company	Unique Ref	DP Ref	CC1 Pre-amble	Planning Policy Response
			managing climate change in the Borough. Although we understand that a good portion of Hartlepool town centre falls within flood zone 3 on the Environment Agency's (EA) flood maps we are pleased to see in paragraph 7.8 that the Council recognises flood risk in the region and is seeking to direct development away from higher flood risk areas. We do feel however that paragraph 7.8 could provide more comprehensive reference to flooding. Fluvial and coastal flooding, whilst the most recognised, are not the only means of flooding. Sewer flooding is also a risk and occurs when sewers are overloaded due to heavy rainfall events and other climatic anomalies. As part of this, it should also be noted that we consider that the effects of "urban creep" have not been suitably explored within the document. "Urban Creep" is the loss of permeable soft landscaping surfaces within urban areas in favour of more impermeable hard standing thus creating increased surface runoff which contributes to sewer flooding and other problems. We encourage the Council to be more proactive in the management of "urban creep" through the Development Management process, and we have identified policy number QP4 as a potential policy where this message can be incorporated. Also in paragraph 7.8 we note that the Council will look to encourage Sustainable Drainage Systems (SuDS) to be used to reduce the impact on conventional drainage systems and watercourses. This is something we strongly agree with and are pleased to see this included in Policy CC1.	Next HBC consider that paragraph 7.8 is adequately comprehensive in its coverage of flooding. Reference is already made within the paragraph to SuDs which recognises relieving pressure on sewers. HBC have identified policy QP6 as appropriate to reference this issue. Point 3 of policy QP6 now reads 'Any matters regarding flood risk, both on and off site, throughout the design life of the site'.
Brenda Road Holdings Ltd	LP0244	DP0212	We agree with the point made at paragraph 7.7 that 'support and encouragement is given to the development of brownfield land' and that 'building in these areas not only removes an often blighted site from the borough but it can provide home and jobs in locations that are currently linked too, or have the potential to be linked to a sustainable infrastructure network'. We could contend that the site at Brenda Road meets both of these aspirations given its proximity to rail and bus links.	The land at Brenda Road which was subject to the planning application known as Seecah Village which was approved on appeal was changed on the Proposals map to white land and had the previous employment designation removed during the Preferred Options Stage. The Publication Local Plan will take account of the 210 C3 units which have planning permission within the revised housing figures.

C1: Minimising and adapting to Climate Change – Policy

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	Policy 1) - The Society supports this policy of use of brownfield sites and sustainable travel options As with Option 6.11 the emphasis should be on 'brownfield first'. Policy 7), 8), 9) - Where possible and practical measures should be taken to save energy and use a proportion of renewable.	Support welcomed.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council fully supports Minimising and Adapting to Climate Change (see comment in Section 6). We support the use of alternative power production, but not at the expense of the rural environment. Solar PV farms should be placed only where they will have a minimal impact on the landscape, neighbours and wildlife, and only on land that is of the lowest agricultural use, as decided by those actually farming the land, (who are not necessarily the landowners).	Support welcomed. All of the aforementioned factors will be taken into account when assessing applications for renewable energy, the criteria is set out in policies INF6 and INF7.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes this policy, especially encouraging development toward well serviced brownfield sites and the reuse, adaption and repair of existing buildings and vacant floors.	Noted.
Highways Agency	LP0029	DP0196	It is noted that this policy is generally consistent with the previous Core Strategy, however in relation to criteria 1) which previously stated, 'Encouraging development, on suitable brownfield sites within the urban limits, and other areas that are, or have the potential to be, well served by sustainable forms of transport', this has been strengthened with stronger reinforcement of sustainable transport provisions and greater emphasis on encouragement of its use, which we support. That said, while it is noted that there is an encouragement to develop brownfield sites, it is clear that the spatial strategy is at odds with this approach in locating much of the development in greenfield locations. It is critical therefore that a strong emphasis is put on making these	Support welcomed. A high percentage of the new homes to be built will be built within the urban limits, it just so happened that those proposals have permission and therefore do not need allocating and thus depicting on a map. The strategic sites allocated on Greenfield land will be made to be as sustainable as possible with green wedges, improved sustainable access links, leisure facilities, local centres and education facilities on site, the aim is to provide a high quality living environment and reduce the need to travel by car.

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
			sites as sustainable (in transport terms) as possible. To achieve this, these less naturally sustainable sites would need to be supported by significant levels of sustainable transport infrastructure and services, in order to avoid car-dependent developments.	
Historic England	LP0044	DP0213	Page 29, Policy CC1: We particularly welcome and support the prominence given to climate change policies. Heritage assets can be extremely vulnerable to the impacts of climate change, including extreme weather events and coastal erosion. It would be helpful to include some reference to the historic environment within the supporting text. We welcome the recognition that the re-use of vacant buildings can be more environmentally efficient. Many historic buildings could be brought back into viable use, and Historic England actively encourages this through its work and grant regimes.	Noted and support welcomed.
Persimmon Homes (Teesside)	LP0045	DP0209	Whilst Persimmon Homes welcome that the council will have regard to the viability of all proposals in the application of this policy, we wish to highlight the following concerns. The second condition requires major developments to include opportunities for charging electric and hybrid vehicles. NPPF paragraph 35 is not as ambitious as the policy. It states only that 'where practical' developments should incorporate facilities for charging plug-in and other ultra low emission vehicles. It is therefore important that any policy is sufficiently flexible to allow alternative measures to be implemented which may be more economically viable and therefore the condition should be 'encouraged' rather than 'required'. The seventh condition aims to ensure that development is energy efficient in accordance with Policy QP7. As set out within the relevant section, Persimmon Homes have significant concerns with the justification behind this policy and therefore suggest that any reference to it within Policy CC1 is deleted. The policy is unsound and therefore any reference to it within Policy CC1 would result in this policy being	Noted. It will be for the applicant to demonstrate that electric charging points cannot be installed, however in many instances such infrastructure can be installed easily within communal areas, car parking bays or in garages. Viability will be taken into account on all applications and therefore it is considered that the plan does allow for flexibility. HBC consider that the policy requirements are in accordance with NPPF paragraphs 95 and 96 and the provisions in the Planning and Energy Act 2008 section 1 (1), which have not yet been repealed. The deregulation Act, section 43 makes provisions to repeal section 1 (1) of the Planning and Energy Act 2008, however this section has not yet came into force. The Ministerial statement is noted and HBC are aware that such statements are material considerations. The statement has been taken into account in the production of policies,

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
			found unsound also. The final part requires that where viable, on schemes of 10 dwellings or more a minimum of 10% of the energy supply shall be from decentralised and renewable or low carbon sources. Persimmon Homes refer to the Written Statement to Parliament on 25th March 2015 by Eric Pickles MP Secretary of State for Communities and Local Government. The statement states that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. The requirement for 10% of energy supply from decentralised or renewable solutions for developments complying with the Building Regulations would therefore be unjustified.	however HBC consider that until a commencement order is issued then the provisions in the Planning and Energy Act are still in place. If it was the intention of the Government to apply these amendments straight away then HBC consider that the Government would have enacted the provisions immediately. Specific reference to policy QP7 has been deleted from policy CC1. However, this is because the plan should be read as a whole and not in response to the comments from Persimmon Homes. No date has been set for the commencement order. HBC will review policy CC1 and QP7 when such an order is produced. Notwithstanding any such commencement order that may lead to changes to policies CC1 and QP7, such changes would only relate to residential development and thus the policy criteria would still apply to all non residential development.
NFU North East	LP0047	DP0003	• It is stated that when demonstrated it is not feasible to provide such energy generation measures then equivalent energy saving measures should be taken by improving the fabric of the building. We would welcome clarification of how this would be implemented in the conversion of existing rural buildings or some agricultural structures when such measures are not achievable.	If it is not possible to provide clean energy on site, and if energy efficiency measures cannot be built into the building, then the equivalent cost will be requested to be put into a carbon management fund as stated in criteria 9 (2).
R Newcomb & Sons	LP0054	DP0011	Policy CC1 1) encourages the development on suitable brownfield sites within the urban limits. Allocation of landuse code NE2e will limit this rather than encourage it, therefore the site should be released from this code.	Although we will amend proposals map to remove NE2e allocation and make it white land to reflect site formed the building and compound for the landfill site. It is not considered a suitable site for housing development due to the former use of the site/adjacent land and more importantly the very close location to the bad neighbour uses area at Sandgate Industrial Estate.
Story Homes	LP0219	DP0181	Story Homes considers that part 9 of Policy CC1: Minimising and adaption to climate change and the second paragraph of Policy QP7	HBC consider that the policy requirements are in accordance with NPPF paragraphs 95 and 96 and the provisions in the

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
			which require housing development of 10 or more homes to provide (where viable) a minimum of 10% of their energy supply from decentralised and renewable or low carbon sources to be inconsistent with national policy. We therefore recommend that these policies should be amended to reflect national policy otherwise the emerging Plan will be deemed unsound. Due consideration must be given to the Ministerial Statement dated 25/03/2015 which set out that LPAs should not seek to set energy requirements from developments are over and above Building Regulations. This statement follows the commencement of amendments to both the Planning and Energy Act 2008 in the Deregulation Bill 2015. Subsequently, a requirement of 10% of energy supplied from decentralised sources is both un-justified and therefore results in the emerging Plan being found unsound if it remains unaltered. In order to address this issue the Council must delete these stringent requirements and amend the policy wording accordingly.	Planning and Energy Act 2008 section 1 (1), which have not yet been repealed. The deregulation Act, section 43 makes provisions to repeal section 1 (1) of the Planning and Energy Act 2008, however this section has not yet came into force. The Ministerial statement is noted and HBC are aware that such statements are material considerations. The statement has been taken into account in the production of policies, however HBC consider that until a commencement order is issued then the provisions in the Planning and Energy Act are still in place. If it was the intention of the Government to apply these amendments straight away then HBC consider that the Government would have enacted the provisions immediately. No date has been set for the commencement order. HBC will review policy CC1 and QP7 when such an order is produced. Notwithstanding any such commencement order that may lead to changes to policies CC1 and QP7, such changes would only relate to residential development and thus the policy criteria would still apply to all non residential development.
Home Builders Federation	LP0234	DP0200	Policy CC1: Minimising and adapting to climate change & QP7: Energy Efficiency 16. Part 9 of Policy CC1 and the 2nd paragraph of Policy QP7 both require housing developments of 10 or more to provide, where viable, a minimum 10% of their energy supply from decentralised and renewable or low carbon sources. This policy requirement is not consistent with national policy and is therefore unsound. 17. The Council will be aware of the ministerial statement dated 25th March 2015. This statement sets out that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from	HBC consider that the policy requirements are in accordance with NPPF paragraphs 95 and 96 and the provisions in the Planning and Energy Act 2008 section 1 (1), which have not yet been repealed. The deregulation Act, section 43 makes provisions to repeal section 1 (1) of the Planning and Energy Act 2008, however this section has not yet came into force. The Ministerial statement is noted and HBC are aware that such statements are material considerations. The statement has been taken into account in the production of policies, however HBC consider that until a commencement order is issued then the provisions in the Planning and Energy Act are still in place. If it was the intention of the Government to

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
			developments which go beyond the Building Regulations. The requirement for 10% of energy supply from decentralised solutions for developments complying with the Building Regulations would therefore be unjustified. 18. Similarly the requirement within Policy QP7 to; "…improve the fabric of the building 10% above what is required by the most up to date Building Regulations…" Would also be unjustified. The HBF therefore recommend the deletion of these requirements.	apply these amendments straight away then HBC consider that the Government would have enacted the provisions immediately. No date has been set for the commencement order. HBC will review policy CC1 and QP7 when such an order is produced. Notwithstanding any such commencement order that may lead to changes to policies CC1 and QP7, such changes would only relate to residential development and thus the policy criteria would still apply to all non residential development.
Sovereign Park	LP0260	DP0235	Our client broadly welcomes policy CC1, but questions the failure to carry out a rigorous reassessment of the suitability of all employment allocations - particularly the continued allocation of land at Sovereign Park, where planning officers have already accepted there is no prospect of employment development taking place. Hansteen also question any policy that would encourage and enable large greenfield housing allocations to come forward ahead of better located previously developed sites within Hartlepool's existing built up area.	As part of the evidence base for the local plan the Council commissioned an independent Employment Land Review which was published in December 2014. This review did rigorously assess all employment allocations for their marketability and deliverability. The review made a number of recommendations, including the de-allocation of some sites. The review did assess Sovereign Park and accepted that it was a constrained site with a number of issues including flooding. However the review did not recommend de-allocation from employment uses but that the site should be subject to further monitoring. The Council does not consider the site to be appropriate for residential use given its location and surrounding land uses. However in line with NPPF paragraph 22 employment land allocations will be regularly reviewed and the Council will consider alternative proposals that accord with local plan policy. The local plan does on a number of previously developed sites within the urban area. However there are insufficient previously developed sites in locations that will allow the creation of sustainable communities in a quality environment

Company	Unique Ref	DP Ref	CC1 Climate Change	Planning Policy Response
				to meet the housing requirement over the 15 year plan period. The local plan therefore has to identify a number of green field sites on the edge of the urban area to meet the housing requirement.
HCA (Oakesway)	LP0086	DP0044	The HCA agrees with Policy CC1 which encourages development on suitable brownfield sites within the urban limits. It also encourages development in other areas that are, or have the potential to be, well served by sustainable forms of transport and encourages sustainable travel options such as enhancing public transport provision, cycle and pedestrian provision. Oakesway is a suitable brownfield site within urban limits which is well connected by sustainable transport. The site is located within an existing urban area, 2km from the town centre. Not developing the site which is located within the conurbation is forcing greenfield and greenbelt sites to be developed which is unsustainable.	Supportive comments regarding policy CC1 welcomed. Comments regarding Oakesway are dealt with under the appropriate policy.

CC2: Reducing and Mitigating Flood Risk – Pre-amble

Company	Unique Ref	DP Ref	CC2 Pre-amble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	FRA failed in its attempt to have a bund installed alongside the beck. Persimmon planned in one area of flood shelving which is to be welcomed. However, to create full confidence in high water control measures there should be further areas of flood shelving upstream within the development area. The additional flood shelving would be cost effective and fit well into the green wedge/wildlife corridor. Importantly it would be applauded by residents and improve resident/developer relations. These comments are supported by Policies CC1, CC2, NE2, NE3 and NE4.	An outline application for the SWE is minded to approved for, residents views regarding flooding were investigated during the application process. Measures to include additional flood shelving and a bund were explored but the measures proposed were deemed acceptable by the Environment Agency and the Council.
Environment Agency	LP0031	DP0190	Flood Risk We have identified that some of the allocated housing, employment and retail sites in the Local Plan are located in flood zones 2 and 3. These sites are not supported by a Sequential Test. A Sequential Test is required to be undertaken as outlined in the Planning Practice Guidance: Flood Risk and Coastal Change, which details that in preparing the Local Plan "the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk." A number of allocations that are within flood zones 2 and 3 have not been assessed in the council's Strategic Flood Risk Assessment (SFRA), which was published back in 2010. The current SFRA will need to be updated, in particular, to reflect the new climate change allowances which are now in place. Please see link below which provides guidance on the climate change allowances: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances We wish to advise that we will object to allocations located in flood zones 2 and 3 if the above assessments are not undertaken prior to the next Local Plan consultation.	HBC are currently in the process of updating the SFRA and once complete the Sequential and exceptions test will be undertaken. HBC will continue to work with the EA to ensure that the evidence base is accurate and that any sites put forward are suitable along with any mitigation measures put forward within the relevant policies.
Stockton Road	LP0237	DP0203	• 7. 19 to 7.24 More house built means less soak always. More hardstanding ground	Each site will be assessed on a case by case basis and discharges from each site will be as a minimum equal to the

Company	Unique Ref	DP Ref	CC2 Pre-amble	Planning Policy Response
Residents Association			means more impact on local sewerages means more stress on Burn valley beck which flows from Dalton Piercy to Colwyn Road. Which over flows and floods in the Burn Valley? Which is surround by Terrace homes which could be flood which makes it impossible to insurance your homes against flood risks which people have lived in these homes for a number of years who have brought up they family's. The Burn Valley Beck joins the town sewerage system in York Road neat Burn Valley round about which stinks and full of rats and gets reported by residents which is ignored and residents go to the quartile south meeting and bring it up then we get Beck clean out if we lucky. The sewerage system sinks (like rotten eggs) across the whole town and Notting has been done about it.	current situation. With regards to the smells from the sewage systems these instances need to be reported to Northumbrian Water for further investigation.
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	More house built means less soak always. More hardstanding ground means more impact on local sewerages means more stress on Burn valley beck which flows from Dalton Piercy to Colwyn Road. Which over flows and floods in the Burn Valley? Which is surround by Terrace homes which could be flood which makes it impossible to insurance your homes against flood risks which people have lived in these homes for a number of years who have brought up they family's. The Burn Valley Beck joins the town sewerage system in York Road neat Burn Valley round about which stinks and full of rats and gets reported by residents which is ignored and residents go to the quartile south meeting and bring it up then we get Beck clean out if we lucky. The sewerage system sinks (like rotten eggs) across the whole town and Notting has been done about it.	Each site will be assessed on a case by case basis and discharges from each site will be as a minimum equal to the current situation. With regards to the smells from the sewage systems these instances need to be reported to Northumbrian Water for further investigation.
Resident	LP0239	DP0205	• 7. 19 to 7.24 More house built means less soak always. More hardstanding ground means more impact on local sewerages means more stress on Burn valley beck which flows from Dalton Piercy to Colwyn Road. Which over flows and floods in the Burn Valley? Which is surround by Terrace homes which could be flood which makes it impossible to insurance your homes against flood risks which people have lived in these homes for a number of years who have brought up they family's. The Burn Valley Beck joins the town sewerage system in York Road neat	Each site will be assessed on a case by case basis and discharges from each site will be as a minimum equal to the current situation. With regards to the smells from the sewage systems these instances need to be reported to Northumbrian Water for further investigation.

Company	Unique Ref	DP Ref	CC2 Pre-amble	Planning Policy Response
			Burn Valley round about which stinks and full of rats and gets reported by residents which is ignored and residents go to the quartile south meeting and bring it up then we get Beck clean out if we lucky. The sewerage system sinks (like rotten eggs) across the whole town and Notting has been done about it.	
Northumbrian Water	LP0241	DP0207	Sewer flooding is a very serious issue and we are committed to reducing the risk of it occurring across the North East region. NW have worked with Hartlepool Council to develop an SFRA by providing information on known flooding areas in the Borough. We fully support paragraph 7.24 which states that surface water drainage must be considered for development as well as the effect on existing sewers and watercourses and that this must form part of the flood risk assessments. It is also pleasing to see the Council continues to encourage the use of SuDS throughout the document. We support the general message behind policy CC2 however the paragraph, which states: "Where relevant the sequential approach should be applied within individual sites and through a detailed Flood Risk Assessment demonstrating how the development will make a positive contribution to reducing or managing flood risk and surface water drainage. To manage surface water drainage and to reduce surface water run-off and sewer flooding from the development the use of SuDS will be actively encouraged" However, it does not, we feel, give a strong enough statement regarding the Council's intentions to manage flood risk within the Borough. This is further evident in the Council's approach to the use of SuDS within the policy. We believe that the words "actively encouraged" should be replaced with a far stronger statement of intent making SuDS a requirement to all new development sites. The wording in the policy is somewhat contradictory to the wording used in paragraph 8.35 which states "All new housing sites will be required to incorporate SuDS." This is a much stronger and more positive statement that we would prefer to see be used within policy CC2 also but we encourage this statement at 8.35 to be revised to include "all employment and industrial sites" as well.	Support welcomed. The wording in Para 3 of Policy CC2 has been changed as follows: Replace 'will be actively encouraged' with 'will be required. ' The wording referred to in the representation has been changed to 'all housing, employment and industrial sites'

CC2: Reducing and Mitigating Flood Risk – Policy

Company	Unique Ref	DP Ref	CC2 Flood Risk	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY CC2 REDUCING AND MINIMISING FLOOD RISK We support the policy that developments should be only in areas of low flood risk and to avoid exacerbating the problem in adjoining areas.	Noted.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports this policy and welcomes the reference to it in HSG4 The South West Extension Strategic Housing Site. It is particularly important that the development of the South West Extension while avoiding the flood plain itself does not increase the risk on the existing low lying properties alongside Greatham Beck.	Support welcomed.
Environment Agency	LP0031	DP0190	In light of the above comments we do, however, support Policy CC2: Reducing and Mitigating Flood Risk in its overall aim to focus development in the lower flood risk areas. It should also be noted that flood risk on any land allocated for development should be managed by aiming to develop those parts of the site at the lowest risk of flooding, where possible, to ensure development is not at an unacceptable risk of flooding. Foul and Surface Water Management We are in support of Policy CC2 in respect of encouraging the management of surface water drainage and reduction of surface water run-off and sewer flooding from developments through the use of Sustainable Drainage Systems (SuDS). However, we would wish to see a more robust statement within the Local Plan in regard to surface water drainage, which could reflect the following wording: 'Surface water from all development must be managed to ensure no increase in flood risk both on site and elsewhere. Drainage will be handled in accordance with the drainage hierarchy and where possible, we would look for development to assist in reducing flood risk downstream.'	Noted. Noted. Model policy wording provided by Northumbria Water used to update policy – this point is covered in the changes.
Resident	LP0236	DP0202	• 7. 19 to 7.24 More house built means less soak always. More hardstanding ground means more impact on local sewerages means more stress on Burn valley beck which flows from Dalton Piercy to Colwyn Road. Which over flows and floods in the Burn Valley? Which is surround by	Each site will be assessed on a case by case basis and discharges from each site will be as a minimum equal to the current situation. With regards to the smells from the sewage systems these instances need to be reported to Northumbrian Water for further investigation.

Company	Unique Ref	DP Ref	CC2 Flood Risk	Planning Policy Response
			Terrace homes which could be flood which makes it impossible to insurance your homes against flood risks which people have lived in these homes for a number of years who have brought up they family's. The Burn Valley Beck joins the town sewerage system in York Road neat Burn Valley round about which stinks and full of rats and gets reported by residents which is ignored and residents go to the quartile south meeting and bring it up then we get Beck clean out if we lucky. The sewerage system sinks (like rotten eggs) across the whole town and Notting has been done about it.	
Northumbrian Water	LP0241	DP0207	Overall, whilst there are some positive elements to policy CC2 we feel the policy in its entirety is insufficient in its current form. The wording is inadequate and creates uncertainty around the intentions of the Council to manage flood risk. We have worked closely for several years with a number of other Local Authorities across the North East region to produce comprehensive flood risk and water management policies which are explicit and directional in their purpose and seek to achieve national policy requirements. We propose some revised wording for policy CC2 below and encourage the Council to fully consider this. We are happy to meet with policy developers to discuss this in more detail: Revised Policy CC2 The Borough Council will seek to ensure that development will be focused on areas of lower flood risk where possible, that is Flood Zone 1. In areas of higher flood risk the extent and impact of flooding will be assessed and reduced by requiring developers to provide evidence that the sequential and exceptions test can be passed where appropriate. All new development proposals will be required to demonstrate how they will minimise flood risk to people, property and infrastructure from all potential sources by: a. Avoiding inappropriate development in areas at risk of flooding and directing the development away from areas at highest risk, applying the Sequential Test and if necessary the Exceptions Test, in accordance with national policy and the Hartlepool Strategic Flood Risk Assessment. Site Specific Flood Risk Assessments will be required in accordance with national policy; b. Ensuring that the development will be safe over its lifetime, taking	Noted and policy wording updated to reflect the comments.

Company	Unique Ref	DP Ref	CC2 Flood Risk	Planning Policy Response
			account of climate change, will not increase flood risk in vulnerable locations elsewhere and where possible, will reduce flood risk overall; c. Assessing the impact of the development proposal on existing sewerage infrastructure and flood risk management infrastructure, including whether there is a need to reinforce such infrastructure or provide new infrastructure; d. Ensuring that development proposals are resilient to flood risk, in accordance with national policy and the findings and recommendations of the Hartlepool Strategic Flood Risk Assessment; e. Requiring that all development proposals include provision for the full separation of foul and surface water flows; f. Ensuring that development proposals separate, minimise and control surface water run-off, with Sustainable Drainage Systems being the preferred approach. i. Surface water should be managed at source wherever possible, ensuring that there is no net increase in surface water runoff for the lifetime of the development. Surface water should be disposed of in accordance with the following hierarchy for surface water run-off: *to a soak away system, unless it can be demonstrated that this is not feasible due to poor infiltration with the underlying ground conditions; *to a watercourse, unless there is no alternative or suitable receiving watercourse available; * to a surface water sewer; * disposal to combined sewers should be the last resort once all other methods have been explored. j. Where Greenfield sites are to be developed, the surface water run-off rates should not exceed, and where possible, should reduce the existing run-off rates. Where previously developed (brownfield) sites are to be developed, surface water run-off rates should seek to achieve greenfield equivalent run off rates or be reduced by a minimum of 50% of the existing site run-off rate	

Section 2 of the Consultation Statement, covering:
Infrastructure

- Policy INF1: Sustainable Transport Network
- Policy INF2: Improving Connectivity in Hartlepool
- Policy INF3: University Hospital of Hartlepool
- Policy INF4: Community Facilities
- Policy INF5: Telecommunications
- Policy INF6: Renewable and Low Carbon Energy Generation
- Policy INF7: Strategic Wind Turbine Development
- Policy INF8: Large Scale Solar Photovoltaic Developments

Preamble to Policy INF1: Sustainable Transport Network and Policy INF2: Improving Connectivity in Hartlepool

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	Option 8.1 A viable solution must be sought to ensure traffic within the town area is allowed to flow – already saturation point has almost been reached. Option 8.4 Improvements must be made particularly to ensure movement westwards in the Borough. Option 8.9 Improvements including widening of the A179 are necessary to improve access outwards in both north and south directions on the A19 and the A19/A179 Junction requires improvement. Option 8.19 An improvement to movement between the Headland and the central area via the Marina could be made by re-introducing a ferry – this combined with cycle use could make a difference especially at peak times. Dalton Back lane is used as an access road from the A19 and from one part if the town to another as well as a well used cycle route - improvements need making to its junction with the A689 and Greatham, irrespective of its use or not by the south-west extension.	Localised solutions will be implemented where practical to improve traffic flows, particularly at key junctions. The proposed Elwick by-pass and grade separated junction on the A19 will help to improve traffic flows west for Hartlepool and will relieve congestion at the A179 and A689 junctions on the A19. A signalised scheme is to be introduced at the A19/A179 junction to improve capacity and traffic flow. Dualling of the A179 is also a longer term aspiration. The idea of a ferry has been made in the past and is certainly an option that the Council would consider/support if a viable proposal was put forward. The Borough Council acknowledges that there

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
				may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
				50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Park Residents Association	LP0014	DP0187	Residents support the majority of options within Section 8 but again stress the need , identified in 8.10, to overcome the issue of congestion and inadequate road infrastructure within the Town itself. We reiterate our concern that the new A19 junction, High Tunstall Development and planning permissions already granted within the West Park area will put too much strain on the current road network and lead to safety issues. A robust solution MUST be found to alleviate the problem of over capacity within this road network and the junctions at Wooler Road /Park Road / Elwick road and Tarnston Road / Hart Lane. We fully support Option 8.13 and would welcome a bus route which would give our members access to the facilities within the town. Members have expressed their concern that the new junction at Greatham / South West Extension / Dalton Back Lane does not overcome the safety issues recently highlighted by the tragic death of a local cyclist. Now would be a good time to alter the access to the South West Extension in order to improve this.	Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
				improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made. The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260

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				dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police
Historic England	LP0044	DP0213	Page 33, Transport and Connectivity: We welcome the commitment to reducing carbon emissions, and to promote a modal shift from the private car. All types of transport schemes and measures can have a potential impact on the historic environment, whether directly or indirectly. This can range from the direct impact of land take associated with major new road	Historic England's support for measures to reduce carbon emissions and promote a modal shift from the private car is welcomed. The impact of traffic and transport on historic assets is clearly of concern. The Local Plan also includes policies specifically aimed at protecting and enhancing the historic

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			schemes and improvements to the existing road network, to the introduction of traffic management measures and their impact on the character and appearance of historic townscapes and landscapes. There may also be opportunities to re-use heritage assets, for example historic routes or bridges. There is more advice on our website at https://historicengland.org.uk/advice/planning/infrastructure/planning-and-transport/ , including links to our advice on assessing the impact of road schemes on the historic environment, and advice on street design. Historic England has also produced guidance on the manner in which streetscapes and public open spaces are designed and managed. This is available at https://content.historicengland.org.uk/images-books/publications/streets-for-all-north-east/north-east-streets.pdf/ .	environment. The Council will consult Historic England where appropriate and refer to relevant guidance.
Resident	LP0046	DP0001	There is mention in the report of bus priority - and the map shows one bus priority route. Its not clear to me why only this one route is proposed and the basis for he selection of the marked route. Whilst there are several references in the plan to the transport interchange, it appears to be a "hope" that bus and coach companies will use it. I think action should be taken to make use of the interchange compulsory for coaches (too many still drop off and pick up at locations such as the Grand Hotel or outside the College). And a truly integrated transport facility would mean at least one bus route through the town included a stop at the railway station.	The bus priority route is a Super Core route which carries the majority of the towns buses on a 10 minute frequency. The route runs through a large proportion of the areas with historically low car ownership rates which gives the operators confidence it will be a viable service. Unfortunately the Local Authority is unable to make the bus operators use the interchange although we do try and encourage them to through not charging companies to use it (in many towns companies are charged to use interchange facilities). At present the Scarlet Band bus uses the interchange and when the South West Extension development has 51 occupied properties a new subsidised service from the SWE will run and use the interchange.

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
Resident	LP0048	DP0004	The proposed plans to ease congestion on the A19/A689 section will not work. The pinch point is the Tees crossing and any efforts on improvements that do not address this issue will fail to improve the current situation. Increased public transport will not ease the issues because the developments in the area do not attract people who will use the public transport systems. Therefore investment in public transport in Wynyard will be a costly failure. Cycle paths are a welcome development as a social amenity, but they will not reduce traffic congestion in any area	There is clearly a capacity issue on the Tees crossing at certain times which causes queuing on the A19. The Tees Valley Combined Authority and the local authorities are actively looking at ways to address this problem which may include a new crossing of the R. Tees. In the shorter term Highways England has secured to widen the A19 to 3 lanes in each direction between Wynyard (A689 junction) and Norton. It is accepted that encouraging more use of public transport is difficult, particularly in areas of high car ownership. Initially a bus service to serve Wynyard will be provided through developer contributions but maintaining a service in the longer term does depend on it being well used. Journeys to work by cycle will probably always form a small percentage of total journeys but the provision of safe, good quality cycle routes is essential to encourage an increase in cycling.
R Newcomb & Sons	LP0054	DP0011	Our client's site is in close proximity to employment zones therefore allowing for sustainable transport to resident's places of work. Re-development of the site will be both sustainable and appropriate.	Whilst we agree that in purely locational terms, your site is sustainable, it is the close proximity to the bad neighbour uses area at Sandgate Industrial Estate and the former use of the site and adjacent land as a landfill area that means that the site is not appropriate for housing.
Resident	LP0083	DP0041	The possibility for an improved link to the A19 is not before time. The two junctions allowing access to the A19 and vice versa have caused many accidents. The bypass around Elwick would be helpful to the people from	Support for the Elwick bypass and new junction on the A19 is welcomed. Some improvement to Elwick Road between the

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			Elwick and Hartlepool. However the new road system will join the present rural road slightly after Devils Elbow. My wife and I were under the impression that very little improvement will be made to this rural road. However a weight restriction would be put in place hopefully to restrict heavy vehicles. There will be a major increase in vehicles at the new junction since traffic will tend to leave the A19 at the new junction instead of preceding upto another very busy exit at Sheraton. Similarly traffic from the north will tend to go to the new bypass. This means that the traffic flow will increase past High Tunstall School and of course the junction at Wooler Road/Elwick Road. At present school drop off and collections are very busy on the verge of dangerous with the amount of cars trying to get in and out of the school. There would appear that the traffic problem will be transferred from the new A19 Elwick junction to the High Tunstall School and Elwick/Wooler Road junctions.	start of the new by-pass and Hartlepool is likely to be required. A weight restriction of 7.5 tonnes is planned for the new junction and by-pass. Concern regarding potential traffic issues around High Tunstall and the Elwick Road/Wooler Road junction is noted. The Local Infrastructure Plan also assesses the impact of developments at existing junctions around the town and where possible improvements will be secured. In terms of the Wooler Road/Elwick Road junction some improvements have been secured as part of the Tunstall Farm planning permission. These include clearer/improved road markings to prevent waiting vehicles from hindering other vehicle movements, the provision of sensors at the pedestrian crossing and an additional pedestrian crossing at the White House hotel. Further work is ongoing to assess whether further improvements can be made.
Resident	LP0096	DP0054	New roads need to be carefully considered, surfaces close to residential areas to have quiet tarmac, widening of 'A roads' more cost effective, perhaps a new road south of Elwick or Dalton as in winter a northerly road could have a problem in adverse weather.	The Council will seek to ensure that road surface materials are as quiet as possible, especially near residential areas. Gritting will be undertaken to keep traffic running during periods of adverse weather.
Resident	LP0204	DP0162	Improvement of safety and quality of road network A689 not to be made worse by traffic lights at Claxton Bank as suggested. This would make road more dangerous and hazardous especially in bad weather when traffic stops and then starts on slope due to traffic lights changing especially as	Improvement of safety and quality of road network A689 not to be made worse by traffic lights at Claxton Bank as suggested. This would make road more dangerous and

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			traffic goes dangerously fast at very busy times 7 – 10am and 3.30 – 6.30pm. Traffic even now going too fast goes through red at Sappers Corner. When there is hold up of traffic due to road works/accidents on A689 or A19 traffic will use Greatham as a rat run to bypass traffic lights making a danger to people living in Greatham as traffic speeds through and making it difficult to get out of drives etc onto road. There should be another route connecting South West Extensions and New Tunstall estate to join Dalton Back Lane.	hazardous especially in bad weather when traffic stops and then starts on slope due to traffic lights changing especially as traffic goes dangerously fast at very busy times 7 – 10am and 3.30 – 6.30pm. Traffic even now going too fast goes through red at Sappers Corner. When there is hold up of traffic due to road works/accidents on A689 or A19 traffic will use Greatham as a rat run to bypass traffic lights making a danger to people living in Greatham as traffic speeds through and making it difficult to get out of drives etc onto road. There should be another route connecting South West Extensions and New Tunstall estate to join Dalton Back Lane.
Middlesbrough Council	LP0209	DP0168	It is noted that the Plan outlines the need for some key areas of infrastructure, which includes a new bypass to the north of Elwick Village and a new grade separated junction at the A19 to create a 'third' main access point into Hartlepool. It is also noted that the retail strategy is to continue to protect the town centre in order to ensure its vitality and viability and support priorities for that area. Along with ensuring the hierarchy of retail and commercial centres are maintained, and enhanced.	Noted.
Resident	LP0217	DP0179	7) Sustainable Transport Network INF 1/2 - it is understood that work on the proposed Elwick bypass may start 2017/18 and take approx 2 years to complete. Until its completion, it is further understood that no development at High Tunstall would be allowed. It is hoped that this will be enforced. What possible justification can there be for the proposed link road between approved housing development at South West Extension and	Highways England has issued a Direction that effectively prevents any further planning applications for housing from being approved until the Elwick bypass and its associated infrastructure is complete. The need for this link road will be kept under

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			proposed development at High Tunstall, save to provide a north-south rat run/shortcut (ie avoiding Catcote Road and Elwick Road) between these proposed residential areas? The need to provide improved connectivity between Hartlepool and the TV and the rest of the NE Region is hardly a major requirement. The existing road access to and from Hartlepool, from north and south, is perfectly satisfactory, with very limited rush hour windows, and unlikely to change significantly as a result of the anticipated business and domestic developments, within the foreseeable future. An expensive and time-consuming full Transport Assessment might, eventually, demonstrate otherwise, but should not be a high priority. To improve the frequency and quality (brand new rolling stock?) of the rail network is yet another "nice to have" rather than a necessity.	review. Currently it is considered that it will improve traffic flows and increase access options for new development. Good connectivity and transport links are a key element in encouraging further inward investment and economic growth. Developers will be looking to see that existing capacity issues on both the road and rail network are being addressed and that plans are in place to address potential issues over the 15 year period of the Local Plan. An improved frequency on the coast rail line will have benefits for many existing rail users and will encourage increased use of the service. Any 'new' rail stock is likely to be cascaded rather than be brand new.
Story Homes	LP0219	DP0181	Story Homes broadly supports the general aims and principles set out in Section 8. In particular, we promote the effective engagement of key partners, stakeholders and other local authorities to ensure that an effective, efficient and sustainable transport network reduces the need to travel. As a minor point, we also suggest that the last paragraph of 'INF2: Improving Connectivity in Hartlepool' should be better punctuated as the first sentence should have a comma after 'development.' As a general point, we also strongly suggest that the Council includes references to ensuring viability in the context of seeking financial contributions in Policy INF2, INF3, INF4 and INF5. This approach will seek to ensure that obligations are only sought where practical, viable and related in size and scale to development proposals. Story Homes support this approach to these types of policy as it ensures that they are drafted in line with the requirements set out within paragraph 173 of the NPPF which seeks to ensure	Support noted. The Council's approach to financial obligations/planning obligations is set out in Local Plan policy QP1. This policy includes 'highway infrastructure and sustainable transport measures'. The Council will only

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			viability and deliverability in both plan-making and decision-taking. This approach will ensure that future development proposals are not threatened by disproportionate obligations and policy burdens. It is also of paramount importance that the Council's policies which seek monetary contributions from development proposals are robustly underpinned by a detailed Infrastructure Delivery Plan. Story Homes reserves its judgement to review the IDP in greater detail going forwards to ensure that the Local Plans infrastructure requirements are adequately addressed and avoid adversely impacting the development industry. Lastly, and in addition to the above, the Council should also undertake a robust Area Wide Viability Assessment to ensure that once these proposed policies are in place development sites remain viable for the duration of the plan period. This would include the cost associated with affordable housing, planning obligations, necessary infrastructure provision and any other costs in policies relating to design, renewable energy etc. Story Homes reserves its judgement to review the Area Wide Viability Assessment in detail going forwards.	seek planning obligations where these are necessary to make a development proposal acceptable in planning terms. Where appropriate viability will be taken into account through a viability assessment.
Resident	LP0220	DP0182	The impact of the High Tunstall development will not be mitigated by the provision of an improved link to the A19 at Elwick. This will only address journeys going out of the town. There are already significant traffic bottlenecks coming into to the town which need to be addressed before there is any more development. For instance at the following: Wooler Road / Elwick Road junction. Tarnston Road / Hart Lane junctions. I agree with proposals for a safe network of footpaths and cycleways, and believe it is particularly important to address the severance issues caused by the A689 in the town centre.	Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
				to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made. Support for the footpath and cycle way networks is noted. The problem caused by the A689 in the town centre is one that the Council is seeking to address through further traffic management measures.
Resident	LP0230	DP0194	Section 8.11 should reflect the need for work on the Elwick Road and Wooler Road junction.	See response to above comment.
Brenda Road Holdings Ltd	LP0244	DP0212	We note the plan's requirement to safeguard land around the B1277 (Brenda Road) and would welcome the improvement of road transport links in the area. We also note plans for the improvement of the bus and rail network within Hartlepool and support the work of the Tees Valley Bus Network Improvement scheme. There is certainly scope to improve the bus services that pass along Seaton Lane and would welcome plans to improve the public transport links from Seaton Carew into the centre of Hartlepool. We also welcome the plans to create a network of footpath and cycle	Support for road improvements and public transport enhancements is noted and welcomed. A green infrastructure master plan has been developed for the Golden Flatts area and improved cycle and footpath links towards Seaton Carew is an issue that is being addressed.

Company	Unique Ref	DP Ref	INF1 and INF2 Preamble	Planning Policy Response
			schemes, particularly the scheme to develop cycle routes through the Golden Flatts site which is a short distance from the Brenda Road site. We would further suggest that cycle and footpath links be developed from the Golden Flatts site towards the coast at Seaton Carew.	
Durham County Council	LP0246	DP0215	A19 road improvements The road improvements suggested at Elwick are welcomed given the Sheraton junction has had three fatalities in the last six years. It is considered that the necessary improvements to the A19 should be made before there is any increase in traffic consequent on new housing.	The A19/Elwick junction improvements will need to be in place in advance of any significant housing completions.
Middleton Grange Shopping Centre	LP0265	DP0240	In 9 and 13 I can't see any reference to cycle parking facilities I can't see reference to car charging The pay and display system of parking in a town centre is a dated one and reference to the review of this should be included. Pay and display thwarts the fluid and sometimes unplanned nature of shopping by keeping shoppers' spending to a time limit	Cycle parking is an element of a package of sustainable transport measures. As part of a strategic approach to sustainable transport the Councilwill work closely with all key stakeholders to include cycle parking facilities where appropriate. Cycle parking is specifically referred to in policy QP3. Policy INF1 does refer to the need to provide vehicle charging points. The pay & Display system is largely beyond the scope of the Local Plan but clearly does have an impact on shopping patterns and movements. The Council will keep the current system under regular review.

Policy INF1: Sustainable Transport Network

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
Fens Residents Association	LP0011	DP0010	The Staggered Junction on the A689 (Dalton Back Lane/Greatham) Ever since the concept of a SWE was first mooted FRA has urged that this notoriously dangerous junction should be converted into a safe, signal controlled crossroads, which would also serve as the southern entry/exit to the estate. This junction has been the scene of fatalities in the past, the most recent being in 2012, and serious injuries occur all too often. Disruption following vehicle damage only is commonplace. Before the October 2015 Planning Committee Meeting a map provided by Persimmon showed the straightening of the crossroads, albeit in addition to a new and unnecessary junction. This map also reflected the reduction in the number of houses for the SWE from 2750 to 1260. Approval was given to an application which leaves the staggered junction as it is. A 50mph limit will do little to help! A golden opportunity to prevent future accidents and fatalities was missed. It is imperative that this is corrected. These comments are supported by Policy QP3, INF1 AND INF2.	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50

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				mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Hartlepool Civic Society	LP0013	DP0231	We support POLICY INF1 3) realistic alternatives to travel by private car 8) improve quality and reliability of bus services 9) improve frequency and quality of rail services, etc. Sufficient space is required to ensure that no developments are permitted which would prevent road and rail schemes from going ahead in the future.	Support noted and welcomed.
Park Residents Association	LP0014	DP0187	Residents support Policy INF1 3) realistic alternatives to travel by private car 8) improve quality and reliability of bus services 9) improve frequency and quality of rail services etc.	Support noted and welcomed.
Campaign to Protect Rural England	LP0015	DP0199	CPRE notes the provisions for sustainable transport throughout the Plan. Clearly, CPRE supports such proposals and welcomes the Preferred Options with regard to cycle routes etc.	Support noted and welcomed.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Infrastructure policies asset out in the Local Plan. We would urge the Borough Council not to allow any new developments on the urban fringe to be occupied until new infrastructure roads are built, to take traffic away from the rural villages, and public transport is available to those living in rural	Support welcomed. The Elwick bypass and new junction on the A19 will need to be complete in advance of any significant housing completions on sites at the edge of the urban area.

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			communities, to enable then to access health and other professional services, education, leisure and retail facilities.	
Greatham Parish Council	LP0018	DP0167	Serious concerns remain regarding the proposed new access from the A689 which will add new junction on the A689 and hinder the smooth flow of traffic on the main access into Hartlepool. The existing staggered junction nearby that provides access to Greatham Village and Dalton Back Lane is already considered to be dangerous. The extra flow of traffic from the large new development can only serve to exacerbate the dangers. Dalton Back Lane will become a rat run linking to the A19 via an equally if not more dangerous junction near Dalton Piercy. It is a most unfortunate wasted opportunity for the new South West Extension development not to use the existing junction for access thus improving safety for new and existing residents and users. Should the new access remain then improvements must be sought for the existing staggered junction which is essential to the village of Greatham. The junction is part of the main bus route between Hartlepool and Teesside. Greatham is extremely fortunate to be served by this route which is greatly valued and enhances the sustainability of the village. The route relies on access via the junction with Dalton Back Lane. Greatham Parish Council welcomes a greater emphasis placed on more convenient routes aimed specifically at pedestrians and cyclists. For example to access Queens Meadow Business Park from Greatham (the West) on foot or bicycle one has to walk past most of the existing premises on Queens Meadow and gain access via the vehicle entrance. No footpath or cycle access has been provided nearer to Sappers Corner for the existing cycle and foot paths. The Parish Council would wish to see a cycle and foot bridge at Sappers Corner (part of national cycle route 14) providing a secure and safe crossing between the village and South Fens. This would hopefully also link to the South West Extension proposal at Claxton. The current pedestrian traffic light crossing requires a diversion from	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50

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			the direct route which is regularly avoided and people prefer to press the button intended for cyclists to cross. It is worth pointing out that village children attend senior school in Hartlepool and if they miss the bus or have out of school activities they need to walk via this crossing. Proposed improved non-vehicular routes to Wynyard along the A689 would also be able to use a bridge at Sappers Corner. The Parish Council would particularly welcome an improved cycle and pedestrian route through Greatham village to the Tees Road accessing employment sites and beyond to Saltholme and Middlesbrough (via the Transporter Bridge).	mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Wynyard Park	LP0027	DP0223	Highways Impacts Wynyard Park notes that in being aspirational, a plan also has to be deliverable and consistent with national policy. As such, it has appointed highways consultants Aecom to undertake modelling which has assessed the highways impact of Wynyard Park's development aspirations in Hartlepool and Stockton. A technical note explaining the findings of this modelling work and the mitigation that is necessary in order to accommodate this quantum of development is appended to this document. The note concludes that the development aspirations can be acceptably accommodated with mitigation and would not result in a "severe" traffic impact (NPPF paragraph 32). Through the Local Plan it is available for the Council to secure the mitigation required and thus facilitate the delivery of the development aspirations – this is entirely a reasonable and sound approach. It would be wrong, for example, to suggest that the proposal could not be found sound and allocated as there was insufficient highways capacity today when plan-making requires a longer-term view on what is achievable and deliverable over the plan period. The reference to the need for highways improvements on	Comments noted – the Borough Council will continue to work closely with Highways England , Wynyard Park and all relevant consultants to ensure that road infrastructure is in place to serve developments in the Wynyard area and does not create capacity issues on the surrounding highway network.

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			paragraphs 8.5 and 8.6 is noted. The accompanying technical note from Aecom demonstrates the principles of the likely mitigation required in order to deliver additional growth at Wynyard Park (please see this attached). Where baseline capacity issues are identified, it is not necessary to be able to demonstrate capacity at day one, rather, the need for mitigation measures can be taken into account within policy wording to ensure that the infrastructure is provided to deliver the housing growth associated with that allocation. It is requested that draft Policies such as HSG6 could be amended to reflect this and to allocate additional development.	
Highways Agency	LP0029	DP0196	It is noted that this policy is generally consistent with previous Core Strategy Policy CS3 Strategic Transport. Highways England is generally supportive of the aims of the policy, to support sustainable economic growth, provide an effective and efficient sustainable strategic transport network, ensuring that new development contributes towards the delivery of sustainable transport whilst reducing the need to travel, particularly by private car. The provision of a public transport interchange in the town centre, improvements in rail and bus services and other sustainable modes such as walking and cycling are particularly supported. The policy states a commitment to working with partner organisations to provide a sustainable strategic transport network, which we fully support. We welcome the reference in Para 8.11 to the modelling previously undertaken by Highways England to assess the implications of the development proposals in the Plan on the SRN. While some reference is made to the element of that analysis that considered High Tunstall, that analysis only sought to offer initial consideration of development influences at the SRN at the stage of different options being explored. The outcome of that analysis was an identification of the trip impacts at various locations of the SRN and	Support noted and welcomed. The Council will continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network.

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			clearly identified the need for further assessment. In relation to High Tunstall and the identification that it would require further assessment of potential impacts, the Plan further states that the impact of the High Tunstall development will be mitigated by the provision of an improved link to the A19(T) at Elwick, including a bypass to the north of Elwick village and a grade separated junction on the A19 itself at the northern Elwick access. We have therefore provided further comment regarding the scheme in response to Policy INF1: Sustainable Transport Network and the Local Infrastructure Plan. However, for the avoidance of doubt and as set out in the supporting paper (Hartlepool Local Plan – an evidence base) that accompanies this response, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	
Persimmon Homes (Teesside)	LP0045	DP0209	Policy INF1: Sustainable Transport Network Persimmon Homes generally support the priorities outlined within Policy INF1 to deliver an effective, efficient and sustainable transport network. However, we strongly consider that further emphasis should be placed upon the need not only to improve local transport links 'in Hartlepool' but also those at the strategic level affecting cross boundary issues. For significant, sustainable, long term growth to occur and be maintained a strategy should be outlined to improve strategic networks over the plan period in order to maximise the	The Borough Council works closely with Highways England, transport operators, and the Tees Valley Combined Authority to improve cross-boundary transport links and links with the rest of the North East and beyond. Initiatives planned are under investigation include the introduction of an improved service frequency on the coast rail line through Hartlepool and improvements on the A19 as part of the 'Expressway' concept.

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			opportunities for growth within the borough. This will provide potential developers, investors and landowners with the confidence that the council will not sit back and await a solutions to the ongoing A19 capacity issues but proactively lobby central government and the Highways England for a reasonable and timely resolution so that the town has the freedom and ability to grow and expand to the ever changing and evolving needs of business. Persimmon Homes believe that such a commitment from the council is essential if the borough is ever going to achieve its economic aspirations.	
Resident	LP0058	DP0015	My observations relate to the Transport Network specifically the buses. Much reference in your document is made to sustainability, improvement to interchange facilities and connectivity, realistic alternatives to private car etc etc. All fine words but what is all the point of this unless we have integrated public transport ? Few buses use the Transport Interchange and until this is changed and a proper bus station established here which all buses use, all these words will be worthless. I would like to see a firm commitment by the Council to establishing a real Transport Interchange at the Railway Station together with proper facilities - shops, toilets etc - facilities that other towns locally possess already. Why is Hartlepool always behind the times ? This is the 21st Century and Integrated Transport is still nowhere to be seen in Hartlepool. The Local Plan should place a firm commitment on the Council to achieve this aim.	Unfortunately the Local Authority is unable to make the bus operators use the interchange although we do try and encourage them to through not charging companies to use it (in many towns companies are charged to use interchange facilities). At present the Scarlett Band bus uses the interchange and when the South West Extension development has 51 occupied properties a new subsidised service from the SWE will run and use the interchange.
Resident	LP0064	DP0021	The Local Plan Preferred Options document recognises the need for a “comprehensive, safe and well managed network of footpaths and cycle routes” but the document needs to be much more specific	The supporting text to policy INF1 in the Local Plan does provide some further detail on planned footpath and cycle routes. These include the Wynyard area,

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			particularly with regard to cycle routes. At the present time there are no safe cycle routes that connect the west of the town to the promenade that forms part of the National Cycle Route 14. The document needs to outline how the cycle network will allow safe journeys from all areas of the town.	Greatham Link, A689 between Billingham and Hartlepool, Golden Flatts, and the town centre. It is important for the Local Plan to have a policy which supports enhanced footpath and cycle way provision so that the Council is in a strong position to provide new links and importantly to ensure that developers will contribute to such links as part of new developments. The Council's Rights of Way officer and Sustainable Transport officer are always exploring opportunities to provide new routes or enhance existing ones.
Resident	LP0077	DP0035	Whilst it may be in the interests of safety to consider options for improving this junction consideration also needs to be given to access to and from Hartlepool via A689 & A19. It is becoming increasingly more difficult to leave or enter the town via the A689 due to the number of traffic lights installed in recent years along with the continuing increase in traffic volumes. Both Truro Drive and especially the Queens Meadow lights can cause delays that increase driver irritation, so perhaps leading to poor driving as the outcome of this frustration and increasing rather than decreasing the possible dangers. Planners can surely search out other options rather than simply installing yet another set of unintelligent lights. In Europe (dare one mention this?) there are stretches of road controlled by lights that are responsive to speed and only change to stop traffic that exceeds the limit. Can an intelligent solution not be sought or are we doomed to suffer yet further delays and constrictions by adopting 20th century solutions to a 21st century problem?	The Borough Council will seek to make use of the most appropriate traffic managements measures to ensure that delays are kept to a minimum.
Resident	LP0218	DP0180	Transport/Infrastructure/Elwick Bypass - proposed improvements in transport networks and road infrastructure must take place before any large scale developments such as High Tunstall are approved or	Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road

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			commence. The document refers several times to the proposed Elwick Bypass/graded junction being a third access into the town. However, the existing traffic junction at Elwick Road/Wooler Road/Park Road is already congested at peak times and will only get worse given the already approved developments of Tunstall Farm and Quarry Farm 1. Park Avenue is used to avoid this junction, not a road ever intended for heavy volumes of traffic. The proposed bypass should be principally to facilitate access to and from the A19 for residents in the local area, not as a route for commercial and heavy vehicles to access the town centre. If the proposed link road from the south west extension to the Elwick bypass goes ahead this will also encourage extra traffic to access the town centre via Elwick Road, thus putting extra pressure on the existing road network in the West Park area.	junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made.
Resident	LP0225	DP0188	The proposed building of 1200 new properties at High Tunstall, with the commensurate increase in traffic, concentrated on the small country lanes is going to have a huge negative impact on the road network and amenity value making cycling or walking along the road from Elwick to Hartlepool a very dangerous undertaking. I am aware that there is a proposal to build a by pass around Elwick village to mitigate the impact on the local road through Elwick from current, and traffic generated by the proposed housing at Tunstall. While I am fully supportive of the proposed by pass (page 38) , I feel very strongly that serious consideration be give to a combined footpath and cycle path running along side Elwick road from Tunstall	The Council is investigating a number of options for incorporating a safe cycle link as part of improvements to Elwick that are necessary as part of the bypass and new access point on the A19. The Council is committed to improving footpath and cycle links throughout the Borough and where appropriate will seek contributions from developers to secure new links or improve existing ones. The Council is also working closely with the Tees Valley

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			to Elwick village and a link to the west of the A19 safely connecting communities in rural areas. The combined path works very well along Seaton Carew promenade be it on a much larger scale, and for greater numbers of people. The provision of a safe link from and to Hartlepool would enable local residents to safely commute to work, school and health appointments etc by cycle or on foot, thus reducing some of the car journeys and help to reduce CO2 pollution. A safe route would encourage residents to walk or cycle that at present with the current volume and speed of the traffic is suicidal (ask Tony Davison), this will become more dangerous with increased volume.(9.20 page 59). To access amenities in Hartlepool or to meet with friends, teenagers and young adults have to rely on parents and friends to transport them using the car as it is too dangerous for them to walk or cycle and the public transport is very limited. Elwick needs the same access that Hart has, the footpath from Hart to Clavering benefits the residents and the local business and is well used. This is an opportunity for Hartlepool Council to improve the health and wellbeing of resident by improving the opportunity to exercise and improve the air quality. Also promote the governments cycle to work scheme which has been implemented to encourage employees to cycle to work, and tax free bikes for work through the Governments Green Scheme. Walking for health, Local Government Walking Initiatives and Get Active Get Healthy. There is a safe network of footpaths across open country side around Elwick with a link to Hartlepool which should prove popular with those residents wishing to take a relaxing walk, view natural habitat and walk their dogs on a lead. The rural paths will be improved if my suggestion is considered as it will open up access to the west of the A 19 by linking current rights of way with the footpath/ cycle path at the side of the Elwick road and proposed by	Combined Authority to explore all potential sources of funding new sustainable transport measures.

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			pass. While I understand this would result in additional costs to the scheme, the benefits to the local community and proposed new housing development would be huge. The 'Governments shift cycling up a gear' expects Councils To up their game to deliver infrastructure that takes cycling into account from the design stage and this will be an opportunity to implement this recommendation. With Consideration of the costs from government grants, CCAG from the department of transport and 106 agreements .	
Network Rail	LP0250	DP0220	We would ask that the council includes the following policy within Policy INF1 or INF2: 1: The council has a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway or impact upon rail infrastructure. 2: Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; and 3: The developer should assess the impacts any development could have upon the railway infrastructure. We would ask that the council looks to include the above policy in the Local Plan.	Network Rail is consulted as a matter of course on the Local Plan and on all relevant planning applications. However the Council will consider including a strengthened reference to consultation either in the policy or supporting text.
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	5.0 Key Infrastructure Improvements 5.1 A key factor in the ability of the Council to deliver the level of housing development required over the Plan period in a sustainable way, through the sustainable western expansion of the town, is the	The comments from CM Yuill regarding the viability of housing developments are noted and the impact on viability will be assessed as part of negotiations during the development process. At present the Council does

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			construction of a grade separated junction on the A19 (T) at Elwick, together with improvements and realignment of Elwick Road including a bypass north of Elwick Village together with a realignment of Coal Lane. These major infrastructure works, which would create a third access into Hartlepool from the A19, would help to relieve the pressure of congestion from the A689 and A179 respectively through allowing existing and future residents to the west of Hartlepool to use this third access point. These works are identified as a priority in the Council's Local Infrastructure Plan (May 2016). 5.2 The Council have estimated the cost of these works to be between £14 and £18 million pounds and a bid has been made to the Local Enterprise Partnership for £18M of Local Growth Fund (LGF) money. However, the LGF money is effectively a loan which would need to be repaid through financial contributions from new development over the Plan period, with those sites that would be recognised as benefiting from the road improvements to the north-west of Hartlepool to be expected to contribute towards the cost of repaying this LGF funding. 5.3 Within the Local Plan Preferred Options the proposed allocations at High Tunstall, Elwick Village and Hart Village would realise a total of 1,285 units. It is the Council's intention to pro rata any potential financial contribution against the number of dwellings per site. In light of this, and on the basis of an overall housing delivery of 1,285 dwellings on sites that are considered will benefit from these major infrastructure works, this equates to just over £14,000 per dwelling. This would effectively mean that the following contributions to the construction of the grade separated junction and bypass will be broken down as follows; High Tunstall (1200) - £16,800,000, Elwick Village (35) - £490,000, Hart Village (50) - £700,000.	not intend to identify further significant housing allocations as part of the Local Plan.

Company	Unique Ref	DP Ref	INF1 Sustainable Transport Network	Planning Policy Response
			5.4 The potential financial contributions highlighted above, required from the draft allocations within the Plan, are extremely significant and it is considered that such levels will bring into question the overall viability of each site which, in turn, will impact upon the ability of each site to deliver affordable housing which is already considered to be a significant issue within the draft Plan, as highlighted in Section 4. The sites subject to a draft allocation at Wynyard Park will not be liable for any form of contribution to these major infrastructure works. 5.5 In light of the above it is the firm view of Cecil M Yuill Ltd that, in order to provide comfort on the part of the Council that £18M of Local Growth Fund money can actually be repaid over the Plan period, whilst still being able to delivering the market and affordable housing numbers required, additional housing sites need to be allocated which can bring forward development in a sustainable manner whilst making a significant financial contribution to the overall cost of the grade separated junction. This will assist also in resolving the level of contributions likely on the other draft allocations thereby improving viability and the ability to deliver both market and affordable housing.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Policy INF2: Improving Connectivity in Hartlepool

Company	Unique Ref	DP Ref	INF2 Improving Connectivity	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY INF2 IMPROVING CONECTIVITY IN HARTLEPOOL The proposed link road between the approved development at the south-west extension and the proposed developments at High Tunstall, is shown as a circuitous route – as it stands – this is pointless and it will be out of date before it is actually constructed. It also has the potential to become a dangerous 'rat run'.	It is important that this link road does not act as a 'by-pass' to the west of Hartlepool. Measures will be put in place to minimise its use as a potential through route.
Greatham Parish Council	LP0018	DP0167	Repeating above the Parish Council would wish to see a cycle and foot bridge at Sappers Corner (on national cycle route 14) providing a secure and safe crossing between the village and South Fens. The Parish Council questions whether sufficient land is being set aside for the suggested road which would link the development at High Tunstall to the A689. If this should ever become a reality it would appear the current suggested meandering route through the housing estates would be entirely insufficient and lead to a reducing quality of life of residents of any new housing along the route. The improvements to the A179 are welcomed as an alternative route into Hartlepool to the A689. This could also reduce the amount of traffic travelling through the centre of town to reach the marina and headland areas. The widening would need to be supported by improvements to the A179/A19 junction.	The new access to the SW Extension from the A689 will include safe crossing facilities for cyclists and pedestrians. A footbridge could only be provided if funding was made available. The link between the SW Extension and High Tunstall should not become a through route and measures will be taken to ensure it does not have an adverse impact on nearby housing.
Highways Agency	LP0029	DP0196	It is noted that this policy is generally consistent with previous Core Strategy Policy CS4: Improving Connectivity. We continue to be supportive of the policy and the provisions that seek to maximise access to sustainable transport. We support the use of legal agreements and conditions to facilitate improvements to the road network and the safeguarding of land for the proposed road and rail schemes. It is noted that the schemes identified are generally consistent with the previous Core Strategy schemes, however we welcome that the A19 North Burn Access scheme has been	The comments are noted and the Council and the Council will continue to liaise closely with Highways England (HE) to ensure that the Local Plan provides sufficient evidence to enable HE to undertake a robust assessment of the Plan's policies and proposals.

Company	Unique Ref	DP Ref	INF2 Improving Connectivity	Planning Policy Response
			removed, given the site is no longer being promoted in the Plan, and was previously of significant concern for Highways England. The new junction on the A19 and the Elwick bypass were not identified in the previous Core Strategy and therefore as set out in the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, these have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. The policy identifies that road and other capacity improvements required during the plan period are set out in the Local Infrastructure Plan (LIP). The LIP recognises the need to tackle projected traffic growth on the SRN, which is seen as a potential constraint to economic growth, by utilising public transport and local road network improvements and demand management measures. The need for junction improvements and improved network management is required to unlock under-used capacity, alongside alternative infrastructure improvement measures such as bus, rail and other sustainable measures. Whilst the policy does not make any reference to the Tees Valley Area Action Plan (AAP), which during the preparation of the previous Core Strategy, was intended to examine the development proposals likely to come forward and the corresponding transport measures required to facilitate economic growth and mitigate potential detrimental impacts on the SRN, paragraph 5.16 to 5.19 of the LIP do detail the scope of this document. Further it identifies that the AAP is, 'currently undergoing further development work and the results of this are expected summer/autumn 2016' and, 'Initial feedback on the AAP has noted the benefits that the	

Company	Unique Ref	DP Ref	INF2 Improving Connectivity	Planning Policy Response
			proposed new junction on the A19 at Elwick and the bypass will provide', which will be reflected in future iterations of the LIP. We therefore welcome the intentions to update the AAP to consider the latest development aspirations for the Plan and the requirements of supporting transport infrastructure. Therefore, whilst our comments throughout our response to the schemes proposed are currently general in nature (as informed by the supporting paper (Hartlepool Local Plan – an evidence base) , we should be able to provide more detailed comment once the latest version of the AAP has been published and provides an evidence base that can be utilised to inform our view. Finally, we continue to support the requirement for new development proposals to be supported by Transport Assessments and Travel Plans.	
Resident	LP0075	DP0033	On The proposed Elwick Bypass to Coal Lane this will increase traffic onto Elwick Road, commuters travelling from the north to Hartlepool will not take(A179) Hart Bypass they will carry on to the Elwick Bypass ending up in Elwick Road. There are no proposals for the Elwick Road, Wooler Road junction which even at present can be a problem to exit these new proposals will only exasperate the situation	Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission

Company	Unique Ref	DP Ref	INF2 Improving Connectivity	Planning Policy Response
				– these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made.
Resident	LP0076	DP0034	On The proposed Elwick Bypass to Coal Lane this will increase traffic onto Elwick Road, commuters travelling from the north to Hartlepool will not take(A179) Hart Bypass they will carry on to the Elwick Bypass ending up in Elwick Road. There are no proposals for the Elwick Road, Wooler Road junction which even at present can be a problem to exit these new proposals will only exasperate the situation	On The proposed Elwick Bypass to Coal Lane this will increase traffic onto Elwick Road, commuters travelling from the north to Hartlepool will not take(A179) Hart Bypass they will carry on to the Elwick Bypass ending up in Elwick Road. There are no proposals for the Elwick Road, Wooler Road junction which even at present can be a problem to exit these new proposals will only exasperate the situation.
Resident	LP0096	DP0054	Improve bus services maybe smaller busses.	The Council is a member of the Tees Valley Bus Network Management Group which is continually looking at ways to improve the local bus services.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble to Policy INF3: University Hospital of Hartlepool and Policy INF4: Community Facilities

Company	Unique Ref	DP Ref	INF3 and INF4 Preamble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY INF3 UNIVERSITY HOSPITAL OF HARTLEPOOL Option 8.26 Accident and Emergency Services need to be provided in the University Hospital of Hartlepool – the services as they exist are not appropriate – apart from the obvious delay in care of the patients in ambulance transportation, there is a huge carbon footprint accessing North Tees Hospital. It should be remembered that the University Hospital of Hartlepool also services a wide area of south-east Durham in the Easington District. Consideration should be given to the creation of a 'helipad' in the grounds of the University Hospital of Hartlepool which could fly very urgent cases to the 'helipad' at James Cook Hospital. This could save lives especially when there are a number of occasions when the main roads are closed following road traffic accidents – the delay could be several hours especially if the accident were serious.	The Borough Council fully support measures to increase the range and services and facilities, including accident and emergency, provided at Hartlepool Hospital. The Council will work closely with all key stakeholders to help achieve this.
Park Residents Association	LP0014	DP0187	Option 8.26 Health Care provision is of major concern to our members and greater emphasis needs to be put behind the need for quick, reliable and timely access to Accident and Emergency specialists. The increase in households, greater congestion on the A19 and an ageing population within the town cause members to be gravely concerned about their ability to access Emergency services when required.	The Borough Council fully supports an enhanced and increased range of services at Hartlepool Hospital and will continue to push for this by working closely with all relevant stakeholders.
Wynyard Park	LP0027	DP0223	The Delivery of Services and a Sustainable Community As discussed in recent meetings with Council Officers and Members, Wynyard Park have a long term masterplan vision which includes the delivery of new homes, local shops and associated services including sports facilities and potentially a new primary school. Both parties agree that it will be important to deliver such facilities in order to ensure that Wynyard Park becomes a sustainable and self-	Comments noted – the Council will work closely with Wynyard Park to ensure that the development in the Wynyard area is as sustainable as possible. The need for any further allocations of residential land in the Wynyard area will be considered in future reviews of the Local Plan.

Company	Unique Ref	DP Ref	INF3 and INF4 Preamble	Planning Policy Response
			sufficient development and the importance of this is reflected in the Policy wording for draft Policy HSG6. However, it will be vital to allocate additional land for residential development in order to achieve a critical mass that will attract and deliver the type of services and facilities both the Council and Wynyard Park would like to see in the future in a viable manner.	
Persimmon Homes (Teesside)	LP0045	DP0209	Paragraph 8.24 Hartlepool South West Extension School Provision The paragraph states that "a two form entry primary school is to be provided as part of the approved South West Extension development." In order not to mislead the public and in line with the ongoing Section 106 discussions this paragraph should be amended to read as follows: "… a one form entry primary school is to be provided as part of the approved South West Extension development."	The current position is that a one-form entry primary school will be provided with sufficient land for it to be expanded into a two-form entry school in the future. Paragraph 8.24 will be amended to reflect this position.
Brenda Road Holdings Ltd	LP0244	DP0212	Healthcare Provision We agree that the existing University Hospital of Hartlepool is a valuable asset that should be protected and retained. We also note the point at paragraph 8.27 which identified facilities to be delivered within Hartlepool as: • Enhanced provision of services within homes • Enhanced GP and health centre services Whilst there will not be a full time surgery on the SECAAH site we would point out that the development will also provide a consultation space that can be used by visiting GPs and other health professionals.	Support for the University Hospital of Hartlepool is welcomed. The position regarding the SECAAH is also noted.

Policy INF3: University Hospital of Hartlepool

Company	Unique Ref	DP Ref	INF3 Hospital of Hartlepool	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England do not currently have any concerns with the intention to provide health care and other related facilities at the safeguarded University Hospital site. It is noted that paragraph 8.28 states that a new hospital was to be located at Wynyard, however, 'a deadline linking to elements of the land sale agreement has now passed raising serious concerns as to whether the hospital will be delivered in this location'. We will therefore monitor this situation and any alternative intentions for the Wynyard site.	Comments noted.
Resident	LP0218	DP0180	Hospital - Para 8.30 (page 41) – Council seeks to expand and improve range of health services. Hopefully this might include restoring services already lost in anticipation of the now mothballed new hospital at Wynyard. North Tees hospital, where many of these lost services were relocated, has a poor reputation and is difficult to travel to using public transport.	The Council fully supports measures to increase the range of services provided at Hartlepool Hospital.

Policy INF4: Community Facilities

Company	Unique Ref	DP Ref	INF4 Community Facilities	Planning Policy Response
Elwick Parish Council	LP0016	DP0222	Sufficient educational facilities should be made available to ensure that all children and young adults have access to education and training as close to home as is possible.	Noted – the Council's Education Department is closely involved in the preparation of the Local Plan and advises on the need for new schools or where capacity needs to be increased to take account of new development.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes the consideration to be given to the proximity of nearby community facilities when considering the provision of new facilities as part of developments. We trust that facilities in neighbouring villages will be included in such considerations. The detailed location of new facilities is crucial to securing the viability of all.	The Council will take into account capacity in all surrounding areas, including the villages, when considering the provision of community facioities.
Highways Agency	LP0029	DP0196	Highways England is generally supportive of this policy and the intentions to ensure that all communities have access to a range of community facilities. Whilst we have no particular comment, we generally support protecting existing provisions and providing new facilities to address deficiencies, which can help to reduce the need to travel.	Support noted.
Sport England	LP0079	DP0037	Sport England welcomes the inclusion of leisure/recreation facilities within this policy, particularly as it recognises the potential need to make provision for sport and recreational needs in new development.	Support welcomed.
Resident	LP0256	DP0230	I've quickly browsed through the local plan and there appears to be no mention of 'community' provision such as nursing homes/schools etc especially in the proposed large housing areas....ie the large 94/95? bed home near Sainsburys on Merlin Way Bishop Cuthbert or school provision for the massive housing proposed to the West of Hartlepool.	For any major housing proposal developers will be required to make a contribution towards either the provision of a new school if there is no capacity in existing schools, or to provide new classrooms etc to increase capacity on existing school sites. The Council also seek guidance and advice from all relevant providers on the need to provide new and/or enhanced community provision, including care and health facilities.

Company	Unique Ref	DP Ref	INF4 Community Facilities	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble - Policy INF5: Telecommunications

Company	Unique Ref	DP Ref	INF5 Preamble	Planning Policy Response
NFU North East	LP0047	DP0003	• We welcome your acknowledgement that the main gaps in coverage for high speed broadband are in 'villages and rural parts of the Borough' and would hope that you will take measures to address this. A reliable service of broadband is an essential requirement for modern living and crucial for agri-business to operate on a day to day basis and meet legislation.	The Borough Council participates in two schemes aimed at 'plugging' gaps in high speed broadband provision in the Borough. In particular the Rural Community Broadband Fund RCBF) is a joint approach between Durham County Council and the Tees Valley local authorities. The fund is in excess of £1m and will be used to improve broadband across rural parts of the Tees Valley and County Durham. The RCBF was used recently to provide a new fibre optic cabinet for Greatham village.
Northumbrian Water	LP0241	DP0207	As outlined in the table of paragraph 8.35 NW have already provided a site by site analysis of the key development sites in the availability of foul and surface water management during the production of the HBC LIP. In paragraph 8.42 the Council states that it will look to work closely with utility providers to ensure that services are provided at appropriate times. This is something we strongly encourage as we already attend liaison meetings with Hartlepool Council in order to keep up to date with development in the area and provide responses to any local issues regarding the sewerage network. NW has a large capital investment programme for the whole of the North East region which operates in 5 yearly cycles known as Asset Management Plan periods (AMPs). The next AMP period is from 2015 to 2020 and the plan is now signed off for this period. The next AMP thereafter for 2020 to 2025 is now in preparation. It would be greatly beneficial to continue to work with HBC to understand timescales for development sites so we can align any investment needed in our infrastructure with the delivery of those sites.	Noted – the Council will continue to work closely with NWL regarding policies and proposals in the Local Plan. In particular the Council is keen to identify any constraints/barriers to development and investment at an early stage.

Policy INF5: Telecommunications

Company	Unique Ref	DP Ref	INF5 Telecommunications	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY INF5 TELECOMMUNICATIONS - (3), (4), (9) The Society supports this policy - cabinets and other equipments have already been put in close proximity to listed and locally listed buildings and in Conservation Areas – there must be some liaison between Open Reach and the Council. The Society supports steps to be taken to ensure that new masts for installations are kept to a minimum. The Society supports the proposal to protect areas of environmental importance.	Support noted.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports the requirement to explore all options for sharing masts, etc. in order to reduce the proliferation of installations. A regard for design and siting along with screening and landscaping in order to minimise impact along with relationship to existing buildings, townscape/landscape, views and vistas is also welcomed. The highlighting of protection for listed buildings and conservation areas in respect of broadband infrastructure is supported. There must be opportunities to provide more sympathetic infrastructure for what is an increasingly necessary service. In a similar vein protection for areas of environmental and nature conservation importance is supported and it is hoped every opportunity to strengthen such protection is taken.	Support noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Policy INF6: Renewable and Low Carbon Energy Generation - Preamble

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
Historic England	LP0044	DP0213	Page 47, Renewable and Low Carbon Energy Generation: We support measures to exploit renewable energy sources. However, we also recognise that some renewable energy technologies have the potential to cause serious damage to irreplaceable historic sites, which are themselves an integral part of the wider environmental and sustainability agenda. High-quality design can play a key role in minimising any adverse effects of projects. Fundamental to achieving high-quality design is a sound understanding of the character and importance of the historic asset involved, whether at the scale of individual buildings and sites or more extensive historic areas and landscapes. We therefore welcome the recognition within Policies INF6 and INF7 that schemes should assess the impact (including cumulative impact) upon the significance of heritage assets, including their setting. However, this would be strengthened by including a reference to the potential impacts upon the historic environment within the supporting text (for example, in paragraph 8.48).	Support noted. Paragraph 8.48 (1st sentence) will be amended to read "....including cumulative impacts on landscape, visual amenity, and historic and natural assets."
Resident	LP0082	DP0040	Section 8.45 In section 8.45 HBC state that 'Onshore and offshore wind turbines – both now well established and one of the most economically viable sources of renewable electricity' – Not true they only provide diversity in the energy mix but during operation degrade the efficiency of other generation platforms by forcing them to reduce load and away from optimal operating conditions. Without existing subsidies from Contract-for-difference payments (the difference between the wholesale price (around £40/MWh)and the agreed tariff of £150/MWh.) wind turbines become an uneconomic technology. The government has stated the subsidies are	The government's National Planning Policy Framework (NPPF) states (paragraph 97) that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. NPPF paragraph 97 goes on to state that local planning authorities should: • Have a positive strategy to promote energy from renewable and low carbon sources • Design their policies to maximise renewable and low

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
			unsustainable and will be ceasing them by April 2017. Section 8.48 Section 8.48 states that HBC will ensure 'that any adverse impacts are satisfactorily addressed, including cumulative landscape and visual impact' then contradict the sentence by stating 'Some proposed developments may need to accompanied by an environmental statement which will include an assessment of any likely significant effects.' Surely all developments require an environmental statement especially when they are close to residential property. This comment was also made by the following representations. LP0050 / DP0006, LP0061 / DP0018, LP0062 / DP0019, LP0065 / DP0022, LP0066 / DP0023, LP0072 / DP0029, LP0102 / DP0060, LP0100 / DP0058, LP0101 / DP0059, LP0103 / DP0061, LP0087/DP0045, LP0089/DP0047, LP0091/DP0049, LP0092/DP0050, LP0093/DP0051, LP0094/DP0052, LP0097/DP0055, LP0098/DP0056, LP0099/DP0057, LP0104/DP0062, LP0105/DP0063, LP0106/DP0064, LP0107/DP0065, LP0108/DP0066, LP0100/DP0067, LP0110/DP0068, LP0111/DP0069, LP0112/DP0070, LP0113/DP0071, LP0114/DP0072, LP0115/DP0073, LP0116/DP0074, LP0117/DP0075, LP0118/DP0076, LP0119/DP0077, LP0120/DP0078, LP0121/DP0079, LP0122/DP0080, LP0123/DP0081, LP0124/DP0082, LP0125/DP0083, LP0126/DP0084, LP0127/DP0085, LP0128/DP0086, LP0129/DP0087, LP0130/DP0088, LP0131/DP0089, LP0132/DP0090, LP0133/DP0091, LP0134/DP0092, LP0135/DP0093, LP0136/DP0094, LP0137/DP0095, LP0138/DP0096, LP0139/DP0097, LP0140/DP0098, LP0141/DP0099, LP0142/DP0100, LP0143/DP0101, LP0144/DP0102, LP0145/DP0103, LP0146/DP0104, LP0147/DP0105, LP0148/DP0106, LP0149/DP0107, LP0150/DP0108, LP0151/DP0109, LP0153/DP0111, LP0154/DP0112, LP0155/DP0113,	carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts • Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources There is a duty therefore, as part of the preparation of the Local Plan, for the local planning authority to positively consider the potential in the Borough for encouraging energy generation for renewable or low carbon sources, and to consider potential locations where such development could be located. The government announced new considerations to be applied to wind energy development in June 2015. Local planning authorities can only grant planning permission for one or more on shore wind turbines if: • The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan, and • Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing The government's intention for these new considerations is so that "local people have the final say on wind farm applications". The Local Plan Preferred Options document has identified two areas as potentially suitable for wind turbine developments: • The High Volts area in association with the existing

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
			LP0156/DP0114, LP0157/DP0115, LP0158/DP0116, LP0159/DP0117, LP0161/DP0119, LP0162/DP0120, LP0163/DP0121, LP0164/DP0122, LP0165/DP0123, LP0166/DP0124, LP0167/DP0125, LP0168/DP0126, LP0169/DP0127, LP0170/DP0128, LP0171/DP0129, LP0172/DP0130, LP0173/DP0131, LP0174/DP0132, LP0175/DP0133, LP0176/DP0134, LP0177/DP0135, LP0178/DP0136, LP0179/DP0137, LP0180/DP0138, LP0181/DP0139, LP0182/DP0140, LP0183/DP0141, LP0184/DP0142, LP0185/DP0143, LP0186/DP0144, LP0187/DP0145, LP0188/DP0146, LP0189/DP0147, LP0190/DP0148, LP0191/DP0149, LP0192/DP0150, LP0193/DP0151, LP0194/DP0152, LP0195/DP0153, LP0196/DP0154, LP0197/DP0155, LP0198/DP0156, LP0199/DP0157, LP0200/DP0158, LP0213/DP0174, LP0215/DP0176, LP0216/DP0177, LP0233/DP0198.	wind turbines • The Brenda Road area in south east Hartlepool The High Volts area was included as an area with potential on the basis of the conclusions of a landscape capacity study. The East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study (Wind Farm Development and Landscape Capacity Studies: East Durham and Tees Plain, North East Assembly, August 2008, and Addendum, Association of North East Councils, October 2009) provided a technical assessment of the capacity of an area to accommodate wind farm development using an agreed and accepted methodology. For the High Volts area the study concluded that landscape value and visual quality are both generally low and there is some limited potential for wind turbine development associated with the existing turbine development provided that the cluster did not exceed more than 6 turbines. Policy INF7 in the Preferred Options document identifies the High Volts area as having potential for up to 3 additional turbines, which should be of a similar scale or smaller to the existing turbines. The Brenda Road area was not included as part of the Wind Farm Development and Landscape Capacity Study referred to above. The Study did however consider the area between Hartlepool and Billingham and concluded that the area is 'medium sensitivity landscape' where a small/medium wind farm (up to 6 turbines) could be accommodated and relate to the industrial development to the south east. Hartlepool Borough Council, in considering its response

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
				to the recent planning applications for three 175m wind turbines on land at Graythorp industrial estate, Brenda Road West, and Tofts Farm West concluded that: • The proposed sites are located at the heart of an industrial area of the town characterised by large scale industrial installations including Tata Steelworks, Phillips Tank Farm, the Huntsman plant, and the Nuclear Power Station • The area is crossed by major power lines, and Seaton Port to the south is periodically occupied by large structures such as oil platforms • The turbines would be visible from some residential areas of Seaton Carew. However the visual impact must be viewed in the context of the existing industrial nature of the landscape and balanced against the benefits of the proposal On the basis of the evidence outlined above the Preferred Options document has identified an area centred on the Brenda Road industrial area (to the south and east of the main railway line) as potential suitable for wind turbine development. However the Preferred Options document has made it clear that should the 3 x 175m turbines gain planning consent (the applications have been called in by the Secretary of State and a public inquiry was scheduled for October 2016) then there is no scope for any further wind turbines. If the 3 turbines were refused consent then, depending on the reasons for refusal, the Preferred Options document proposes that the Brenda Road area could be suitable for up to 6 small/medium scale turbines, with a maximum tip height of 99 metres. However, the Inspector for the Planning

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
				Appeal determined that the developer had not carried out an adequate consultation which meant that application is not valid and the Inquiry did not take place. The identification of an area in the Local Plan as potentially suitable for wind turbines does not mean that all applications within that area will be approved. The Local Plan policy sets a maximum limit to the total number of turbines and all proposals will be subject to assessment against a number of criteria concerning: • Impact on landscape/townscape, including cumulative impact • Impact on ecology/wildlife • Impact on historic assets • The effect of noise from the turbine(s), particularly where this may affect where people live and work • Measures of minimise and control shadow flicker • Impact on telecommunications systems and air traffic control • Flood risk • Highway and access arrangements Overriding all the above criteria and considerations is the government's stipulation that "following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing". Consultation on the Local Plan Preferred Option has demonstrated a considerable amount of concern and opposition to the proposal to identify the Brenda Road area as potentially suitable for wind turbine developments.

Company	Unique Ref	DP Ref	INF6 Preamble	Planning Policy Response
				However given the timing (at the end of the Local Plan Preferred Options consultation period) of the Government Inspector's decision not to proceed with a public hearing into planning applications for 3x175m turbines due to lack of adequate consultation by the developer, it has been deemed appropriate to carry forward the wind turbine areas to the next stage of the Local Plan process as there is some concern that supporters of the 3 wind turbines at the application stage may have understood that the applications had been approved by the Council and therefore had not made a representation on the Local Plan. The Council note the concern that some members of the public have expressed regarding the proximity of the turbines to residential areas and will therefore consider reducing the area allocated for wind turbines in the Publication draft.
Teesmouth Bird Club	LP0227	DP0191	Businesses should be given financial encouragement to install solar panels and / or green roof plantings. Perhaps this should be obligatory!	Perhaps this is something that central government should be encouraged to undertake as part of its climate change mitigation strategy.

Policy INF6: Renewable and Low Carbon Energy Generation

Company	Unique Ref	DP Ref	INF6 Renewable Generation	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY INF 6 RENEWABLE AND LOW CARBON ENERGY GENERATION (1) to (7)The Society supports this policy and emphasises need to restore sites to a quality of at least its original condition when the development has reached the end of its operational life.	Support welcomed.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council particularly supports the use of bullet points 3, 4, 5 & 7 in this policy as protection for residents, landscape, nature and heritage. Restoration of a site is also an essential component which the Parish Council supports.	The Parish Council's support for these elements in the policy is welcomed.
EDF energy	LP0019	DP0227	In terms of Policy INF6, the weight to be given to the achievement of wider environmental and economic benefits is welcomed. However, the relevance of criteria (1) is questioned, as it is ultimately for the developer to determine the most appropriate technology and for the local planning authority to determine the appropriateness of any application. We therefore, suggest the deletion of criteria (1) from this policy. Furthermore, it is worth noting that it is common practice for onshore wind projects to remove the turbine foundations only to a depth of 1–1.5m. This industry-wide approach should be had regard to when determining applications, including any provisions relating to the postoperational phase. We also consider that the policy should explicitly state that any applications for a lifetime extension or repowering should not be withheld where there are no material reason(s) to do so. In terms of Policy INF7, EDF Energy strongly supports the identification of Strategic Areas for onshore wind development. This approach accords with paragraph 97 of the National Planning Policy Framework (NPPF) and the Government's written statement of 18 June 2015, which encourages planning	EDF's comments regarding the most appropriate technology and lifetime extension or repowering of projects have been noted and will be incorporated in the next version of the Local Plan. The NPPF, while encouraging renewable energy projects through local plan policy, is also clear that this should not be at the expense of environmental and landscape considerations. The Council has used the East Durham and Tees Plain Wind Farm Landscape Study as part of its evidence base and considers that any further wind turbines in the High Volts area should be of a scale similar to the existing turbines.

Company	Unique Ref	DP Ref	INF6 Renewable Generation	Planning Policy Response
			authorities to identify areas suitable for wind energy development in local or neighbourhood plans. However, it is considered that the reference to the scale of development at the High Volts strategic area is overly prescriptive, and should be deleted from the policy. Applicants should be left to formulate their proposals, in consultation at the appropriate stage, and then any application would be considered against the policy criteria in INF6, INF7 and others as relevant. Similarly, it should be stated that a lifetime extension or repowering would be considered within the strategic wind turbine area, in accordance with the principles set out in the policy. For the avoidance of doubt, EDF Energy is not the operator of the High Volts wind farm. In terms of the general drafting of Policies INF6 and INF7, it is not necessary to cross refer to other policies in the local plan as the development plan must be read as a whole.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Policy INF7: Strategic Wind Turbine Development - Pre-amble

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
Resident	LP0049	DP0005	On behalf of my wife and myself we wish to object to the erection of all wind turbines in Seaton Carew. They are unsightly noisy and interfere with daylight.	A response to the concerns raised by many residents to the wind turbine policy is set out above.
Resident	LP0087	DP0045	In relation to 8.51 whilst the wind turbines may contribute towards the energy generation targets the costs of doing this may outweigh any benefits, as can be seen by Denmark making a u turn on onshore turbines. You state in 8.53 of the plan 'and the proposal has the backing of the local community.' Wind Turbines do not have the backing of the local community – people are in favour of green energy however, this does not necessarily mean they are in favour of having wind turbines on their doorsteps. Other councils have ensured any new builds have solar panels on any new houses that are built and this would help meet the energy generation targets and make households more efficient. In 8.55 you state that the 'north west of the Borough, in association with existing wind turbine scheme at High Volts' has the potential to be developed. There is no mention of the Brenda Road site yet this is identified as a potential site when there is limited evidence to support this. Re 8.58 the community want to live in a pleasant environment and not have overbearing visual impact from wind turbines in their back gardens, this is more important to them than benefit schemes. This comment was also made by the following representations. LP0050 / DP0006, LP0061 / DP0018, LP0062 / DP0019, LP0065 /	The government's National Planning Policy Framework (NPPF) states (paragraph 97) that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. NPPF paragraph 97 goes on to state that local planning authorities should: • Have a positive strategy to promote energy from renewable and low carbon sources • Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts • Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources There is a duty therefore, as part of the preparation of the Local Plan, for the local planning authority to positively consider the potential in the Borough for encouraging energy generation for renewable or low carbon sources, and to consider potential locations where such development could be located. The government announced new considerations to be applied to wind energy development in June 2015. Local

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
			DP0022, LP0066 / DP0023, LP0072 / DP0029, LP0102 / DP0060, LP0100 / DP0058, LP0101 / DP0059, LP0103 / DP0061, LP0087/DP0045, LP0089/DP0047, LP0091/DP0049, LP0092/DP0050, LP0093/DP0051, LP0094/DP0052, LP0097/DP0055, LP0098/DP0056, LP0099/DP0057, LP0109/DP0067, LP0104/DP0062, LP0105/DP0063, LP0106/DP0064, LP0107/DP0065, LP0108/DP0066, LP0100/DP0067, LP0110/DP0068, LP0111/DP0069, LP0112/DP0070, LP0113/DP0071, LP0114/DP0072, LP0115/DP0073, LP0116/DP0074, LP0117/DP0075, LP0118/DP0076, LP0119/DP0077, LP0120/DP0078, LP0121/DP0079, LP0122/DP0080, LP0123/DP0081, LP0124/DP0082, LP0125/DP0083, LP0126/DP0084, LP0127/DP0085, LP0128/DP0086, LP0129/DP0087, LP0130/DP0088, LP0131/DP0089, LP0132/DP0090, LP0133/DP0091, LP0134/DP0092, LP0135/DP0093, LP0136/DP0094, LP0137/DP0095, LP0138/DP0096, LP0139/DP0097, LP0140/DP0098, LP0141/DP0099, LP0142/DP0100, LP0143/DP0101, LP0144/DP0102, LP0145/DP0103, LP0146/DP0104, LP0147/DP0105, LP0148/DP0106, LP0149/DP0107, LP0150/DP0108, LP0151/DP0109, LP0153/DP0111, LP0154/DP0112, LP0155/DP0113, LP0156/DP0114, LP0157/DP0115, LP0158/DP0116, LP0159/DP0117, LP0161/DP0119, LP0162/DP0120, LP0163/DP0121, LP0164/DP0122, LP0165/DP0123, LP0166/DP0124, LP0167/DP0125, LP0168/DP0126, LP0169/DP0127, LP0170/DP0128, LP0171/DP0129, LP0172/DP0130, LP0173/DP0131, LP0174/DP0132, LP0175/DP0133, LP0176/DP0134, LP0177/DP0135, LP0178/DP0136, LP0179/DP0137, LP0180/DP0138, LP0181/DP0139, LP0182/DP0140, LP0183/DP0141, LP0184/DP0142, LP0185/DP0143, LP0186/DP0144, LP0187/DP0145, LP0188/DP0146, LP0189/DP0147, LP0190/DP0148, LP0191/DP0149, LP0192/DP0150, LP0193/DP0151, LP0194/DP0152, LP0195/DP0153, LP0196/DP0154, LP0197/DP0155, LP0198/DP0156, LP0199/DP0157, LP0200/DP0158, LP0213/DP0174, LP0215/DP0176, LP0216/DP0177, LP0233/DP0198.	planning authorities can only grant planning permission for one or more on shore wind turbines if: • The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan, and • Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing The government's intention for these new considerations is so that "local people have the final say on wind farm applications". The Local Plan Preferred Options document has identified two areas as potentially suitable for wind turbine developments: • The High Volts area in association with the existing wind turbines • The Brenda Road area in south east Hartlepool The High Volts area was included as an area with potential on the basis of the conclusions of a landscape capacity study. The East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study (Wind Farm Development and Landscape Capacity Studies: East Durham and Tees Plain, North East Assembly, August 2008, and Addendum, Association of North East Councils, October 2009) provided a technical assessment of the capacity of an area to accommodate wind farm development using an agreed and accepted methodology. For the High Volts area the study concluded that landscape value and visual quality are both generally low and there is some limited potential

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
				for wind turbine development associated with the existing turbine development provided that the cluster did not exceed more than 6 turbines. Policy INF7 in the Preferred Options document identifies the High Volts area as having potential for up to 3 additional turbines, which should be of a similar scale or smaller to the existing turbines. The Brenda Road area was not included as part of the Wind Farm Development and Landscape Capacity Study referred to above. The Study did however consider the area between Hartlepool and Billingham and concluded that the area is 'medium sensitivity landscape' where a small/medium wind farm (up to 6 turbines) could be accommodated and relate to the industrial development to the south east. Hartlepool Borough Council, in considering its response to the recent planning applications for three 175m wind turbines on land at Graythorp industrial estate, Brenda Road West, and Tofts Farm West concluded that: • The proposed sites are located at the heart of an industrial area of the town characterised by large scale industrial installations including Tata Steelworks, Phillips Tank Farm, the Huntsman plant, and the Nuclear Power Station • The area is crossed by major power lines, and Seaton Port to the south is periodically occupied by large structures such as oil platforms • The turbines would be visible from some residential areas of Seaton Carew. However the visual impact must be viewed in the context of the existing industrial nature of the landscape and balanced against the benefits of

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
				the proposal On the basis of the evidence outlined above the Preferred Options document has identified an area centred on the Brenda Road industrial area (to the south and east of the main railway line) as potential suitable for wind turbine development. However the Preferred Options document has made it clear that should the 3 x 175m turbines gain planning consent (the applications have been called in by the Secretary of State and a public inquiry is currently scheduled for October 2016) then there is no scope for any further wind turbines. If the 3 turbines are refused consent then, depending on the reasons for refusal, the Preferred Options document proposes that the Brenda Road area could be suitable for up to 6 small/medium scale turbines, with a maximum tip height of 99 metres. However, the Inspector for the Planning Appeal determined that the developer had not carried out an adequate consultation which meant that application is not valid and the Inquiry did not take place. The identification of an area in the Local Plan as potentially suitable for wind turbines does not mean that all applications within that area will be approved. The Local Plan policy sets a maximum limit to the total number of turbines and all proposals will be subject to assessment against a number of criteria concerning: • Impact on landscape/townscape, including cumulative impact • Impact on ecology/wildlife • Impact on historic assets

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
				• The effect of noise from the turbine(s), particularly where this may affect where people live and work • Measures of minimise and control shadow flicker • Impact on telecommunications systems and air traffic control • Flood risk • Highway and access arrangements Overriding all the above criteria and considerations is the government's stipulation that "following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing". Consultation on the Local Plan Preferred Option has demonstrated a considerable amount of concern and opposition to the proposal to identify the Brenda Road area as potentially suitable for wind turbine developments. However given the timing (at the end of the Local Plan Preferred Options consultation period) of the Government Inspector's decision not to proceed with a public hearing into planning applications for 3x175m turbines due to lack of adequate consultation by the developer, it has been deemed appropriate to carry forward the wind turbine areas to the next stage of the Local Plan process as there is some concern that supporters of the 3 wind turbines at the application stage may have understood that the applications had been approved by the Council and therefore had not made a representation on the Local Plan.

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				The Council note the concern that some members of the public have expressed regarding the proximity of the turbines to residential areas and will therefore consider reducing the area allocated for wind turbines in the Publication draft. In relation to a number of specific points raised by this set of consultation responses: • The Government's withdrawal, from April 2016 of subsidies to the onshore wind industry (the Renewable Obligation Certificate) does suggest that investment in new onshore wind projects is likely to be much less attractive • The Borough Council has agreed a policy that a minimum of 10% of development energy needs for major developments (schemes involving 10 or more dwellings or floorspace of 1000 sq.m. or more) should be from renewable and/or decentralised sources • The Local Infrastructure Plan identifies that infrastructure that is needed to meet the development proposed in the Local Plan, and whether such infrastructure will be in place at the right time. Renewable energy projects such as wind farms or solar photovoltaic farms are not essential to meet developments needs and therefore not included in the Infrastructure Plan. Renewable energy generation projects are necessary to move away from reliance on fossil fuels and their associated carbon emissions and to generate electricity from as wide a range of sources as possible to increase energy security.

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
Resident	LP0201	DP0159	INF 7: Turbines with a tip height of 175 metres will be visible from a great distance. Most certainly they will dominate the skyline from the Fens and Greatham. Paragraph 8.53 states that applications for wind energy development must have the backing of the local community. There was no consultation with residents of the Fens to check for backing.	The planning application for the 3 wind turbines with a tip height of 175 metres was submitted in 2014 has been called in by the Secretary of State and a public inquiry is scheduled for later in 2016. The Government introduced new considerations to be applied to proposed wind energy development so that the proposal has the backing of the local community with effect from 18th June 2015, after the 175m turbine application had been submitted and considered by the Borough Council. A hearing into the 3 turbine applications will not now go ahead as the Government Inspector has determined that the development did not undertake adequate public consultation and the applications are therefore not valid. The Council note the concern that some members of the public have expressed regarding the proximity of the turbines to residential areas and will therefore consider reducing the area allocated for wind turbines in the Publication draft.
Resident	LP0204	DP0162	Too many and too high wind turbines detriment to villages. Have a bad impact on landscape. Do not generate enough electricity.	A response to the concerns raised by many residents to the wind turbine policy is set out above.
Resident	LP0205	DP0163	Too high and too many wind turbines not needed have a bad impact on landscape.	A response to the concerns raised by many residents to the wind turbine policy is set out above.
Resident	LP0223	DP0185	I am writing to make my objections to the proposal of the 3 large wind turbines to be erected near to Seaton Carew or if these are rejected the 6 smaller turbines in High Volts. My reasons for the objection are as follows: 1) Lack of community support	The planning application for the 3 wind turbines with a tip height of 175 metres was submitted in 2014 has been called in by the Secretary of State and a public inquiry is scheduled for later in 2016. The Government introduced new considerations to be applied to proposed wind energy development so that the proposal has the

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
			I have attended a number of public meetings arranged by Seaton Carew Wind Turbine Action Group. These have been well attended and everyone who attended the meetings strongly opposed the plans. 2) Impact on health due to potential flicker My partner's son is visually impaired and has also been diagnosed with epilepsy. Our concern is if there is flicker due to the turbines being built so near to a residential area that it may result in him suffering from epileptic fits. This would have a detrimental impact on his time he stays with us. 3) Inadequate pre-application consultation by the developer. The first time I heard of this development was when I saw a poster in the local shop for the first meeting of the Seaton Carew Wind Turbine Action Group. During the meeting it was apparent that this lack of consultation was felt by many others who attended the meeting. It also transpired that a number of people who approved the original proposal in the supposed 'consultation' period lived nowhere near to the proposed site and in some cases didn't even live in the town. If a proper consultation had taken place surely we would have been aware. 4) Visual impact The proposed size of the turbines will have a negative visual impact on the surrounding area. It could be argued that due to the industrial landscape which surrounds Seaton Carew then the turbines would not make any difference. However it should be considered that due to the area having such a large concentration of highly visible industries e.g. power station, steel works etc that any other large scale development would have a detrimental impact on	backing of the local community with effect from 18th June 2015, after the 175m turbine application had been submitted and considered by the Borough Council. A hearing into the 3 turbine applications will not now go ahead as the Government Inspector has determined that the development did not undertake adequate public consultation and the applications are therefore not valid. The Council note the concern that some members of the public have expressed regarding the proximity of the turbines to residential areas and will therefore consider reducing the area allocated for wind turbines in the Publication draft. The scale of concerns about wind turbine proposals in this area has been noted in the responses provided above.

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
			both residents and visitors to Seaton Carew. 5) Noise There is the potential for local residents to experience a negative impact for local residents with regards to the noise produced by the wind turbines. The level of noise will not be known until the turbines had been completed and I don't feel that this risk to the quality of life for local residents, especially as the wind turbines will be in such close proximity to a large residential area, can be justified by the economic benefits the turbines supposedly will bring. 6) Overbearing impact upon residential area Our house faces the proposed sites. The size of the turbines means that we will be able to see them from our front window. Residents don't want to be able to see wind turbines in their back gardens, which would be the case if they were built so close to a residential area. 7) Natural impact We have a large number of bats as well as flocks of birds in the area of the proposed site. The size of the proposed blades of the wind turbines could injure or kill passing wildlife. I would be grateful if you could consider the approve objections	
Resident	LP0224	DP0186	To whom it may concern, I am writing to make my objections to the proposal of the 3 large wind turbines to be erected near to Seaton Carew or if these are rejected the 6 smaller turbines in High Volts. My reasons for the objection are as follows:	The planning application for the 3 wind turbines with a tip height of 175 metres was submitted in 2014 has been called in by the Secretary of State and a public inquiry is scheduled for later in 2016. The Government introduced new considerations to be applied to proposed wind energy development so that the proposal has the

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
			1) Lack of community support I have attended a number of public meetings arranged by Seaton Carew Wind Turbine Action Group. These have been well attended and everyone who attended the meetings strongly opposed the plans. 2) Impact on health due to potential flicker My partner's son is visually impaired and has also been diagnosed with epilepsy. Our concern is if there is flicker due to the turbines being built so near to a residential area that it may result in him suffering from epileptic fits. This would have a detrimental impact on his time he stays with us. 3) Inadequate pre-application consultation by the developer. The first time I heard of this development was when I saw a poster in the local shop for the first meeting of the Seaton Carew Wind Turbine Action Group. During the meeting it was apparent that this lack of consultation was felt by many others who attended the meeting. It also transpired that a number of people who approved the original proposal in the supposed 'consultation' period lived nowhere near to the proposed site and in some cases didn't even live in the town. If a proper consultation had taken place surely we would have been aware. 4) Visual impact The proposed size of the turbines will have a negative visual impact on the surrounding area. It could be argued that due to the industrial landscape which surrounds Seaton Carew then the turbines would not make any difference. However it should be considered that due to the area having such a large concentration of highly visible industries e.g. power station, steel works etc that any	backing of the local community with effect from 18th June 2015, after the 175m turbine application had been submitted and considered by the Borough Council. A hearing into the 3 turbine applications will not now go ahead as the Government Inspector has determined that the development did not undertake adequate public consultation and the applications are therefore not valid. The Council note the concern that some members of the public have expressed regarding the proximity of the turbines to residential areas and will therefore consider reducing the area allocated for wind turbines in the Publication draft. The scale of concerns about wind turbine proposals in this area has been noted in the responses provided above.

Company	Unique Ref	DP Ref	INF7 Preamble	Planning Policy Response
			other large scale development would have a detrimental impact on both residents and visitors to Seaton Carew. 5) Noise There is the potential for local residents to experience a negative impact for local residents with regards to the noise produced by the wind turbines. The level of noise will not be known until the turbines had been completed and I don't' feel that this risk to the quality of life for local residents, especially as the wind turbines will be in such close proximity to a large residential area, can be justified by the economic benefits the turbines supposedly will bring. 6) Overbearing impact upon residential area Our house faces the proposed sites. The size of the turbines means that we will be able to see them from our front window. Residents don't want to be able to see wind turbines in their back gardens, which would be the case if they were built so close to a residential area. 7) Natural impact We have a large number of bats as well as flocks of birds in the area of the proposed site. The size of the proposed blades of the wind turbines could injure or kill passing wildlife. I would be grateful if you could consider the approve objections.	

Policy INF7: Strategic Wind Turbine Development

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	(3) It is important that the siting and scale of turbines takes into account appearance, topography, landscape and character of the areas as identified in existing and any future landscape and visual impact assessments. It is crucial all proposals should include details of measures to mitigate adverse affects.	Noted – these elements are covered within the criteria set out in the policy.
Campaign to Protect Rural England	LP0015	DP0199	However, CPRE is concerned about the proposals to allocate certain areas for wind turbines and objects to the proposals in Policy INF7. As far as Brenda Road is concerned, it is noted that this will only be allocated for 6 x 99 metre tall turbines if the current applications for 3x175 metre tall turbines are not permitted. While CPRE acknowledges that the landscape around Brenda Road is poor, it also notes that this is an area close to residential development in Seaton Carew. It believes that turbines of this height will still impact on the residential amenity of this area of Hartlepool which has only recently been proposed for improvement under the Seaton Carew Regeneration SPD. Further, this area is not considered in the Arup Landscape Capacity Study for East Durham Limestone and Tees Plain. Although this document was published in 2008, it is still clearly considered relevant as it is mentioned in the Preferred Options. It is a comprehensive study of potentially suitable sites for wind energy in this area of "greater Durham" and the fact that Brenda Road is not even considered is surely significant. CPRE is also concerned about the potential allocation of land by High Volts Wind Farm as suitable for further development. This is Zone 13 in the Arup Study. Although Table 2 of that Study states that there is scope for a medium development here, it states that capacity is limited and discussed further in Table 8. Table 8 states that there is no or limited capacity for further wind farm development in this Zone. In the Comments Section, it states "There could be some potential for further development associated	The government's National Planning Policy Framework (NPPF) states (paragraph 97) that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. NPPF paragraph 97 goes on to state that local planning authorities should: • Have a positive strategy to promote energy from renewable and low carbon sources • Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts • Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources There is a duty therefore, as part of the preparation of the Local Plan, for the local planning authority to positively consider the potential in the Borough for encouraging energy generation for renewable or low carbon sources, and to consider potential locations where such development could be located.

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			with High Volts provided that the cluster did not exceed the typology assessed as appropriate (<6 turbines). The zone theoretically has the capacity to accommodate additional small scale development elsewhere in the zone. However, the constraints map indicates that there is potentially little unconstrained land and separation distances from High Volts would be low or relatively low (2.5 – 4km), cumulative impacts might therefore be unacceptably high." We therefore represent that neither of these areas is suitable for wind farm development or extension.	The government announced new considerations to be applied to wind energy development in June 2015. Local planning authorities can only grant planning permission for one or more on shore wind turbines if: • The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan, and • Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing The government's intention for these new considerations is so that "local people have the final say on wind farm applications". The Local Plan Preferred Options document has identified two areas as potentially suitable for wind turbine developments: • The High Volts area in association with the existing wind turbines • The Brenda Road area in south east Hartlepool The High Volts area was included as an area with potential on the basis of the conclusions of a landscape capacity study. The East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study (Wind Farm Development and Landscape Capacity Studies: East Durham and Tees Plain, North East Assembly, August 2008, and Addendum, Association of North East Councils, October 2009) provided a technical assessment of the capacity of an area to accommodate wind farm development using an agreed and

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				accepted methodology. For the High Volts area the study concluded that landscape value and visual quality are both generally low and there is some limited potential for wind turbine development associated with the existing turbine development provided that the cluster did not exceed more than 6 turbines. Policy INF7 in the Preferred Options document identifies the High Volts area as having potential for up to 3 additional turbines, which should be of a similar scale or smaller to the existing turbines. The Brenda Road area was not included as part of the Wind Farm Development and Landscape Capacity Study referred to above. The Study did however consider the area between Hartlepool and Billingham and concluded that the area is 'medium sensitivity landscape' where a small/medium wind farm (up to 6 turbines) could be accommodated and relate to the industrial development to the south east. Hartlepool Borough Council, in considering its response to the recent planning applications for three 175m wind turbines on land at Graythorp industrial estate, Brenda Road West, and Tofts Farm West concluded that: • The proposed sites are located at the heart of an industrial area of the town characterised by large scale industrial installations including Tata Steelworks, Phillips Tank Farm, the Huntsman plant, and the Nuclear Power Station • The area is crossed by major power lines, and Seaton Port to the south is periodically occupied by large structures such as oil platforms

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				• The turbines would be visible from some residential areas of Seaton Carew. However the visual impact must be viewed in the context of the existing industrial nature of the landscape and balanced against the benefits of the proposal On the basis of the evidence outlined above the Preferred Options document has identified an area centred on the Brenda Road industrial area (to the south and east of the main railway line) as potential suitable for wind turbine development. However the Preferred Options document has made it clear that should the 3 x 175m turbines gain planning consent (the applications have been called in by the Secretary of State and a public inquiry is currently scheduled for October 2016) then there is no scope for any further wind turbines. If the 3 turbines are refused consent then, depending on the reasons for refusal, the Preferred Options document proposes that the Brenda Road area could be suitable for up to 6 small/medium scale turbines, with a maximum tip height of 99 metres. The identification of an area in the Local Plan as potentially suitable for wind turbines does not mean that all applications within that area will be approved. The Local Plan policy sets a maximum limit to the total number of turbines and all proposals will be subject to assessment against a number of criteria concerning: • Impact on landscape/townscape, including cumulative impact • Impact on ecology/wildlife • Impact on historic assets

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				• The effect of noise from the turbine(s), particularly where this may affect where people live and work • Measures of minimise and control shadow flicker • Impact on telecommunications systems and air traffic control • Flood risk • Highway and access arrangements Overriding all the above criteria and considerations is the government's stipulation that "following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing". Consultation on the Local Plan Preferred Option has demonstrated a considerable amount of concern and opposition to proposals for further wind turbines in Hartlepool. However given the timing (at the end of the Local Plan Preferred Options consultation period) of the Government Inspector's decision not to proceed with a public hearing into planning applications for 3x175m turbines due to lack of adequate consultation by the developer, it has been deemed appropriate to carry forward the wind turbine areas to the next stage of the Local Plan process as there is some concern that supporters of the 3 wind turbines at the application stage may have understood that the applications had been approved by the Council and therefore had not made a representation on the Local Plan.

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Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports proposals being subject to all 8 criteria stated in the policy. With regard the Brenda Road site in particular, the consideration regarding the impact on longer distant views from residential areas and heritage areas, which would include Greatham, is particularly important. The Parish Council would be very interested in developers working constructively with the local community and would expect this to include Greatham Parish Council. Obviously they would not wish Greatham Parish to be forgotten with regard appropriate community benefits.	Support noted. Should any developers wish to develop wind turbines in the Brenda Road then they would have to undertake in depth consultation with all local communities that may be affected, and demonstrate that they have taken addressed all concerns and have the backing of local communities. Greatham Parish Council would be part of any such consultation exercise
Met Office	LP0053	DP0009	(Please refer to map included in representation) There appears to be two sites for consideration for wind turbines on your proposals map and the site indicated in the South (which I believe is the Brenda Road site?) Is outside of our consultation zone and therefore we would have no concerns. However, as you have said in your email the other site that is South of the A179 and East to A19 know as High Volts Farm is within our 20km (that is 20km from our radar at High Moorsley) consultation zone. Within this 20km we need to be consulted on all wind turbine proposals regardless of height. The coloured areas within this zone (see paper response for map) are for other proposals other than wind turbines and refer to the heights of those proposals. Therefore as you can see below the site is partially within the green and partially within the yellow. In the yellow we need to see all proposals that exceed 45.7m in height and in the green we need to all proposals that exceed 15.2m in height We may therefore have some concerns regards any wind turbine applications and those other proposals that exceed the heights indicated. However it should be noted that, factors such as • Location • height of the proposal • height of the ground where the proposal will located • Topography of land between the proposal site and the radar • The operation of our radar	It is proposed to amend policy INF7 as follows: • Point 7 in the 3rd paragraph be amended to read "any adverse interference with electromagnetic transmissions including radio, television and communication signals, and safeguarded meteorological sites and installations" Additionally the following paragraph will be included in the Renewable Energy Generation Evidence Paper (which provides background detail and evidence to support the Local Plan: New paragraph 6.9 to read "The High Volts is within the Meteorological Office consultation zone for its radar installation at High Moorsley between Durham and Sunderland. The Met Office must be consulted on any wind turbine application in the area so that it can determine the impact on its radar. Any impact will require mitigation. Mitigation could simply be a reduction in tip height and/or mitigation in the form of adjustment to radar quality control. For further details contact : metofficesafeguarding@metoffice.gov.uk"

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			These all influence whether there will be an impact on the radar or not. In view of this we would strongly recommend that a pre-application enquiry is made by any developer prior to any application being submitted. We would suggest that they should fill out the proforma attached with all the potential locations for the proposal. Each application site will therefore be assessed individually and if after assessment it is considered that there may be impacts we would be seeking mitigation measures. Mitigation This could be simply a reduction in tip height of proposal and/or mitigation in the form of adjustment to our radar quality control. Note this would be subject to an agreement to recover our costs for this work. So, in summary to your question is the proposed allocation at High Volts Farm is acceptable? We would say "Any application in this area for wind turbines could impact on our radar at High Moorsley and would require an assessment by the Met Office to be carried out. If the assessment shows that there may be impacts to our radar, mitigation will be required. Mitigation could simply be a reduction in tip height of proposal and/or mitigation in the form of adjustment to our radar quality control. Note this would be subject to an agreement to recover our costs for this work." Many thanks again for consulting us on this allocation, we very much appreciate the opportunity to engage with you regards land allocations like this and to raise awareness of our radars and the importance of them being considered as part of the Local Plan process.	
Resident	LP0061	DP0018	INF7 – does not mention having community buy in. All such wind farm developments should have local communities support. There should be significant consultation in relation to the wind turbines at High Volts and Brenda Road, indeed any wind turbine proposal that will be close to residential property. There is no mention of wind turbines in the adopted Hartlepool Infrastructure plan.	The Government's requirement for all wind turbine proposals to have community came into effect from 18th June 2015. This is referred to in paragraph 8.53 of the supporting text to policy INF7. However it is accepted that this should also be included as part of policy INF7 along with the need for a developer to undertake consultation with the local community.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			For the above reasons I would like to see the removal of onshore wind turbines from the Hartlepool Plan. This comment was also made by the following representations. LP0050/DP0006, LP0061/DP0018, LP0062/DP0019, LP0065/DP0022, LP0066/DP0023, LP0070/DP0027, LP0072/DP0029, LP0102/DP0060, LP0100/DP0058, LP0101/DP0059, LP0103/DP0061, LP0087/DP0045, LP0089/DP0047, LP0091/DP0049, LP0092/DP0050, LP0093/DP0051, LP0094/DP0052, LP0097/DP0055, LP0098/DP0056, LP0099/DP0057, LP0109/DP0067, LP0104/DP0062, LP0105/DP0063, LP0106/DP0064, LP0107/DP0065, LP0108/DP0066, LP0100/DP0067, LP0110/DP0068, LP0111/DP0069, LP0112/DP0070, LP0113/DP0071, LP0114/DP0072, LP0115/DP0073, LP0116/DP0074, LP0117/DP0075, LP0118/DP0076, LP0119/DP0077, LP0120/DP0078, LP0121/DP0079, LP0122/DP0080, LP0123/DP0081, LP0124/DP0082, LP0125/DP0083, LP0126/DP0084, LP0127/DP0085, LP0128/DP0086, LP0129/DP0087, LP0130/DP0088, LP0131/DP0089, LP0132/DP0090, LP0133/DP0091, LP0134/DP0092, LP0135/DP0093, LP0136/DP0094, LP0137/DP0095, LP0138/DP0096, LP0139/DP0097, LP0140/DP0098, LP0141/DP0099, LP0142/DP0100, LP0143/DP0101, LP0144/DP0102, LP0145/DP0103, LP0146/DP0104, LP0147/DP0105, LP0148/DP0106, LP0149/DP0107, LP0150/DP0108, LP0151/DP0109, LP0153/DP0111, LP0154/DP0112, LP0155/DP0113, LP0156/DP0114, LP0157/DP0115, LP0158/DP0116, LP0159/DP0117, LP0161/DP0119, LP0162/DP0120, LP0163/DP0121, LP0164/DP0122, LP0165/DP0123, LP0166/DP0124, LP0167/DP0125, LP0168/DP0126, LP0169/DP0127, LP0170/DP0128, LP0171/DP0129, LP0172/DP0130, LP0173/DP0131, LP0174/DP0132, LP0175/DP0133, LP0176/DP0134, LP0177/DP0135, LP0178/DP0136, LP0179/DP0137, LP0180/DP0138, LP0181/DP0139, LP0182/DP0140, LP0183/DP0141, LP0184/DP0142, LP0185/DP0143, LP0186/DP0144, LP0187/DP0145, LP0188/DP0146, LP0189/DP0147, LP0190/DP0148, LP0191/DP0149, LP0192/DP0150, LP0193/DP0151, LP0194/DP0152, LP0195/DP0153, LP0196/DP0154, LP0197/DP0155, LP0198/DP0156, LP0199/DP0157, LP0200/DP0158, LP0213/DP0174, LP0215/DP0176, LP0216/DP0177, LP0233/DP0198.	Renewable energy development, including wind turbines, is not infrastructure necessary to deliver housing and other developments in the way that roads and utility services are considered as infrastructure. Wind turbines and other renewable energy generation developments are not therefore included in the Local Infrastructure Plan.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
Resident	LP0070	DP0027	I would like to object to the wind farm that is planned around Seaton area. 1. It will reduce the price off my property 2. Health, I have hypersensitive hearing, the pulsation noise and addition wind that the turbines cause can cause my ear drums to burst or extreme discomfort. 3. It will affect the visual and aural amenity. 4. The size of the wind turbines and the close proximity to the road is a major safety issue. They have been several incidents of the blades breaking and one caught fire. 5. The fact that Hartlepool council have a monetary vested interest in the planning permission going ahead as the company who own the wind turbines have publicly announced they will put money into the community fund 6. All the residence in Seaton crew were not notified that the plans were put in, it feel like the council wanted as little objection as they could, the people voting for the turbines when first announced did not live in Seaton or the surrounding area	The planning application for the 3 wind turbines with a tip height of 175 metres was submitted in 2014 has been called in by the Secretary of State and a public inquiry is scheduled for later in 2016. The Government introduced new considerations to be applied to proposed wind energy development so that the proposal has the backing of the local community with effect from 18th June 2015, after the 175m turbine application had been submitted and considered by the Borough Council. A hearing into the 3 turbine applications will not now go ahead as the Government Inspector has determined that the development did not undertake adequate public consultation and the applications are therefore not valid.
Resident	LP0081	DP0039	I'm concerned about the proposal for 3 additional turbines at High Volts and 6 wind turbines to be placed in Brenda Road, if the 3 current proposed turbines are rejected by the planning inspectorate. I believe that wind turbines should not be this close to residential properties; regardless of size also the adverse impacts on landscape. In the event of this going ahead, the visual impact would need to be satisfactorily addressed I am also concerned about the possible flicker effect because of the size of the 3 largest turbines, noise could also be a major problem. I do not have a problem with off shore wind turbines, but I am not in favour of having wind turbines on peoples doorstep. Why not be like other councils and ensure any new builds have solar	A response to the concerns raised by many residents to the wind turbine policy is set out above.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			panels. This would help meet the energy generation targets and make households more efficient.	
Resident	LP0082	DP0040	INF7 – does not mention having community buy in. All such wind farm developments should have local communities support. There should be significant consultation in relation to the wind turbines at High Volts and Brenda Road, indeed any wind turbine proposal that will be close to residential property. The proposed INF7 site on Tees Rd is only 500M from the Seaton Sands and Dunes housing estate development, whilst nearest housing to the other INF7 sites is only 900 or so metres. There is no mention of wind turbines in the adopted Hartlepool Infrastructure plan. Despite other issues these developments will degrade visual amenity as they will break the rooftop skyline in a repetitive way, imposing on the residential areas of Seaton Carew, and that is wholly unacceptable. There is strong resident and industrial opposition to such developments. HBC must not sacrifice the welfare and quality of life of Seaton Carew and other impacted areas to the economic benefits to the council finances from turbine community-fund payments, (nor goods and services 'in kind' as the proposal document implies). Goods and services 'in kind ' complicate proper control and accountability in the management of accounts and contracts. They also represent an additional cost saving to the vendor which the client does not benefit from.	The policy will be strengthened by further references to community buy in. Renewable energy development, including wind turbines, is not infrastructure necessary to deliver housing and other developments in the way that roads and utility services are considered as infrastructure. Wind turbines and other renewable energy generation developments are not therefore included in the Local Infrastructure Plan.
Brenda Road Holdings Ltd	LP0244	DP0212	The plan notes the upcoming planning enquiry regarding three very large (175m tip height) wind turbines just to the south of our site. We note that the new policy (INF 7) stipulates that there should be six turbines in this area with a tip height not to exceed 99m. Whilst it is to be welcomed that scale of the new turbines are to be reduced we would like to object strongly to the potential siting of any wind turbines in this area.	See response to comments above.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			The area within which the turbines are to situated comes very close to our site and to existing housing to the south of Seaton Carew. The effects of shadow, flicker and low frequency sound from any turbine in this area would have an unacceptable impact on local residents. In this respect the siting of turbines here would breach the constraints within INF 7, namely: "The impact, either individually or cumulatively, on the amenity of local communities or residents including visual intrusion, noise and traffic."	
TM Darling & Son	LP0245	DP0214	The area INF7 Strategic Wind Turbine Development covers most of the farm except for the fields adjoining Hart quarry and the golf course. Could I request this area is moved in a easterly direction to include those two fields ?	The Council has used the East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study as a basis for considering the potential for further wind turbines in the High Volts area. The Council will however seek expert landscape advice regarding these two fields if a decision is taken to proceed with the wind turbine area proposal.
Durham County Council	LPO246	DPO0215	We note that you are proposing two new sites for wind turbines but we wondered if you had considered identifying existing sites or sites under construction for the possibility of repowering them in the future. This may be beyond your Plan period but it is something Durham County Council is considering. Another observation would be to wonder if you had considered identifying sites for other sizes of turbines – perhaps smaller ones. Again, this is a matter under consideration in Durham.	Consideration has also been given to the potential of Red Gap Moor to accommodate a medium-small – small scale development but it was concluded that the overall level of development proposed at Red Gap Farm was below the landscape capacity. All of the wind turbine or photovoltaic sites within the Borough are currently operational. If any were de-commissioned and a new operator came forward they would have to meet the criteria in the policy.
Resident	LP0249	DP0219	Finally, I wish to register my objections yet again regarding the applications for huge land based wind turbines to the South of Seaton Carew which have been included in the local plan. In brief my objections include: 1) Hartlepool Council's own Landscape Assessment states that this will be beside a "HIGH VALUE COASTAL LANDSCAPE". These turbines will obviously degrade the value rating.	See response to comments above.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			2) They will dominate the Southern approach to Hartlepool and this is important because it is near the TRANSPORT CORRIDOR. This is extremely important in a village that relies on tourism. 3) The development would be central to areas the council has designated MAJOR VIEWS, MAJOR VIEWPOINT and MAJOR RIDGELINES. These turbines will inevitably destroy the VISUAL ASPECT. 4) This scheme will adversely affect the perception of the town's tourists. Seaton Carew is the village adjoining the development and it is the major tourist draw of the town. A downturn in tourism will affect employment of SEASONAL WORKERS and tourist related BUSINESSES. 5) The low noise generated by the operation on the turbines can adversely affect the HEALTH and SLEEP PATTERNS of Seaton Carew residents. This is a well documented fact and such low noise was utilised as a potential weapon in world war two. The noise disturbance caused by the turbines already erected offshore can be detected by residents when the wind conditions are right. Imagine how worse the noise from much closer land based generators would be. 6) The sunlight reaches the village from that direction. A spinning structure that tall will create a dappled light effect. Although this light flicker is not totally blocking the light it will deprive residents of the LIGHT they currently enjoy. 7) Turbine blades are known killers of birds. These plans intend to situate such mechanisms in the flight paths of overwintering birds attracted by the INTERNATIONALLY PROTECTED RAMSAR mudflats and SSSI's (Sites of special scientific interest) on the dunes not to mention the SALTHOME bird sanctuary nearby which is also a tourist attraction. 8) These blades are certainly high enough to create ghosts on RADAR	

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			screens which could easily cause confusion to air traffic control or disrupt FLIGHTS from Tees Durham airport or even the Newcastle airport flight paths. Expensive software to block this action could also create blind spots in the radar field – not what you want over a nuclear power station and one of the biggest chemical complexes in Europe? 9) What's more the turbine action will act as screens which could attract TERRORIST ACTIVITY. Aviators know that this create a flight path behind them totally unseen by the radar – something that should ring warning bells being so close to a nuclear facility in these times of terrorist strikes. 10) These turbines have recently been exposed as a FIRE hazard. As the development falls within the curtilage of the NUCLEAR POWER STATION (where explosive and combustible materials are not allowed) this should be enough in itself to render such applications unworkable. 11) The blades of these turbines would create hazards for, not only the police helicopter, but also the Great North Air Ambulance. 12) I am amazed that the erection of turbines was even considered on this site. The legislation states that not only must these turbines have a topple zone, it should be 10 meters larger than the height of the wind turbine. Clearly the site is not large enough to comply with the legislation. Considering that Scotland has recently turned down several turbine plans, I cannot see why Hartlepool Council is encouraging them.... especially as they would be the largest wind turbines in Europe. This is certainly not an exhaustive list - but surely it raises enough points to warrant rejection of these plans?	
The Energy Workshop Ltd	LP0251	DP0221	Policy INF7: Strategic Wind Turbine Developments. Paragraph 8.57 of the supporting text of the policy states that the 'Brenda Road area in south east Hartlepool is considered to have potential to	The Council has used the East Durham and Tees Plain Wind Farm Development and Landscape Capacity Study as a basis for considering the potential for further wind turbines in the

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			accommodate a limited number of wind turbines'. The supporting text then goes on to state that the maximum number of turbines in the Brenda Road strategic allocation should be restricted to six, and only small/medium scale turbines should be permitted, with a maximum tip height of 99 metres. It justifies this conclusion through reference to the Wind Farm Landscape Capacity Study, which stated that the area between Billingham and Hartlepool had potential to accommodate a 'small-medium' wind farm (up to 6 turbines). In practice, however, the Wind Farm Landscape Capacity Study did not include the urban and industrial areas of Hartlepool so its conclusions with regard to turbine capacity and height are not directly relevant to the Brenda Road area, and relate instead to the more rural area to the west. I also wish to raise concerns with regard to the setting of a maximum tip height and a restriction in maximum turbine numbers at the Brenda Road allocation. Setting a maximum tip height of 99m would preclude the installation of a whole raft of modern turbine types which more typically fall within the 100m to 135m tip plus height range, which are significantly more efficient and economic than sub-100m turbines. The Brenda Road area has significant potential to accommodate such larger turbines, potentially providing a location for test and demonstration sites for modern offshore turbines. This, in turn,could bring additional benefits in attracting associated inward investment opportunities as has been the case at Blyth. I would therefore request that reference to maximum tip heights and turbine numbers should be removed, and that the capacity of the strategic allocation should, instead, be governed by technical and environmental constraints. The relevant part of the policy should, therefore, be reworded thus: 1) High Volts – in association with the existing wind turbine development there is potential for up to 3 additional turbines 2) Brenda Road area – an anticipated capacity of around 6 turbines, subject to technical and environmental considerations Proposals in the High Volts area should be of a similar scale (or smaller) to the existing turbines. In the Brenda Road area, the number and scale of	High Volts area. The Council will however seek expert landscape advice regarding these two fields if a decision is taken to proceed with the wind turbine area proposal.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			proposals should be governed by the relevant environmental and technical constraints.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	The planning application for the 3 wind turbines with a tip height of 175 metres was submitted in 2014 has been called in by the Secretary of State and a public inquiry is scheduled for later in 2016. The Government introduced new considerations to be applied to proposed wind energy development so that the proposal has the backing of the local community with effect from 18th June 2015, after the 175m turbine application had been submitted and considered by the Borough Council. A hearing into the 3 turbine applications will not now go ahead as the Government Inspector has determined that the development did not undertake adequate public consultation and the applications are therefore not valid.
Resident	LP0262	DP0237	I am a Seaton Carew resident I live in the new estates by the sports domes. I think the wind turbines will ruin this Estate, we will struggle to sell our homes we will have an eyesore out of our windows. We have not been consulted about the meetings in relation to the wind turbines (apparently one was held last night at the Seaton social club). I didn't receive anything through the post. I think people should know what is happening in our town and be allowed to express their views by post or email not just by attending a meeting. I think we should be given information on how far away they will be to our homes and if we will be effected in any way (noise or shadow flickers which can affect mental stability). I want to be made more aware of the plans and what us as residents can do to stop these things being built so close to our homes.	Comments noted. However there has been considerable concern raised over any proposals for wind turbines in the Brenda Road area as can be seen from the comments and responses above. However given the timing (at the end of the Local Plan Preferred Options consultation period) of the Government Inspector's decision not to proceed with a public hearing into planning applications for 3x175m turbines due to lack of adequate consultation by the developer, it has been deemed appropriate to carry forward the wind turbine areas to the next stage of the Local Plan process as there is some concern that supporters of the 3 wind turbines at the application stage may have understood that the applications had been approved by the Council and therefore had not made a representation on the Local Plan.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
Resident	LP0263	DP0238	I wrote to you on 26th November 2015 and 7th January 2016 (Planning Inspector) regarding my objection to the planning applications for the erection of three large wind turbines at Seaton Carew in close proximity to my home. I understood that wind turbines would not be built near people's homes without their consent and agreement and I wish to express my disbelief that, should their current application fail, the applicants have submitted plans to erect six smaller turbines. I should again like to lodge my objection to these as we do not want turbines of any shape, form or size close to our homes. There are numerous turbines out at sea, close to Redcar, very visible from our part of the coastline and cannot understand why they cannot be erected at sea if they have to be built at all. We further understand that they do not always function correctly but the applicants appear to be more interested in the lucrative Government subsidies than the public's wishes. I am particularly concerned about the noise emitted from the turbines, especially as I believe the wind will carry this incessant noise to a greater distance to that declared by the applicant. The shadow flicker will also have a great effect upon us as we particularly enjoy using our west-facing garden. I also do not believe that there have been enough, in-depth studies of the effect upon wild-life currently breeding in the surrounding area. There are sand dunes, fields with grazing cattle, a seal colony in the Tees estuary and Saltholme Nature Reserve with wetlands and hides for birdwatching and cannot believe there will be no adverse effects upon them. There are numerous species of birds on the local links golf course, which leads to the dunes, and very many birdwatchers are very often seen in this vicinity. Studies made in Denmark showed that wind turbines built there had an	Noted.

Company	Unique Ref	DP Ref	INF7 Strategic Wind Turbine Developments	Planning Policy Response
			effect upon a nearby mink farm whereby the animals ceased to breed. Such studies should be carried out in depth in this country before agreement is given for wind turbines to be built. The rush for plans to be submitted and passed seems to be happening far too quickly and coincides with the Government's proposals to withdraw funding and/or grants for the projects. They seem intent on beating deadlines rather than take into consideration residents' wishes. Sadly this also seems to be in line with our Council's lack of notification about the intention to build the turbines. On checking with various householders and local businesses, there was a distinct lack of notification and one local business man said that eight separate envelopes, all addressed to his business, were delivered on the same day in the same post when nearby residential properties received none! Please consider my (and others') objections before making a decision.	

Policy INF8: Large Scale Solar Photovoltaic Developments - Pre-amble

Company	Unique Ref	DP Ref	INF8 Preamble	Planning Policy Response
NFU North East	LP0047	DP0003	• While we agree that the best and most versatile agricultural land should be prioritised, careful consideration should be given to a development that crucially supports the sustainability of an agri-business.	In considering proposals for large scale photovoltaic developments the Council is following current Government guidance on the avoidance of the best and most versatile agricultural land. However the Local Plan also contains policies to support the rural economy, including agriculture. All proposals will be considered on their merits but if it is robustly demonstrated that a proposal on best and most versatile land supports the sustainability and viability of an agri-business then this will be taken into account as part of the decision process.

INF8 Policy: Large Scale Solar Photovoltaic Developments

Company	Unique Ref	DP Ref	INF8 Solar Photvoltaic Developments	
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council feels the loss the best quality and most versatile agricultural land should be avoided wherever possible. A key consideration is the impact on the rural landscape represented in bullet point 3. The Parish Council feels it is essential that suitable screening with trees and hedgerows is required which can also secure benefits to the ecology of the area.	Noted – these concerns are reflected in policy INF8.
Hartlepool Civic Society	LP0013	DP0231	POLICY INF 8 – LARGE SCALE SOLAR PHOTOVOLTAIC DEVELOPMENTS (1) to (8) The Society supports all requirements to minimise effects on the environment and landscape.	Noted.
Historic England	LP0044	DP0213	Policy INF8 should be strengthened by using the same form of wording as policies INF6 and INF7 regarding heritage assets, ie: by referencing their significance. Historic England has produced guidance on the historic environment and renewable technologies, available on our website at https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/microgeneration/ . Given the rapidity with which renewable energy technologies are evolving, renewable energy projects and their associated infrastructure should aim to be reversible where possible.	Sub-paragraph 6) of the Large Scale Photovoltaic Developments policy will be amended to read: "impact, either individually or cumulatively, on the significance of a heritage asset including its setting"
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support noted

Section 3 of the Consultation Statement, covering:

Quality of Place
Policy QP1: Planning Obligations
Policy QP2: Compulsory Purchase Orders
Policy QP3: Location, Accessibility, Highway Safety and Parking
Policy QP4: Layout and Design of Development
Policy QP5: Safety and Security
Policy QP6: Technical Matters
Policy QP7: Energy Efficiency
Policy QP8: Advertisements

Pre-amble QP1: Planning Obligations

Company	Unique Ref	DP Ref	QP1 Preamble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	We find that the chapters covering Climate Change, Quality of Place and the Natural Environment include aspirations and aims which deserve support and endorsement from residents and their representatives. Indeed, if they are ultimately to influence development for the better, these chapters are supportive of the additional measures and amendments needed and which we set our below. We consider them absolutely essential for the best outcomes, not only for residents of the Fens Estate and future residents of the South West Extension (SWE), but for all of Hartlepool.	Support noted.
Resident	LP0201	DP0159	'Better quality roads', this should cover the conversion of the A689/Dalton Back Lane junction into a signalised cross roads via development contributor also relates to 9.22.	Noted. Highway infrastructure is included as a key point within the policy, need for specific projects are assessed as part of the development management process.

Policy QP1: Planning Obligations

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
Hartlepool Civic Society	LP0013	DP0231	POLICY QP1 - PLANNING OBLIGATIONS Planning obligations should be sought from developers and it is vital to include public transport measures.	Noted.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Quality of Place policies outlined in the Local Plan. We would urge the Borough Council to ensure that affordable housing is made available in rural areas as well as the urban areas of Hartlepool. Many young people/families are unable to remain in the place of their birth due to the cost of housing in rural areas. .	Noted. Affordable housing is required on site in the rural villages. Policies within the plan support this. Reference is made to the priorities within made neighbourhood plans.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports this policy. The Parish Council would urge that the Parish of Greatham is not forgotten when consideration is given to what benefits can be derived from planning obligations and s106 agreements for development within and near the Parish.	Support welcomed and noted. In order to meet the tests of the CIL Regulations, planning obligations are only sought when necessary to the proposal to be sustainable development. Should planning obligations be required these are usually directed to as close to the development site as possible. Once made the Neighbourhood Plan, including priority information on planning obligation in terms of infrastructure priorities will be considered as part of the planning application process. Policy updated to ensure consideration of made neighbourhood plans.
Highways Agency	LP0029	DP0196	Highways England is generally supportive of this policy and the use of planning obligations to secure contributions towards the delivery	Noted. The preamble to QP1 clearly references that the Council may develop a CIL charging schedule should the

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
			of infrastructure improvements. Further, we welcome that planning obligations will be required towards highway infrastructure and sustainable transport measures. During consultation on the previous Core Strategy we stated our support for utilising CIL should the Council decide to use this mechanism for securing developer contributions. However, it is noted in paragraph 9.7 that CIL will not be implemented as, 'viability testing to date has indicated that implementation of a CIL charging schedule would impact upon the deliverability of development across the Borough'. We acknowledge that this is the current situation for Hartlepool and that should this position change in the future, CIL may be reconsidered, at which point we point we would welcome further consultation on the proposed CIL charging schedule.	economic situation change and this is seen as a more appropriate approach then the current method. Any changes would be subject to statutory consultation in line with the regulations.
Historic England	LP0044	DP0213	Page 56, Policy QP1: The reference to the potential for planning obligations to be used for the benefit of heritage is particularly welcomed, along with the recognition that developer contributions may be reduced in certain circumstances such as renovation of a heritage asset.	Noted.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy QP1: Planning Obligations Paragraph 173 of the NPPF emphasises the importance of plans and sites being deliverable. It states: "Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viable is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as those for affordable housing, standards, infrastructure contributions and other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a	Noted. The planning obligations are set on the cost of infrastructure and have been tested by development within Hartlepool. Should economic conditions change substantially the Council may wish to revisit the Planning Obligations SPD to ensure thresholds reflects need. The policy recognises that there are instances where developments may not be able to accommodate all planning obligations required, in this instance this is assessed against a viability assessment. The SHLAA process considers deliverability of sites. The policy does provide the mechanism for viability to be tested. A deliverability risk assessment will be produced

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
			willing land owners and willing developer to enable the development to be deliverable." Persimmon Homes therefore welcome the reference within the policy stating that "the Borough Council will seek planning obligations from developers, where viable". However it is imperative that the cumulative impact of all the policies within the plan do not threaten the viability of sites. It is also important that the scale of obligations is not set on the threshold of viability to provide flexibility within the plan for changing economic conditions. At present the plan has not been subject to viability testing to demonstrate that the preferred allocations are viable when considered against the proposed level of obligations. In an area with historically low achieved sales prices, this is a significant concern for Persimmon Homes. If sites are subject to a burden which means that they cannot provide landowners with a suitable land value after the development costs and profit has been taken, landowners will not sell and development will not take place. This will impact upon the delivery of housing in the borough. Persimmon Homes therefore recommend that viability testing is undertaken as part of the plan-making process to support and inform the progression of the Local Plan.	for the submission stage.
Sport England	LP0079	DP0037	Sport England welcomes and supports the inclusion of playing pitches & outdoor Sports / exercise provision and built sport facilities within the types of infrastructure for which planning obligations may be sought to address the impacts arising from a development.	Support welcomed.
Story Homes	LP0219	DP0181	Policy QP1: Planning Obligations Story Homes considers that Policy QP1: Planning Obligations should	Noted. The policy clearly refers to viability and refers to the Planning Obligations SPD. Section 16 of the SPD

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
			be intrinsically linked and reflective of National Policy which sets out the governments preferred approach to dealing with obligations levied on new developments. In this regard we support the reference within the first sentence which sets out that obligations should be 'viable' and deemed to be 'required to address the impacts arising from development'. As a responsible developer we support the delivery of essential infrastructure to deliver sites and to ensure that development in acceptable in planning terms; however, for the avoidance of doubt we suggest that there should be increased references and mechanism built in to this policy to ensure that viability is taken into consideration. We recommend that this policy should include clear wording which sets out that obligations should be sought where practical, viable and related in size and scale to development proposals. As set out in our response to section 6, Policy QP1 should also be reflective of the requirements set out within paragraph 173 of the NPPF which seeks to ensure viability and deliverability in both plan-making and decision-taking. This approach will ensure that future development proposals are not threatened by disproportionate obligations and policy burdens. Notwithstanding the above, where a formal CIL Charging mechanism is not in place, these matters should be requested through the Section 106 Agreement at the planning application stage. Whilst it is essential that the necessary infrastructure is provided to facilitate the development, the Council must ensure that any planning obligations meet the tests of Regulations 122 and 123 of the Community Infrastructure Regulations 2010 (as amended). The tests require planning obligations to be: • Necessary to make the development acceptable in planning	refers to Viability and allows for the submission of a viability assessment should affordability of necessary planning obligations be an issue. Levels of obligation as set out in the SPD have been set at a deliverable level tested by continues development in Hartlepool for a number of years.

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
			terms; • Directly related to development; and • Fairly and reasonably related in scale and kind to the development.	
Network Rail	LP0250	DP0220	DEVELOPER CONTRIBUTIONS Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, cycle facilities, improved access arrangements, ticketing facilities or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It would be appropriate to require contributions towards rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network. Network Rail therefore requires new developers to fund any enhancements to our infrastructure required as a direct result of new development and any policy or guidance should specifically name 'rail infrastructure'. The likely impact and level of improvements required will be specific to each station and each development meaning standard charges	Noted. Whilst rail infrastructure is not specifically mentioned within the policy it is clear that the list of possible obligations is not exhaustive. Under green infrastructure (NE2) the importance of rail links are recognised, green infrastructure planning obligations can be directed towards enhancing this as appropriate. Policy QP1 will be updated to expand highway infrastructure to include rail infrastructure. Future amendments to the Planning Obligations SPD will consider ensuring clearer reference to rail infrastructure. In terms of consultation, statutory guidance is followed by Planning Services to ensure all statutory consultees are involved as required.

Company	Unique Ref	DP Ref	QP1 Planning Obligations	
			and formulae may not be appropriate. Therefore, in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network. To ensure that developer contributions can deliver appropriate improvements to the rail network we therefore request that any Policy or guidance on Developer Contributions in the LDP or any Supplementary Planning Guidance includes provision for rail. The policy and/or supporting Guidance should include the following: • A requirement for developer contributions to deliver improvements to the rail network where appropriate. • A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. • A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Pre-amble QP2: Compulsory Purchase Orders

Company	Unique Ref	DP Ref	QP2 Preamble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY QP2 – COMPULSORY PURCHASE ORDERS Option 9.12 Every effort should be made to prevent unsightly derelict land and buildings . Where necessary legal challenges should be made earlier than hitherto. Option 9.16 The Society finds this option vague and needs 'tightening up' to prevent buildings and sites becoming dangerous eyesores – blighting the surrounding areas. Option 9.18 - The idea underlying the option is admirable but there is no policy – encouragement is not sufficient. Far too long have developers been setting standards incorporating 'bog standard' designs with the sole purpose of achieving their commercial aims. Developers must be required to engage in early discussions with the Council.	Noted. There is a comprehensive formal process to adhere to when progressing a Compulsory Purchase Order. The Council does use legal powers to progress development and address derelict land and buildings.

Policy QP2: Compulsory Purchase Orders

Company	Unique Ref	DP Ref	QP2 Compulsory Purchase Orders	Planning Policy Response
Highways Agency	LP0029	DP0196	No comment	
Resident	LP0218	DP0180	Compulsory Purchase Orders - HBC's intention to use CPOs to remove or renovate derelict and dangerous buildings is to be applauded, however it is to be hoped that the grants referred to in para 9.16 (page 58) do not encourage the owners of such eyesores to deliberately run down such properties in order to benefit from such grants.	Noted. Any grant funding programmes administered by HBC have strict eligibility criteria and robust monitoring frameworks
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Pre-amble QP3: Location, Accessibility, Highway Safety and Parking

Company	Unique Ref	DP Ref	QP3 Preamble	Planning Policy Response
Historic England	LP0044	DP0213	Page 58, Improving the Quality of Place: The recognition of the role that heritage can take in improving an area and encouraging regeneration is particularly welcomed. The reference to 'English Heritage' in paragraph 9.17 should be amended to read Historic England, following our separation into two organisations in 2015.	Support welcomed. Agreed. Reference changed.
Resident	LP0082	DP0040	Section 9.25 I suggest the council consider park and ride facilities for events that draw crowds. Particularly Seaton Carew, which is sometimes a victim of its own success when events are staged since there is insufficient parking for the scale of visitor influxes. Perhaps a scheme run from one of the industrial estates areas off Brenda Rd. South?	The Council has provided park and ride facilities in the past for borough events and this is something that the Council will look to use again as and when needed. Comments and suggested location are welcomed.
Tees Valley Local Access Forum	LP0214	DP0175	We are pleased to read under 9.20 ..' a net loss of a route will not be acceptable in any circumstances...'	Support welcomed.

Policy QP3: Location, Accessibility, Highway Safety and Parking

Company	Unique Ref	DP Ref	QP3 Location, Accessibility, Highway Safety and Parking	Planning Policy Response
Fens Residents Association	LP0011	DP0010	The Staggered Junction on the A689 (Dalton Back Lane/Greatham) Ever since the concept of a SWE was first mooted FRA has urged that this notoriously dangerous junction should be converted into a safe, signal controlled crossroads, which would also serve as the southern entry/exit to the estate. This junction has been the scene of fatalities in the past, the most recent being in 2012, and serious injuries occur all too often. Disruption following vehicle damage only is commonplace. Before the October 2015 Planning Committee Meeting a map provided by Persimmon showed the straightening of the crossroads, albeit in addition to a new and unnecessary junction. This map also reflected the reduction in the number of houses for the SWE from 2750 to 1260. Approval was given to an application which leaves the staggered junction as it is. A 50mph limit will do little to help! A golden opportunity to prevent future accidents and fatalities was missed. It is imperative that this is corrected. These comments are supported by Policy QP3, INF1 AND INF2.	Noted.
Hartlepool Civic Society	LP0013	DP0231	The Society supports the paragraph which suggests that where developments are proposed and where there is no public transport – then developers should provide a subsidised bus service or contribute to the expansion of an existing service.	Support welcomed.
Park Residents Association	LP0014	DP0187	Policy QP3 - Members support the paragraph suggesting that where developments are proposed in an area with no public transport then the developer should provide and subsidise a bus service .	Support welcomed.
Highways Agency	LP0029	DP0196	Highways England has no particular comments but is generally supportive of this policy and ensuring that development is sustainably located and well connected to sustainable travel options. We also support the requirement for developers to provide a	Support welcomed.

Company	Unique Ref	DP Ref	QP3 Location, Accessibility, Highway Safety and Parking	Planning Policy Response
			subsided bus service or contribute to the expansion of an existing service, where sites are not adequately served by public transport or have no provision within the vicinity of the site.	
NFU North East	LP0047	DP0003	'In some circumstances, where appropriate, they (rights of way) are also diverted and/or improved to allow for development. In some instances the development also allows for the creation of new public rights of way, in addition to any diversionary changes. However a net loss of a route will not be acceptable, in any circumstances.' We would expect that in the event of alterations to rights of way that landowners are thoroughly consulted at an early stage. We also welcome the acknowledgment that green infrastructure can be designed in such a way to provide flood risk mitigation through 'sustainable drainage solutions' and support biodiversity. Any such drainage schemes should include provisions for maintenance.	Noted. Landowners are consulted as early as possible when alternative or new PRoW are proposed. Noted. To date all the schemes we have accepted will be maintained through third party maintenance agreements whereby each resident pays into a scheme for the upkeep on SUDS features. HBC will be monitoring the existing SUDS scheme to help develop a better idea of maintenance costs into the future and it may be possible that we can come to an agreement whereby we are provided with a lump sum to cover future works.
Homes and Communities Agency	LP0063	DP0020	The HCA welcomes the reference to the partnership work with the LA to maintain high design and quality standads within 9.17 "The Council will seek to ensure that all development is carried out to a highstandard of design and adds to the quality and enjoyment of the borough for the lifetime of the development. The Council will work with partner organisations including the Homes and Communities Agency (HCA), English Heritage (EH) and the Commission for Architecture and the Built Environment (CABE) to help achieve this". There is a desire to see an element of Starter Homes within the North Burn site. HCA Guidance on Starter Homes suggests that HCA Area teams are to work with Local Planning Authorities to help the LPA to articulate their requirements for Starter Homes design.	Support welcomed.

Company	Unique Ref	DP Ref	QP3 Location, Accessibility, Highway Safety and Parking	Planning Policy Response
			Tender documents for Starter Homes sites will clearly articulate the Government's aspirations for design quality within the Starter Homes programme together with the specific starter homes design statement developed with the LPA.	
Sport England	LP0079	DP0037	Hartlepool's Sustainable Community Strategy has an ambition theme of strengthening communities health and well-being through encouraging healthier lifestyles. For some residents this mean ensuring that they are served by the right sports facilities in the right place. However for a significant amount of the population, formal sport is not something they would normally contemplate if delivered in its usual places and formats. It is imperative that this section of the population are active through other means if communities are to become healthier. Sport England has developed a design guidance called Active Design. We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design. The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more	Noted - Active Design guidance to be reviewed and reflected where necessary. Noted and agree. Hartlepool Council seeks to ensure that environments are conducive to an active and healthy physical lifestyle. HBC are seeking to limit direct reference to specific design principles or guidance as such literature can often be updated/superseded or deleted . Whilst HBC is supportive in principle of the ten principles of active design in the design guidance developed by Sport England, they are considered to be too prescriptive too wholly incorporate in the Local Plan.

Company	Unique Ref	DP Ref	QP3 Location, Accessibility, Highway Safety and Parking	Planning Policy Response
			people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often. Sport England considers that draft policies QP3 and QP4 could be amended to incorporate or make direct reference to Active Design's principles. The document can be found at the following location on our website; https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Pre-amble QP4: Layout and Design of Development

Company	Unique Ref	DP Ref	QP4 Preamble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society supports (1) to (10) but with particular regard to (9) Consideration should be given to preventing situations which exist where buildings – eg bungalows – are completely 'swamped' by larger, adjoining developments. Of particular importance – privacy of residents and visitors should not be significantly negatively impacted. (Options 9.36 - 9.38)	Support welcomed and points noted.
Resident	LP0082	DP0040	Section 9.28 Re. form of development . Clearly wind turbines seem to be excluded from the intent of this clause since they render the space around them unusable for human activities including keeping livestock. They are effectively a multiple high-rise development adjacent to a residential area.	Paragraph 9.28 applies to all types of development, the impact upon surrounding land use will be taken onto account during allocation and/or application stage.
Resident	LP0096	DP0054	It all depends on the people who live in a place.	The Council has a duty to provide for all residents and in doing so seeks to ensure all development is correctly laid out and designed.
Resident	LP0201	DP0159	9.34 & 9.35 Good policies if developers don't manage to evade them.	Noted. Support welcomed
Brenda Road Holdings Ltd	LP0244	DP0212	We welcome the point made at 9.34 noting "the need to cater for the changing demands of the population and in particular the needs of an ageing population and those with disabilities or those who may have a disability in the future."	Support welcomed.
Resident	LP0258	DP0233	9.36 - This development will have a detrimental affect both North and South side of the 2 developments (HSG8 a & b) especially due to loss of privacy, increase in noise, Overshadowing, poor outlook and disturbance, which will also filter down this small village due to various situations i.e. Footfall, Cars, deliveries, etc et The overall quality of living in Hart Village will be drastically reduced due to the above, which is not a exhaustive list of issues or concerns.	Comment noted but it does not relate directly to the pre-amble to policy QP4.

Policy QP4: Layout and Design of Development

Company	Unique Ref	DP Ref	QP4 Layout and Design of Development	Planning Policy Response
Park Residents Association	LP0014	DP0187	Policy QP4 - With regard to layout and design of a development further weight should be given to preventing existing buildings being overlooked or crowded by a new development. Bungalows in particular are vulnerable to this as are existing two storey homes when a development includes the now fashionable three storey town house.	Noted. The separation distances proposed are deemed to be acceptable, they have been in place for many years and are broadly comparable with those across the Tees Valley. HBC has no evidence to indicate that the separation distances are unacceptable.
Elwick Parish Council	LP0016	DP0222	All housing developments should be required to have sufficient off road parking to enable the easy flow of traffic through and around the area, and to ensure the safety of children and the elderly alike. All developments should take into account the needs of, not only, those who use wheelchairs, but those who are frail or incapacitated in other ways.	The Council has an agreed set of standards for car parking, traffic calming/speeds, disable access etc for residential areas and these standards must be met by developers.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports the aims of this policy particularly that developments should respect and reflect the distinctive character and history of the vicinity in which they are built. Will the Local Plan be referencing Greatham Village Design Statement?	Support welcomed. The village design statements are contained within the Hartlepool Rural Neighbourhood Plan. Once made the rural plan will form part of the development plan and thus it is considered that the statements do not need including within the HBC Local Plan.
Historic England	LP0044	DP0213	While we fully support Policy QP4, the wording of (6) with regards the historic environment could potentially be strengthened by going further than just 'respecting' the historic environment, and refer to 'sustaining and enhancing the significance'.	Comment noted and 'respect' replaced with 'sustain and/or enhance'.
Sport England	LP0079	DP0037	Hartlepool's Sustainable Community Strategy has an ambition theme of strengthening communities health and well-being through encouraging healthier lifestyles. For some residents this mean ensuring that they are served by the right sports facilities in the right place. However for a significant amount of the population, formal sport is not something they would normally contemplate if delivered in its usual places and formats. It is	Noted - Active Design guidance to be reviewed and reflected where necessary. Noted and agree. Hartlepool Council seeks to ensure that environments are conducive to an active and healthy physical lifestyle.Not

Company	Unique Ref	DP Ref	QP4 Layout and Design of Development	Planning Policy Response
			imperative that this section of the population are active through other means if communities are to become healthier. Sport England has developed a design guidance called Active Design. We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design. The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often. Sport England considers that draft policies QP3 and QP4 could be amended to incorporate or make direct reference to Active Design's principles. The document can be found at the following location on our website;	HBC are seeking to limit direct reference to specific design principles or guidance as such literature can often be updated/superseded or deleted . Whilst officers are supportive in principle of the Ten Principles of Active Design, it is considered that they are too prescriptive to be wholly incorporated within the Local Plan.

Company	Unique Ref	DP Ref	QP4 Layout and Design of Development	Planning Policy Response
			https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	
Brenda Road Holdings Ltd	LP0244	DP0212	We note the inclusion of policy QP4 regarding acceptable layout and design of development. We agree that all development should be designed to the highest quality and that the amenity of residents should be protected. However, whilst fixed separation distances can help protect residents privacy and amenity, rigid rules of this nature can limit the design options available, especially when using curved building forms. Whilst policy QP4 states that "there is opportunity for appropriate inclusive, innovative and sustainable design that can be bolder in design terms and often aims to create a landmark development", care should be taken that this policy does not inhibit more innovative proposals from coming forward. We would welcome the opportunity to comment on the forthcoming Residential Design SPD when it becomes available.	The separation distances do seek to ensure residential amenity is protected and the standard has been successfully widely applied across the borough. The standard has been included to give firm guidelines to developers. No change to the policy. Noted. Each application will be considered on its merits and the site and its surrounding will be taken into account during the application process. It is considered that the policy does will not preclude innovative proposals, it will allow for them where appropriate. Noted. Brenda Road Holdings will be consulted on the draft SPD.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support welcomed.

Pre-amble QP5: Safety and Security

No Comments

Policy QP5: Safety and Security

Company	Unique Ref	DP Ref	QP5 Safety and Security	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY QP5 – SAFETY AND SECURITY We support the policy in principal, however, when applications for developments are being considered – the possibility of providing opportunities for anti-social behaviour should be re-considered. New tree planting should not provided in shaded areas which could contribute to anti-social behaviour.	Support noted. The intention of the policy is to reduce the occurrences of crime, fear of crime and anti social behaviour through design. The location of trees will be considered against safety principles.
Park Residents Association	LP0014	DP0187	Policy QP5 - Members support this in principal however there should be more robust regulations to prevent the opportunity for anti social behaviour.	Support welcomed. The LP seeks to prevent anti social behaviour by designing environments that make it difficult to undertake such activity.
Environment Agency	LP0031	DP0190	We support strategic tree planting to provide shade and urban cooling within development as detailed in Section 9.41. This would also help, albeit minimally, to reduce the rate of run-off into surface water drainage. We would recommend the planting of native tree species.	Support welcomed.
Hartlepool Borough Council	LP0037	DP0217	Public Protection supports the inclusion of sun shading provision into the Hartlepool Borough Council Local Plan. This supports the work that we do within the Public Health Department to raise awareness and promote health and wellbeing, including the protection from over exposure to ultra violet radiation, which can increase an individual's risk of developing skin cancer (NICE, 2016). According to the National Institute for Health Care Excellence (NICE) incidence of skin cancer in the UK has more than tripled since the 1970's and it is estimated that non-melanoma skin cancer accounts for more than a third of all cancers detected in the UK (2016). Skin	Support welcomed.

Company	Unique Ref	DP Ref	QP5 Safety and Security	Planning Policy Response
			cancer is the most preventable type of cancer (CIEH, 2005) as the risk of developing skin cancer can be reduced by adopting an holistic approach which includes spending time in the shade, wearing loose fitting light weight clothing to protect the skin and applying sunscreen. Children are particularly at risk of sun burn as their skins are thinner and more delicate than adults and are therefore at greater risk of over exposure to UVR (Skin Cancer Prevention, 2014). The inclusion of sun shading provision in new developments will ensure that vulnerable people who are at risk of sun burn will receive some protection from damaging ultra violet radiation. Public Protection offer advice and guidance to new businesses who wish to offer outside areas for the use of their clients, employees and members of the public.	
Persimmon Homes (Teesside)	LP0045	DP0209	Policy QP5: Safety & Security The policy is simply unnecessary and unjustified. Criteria 1 requires development to adhere to national security standards as set out by central government. This is covered by the most recent Building Regulations and therefore a policy requiring compliance with such standards is not necessary. The second part requires development to be developed in a way that minimises crime and the fear of crime through amongst other measures incorporating Secured by Design principles. Whilst Persimmon Homes welcome the reference to only 'principles' of Secured by Design rather than full accreditation, we believe that such a requirement would be better incorporated into Policy QP4: Design and Layout of Development.	Noted. HBC consider that the policy is necessary and justified and will see to ensure that all development is designed in a way to be safe and secure for residents and visitors. With regard to criteria 1, it is noted that the government set these standards however at times it is prudent to make the reader aware that such standards exist and that HBC have policies in place to ensure standards are adhered to. With regard to criteria 2 the matter is noted, there will inevitable by cross over between policies however given that this criteria relates to safety and security is it best located within this policy.

Company	Unique Ref	DP Ref	QP5 Safety and Security	Planning Policy Response
			The third measure requires areas of sun shading and urban cooling to be provided through tree planting, strategic landscaping and other design considerations such as canopies on buildings. Justification for such an approach is outlined within paragraph 9.41 of the Plan. Persimmon Homes consider this justification particularly in relation to residential development to be weak and a policy requiring such measures not to be the most appropriate strategy when considered against the reasonable alternatives as per Paragraph 182 of the NPPF. It is Persimmon Homes' belief that there are a number of simple measures residents can take at home to protect themselves from the sun or to cool down without adding further burdens upon developers. We therefore advise that this principle is deleted from the plan.	HBC do not consider the requirement to be too onerous, many developments require landscaping and thus HBC ask the applicant to consider landscaping and the benefit it can have to sun shading and urban cooling. It is noted that residents can take measures themselves to protect from sun damage, however it is the responsibility of HBC to ensure the environment is safe and secure and reduce impact upon health where possible.
Health Improvement Team	LP0240	DP0206	The Health Improvement Team within the Public Health department fully endorse the Safety and Security policy, in particular item 3 which addresses the Public Health agenda around sun safety and the risk of skin cancers due to over-exposure to the sun. The policy will ensure future planning considerations incorporate safety issues, sun shading and urban cooling measures into the design of residential developments, which will complement educational awareness campaigns and help address the public health issue around an increased risk of skin damage and cancer due to over-exposure to high UV sunlight.	Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Pre-amble QP6: Technical Matters

Company	Unique Ref	DP Ref	QP6 Preamble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	Whilst the 9m distance of the power lines from new buildings is legal and cannot be challenged from that angle it is certainly not desirable from a Quality of Place viewpoint. Hartlepool's standards should not be linked to minimums. Although 9m exceeds the 6m laid down by authorities it still presents problems of safety where children are likely to play. Expert opinion on a global basis is still divided about health issues due to electro magnetic pollution and there seems to be an average distancing of 30m in other countries. When it comes to gambling with human health and safety, residents expect Hartlepool to take no chances and therefore a minimum gap of 30m should be sought for development bordering overhead power lines. These comments are supported by Policies QP4 and QP6.	A minimum distance that development should be located from powerlines has not been set out within policy QP6. The Council has investigated this matter and considers that there is no conclusive evidence to state that the levels of Electro Magnetic Radiation (EMR) are at such a level that would conclusively cause harm to human health. Much of the research indicates that people make a choice on whether or not they want to live near a power line and in many instances house prices reflect the location of homes in proximity to power lines. The Council will continue to assess applications close to over head power lines on a case by case basis and will take on board advice from HBC Public Protection and Northern Powergrid. For a comprehensive analysis of the research surrounding this subject please see planning application H/2014/0405 and view the Public Protection comments, interlinked with Public Health England comments dated 29th July 2015. (http://edrms.hartlepool.gov.uk/AnitePublicDocs/12754056.pdf)
Environment Agency	LP0031	DP0190	Landfill There are a number of active and historic landfill sites in Hartlepool and development close to these sites can cause amenity/health issues. On that basis we suggest that the following wording is included in Policy QP6: Technical Matters (criterion 2), 'Development should take account of previously contaminated land including from historic landfill sites.'	Agreed. Point 2 now reads 'Development should take account of previously contaminated land including from historic landfill sites.'

Company	Unique Ref	DP Ref	QP6 Preamble	Planning Policy Response
Resident	LP0201	DP0159	9.47 In the case of the South West Extension the exclusion zone regarding the overhead power lines is totally insufficient. The health of future generations is being gambled with.	Noted. Please see comments above.

Policy QP6: Technical Matters

Company	Unique Ref	DP Ref	QP6 Technical Matters	Planning Policy Response
Persimmon Homes (Teesside)	LP0045	DP0209	Policy QP6: Technical Matters Persimmon Homes would question the purpose and necessity of such a policy given that it appears to be a Validation Checklist. We would therefore advise removing this policy from the plan and instead directing applicants to a separate Local Validation Checklist which can be produced independently of the Local Plan and regularly reviewed and updated when necessary. However should the Council wish to persist with such a policy, we would request the following amendment to the wording: "Where appropriate, All proposals should ensure that the following matters are investigated and satisfactorily addressed:…"	The purpose of the plan is to set out what criteria will be looked at when assessing planning applications; the plan is intended to give certainty and clarity and is aimed at developers and residents. It may be the case that residents, and some developers are not fully aware of all validation and legal requirements and thus they are included within the plan so that nothing is overlooked at the drafting stages of an application. Agreed. Wording changed to 'Where appropriate, All proposals should ensure that the following matters are investigated and satisfactorily addressed'.
NFU North East	LP0047	DP0003	• We note the importance the Council places on 'the status of any agricultural land and it's importance to the borough' and 'any matters regarding flood risk, both on and off site'. We would hope that the both matters are of paramount importance when assessing the feasibility of any development. The preservation of rural land is vital in ensuring the sustainability of the rural economy and therefore the economy of the area as a whole. As demonstrated recently, incorporating flood risk mitigation into design should be a key consideration, but must not be at the detriment of the agricultural sector.	Comment noted.
Home Builders Federation	LP0234	DP0200	Policy QP6: Technical Matters 44. This policy reads like a validation checklist and the need	Comment noted. Please see response above.

Company	Unique Ref	DP Ref	QP6 Technical Matters	Planning Policy Response
			purpose for the policy is questioned. Whilst the issues identified are likely to be relevant to many applications it is unlikely all of the identified matters will require investigation on every occasion. 45. If the Council considers it necessary to retain this policy it is recommended that the following amendments are made; “Where appropriate, All proposals should ensure that the following matters are investigated…”	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Pre-amble QP7: Energy Efficiency

Company	Unique Ref	DP Ref	QP7 Preamble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	FRA believes that when new houses are built the opportunity should be taken to incorporate best practice regarding energy efficiency and supporting the natural environment within new built areas. If this is not done now then future generations will regard us as having failed badly. This is another example of where Hartlepool should aim high and developers accept responsibility. These comments are supported by Policies QP7, NE2, NE3 and NE4.	Noted and agree. Support for policy QP7, NE2, NE3 and NE4 with regards to energy efficacy and supporting the natural environment is welcomed.
Hartlepool Borough Council	LP0248	DP0218	The Council is certainly committed to ensuring that residents are advised and assisted wherever possible in order to achieve a home that is energy efficient. This assistance may be in the form of signposting and referral to appropriate schemes, through partnership working and through enforcement activity. Current consultation by DECC suggests that the emphasis of the Energy Company Obligation (ECO) to deliver energy efficiency measures will be more focussed on fuel poverty. Work will need to be undertaken to identify households in fuel poverty so that activity may be targeted. We will no doubt be looking at schemes to help residents reduce their fuel bills in the future, such as Collective Switching.	Comment noted.

Policy QP7: Energy Efficiency

Company	Unique Ref	DP Ref	QP7 Energy Efficiency	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY - QP7 - ENERGY EFFICIENCY (1) and (3) the policy proposals are well-meaning but should not come at the cost of good architecture.	Comment noted.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy QP7: Energy Efficiency As set out within our response to Policy CC1, Persimmon Homes have significant concerns with this policy. The policy itself is purely subjective. There is simply no way of governing the policy as there is no defined method of calculating when the 'best use' of solar gain, passive heating and cooling, natural light and natural ventilation is sufficient. With many different influences upon a layout, it is simply impractical to state that it must make 'best use' of a specific matter. The policy will therefore create uncertainty within the decision making process which in turn will lead to costly delays to the delivery of new homes within the borough. The second paragraph subsequently requires housing developments of 10 or more to provide, where viable, a minimum 10% of their energy supply from decentralised and renewable or low carbon sources. This policy requirement is not consistent with national policy and is therefore unsound. Persimmon Homes would again refer the Council to the Ministerial Statement of the 25th March 2015 in which it was made clear that	Please see response to CC1. The principles of solar gain are widely available and easy to apply. HBC currently assess the solar gain merits of applications and will continue to do so. The residential design SPD will provide further advice. HBC currently work with developers to look at the layout of proposals, if developers consider energy efficiency at design stage then there should be no delays. If developers cannot design to a high energy efficiency standard then they can choose to improve the fabric of a building further. It is disappointing to read that just because something takes time and effort to do that it is not worth doing. This is set out in Policy CC1, please see Policy CC1 response.

Company	Unique Ref	DP Ref	QP7 Energy Efficiency	Planning Policy Response
			following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. Persimmon Homes therefore have major concerns with the policy and believe that such an approach lacks any justification or consistency with national guidance. The policy is therefore unsound and on this basis Persimmon Homes suggests that the policy is deleted from plan.	
Home Builders Federation	LP0234	DP0200	Policy CC1: Minimising and adapting to climate change & QP7: Energy Efficiency 16. Part 9 of Policy CC1 and the 2nd paragraph of Policy QP7 both require housing developments of 10 or more to provide, where viable, a minimum 10% of their energy supply from decentralised and renewable or low carbon sources. This policy requirement is not consistent with national policy and is therefore unsound. 17. The Council will be aware of the ministerial statement dated 25th March 2015. This statement sets out that following the commencement of the amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015, Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. The requirement for 10% of energy supply from decentralised solutions for developments complying with the Building Regulations would therefore be unjustified. 18. Similarly the requirement within Policy QP7 to; "…improve the fabric of the building 10% above what is required by the most up to date Building Regulations…" Would also be unjustified. The HBF therefore recommend the deletion of these requirements.	HBC consider that the policy requirements are in accordance with NPPF paragraphs 95 and 96 and the provisions in the Planning and Energy Act 2008 section 1 (1), which have not yet been repealed. The deregulation Act, section 43 makes provisions to repeal section 1 (1) of the Planning and Energy Act 2008, however this section has not yet came into force. The Ministerial statement is noted and HBC are aware that such statements are material considerations. The statement has been taken into account in the production of policies, however HBC consider that until a commencement order is issued then the provisions in the Planning and Energy Act are still in place. If it was the intention of the Government to apply these amendments straight away then HBC consider that the Government would have enacted the provisions immediately. No date has been set for the commencement order. HBC will review policy CC1 and QP7 when such an order

Company	Unique Ref	DP Ref	QP7 Energy Efficiency	Planning Policy Response
				is produced. Notwithstanding any such commencement order that may lead to changes to policies CC1 and QP7, such changes would only relate to residential development and thus the policy criteria would still apply to all non residential development. With specific regard to policy QP7, the Council first seeks to ensure that the design and layout maximises the benefits of solar gain. If a developer ca not do this and thus fulfil its duties under NPPF paragraph 96 (bullet point 2) then the Council offers an alternative option, the alternative option is not a requirement it a flexible approach to ensure that development meets with the paragraphs in the NPPF and is overall considered to be sustainable development. Without such an option, if development did not fulfill its obligations under NPPF paragraph 96 then an application may be refused.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Comment noted.

Pre-amble QP8: Advertisements

No Comments

Policy QP8: Advertisements

Company	Unique Ref	DP Ref	QP8 Advertisements	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	We support this policy.	Support welcomed.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports this policy, particularly that advertisements which introduce visually obtrusive features will not be permitted.	Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support welcomed.

Section 4 of the Consultation Statement, covering:

- Pre-amble HSG1: New Housing Provision
- Policy HSG1: New Housing Provision
- Pre-amble HSG2: Overall Housing Mix
- Policy HSG2: Overall Housing Mix
- Pre-amble HSG3: Urban Local Plan Sites
- Policy HSG3: Urban Local Plan Sites
- Pre-amble HSG4: The South West Extension Strategic Housing Site
- Policy HSG4: The South West Extension Strategic Housing Site
- Pre-amble HSG5: High Tunstall Strategic Housing Site
- Policy HSG5: High Tunstall Strategic Housing Site
- Pre-amble HSG6: Wynyard Housing Developments
- Policy HSG6: Wynyard Housing Developments
- Pre-amble HSG7: Elwick Village Housing Development
- Policy HSG7: Elwick Village Housing Development
- Pre-amble HSG8: Hart Village Housing Developments
- Policy HSG8: Hart Village Housing Developments
- Pre-amble HSG9: Affordable Housing
- Policy HSG9: Affordable Housing
- Pre-amble HSG10: Housing Market Renewal
- Policy HSG10: Housing Market Renewal
- Pre-amble HSG11: Extensions to Existing Dwellings
- Policy HSG11: Extensions to Existing Dwellings
- Pre-amble HSG12: Residential annexes
- Policy HSG12: Residential annexes
- Pre-amble HSG13: Gypsy and Traveller Provision
- Policy HSG13: Gypsy and Traveller Provision

Pre-amble HSG1: New Housing Provision

Company	Unique Ref	DP Ref	HSG1 Preamble	Planning Policy Response
R Newcomb & Sons	LP0054	DP0011	The local plan identifies a clear shortfall in the allocation of deliverable homes of 2,000 units. Policy HSG10 calls for housing market renewal. Our client's site is not only immediately deliverable on brownfield land, but it is within the urban fence and is in a sustainable location for employment. It has little environmental value and therefore warrants being removed from the NE2e landuse code which would limit re-development of the site.	Do not agree. Although we will amend proposals map to remove NE2e allocation and make it white land to reflect site formed the building and compound for the landfill site. It is not considered a suitable site for housing development due to the former use of the site / adjacent land as a landfill site and more importantly the very close location to the bad neighbour uses area at Sandgate Industrial Estate. Housing Market Renewal refers to areas of former housing, which tend to be predominantly terraced housing, which are not fit for modern purpose, with high numbers of vacant units – schemes are then put together to demolish these and replace with new houses. This does not apply to this site.
Landowner	LP0095	DP0053	I hereby make an official representation as the landowner of the parcel of land visible on both enclosed maps and labelled 'Brewery Farm Extension' for its inclusion in the current Hartlepool plan. The land has been identified by Leebell Development Ltd for inclusion in their planning portfolio for the Upper Warren to follow on as a viable and sustainable development after the completion of their current commitment to the Upper Warren. This development would ideally fit into achievable timescale of 6-10 years, this being the second tranche of your proposed 15 year plan. The suggested site, once completed would allow the Upper Warren to have a geographical uniformity. It would allow the rural corridor between it and Hart Village to the North East to enhance the development by virtue of its natural surroundings including forestry, reservoir, nature reserve and sheep farming. For the above stated reasons I see the site as extremely suitable for inclusion in your proposed plan. The land has been made available for development by my family and the developers are confident that it can be delivered in a manner suitable to the needs of the forthcoming plan.	The site was assessed as part of the SHLAA. Following assessment the site was put in the 15+ year period due to the proximity of the quarry. Once Middle Warren has developed out, if the quarry is no longer in use, it may be an appropriate site for the next Local Plan.

Company	Unique Ref	DP Ref	HSG1 Preamble	Planning Policy Response
			I include for your consideration a copy of the comments made by Barton Willmore on behalf of Leebell Developments supporting the inclusion of this land (Copy sent to Mr Andrew Carter September 2014) Thank you for your kind consideration in this matter.	
Resident	LP0096	DP0054	Small sites and infill around the urban and rural areas but with varied styles and sizes of dwellings, urban sprawl encroaches on green field areas.	Whilst the use of small infill sites within the urban and rural villages is appropriate, there are not enough of these sites to meet the housing need over the plan period.
Resident	LP0201	DP0159	The target of 6,000 houses over the plan period is grossly overestimated. If achieved it will not be because of household formation or in migration, it will be at the expense of creating a huge number of empty homes on what are presently good quality estates. It's what happens with over supply.	It is not considered the 6,000 houses is a gross over-estimation. This is the figure that has been arrived at using national guidance to determine the Objectively Assessed Need and has then factored in an element of demolitions and an additional sum for previous under supply.
Middlesbrough Council	LP0209	DP0168	As outlined in the Preferred Options Local Plan this balanced housing offer will be achieved by delivering approximately 6,000 new dwellings during lifetime of the Plan, which equates to an average of 400 dwellings per year. This provision being partly provided by allowing a controlled westward expansion of the town into greenfield land, and a limited number of sites in the villages of Hart and Elwick, with an element of growth at Wynyard Park.	Comment noted.
Resident	LP0218	DP0180	Housing requirements are based on an expanding population shown in para 10.3 (page 73) as estimated (by the Office of National Statistics in 2012) at 97,400 by 2037. Expanding population is seen throughout the document as preceding expanding economy and job availability which would seem to be the reverse of the realistic vision mentioned in 1.2 (page 1). Jobs attract people, not the other way round. Para 2.3 (page 6) states that under the Localism Act (2011) local authorities are able to determine their own targets and policies, although these need to be justified by local evidence – in other words, local authorities are not bound to adhere to NPPF guidelines in terms of numbers of houses required, but that would seem to be HBC's reason for being unable to	The Local Plan does not suggest that housing is needed prior to new employment being attracted and it is considered that both go hand in hand. Bullet point 3 at paragraph 10.3 clearly says Economic Growth is one of the drivers for housing need. Whilst HBC are able to now set our own targets as the Regional Spatial Strategy was abolished, there is still a requirement for the Council to adhere to, and ensure the new plan is in conformity with, national planning guidance in the form of the National Planning Policy Framework (NPPF) and

Company	Unique Ref	DP Ref	HSG1 Preamble	Planning Policy Response
			refuse planning permission in most cases. The frequently quoted "shortage of executive housing" is disputed by many residents as being untrue and unnecessary unless a large number of highly paid jobs attracting inward mobility of executives is envisaged – this would seem unlikely. Affordable housing is surely a much higher priority. Para 10.20 (page 81) SHMA 2015 notes a strong unmet demand for bungalows – recently approved developments have failed to take note of this as it is more profitable to build houses. One developer (Signet, Quarry Farm 1) agreed to include 2 extra but Taylor Wimpey (Tunstall Farm) flatly refused to increase the number of bungalows on this basis. HBC should press more aggressively on this matter when considering future applications. A report headed "Bungalow Building 'Crisis' Forces Elderly to Pay Premium Prices" in the Daily Telegraph on 19 July 2016 states "Figures from Rightmove show the bungalow premium is most severe in the North East, where a three-bedroom bungalow is 62 percentage points more expensive than the average equivalent home with stairs. In the North West and Midlands the premium is 48 points."	National Planning Practice Guidance (NPPG). The Strategic Housing Market Assessment (SHMA) illustrates the housing need on a ward by ward basis. It is agreed that affordable housing is a high priority which needs to be tackled and the plan has included an affordable housing policy to try and address this issue. Higher end, executive dwellings, are also needed over the plan period, this is illustrated within the SHMA. It is agreed, the SHMA does identify a significant need for bungalows. Housing policies are going to be updated to draw reference to housing need identified within the most recent evidence base.
Teesmouth Bird Club	LP0227	DP0191	Plans should require that the built environment can have its own special biodiversity - eg provision for urban cavity nesting bird and bat species; green roofs.	Reference to this will be included within Policy NE2, Green Infrastructure.
HBC Housing Services	LP0228	DP0192	On behalf of Housing Services I have reviewed the Local Plan preferred options consultation document and I am in support of the housing policies within it and the aim to achieve a overall balanced housing stock within the Borough.	Support for housing policies noted and appreciated.
Resident	LP0230	DP0194	Section 10.3 the statement economic growth and improvement should highlight that the scenario chosen is 'Scenario F. The 1700 jobs are from the HBC Employment Land Review and cover the period 2016- 2031. This scenario assumes that all of the jobs are satisfied by new in migrant workers.' It should be cross-referenced to section 11.4. This is a long complex document and some readers may not read all sections in equal depth or have looked at the SHMA and the magnitude of the job creation assumption is a key driver of the volume.	As part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios.

Company	Unique Ref	DP Ref	HSG1 Preamble	Planning Policy Response
			Section 10.4 there is a reference to the need to include estimated demolitions, shown in table 6 as 525 over the 15 year period. These demolitions create brown field land but there is no explanation how this landed will be used. I would have expected table 8 Future Housing Supply Over Next Five Years, in column headed Land Type, to include a number of brownfield developments as a result of the demolitions.	Also agree with point regarding demolitions – Publication version o f the Local Plan will make assumption regarding proportion of housing to replace them on site.
Durham County Council	LP0246	DP0215	Following our meeting in April, we have considered the SHMA and raise no cross boundary concerns with regard to that element.	Noted. For reference, as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios.
Stovell & Millwater Ltd	LP0247	DP0216	Paragraph 10.1 states "Hartlepool needs to provide a range of house types in a variety of locations where people want to live. The Government's overall ambition is to increase housing supply in sustainable locations". It would seem to us this advice would not accord with the restrictive Policy LS1. The justification and implementation of the housing supply is discussed at paragraphs 10.2 - 10.18, this also includes tables 6, 7 & 8. Our first observation would be the fact there is a heavy reliance on extant planning permissions being implemented. This accounts for nearly two thirds of the overall supply. Although demolitions and previous undersupply have been taken in to account it does not seem as though there has been any allowance for the extant sites not being developed. The following post NPPF appeal decisions accept that a minimum of a 10% non-implementation allowance is acceptable. • APP/H1840/A/12/2171339 - Honeybourne – paragraph 39; and, • APP/T2350/A/12/2176977 – Ribble Valley – paragraphs 11-14. If this was applied the supply would be reduced by 400. This would be significant loss to the overall supply and given the geographical constraints of Hartlepool and the proposed plan there would be little prospect of other potential sites being delivered. We believe it is also worth noting the consistent undersupply within the Council, only hitting its housing target once in the last 10 years. We appreciate that a 20% frontloaded	Policy LS1 is not considered a restrictive policy. The Policy will help to ensure that housing growth takes place in a controlled way, alongside the necessary infrastructure improvements needed to ensure all new development is sustainable. An exercise was undertaken to look at extant planning permissions to ensure deliverability – where sites where considered highly unlikely to deliver within the plan period they were removed from the extant permissions figure. This removed circa 600 dwellings from the figure which equates to more than 10% of extant permissions. The Ribble Valley appeal decision does not accept a minimum 10% allowance for non-delivery of extant permissions – it is a dismissed appeal for the removal of an occupancy condition on holiday lets with no mention of extant permissions other than in a discussion regarding 5 year supply. Whilst the Honeybourne appeal does make reference to 10% allowance for non-delivery being considered acceptable, that was in respect of that Local Authority and their circumstances at that time – it is not considered relevant for Hartlepool.

Company	Unique Ref	DP Ref	HSG1 Preamble	Planning Policy Response
			buffer allowance has been included for the 5 year plan period to make up for this undersupply, however we believe this trend could continue and there would be little prospect of making up the difference through planning permissions given the restrictive nature of the proposed plan.	The Council will give consideration to the inclusion of a 20% buffer in case sites stall as requested by a number of developers.

Policy HSG1: New Housing Provision

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	There is insufficient detail regarding the mix of house types in the 'Approx Dwelling Provision' tables – similarly with the table under POLICY HSG2 – 'Overall Housing Mix'. There should be a requirement to provide bungalows – at least as good as present but even more are required - particularly with a predicted increase in ageing population. Socially it means that different age groups are living in different areas! The information we have regarding apartments is somewhat confused – is there an under or over supply of apartments in the Borough?	Disagree. Believe Table 10 sets out the types of dwellings considered appropriate. The definitions within this table are required by HSG2. The range of housing will be subject to determination at planning application stage – through seeking a full range of house types and making reference to the need identified within the SHMA this is to help ensure that where there are particular needs within an area that these needs are catered for and to ensure where there is a problem with an oversupply or undersupply of one particular type of housing that planning applications take account of this within their designs. Overall table nine of the Preferred Options illustrates that when considered against all dwellings within the Borough there is a relative undersupply of apartments at 12.5% of the total. There is however within the Marina area a large oversupply of apartments in terms of existing planning permissions still to be built.
Park Residents Association	LP0014	DP0187	Members would like to see more detailed information regarding the housing mix within Policy HSG1. It is our understanding that there is a need for bungalows over an above the current housing stock , yet there does not appear to be any robust method of ensuring developers provide this as a percentage of their overall housing mix. We would also seek clarification regarding Table 9…in conjunction with point 10.23 and Table 10 as there appears to be some contradiction in the housing supply mix , especially with regards to apartments. Option 10.33 again says that the new bypass at Elwick will create a "third access into Hartlepool", if this is to be the case then funding must be found to upgrade the road infrastructure from this point through to the town, minimising the impact on existing residents, Conservation area and the over capacity junctions.	It is not considered more information on housing mix is needed in Policy HSG1 as this information is set out in Policy HSG2. It is proposed to make reference to the SHMA (or similar document) within HSG2 to enable evidence to be drawn from the SHMA where there is a particular need identified within an area. This will ensure the Local Plan does not become outdated if a new SHMA is produced. Table 9 sets out the current stock balance and para 10.23 notes the areas of over supply and under supply on a percentage basis. Agree to add reference to SHMA within table 10 to guide developments.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
				The issues regarding the impact of growth on infrastructure are recognised by the plan. Where future growth is going to have an impact on infrastructure the Local Infrastructure Plan highlights where improvements and investment will be needed. Where mitigation to infrastructure is needed, development will be required to pay for it.
Campaign to Protect Rural England	LP0015	DP0199	CPRE notes that there were in 2013 40,638 households in Hartlepool. The Preferred Options state that it is proposed to increase this by 6,000 houses. That is an increase of about 14% in the number of households in the Borough. CPRE believes that such a great increase is unrealistic and in turn leads to unnecessary development of greenfield land. Indeed, this issue of overestimating the Objectively Assessed Need has been addressed by CPRE nationally in its study "Set up to Fail", where it states that local authorities nationally have tended to overestimate their housing need by some 30%. CPRE locally has already argued that there has been potential overestimate of OAN when considering other local plans in the North East. Even before "Set up to Fail" was published, CPRE has argued that this over-provision throughout the Nort East appears to be about 30%. We appreciate that further figures regarding population forecasts are likley to be published shortly. We believe these will need careful assessment to determine whether this kind of increase in Hartlepool is justified but in the meantime we wish to register our concern about this OAN in the Preferred Options. As a result we must question the need for the proposed further developments at High Tunstall and Wynyard. As regards the element of housing growth identified as being required to cater for economic growth (para 10.3), CPRE would expect this to be key matter for co-operation with neighbouring authorities. This would follow from the economic strategy of the Tees Valley Combined Authority (and LEP). We would also expect extensive co-operation with Durham CC whose	Note concern regarding OAN and CPRE's belief that this, both locally and nationally, is overstated by local authorities. The Hartlepool SHMA involved consultation with all neighbouring authorities during its production. This was also the case with the preparation and consultation on the Local Plan where regular meetings to discuss a range of issues including housing and housing need were discussed. No objections have been received from any neighbouring local authorities. The 2014 SNHP were released earlier this year. Colleagues at the Combined authority have analysed these to check how they compare with the previous 2012 figures. The new figures equate to a dwelling requirement of 198 per annum which is slightly higher than the 2012 figure requirement but lower than the ELR employment scenario on which the plan is based.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Local Plan is proposing extensive commuter housing in south Durham to serve Teesside. Our current analysis shows no evidence of a "duty to co-operate" leading to modification of housing provision strategies. This lack of co-ordination is resulting in significant duplication and overprovision of housing across Tees Valley and the North East.	
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the policies on Housing as set out in the Local Plan, with the caveats mentioned earlier, viz All housing developments should be required to have sufficient off road parking to enable the easy flow of traffic through and around the area, and to ensure the safety of children and the elderly alikehat: • the Borough Council not to approve any further developments at the north-west end of the town until a By-Pass is open around Elwick; • affordable housing is made available in rural areas as well as the urban areas of Hartlepool; and that the aspirations outlined in Rural Neighbourhood Plan in regard to any new housing development are supported.	Note support for housing policies. As previously mentioned the highway requirements of a development are considered in line with the Highway Design Guide which is used by all Tees Valley Authorities. The bypass is considered by HBC to be a priority to deliver early in the plan period. Affordable Housing will be required on all housing sites within the Local Plan with the exception of the North Pentagon which will make an off site contribution. It is considered that the Local Plan as currently drafted is in general conformity with the Rural Neighbourhood Plan.
Wynyard Park	LP0027	DP0223	Housing Need and Land Supply Section 10 of the consultation document sets out the housing target across the 15 year plan period from 2016 to 2031. Specifically, this section provides detail of the proposed housing requirement and anticipated supply over the plan period. GVA has undertaken a review of the Council's interpretation of housing needs evidence in its plan which in turn affects the Council's conclusions on five year housing supply. Table 6 of the consultation document sets out the annual dwelling need identified by the 2015 Strategic Housing Market Assessment (SHMA) and the 'proposed baseline housing target'. Returning to the 2015 SHMA, it provides a series of population and household projections from 2016 to 2031. This is despite the fact that the latest demographic estimates of population available to the SHMA would have	As part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. As part of the above works, the undersupply in housing from the adoption of the 2006 Local Plan will be considered. The Policy will indicate that the housing numbers are not a ceiling figure. In preparing the Publication document the Council will

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			been (at the time it was written) 2013 based. The OAN should therefore be based in 2013 and housing performance since 2013 should be taken into account when assessing the five year housing land supply position. The effect of the 2015 SHMA rebasing its OAN to a future date in 2016 (as it has done) is to ignore housing needs in the present and the extent to which they've been met and or need to be met going forward. Between 2013 and 2015 the Council delivered just 460 dwellings or 230 dwellings per annum. No account has been taken of this undersupply. Mindful of the above, whilst the plan demonstrates how the Council will meet their identified target of 6,000 new homes over the plan period through new allocations, the need to take into account the backlog since 2013 will increase the housing target and necessitate additional housing allocations. Further development at Wynyard Park would assist the Council in addressing this backlog and meeting this target. Notwithstanding the above, Draft Policy HSG1 should clarify that the final housing target across the plan period should be confirmed to be a target level of growth to be exceeded rather than a ceiling in order to boost significantly the supply of housing and plan flexibly and positively across the plan period. It is noted within paragraph 10.17 of the consultation document that the allocated development at Wynyard is estimated to take place in the second and third 5 year periods of the plan. However, the existing or minded to grant consents that form part of the supply are either under construction at present or are subject to new live applications for self-build residential development. Moreover, in partnership with Taylor Wimpey, Wynyard Park has a live planning application submitted to Hartlepool Borough Council on land at the North Pentagon which forms part of the draft allocation. As such, subject to the grant of planning consent on this land, there is scope for these allocations to come forward for development within the first and second 5 year periods and Wynyard Park respectfully request that the Council re-evaluate their approach in order to avoid a scenario where further growth in the latter part of the plan is restricted by policy allocations. To summarise, it is evident that Hartlepool has a significant oversupply of	consider the appropriate level of Prestige Employment Land required at Wynyard in the context of considering whether any additional housing allocation and related community infrastructure may be needed / acceptable within the Wynyard area.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			employment land and an undersupply of housing when viewed in the context of historic periods of under delivery. On this basis, the draft Local Plan strategy for Wynyard is not a positively prepared and aspirational as it could be when viewed in the context of market demand for new housing at Wynyard, it is not effective considering that it will be unlikely to deliver such a large quantum of B-class development in the current market; and as a result, the strategy at Wynyard cannot be justified as the most appropriate strategy when considered against reasonable alternatives.	
Highways Agency	LP0029	DP0196	Highways England is generally supportive of the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks. However, with regards to the housing locations and scale of development, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that accompanies this response, the Local Plan text and the housing policies can be combined to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	Note issues. HBC will continue to work and liaise with Highways England and the Combined Authority to ensure that the impacts of the proposals in the plan are fully assessed and where mitigation is necessary is included within the plan or the Local Infrastructure Plan.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy HSG1: New Housing Provision Paragraph 47 of the NPPF advises that local planning authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area". The plan subsequently identifies a requirement for 400 dwellings per annum (dpa) or 6,000 dwellings over the plan period against which it	It is considered that HBC used the upper target identified within the 2015 SHMA to illustrate the Council's desire to meet the requirements of the NPPF in terms of boosting significantly the housing supply within the Borough. In regard to concerns regarding the assumptions which underpinned the SHMA it is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			allocates a supply of 6,072 dwellings from various sources including extant planning permissions. The housing target of 6000 units over the plan period or 400 dwellings per annum (dpa) is a gross target based upon the identified housing need of 325dpa established by the 2015 Hartlepool SHMA using the 2012-based ONS population projections as the starting point. An allowance has then been made for demolitions (35dpa) and a 10% uplift applied for previous under-delivery (36dpa). The figure of 396dpa is then rounded to 400dpa for the purposes of the plan. It is important that any housing requirement is grounded by a sound evidence base. Persimmon Homes would therefore make the following comments: • National Planning Guidance states that the starting point for establishing housing need should be should be the household projections published by the Department for Communities and Local Government. The housing requirement therefore needs to be re-considered in light of the publication of the 2014-based household projections for England on the 12th July 2016. • Whilst it is recognised the plan provides uplift to the proposed housing requirement to account for previous under-delivery, there is currently no evidence to suggest that this 10% uplift is sufficient. • The housing requirement is derived from a number of scenarios which have been 'run' through the POPGROUP modelling software of Tees Valley Unlimited (paragraph 4.6, 2015 SHMA). As explained in greater detailed within the HBF representations there is little explanation on why the scenarios were considered the most appropriate or the assumptions used in the modelling which makes commenting upon the outcomes difficult. • The SHMA identifies a substantial net imbalance of affordable dwellings	Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. It is also questioned whether the SEP based projections are only over the period of the SEP rather than the plan period – when the SHMA was prepared the scenario was extrapolated over the whole of the plan period to give the dwelling projection for the whole of the plan period. Sensitivity testing was undertaken within the SHMA preparatory work however there was only limited variances which could be looked at regarding the SEP figures given the desire of the SEP to reduce the unemployment level as stipulated above. This will also be the case when a SHMA addendum is produced. In regards to your concern regarding the affordable housing need and the suggestion additional sites should be allocated to help meet this will be considered in the preparation of the Publication document. Whilst the Council recognises and appreciates Persimmon Homes continued presence and developments within Hartlepool, the plan has only allocated the 1260 at the South West Extension as it is considered that this is a deliverable number of dwellings within one locality over the 15 years of the plan period – whilst it is accepted that the previously withdrawn plan included a larger allocation at the South West Extension, it is not considered that that plan would have lead to the strategic infrastructure improvements that this plan will lead to. Through including the High Tunstall allocation for 1200 dwellings this will help to pay for a new junction on the A19 and a bypass to the north of Elwick Village which will be

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			each year of 144dpa, representing 36% of the proposed housing requirement. Due to viability concerns across the borough such a high percentage is clearly undeliverable within Hartlepool and therefore it is clear that the plan will struggle to meet the full objectively assessed needs for affordable housing as required by paragraph 47 of the NPPF. To address this issue other methods of housing delivery should be explored including a higher housing requirement which would assist in meeting the affordable need. In terms of supply, the plan identifies 6,072 dwellings over the plan period against a requirement of 6000. It is clear that the plan does not include a significant buffer of any kind to provide flexibility and choice as required by the NPPF. Given the history of under-delivery within the borough, it would be sensible to provide a buffer over the plan period. In line with the HBF recommendation, Persimmon Homes would advocate a buffer of 20%. Notwithstanding the above Persimmon Homes are of the opinion that Policy HSG1 fails to identify the most logical and sustainable sites in line with the spatial strategy outlined within Policy LS1. The plan has ignored Phase 2 of the Hartlepool South West Extension (HSWE). The second phase of the HSWE is on land immediately to the west of the first phase which has been minded to approve subject to the completion of a Section 106 Agreement. The second phase formed part of the wider HSWE site which was previously draft allocated and found to be a sustainable location for approximately 2200 units by a government appointed inspector following the Public Examination in 2013. The site has since changed hands but work has continued refining a scheme with input from community groups, ward councillors and local residents to address such issues as flood risk, amenity and connectivity. The site therefore represents the only logical, strategically planned, and proven to be sound option for an expansion of the town beyond the western urban limits. The wider HSWE land should therefore form the focal	of significant value to the Borough over the coming years – additional housing at the South West Extension would not lead to these benefits and was therefore not included within the plan. Persimmons comments in regard to the SHLAA are noted in relation to the SHLAA considering only 700 were deliverable over the plan period – the SHLAA was prepared at a time prior to the proposals for the bypass and grade separated junction and were therefore influenced by the capacity of the roads and junctions within that area at the time of carrying out the SHLAA – the provision of the Grade Separated Junction and the bypass significantly increase the ability of High Tunstall to deliver a larger number of houses over the plan period and is therefore considered sound and deliverable and equally as sustainable as the South West Extension. In terms with concerns regarding the allocation of housing at Wynyard it is noted that the previous inspector had recommended modifications to the withdrawn plan that included the removal of housing at Wynyard – this was considered to be as a result of the inspector not considering the area sustainable – as such the Publication Stage of this Local Plan will include further amendments to the proposals map and the policy on Wynyard to ensure the delivery of a range of community facilities and services all with the aim of making Wynyard a sustainable community – the inclusion of Wynyard is considered vital to the Local Plan as it provides a range of high end residential properties which are needed to ensure a full range of housing is delivered within the Borough over the plan period.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			point of the Local Plan's housing strategy over the forthcoming plan period and beyond. A Deliverability Statement detailing how the site is deliverable with no legal, policy or physical constraints which would prevent or inhibit development coming forward over the plan period was submitted to the Council in March 2015 for consideration. As a refresher the statement is again enclosed within this letter and Persimmon Homes would draw the Council's attention to the document. The statement demonstrates that the second phase is a suitable, available and achievable solution to the towns housing shortage. This is in stark contrast to the other 'preferred' allocations within the plan at Wynyard which have previously been assessed by an Inspector and found to be unsound given the lack of local services and their unsustainable location away from the urban fringe. This it also in stark contrast to the proposed allocation at High Tunstall which unlike the HSWE is not supported by one of Britain's largest housebuilders with a proven track record of delivering large-scale, strategic sites within the Borough. Given this lack of local knowledge and experience to guide the development it makes it all the more surprising that the Plan ignores the SHLAA trajectory which predicts that only 700 units are achievable within the plan period and instead identifies all 1200 as deliverable. Despite Persimmon Homes' involvement within the SHLAA Steering Group we are unaware of any new or available evidence which justifies this expected increase in the delivery rates following the publication of the SHLAA in January 2015. There are subsequently question marks over the deliverability of the whole site over the plan period and therefore High Tunstall represents an unnecessary and illogical risk which could lead to the Plan being found unsound. When there are clearly more logical, sustainable and deliverable options available to the Council to meet the borough's housing needs such as the second phase of the Hartlepool South West Extension, the allocation at High Tunstall should be reduced and the units focused elsewhere across the borough.	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			As per the ongoing Section 106 discussions, it is currently estimated that the first phase of the HSWE will be completed by 2025. It is therefore clear that a second phase could follow within this plan period. Continuing the expected trajectory, it is estimated that by 2031, the HSWE could deliver in total approximately 2300 units. It is therefore clear that the site can make a substantial contribution to the delivery of new homes within the borough and provide a mechanism for the delivery of the southern part of the western relief road. As such it is therefore requested that Phase 2 of the Hartlepool South West Extension on land between Brierton Lane and the A689 is considered favourably and allocated within the emerging Hartlepool Local Plan for residential development. NB. THE SUBMISSION INCULDES A TRAGECTORY TABLE FOR SWE2 - PLEASE SEE SUBMISSION.	
Homes and Communities Agency	LP0063	DP0020	The Council cannot demonstrate a five year supply of deliverable housing land. There is a significant deficit of housing sites and whilst we are aware that certain strategic sites are being promoted elsewhere, there is a need for a varied supply to ensure the targets are met (and exceeded - it's not a maximum target). Any sites identified must be demonstrably deliverable in terms of availability, suitability and viability. The HCA as a government agency are committed to delivering an element of Starter Homes on their residential developments, including North Burn. This would provide a mix of housing, including homes for young first time buyers who are currently restricted from the market due to high house prices and lack of available housing for such buyers. This would also assist Hartlepool Borough Council to meet housing targets which they are currently unable.	One aim of the Local Plan is to propose allocating enough land for the development of housing for the next 15 years. The 5 year land supply issue only needs considering in the plan so far as to illustrate that it can be illustrated that an additional 20% (frontloaded from the later stages of the plan) can be accommodated in line with the NPPF – this is illustrated at Table 7. It is considered that the plan has proposed a range of deliverable sites in more appropriate and sustainable locations than the North Burn Site.
Health and Safety Executive	LP0211	DP0170	Compatibility of Development with Consultation Zones The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below. Housing Allocations Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units	Zones noted.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			where there is a minimal increase in people at risk. Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare. Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.	
Story Homes	LP0219	DP0181	Story Homes attaches great importance to ensuring that Section 10 of the emerging Plan is effective and seeks to assist in addressing the national shortfall of housing. Policy HSG1: New housing provision identifies a requirement for 400 dwellings per anum or 6,000 over the next plan period which equates to a total supply of 6,072 dwellings. Story Homes suggests that this requirement should be expressed as a minimum in order to ensure that the plan is meeting the NPPF requirements for positive planning and the identified national need to significantly boost housing supply. We also consider that future reiterations of the emerging Plan should include a more detailed consideration of the impacts of under-delivery in the past, have greater regard to market signals and more detailed information on how the Council seeks to respond to affordable housing needs. Our attention was also drawn to the housing delivery numbers set out within Table 8 which identify a total supply of 6,072 dwellings over the next Plan period. When considered against the 'Proposed Baseline Housing Target' in Table 8 this equates to an additional 72 dwellings or a 1% buffer which is insufficient to satisfy national policy requirements. Paragraph 47 of the NPPF, coherently sets out that where there has been a record of persistent under delivery of housing, LPAs should seek a buffer of 20%. We therefore strongly advise that the Council implement this 20% requirement and that this change should be cascaded throughout the relevant housing supply figures, tables and policies within the emerging Plan.	Noted, a reference to the housing figures not being a ceiling for the plan period will be included within the Publication Version. Paragraph 47 of the NPPF does not require an additional 20% to be added to the housing total – it requires that 20% be frontloaded from later in the plan period – ie providing 6 years supply within the first 5 years.
Resident	LP0220	DP0182	The Government's ambition to increase housing supply is only really relevant to areas where there are housing shortages and where there are jobs for those who would move to occupy the housing.	The Government ambition applies to the whole country. It is up to each local authority to undertake a Strategic Housing Market Assessment (SHMA) to assess its own need in light of

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			In the light of the Referendum results, and the likelihood that national policy objectives may change, will the Council be revising its housing growth targets? What evidence is there that the previous under delivery of housing has caused problems ? Regarding the High Tunstall Strategic Housing Site, the existing traffic bottlenecks need to be addressed before any development, particularly one of this size, is allowed. The re-use and modification of empty homes to provide modern affordable homes should take priority over new build wherever possible as it has the added advantage of improving run down areas. The council should also be looking to force owners of derelict or empty housing to bring those properties back up to acceptable standards to make them available for occupation. The council need to give particular attention, when granting planning permission for extensions and when carrying out inspections, to the arrangements for connections to sewerage / grey water systems. Also, is there any way to control the paving over of previous garden land and the impact that can have upon flooding?	government guidance. No. The Council will re-assess housing numbers in the Publication Document to take into account completions of the first half of 2016 and to reflect any planning permissions / appeals granting during that period. The issue of previous under supply is very hard to relate to problems caused – it is likely to have constrained household formation and there may be larger numbers of older children / young adults still living with parents, it could have constrained migration and may have led to people leaving the area or not moving to the area who may have if the houses had been available. Highway issues and improvements are considered within the Local Infrastructure Plan – necessary mitigation will be secured as part of the developments. It is agreed that the refurbishment and modification of empty homes offers a way to provide affordable units within central areas. The numbers instances where this is a viable option will be limited though due to the age and condition of many of the terraced properties within Hartlepool. A scheme where refurbishment is a key element is included as an allocation at Carr and Hopps St. Noted – The Council's engineers and NWL are consulted on applications to ensure connection into the sewerage and water systems is possible. Unfortunately there is not, this work is permitted development.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
Resident	LP0221	DP0183	I am pleased to note that the plan includes only one development site in the Greatham area, which already has agreed outline planning permission. However I note from the SHLAA that there are three additional areas for potential development over the next five years. One of these appears to be in the green belt which separates the village from both Hartlepool and a local business park, (Queen's Meadow Business Park). I am therefore seeking some reassurance that the Local plan would effectively not support the development of this particular site or any such site which would reduce the availability and robustness of the identified green wedge. (Policy NE2). Such development in a small village would also appear to be contrary to some of the policies outlined within the Preferred Options Plan, (Policy RUR1). If all three suggested developments are allowed to go ahead, there would be a substantial increase in both accommodation and population in the small rural village.	In terms of Greatham Village the Preferred Options Local Plan only took account of any existing (extant) planning permissions within the housing numbers for the plan. No new sites were proposed for allocation within the plan. The SHLAA assesses all sites submitted for consideration and considers their suitability, achievability and deliverability. A selection of SHLAA sites which meet those criteria are then selected as allocations within the plan – none of the sites within Greatham which were considered to meet the criteria were chosen to allocate within the local plan.
Resident	LP0230	DP0194	Housing target calculation Section 10.4 says that the SHMA appropriate housing target would be approximately 325 net additional dwellings. Which is then adjusted for by demolitions and a backlog to give a rounded target of 400. The SHMA states as follows: 6.8 There are many factors to consider when establishing an Objectively Assessed Housing Needs figure and after considering this evidence it is proposed that the Objectively Assessed Housing Need figure for Hartlepool Borough is around 300-325. This takes into account: • A baseline dwelling requirement based on 2012-based SNPP of 194 each year; and • A need to deliver new dwellings to support economic growth aspirations. 6.9 Housing Market Signals are not indicating a 'pent up' demand for housing, with lower quartile house prices generally constant, coupled with a fluctuating number of households on the Housing Register and a vacancy rate in excess of the national rate of 2.7%. 6.10 In conclusion, the 300-325 target represents an ambitious and aspirational figure which addresses housing need and supports economic growth ambitions. It is also assumed that the target addresses any backlog in need as it uses a	Thank you for taking the time to consider in detail the assumptions which underpinned the Preferred Options document. It is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. Your point regarding brownfield regeneration sites is noted and agreed. An allowance for replacement dwellings on regeneration sites will be included in the Publication version assumptions.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			baseline household figure based on the current demographic situation in Hartlepool Borough. I would like to make the following observations about the 325 used • The higher end of the range has been selected i.e. 325, which is 8% above 300. • The scenario chosen is headed 'Scenario F. The 1700 jobs are from the HBC Employment Land Review and cover the period 2016- 2031. This scenario assumes that all of the jobs are satisfied by new in migrant workers.' I would argue that the housing requirement annually should be weighted to the latter period to allow for the 1700 jobs to materialize and certainly should not be reflected in the underperformance 10% or the 20% NPPF para 47 buffer target. I would make the following observations about the underperformance adjustment: • A further 10 % has been applied as an under performance backlog to a value which is the high end of a range. • Why would a percentage of future demand represent a backlog surely a backlog would relate to something in the past? • Paragraph 6.9 of the SHMA identifies no 'pent up ' demand so why is a backlog adjustment needed • Conceptually I have a problem with a backlog at all as the modeling should reflect the current status as a starting point, which I would have thought implicitly, included any backlog. This thought appears to be confirmed by the statement within Paragraph 6.10 of the SHMA which says ' the target addresses any backlog in need as it uses a baseline household figure' In looking at the future-housing table 8 there appears to be no brownfield land identified for the demolition sites My concerns are: • Housing demand is overstated which leads to more greenfield land being made available which may reduce the pressure on development of the brownfield land. • New housing in excess of migration and housing formation could lead to more vacant properties and potentially a reduction in the values of existing	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			properties across Hartlepool. • The housing volume is a significant driver of other parts of the plan the related actions may not be possible if the volume does not materialize and mitigating strategies would not have been developed.	
Home Builders Federation	LP0234	DP0200	Policy HSG1: New housing provision 19. The policy and supporting text identify a requirement for 400 dwellings per annum (dpa) or 6,000 dwellings over the plan period. A supply of 6,072 dwellings is also identified from various sources including extant planning permissions. The differing elements of the housing target and supply are discussed separately below. Housing target 20. The housing target (400dpa) is a gross target made up of an identified housing need of 325dpa, as suggested by the 2015 Strategic Housing Market Assessment (2015 SHMA), plus an allowance for demolitions (35dpa) and a 10% uplift for previous under-delivery (36dpa). This is then rounded to 400dpa. Whilst it is recognised that the figure of 325 sits at the upper end of the range identified by the 2015 SHMA we do have a number of concerns which should be addressed. This may lead to an overall increase in the housing requirement. 21. The Council's choice of a gross requirement is unusual in that it relies upon the number of suggested demolitions (35dpa) being correct over the plan period. Most Local Plan housing requirements are stated as net of demolitions. In the case of Hartlepool, based on the information provided, this would equate to 365dpa (400-35). There is also no explicit reference to the housing requirement within the policy. To aid clarity it is recommended that the housing requirement is included within Policy HSG1 and that it be identified as a minimum requirement. The reference to a minimum requirement is to ensure that the plan is meeting the NPPF requirements for positive planning and the need to boost significantly housing supply. 22. The housing requirement is derived from a number of scenarios which have been 'run' through the POPGROUP modelling software of Tees Valley	Note concern regarding how demolitions have been illustrated as a gross figure. Will consider changing this approach in the Publication Document. Agree to add reference to housing requirement into policy and note that this is a minimum not a ceiling. It is considered that HBC used the upper target identified within the 2015 SHMA to illustrate the Council's desire to meet the requirements of the NPPF in terms of boosting significantly the housing supply within the Borough. In regard to concerns regarding the assumptions which underpinned the SHMA it is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. It is also questioned whether the SEP based projections are only over the period of the SEP rather than the plan period – when the SHMA was prepared the scenario was extrapolated over the whole of the plan period to give the dwelling projection for the whole of the plan period. Sensitivity testing was undertaken within the SHMA

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Unlimited (paragraph 4.6, 2015 SHMA). There is little explanation on why the scenarios were considered the most appropriate or the assumptions used in the modelling. This makes commenting upon the outcomes difficult. The only information in relation to scenario choice and assumptions, which the HBF is aware of, is contained in table 4.1 of the 2015 SHMA. To provide clarity and transparency further details should be provided upon the choice of scenarios, whether others were considered, if so why they were discounted, and the assumptions used on each scenario. 23. The figure of 325dpa is based upon an economic scenario (scenario F, Jobs-led 2) which would provide 1,700 jobs over the plan period. The study anticipates that the majority of these additional jobs will be satisfied by new migrants. The HBF is supportive of aligning jobs growth and housing growth which is consistent with the NPPF and current advice within the PPG. The figure of 1,700 jobs over the plan period is suggested within the 2015 SHMA to align with the recommendations of the 2014 Employment Land Study. 24. A further employment led scenario is also considered (scenario E, jobs led 1) which is supposed to align with the ambitions of the Tees Valley Unlimited Strategic Economic Plan (SEP). The SEP aims to create 2,900 jobs in Hartlepool over the period 2012 to 2022. It is understood that scenario E attempts to model this but given the SEP target is for 10 years, some of which have already passed, it is unclear how this has been integrated into the plan period up to 2031. It is considered as a minimum the scenario should extrapolate the rate of jobs growth for the 15 years of the plan, as such the aim should be to create 4,350 jobs over the plan period, not 2,900 over 10 years. It is unclear why the Council has chosen to apply the 2,900 jobs over the 15 year timescale. 25. The SEP job creation targets, as amended for the plan period, would in our opinion represent a credible alternative jobs-led scenario. This is because it is clearly linked to the aspirations to boost the economy of the Tees Valley. However, despite the fact that this scenario would provide	preparatory work however there was only limited variances which could be looked at regarding the SEP figures given the desire of the SEP to reduce the unemployment level as stipulated above. This will also be the case when a SHMA addendum is produced. In regards to your concern regarding the affordable housing need and the suggestion additional sites should be allocated to help meet this will be considered in the preparation of the Publication document. It is agreed that we will add some additional text to the Publication Version of the Local Plan to explain the assumptions and the background to the SHMA. Concern over past under delivery noted. It is proposed to consider the under supply from the adoption of the 2006 Local Plan and reflect that shortfall within the Publication document. Consideration will be given to the need for a 20% buffer in the preparation of the Publication document as it is appreciated that it would allow flexibility should sites stall and help to reflect the findings of the Local Plan expert group.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			more jobs than scenario E it would, as modelled, require less housing, 246dpa compared the 311dpa. The reason for this disparity is illustrated by table 4.1 (2015 SHMA) which identifies scenario E is heavily reliant upon a significant increase in employment activity rates as well as a substantial increase in in-commuting (15% of jobs) to Hartlepool. The study does not comment upon the realism of these assumptions or why it is considered appropriate to apply them to this scenario without any sensitivity testing of alternatives. 26. These assumptions are considered extremely optimistic particularly given the fact that Hartlepool has an aging population which is likely to reduce economic participation rates within the resident population over time. Furthermore even if participation rates could be increased substantially amongst the working age population the Council would still need agreement from neighbouring authorities to take some of their housing need. This is because of the 15% of the additional workforce assumed to be due to increased commuting rates from locations outside Hartlepool. The HBF therefore conclude that scenario E has not been properly considered despite it being an ambition of the SEP, and the Council being represented on the leadership board. 27. The HBF would, therefore, like to see further modelling of realistic economic scenarios, particularly variants upon scenario E, which provide realistic and defensible economic employment and commuting rates. 28. The 2015 SHMA also correctly provides an analysis of market signals. These are essential elements of determining an objectively assessed housing need for the area. Whilst it discussed the majority of the relevant signals it is considered that the analysis of previous rates of development and their impact upon household formation rates within Hartlepool is weak. There has been persistent under-delivery within Hartlepool since at least 2004, as shown by the various Annual Monitoring Reports. This lack of delivery will undoubtedly have had an impact upon the household projections and as such should be fully considered. It is recognised the plan	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			provides an uplift to the proposed housing requirement to account for previous under-delivery, which is supported, there is no assessment of whether the 10% uplift applied is sufficient. 29. With regards the other market signals the HBF concur, with paragraph 4.14 (2015 SHMA), that the analysis does not appear to warrant any further uplift. It is, however, noted that the time period over which the signals are addressed, 4 years, is short and is heavily influenced by the recession. This is likely to mask longer-term trends, as such a longer-term view would be useful to identify longer term problems which need to be addressed. 30. There is a substantial net imbalance in affordable dwellings, 144 per annum. This represents 36% of the proposed housing requirement. Such a high percentage is clearly undeliverable within Hartlepool from market sites. To address this significant problem the Council should investigate other methods of delivery. In addition a higher housing requirement would undoubtedly assist in reducing this figure. 31. Finally, since publication of the current consultation document the 2014 based sub national household projections have been released. These indicate a slightly higher starting point, over the plan period, for the objectively assessed need than the 2012 projections upon which the 2015 SHMA is based. The impact of the new projections will need to be considered prior to the next stage of consultation upon the plan. 32. The HBF therefore make the following recommendations in relation to the housing requirement; • The requirement be expressed as a minimum and ideally be net of demolitions; • Provide reasoning for the choice of scenarios, together with details of any discounted scenarios; • Clarity be provided in terms of the assumptions used in each scenario; • Further work be undertaken in relation to jobs-led scenarios, particularly	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			scenario E; • Further more detailed consideration of the impacts of under-delivery over the past, including upon household formation rates; • A longer analysis of market signals; • How the Council is to address the affordable housing needs of the area; and • Consideration be given to the impact of the 2014 sub national household projections. Housing Delivery 33. Table 8 of the consultation document and the policy identify a total future supply of 6,072 dwellings over the plan period. This is just 72 dwellings greater than the proposed requirement. Whilst it is recognised that a number of permissions for apartments have been discounted from the supply (plan paragraph 10.23) this provides only a 1% buffer to provide flexibility and choice as required by the NPPF. Given the previous levels of under-delivery within Hartlepool it would appear prudent to provide a significantly greater buffer over the plan period. The HBF recommend 20%. 34. To achieve a higher buffer the Council will need to consider all potential sources of delivery. It would, however, appear a reasonable assumption that further site allocations will be required. A buffer of 20% should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. It is also notable that the recent recommendations from the Local Plan Expert Group suggest such a buffer is required. 35. Paragraph 10.18 identifies that the Council will not seek to control housing delivery and that; " …each housing site identified will deliver according to the housing market at the time, table 7 and graph 1 are included for illustrational purposes	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			only…" 36. The HBF supports this stance and considers it an appropriate response to previous delivery issues.	
Resident	LP0236	DP0202	I would support the building of new homes if you take the following in to account • Consider new sewerage system throughout the town. • Starter homes for young people. • Homes for people who have lived in Hartlepool first. • Village people have first choice to buy home in the village they have lived in. • More Bungalows' which is in short supply. • Community building in areas of large locations of over 500 homes also doctors, dentist and shops. • Improve Bus transport and rail transport throughout day and late evening, not stop at 6.30 pm. • I would not support the Britmag site (373) homes ground is contaminant. • Road congestion in centre of town, when an accident acres on the A19. • Play areas in and around new homes.	Support for new housing subject to comments noted. In relation to your suggestions the plan and associated supporting documents support and will ensure the following are provided: - adequate new sewerage in line with new developments - Starter Homes / Affordable Homes - More bungalows - Community buildings in large new developments - Improved public transport and improvements to rights of way and cycle ways - Play areas in new developments Unfortunately through planning we are unable to ensure that Hartlepool residents or young people get first choice of housing. Also, whilst every effort is being made to help improve the transport networks we cannot guarantee congestion will decrease. The Britmag development already has an extant planning permission and is being developed out at present.
Stockton Road Residents Association	LP0237	DP0203	I would support the building of new homes if you take the following in to account • Consider new sewerage system throughout the town. • Starter homes for young people. • Homes for people who have lived in Hartlepool first. • Village people have first choice to buy home in the village they have lived	Support for new housing subject to comments noted. In relation to your suggestions the plan and associated supporting documents support and will ensure the following are provided: - adequate new sewerage in line with new developments

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			in. • More Bungalows' which is in short supply. • Community building in areas of large locations of over 500 homes also doctors, dentist and shops. • Improve Bus transport and rail transport throughout day and late evening, not stop at 6.30 pm. • I would not support the Britmag site (373) homes ground is contaminant. • Road congestion in centre of town, when an accident acres on the A19. • Play areas in and around new homes.	- Starter Homes / Affordable Homes - More bungalows - Community buildings in large new developments - Improved public transport and improvements to rights of way and cycle ways - Play areas in new developments Unfortunately through planning we are unable to ensure that Hartlepool residents or young people get first choice of housing. Also, whilst every effort is being made to help improve the transport networks we cannot guarantee congestion will decrease. The Britmag development already has an extant planning permission and is being developed out at present.
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	I would support the building of new homes if you take the following in to account • Consider new sewerage system throughout the town. • Starter homes for young people. • Homes for people who have lived in Hartlepool first. • Village people have first choice to buy home in the village they have lived in. • More Bungalows' which is in short supply. • Community building in areas of large locations of over 500 homes also doctors, dentist and shops. • Improve Bus transport and rail transport throughout day and late evening, not stop at 6.30 pm. • I would not support the Britmag site (373) homes ground is contaminant. • Road congestion in centre of town, when an accident acres on the A19. • Play areas in and around new homes.	Support for new housing subject to comments noted. In relation to your suggestions the plan and associated supporting documents support and will ensure the following are provided: - adequate new sewerage in line with new developments - Starter Homes / Affordable Homes - More bungalows - Community buildings in large new developments - Improved public transport and improvements to rights of way and cycle ways - Play areas in new developments Unfortunately through planning we are unable to ensure that Hartlepool residents or young people get first choice of housing.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
				Also, whilst every effort is being made to help improve the transport networks we cannot guarantee congestion will decrease. The Britmag development already has an extant planning permission and is being developed out at present.
Resident	LP0239	DP0205	I would support the building of new homes if you take the following in to account • Consider new sewerage system throughout the town. • Starter homes for young people. • Homes for people who have lived in Hartlepool first. • Village people have first choice to buy home in the village they have lived in. • More Bungalows' which is in short supply. • Community building in areas of large locations of over 500 homes also doctors, dentist and shops. • Improve Bus transport and rail transport throughout day and late evening, not stop at 6.30 pm. • I would not support the Britmag site (373) homes ground is contaminant. • Road congestion in centre of town, when an accident acres on the A19. • Play areas in and around new homes.	Support for new housing subject to comments noted. In relation to your suggestions the plan and associated supporting documents support and will ensure the following are provided: - adequate new sewerage in line with new developments - Starter Homes / Affordable Homes - More bungalows - Community buildings in large new developments - Improved public transport and improvements to rights of way and cycle ways - Play areas in new developments Unfortunately through planning we are unable to ensure that Hartlepool residents or young people get first choice of housing. Also, whilst every effort is being made to help improve the transport networks we cannot guarantee congestion will decrease. The Britmag development already has an extant planning permission and is being developed out at present.
Northumbrian Water	LP0241	DP0207	We note that the aim of Hartlepool Council is to deliver 6,072 new homes in the region over the next 15 year period. This comprises 3951 units that	Noted and agree.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			have existing planning permissions and an additional 2121 units that are due to come forward for planning permission. The existing permissions are of a mix of greenfield and brownfield sites, while all the new proposed housing will be built on greenfield land.	
			NW will look to support the above housing targets by providing adequate drainage from sites where applicable. We intend to work with HBC and applicants to help deliver the housing sites through adequate drainage infrastructure in the region. We strongly believe early engagement with NW is the best solution for any new housing sites coming forward and we encourage Hartlepool Council to consult us at the earliest possible stage of the planning process.	Noted and intention to work with developers is welcomed.
			Our aim is to ensure there is capacity within our infrastructure to accommodate the development. It is noted that within the Local Plan the phasing of sites is not mentioned and that presently there is no requirement for any form of phasing plan for larger developments. When a site comes forward for planning permission in order to accommodate that site we may have to upgrade our infrastructure. So that development is not delayed it would be very beneficial for us to have a predicted phasing plan of larger sites at the earliest opportunity, this would ensure that we can upgrade our infrastructure at the right time to accommodate development. A suggestion would be to make it a requirement for any site of 250+ dwellings to submit a phasing plan as part of their planning submission.	Note concerns regarding phasing - as there are only limited larger sites wihin the Local Plan it is likely that most sites will develop from within the first 5 years of the plan and develop over the plan period. We note comment regarding a requirement for sites of 250+ to submit a phasing plan as part of their planning submission – in discussion with colleagues in development control it has been noted that when an application comes in you are able to request a phasing plan at that stage which can then be added as a condition on the planning permission.
			We welcome having greater visibility of your longer term strategic development sites as this allows us plan our wastewater infrastructure in an equally strategic manner. An example would be the High Tunstall and Quarry Farm area where there is not only ongoing smaller scale development but far greater development planned for future years. We will endeavour to work with the existing developers to ensure that sewerage infrastructure is designed in such a way to be future proofed to support the rest of the strategic development sites. This could require	Support for providing the correct infrastructure within the High Tunstall area is noted and appreciated.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			significant negotiation and indeed in some cases legal notices to be served. Our experience of these scenarios in other parts of the region points towards best practice at Newcastle and Gateshead where the planning inspector sought to resolve the potential for any conflict and/or uncertainty which could hinder development progress Within Main Modification 6 of the Inspector's report he included the following for strategic development sites. We would urge the council to consider a similar approach for your strategic sites. MM6 is copied below for your reference and it is working incredibly well in bringing developers together to avoid piecemeal foul and surface water infrastructure provision. "MM6 Para 7.10 Given that the new development will generate the need for new infrastructure it is important that the individual sites (as defined in Policy CS3) in each of the Neighbourhood Growth Areas are masterplanned together, regardless of ownership. Phasing plans will be required which set out the triggers for the provision of required infrastructure and legal agreements will need to be put in place to deliver that infrastructure. Masterplans will be prepared by the landowner/developer(s) in consultation with the Councils and must be approved as part of the planning application process. Our expectations for masterplanning and the development requirements of these sites are set out in policies in the Sub Areas and Site Specific policies in Section XXX of the Plan Section YYY5 (Sub Area and Site Policy)."	We note comment regarding a requirement for sites of 250+ to submit a phasing plan as part of their planning submission – in discussion with colleagues in development control it has been noted that when an application comes in you are able to request a phasing plan at that stage which can then be added as a condition on the planning permission, however reference will also be made in HSG5 and HSG6, both are for sites in excess of 250 dwellings to assist with addressing this requirement.
Land interest - Tunstall Farm 2	LP0243	DP0211	Hartlepool Local Plan Preferred Options Consultation: Tunstall Farm, Hartlepool Nathaniel Lichfield & Partners are pleased to provide the following response to the Hartlepool Local Plan Preferred Options Consultation. We provide this response in light of our Client's (Taylor Wimpey UK) land interest in bringing forward a residential development at Tunstall Farm, Hartlepool. Site & Surroundings Tunstall Farm is located within the Rural West ward in Hartlepool and extends to approximately 24.9Ha of arable farmland.	Observations regarding Tunstall farm site noted.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			The majority of the site is located within Flood Zone 1, categorised by the Environment Agency as having the lowest risk of flooding. The site is bounded by: • Tunstall Farm Phase 1 with Planning Permission for residential development to the north; • a public footpath to the east; • planting / agricultural boundaries to the south with Summerhill Country Park beyond; and • agricultural boundaries and a river to the west. The site is well-served by facilities in the surrounding area, including sports facilities and schools. Local shops including convenience stores and takeaways are a 15 minute walk from the site at the Catcote Road/Oxford Road junction. There are six primary schools located within a two mile walking radius of the site, namely: • West Park Primary School; • Eldon Grove Primary School; • Sacred Heart Primary School; • Jesmond Gardens Community Primary School; • Lynnfield Primary School; and • Rift House Primary School. At the secondary school level, there are five schools located within a three mile walking radius, including: • High Tunstall College of Science; • Catcote Academy; • The English Martyrs School and Sixth Form College; • Dyke House Sports and Technology College; and • Manor Community Academy. Further facilities including supermarkets and public houses are available at High Throston and Rift House which are approximately 2.1km north and 2.6km south east of Tunstall Farm respectively. Hartlepool town centre is also just 3.2km east of the site and hosts a train station with services throughout the North East. Bus services are also available in the local area. Housing Requirement	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Policy HSG1: New Housing Provision Over the plan period, the Plan sets out a proposed baseline housing target of 400 dwellings per annum: Table 1 Housing Target Breakdown Housing Target Breakdown Annual Dwellings Total Dwellings Over 15 Years SHMA Housing Requirement (FOAN) 325 4,875 Estimated Demolitions Replacements 35 525 10% Previous Underperformance Backlog 36 540 Total Gross Delivery Required 396 5,940 Proposed Baseline Housing Target 400 6,000 Source: Hartlepool Local Plan - Preferred Options Consultation Document Policy HSG1 and the supporting text identify a requirement for 400 dwellings per annum (dpa) or 6,000 dwellings over the plan period. A supply of 6,072 dwellings is also identified from various sources including extant planning permissions. The housing target (400dpa) is a gross target made up of an identified housing need of 325dpa, as suggested by the 2015 Strategic Housing Market Assessment (2015, SHMA), plus an allowance for demolitions (35dpa) and a 10% uplift for previous under-delivery (36dpa). This is then rounded to 400dpa.	HSg1 will be amended to make note of housing requirement and to reflect that the requirement is a minimum, not a ceiling.
			There is no reference to the housing requirement within Policy HSG1. For clarity, the housing requirement must be expressed as a minimum and included within Policy HSG1.	Agree to add reference to housing requirement into policy and note that this is a minimum not a ceiling.
			SHMA 2015 Whilst the SHMA (2015) provides analysis of market signals, the analysis of previous rates of development and their impact upon household formation rates in Hartlepool is insufficient. There has been persistent under-delivery within Hartlepool since at least 2004, and this lack of delivery needs to be fully considered. We acknowledge that the plan provides uplift in this context but no assessment of whether the 10% uplift applied is sufficient. Given persistent under delivery since 2004, the Council should apply the maximum 20% NPPF buffer to their housing requirement in addition to addressing the cumulative shortfall outlined within the SHMA. Housing Delivery	Concern over past under delivery noted. It is proposed to consider the under supply from the adoption of the 2006 Local Plan and reflect that shortfall within the Publication document.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Table 8 of the consultation document identifies a total future supply of 6,072 dwellings over the plan period – just 72 dwellings greater than the proposed requirement. This constitutes only a 1.2% buffer for flexibility on the identified requirement. Given the previous levels of under-delivery we feel it wholly appropriate for the Council to provide a substantially greater buffer over the plan period. A buffer of 20% should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirement for the plan to be positively prepared and flexible. Emerging Allocations As outlined above, we believe the 1.2% housing supply buffer outlined by the Council to be insufficient and a 20% buffer should be considered a much more appropriate level of provision. The current emerging allocations for residential development are therefore also insufficient and further provision must be made by the Council to achieve this. Tunstall Farm is currently not allocated for residential development within the emerging Local Plan. This is unacceptable given the context of proximal proposed allocations including the High Tunstall Strategic Site. The High Tunstall strategic site is currently proposed to be allocated for 1,200 dwellings across the plan period. It constitutes a highly incongruous extension to the western boundary of Hartlepool; extending far beyond the existing built form of the urban area in an unsympathetic and harmful manner. To allocate this site ahead of Tunstall Farm, which is a suitable, achievable and deliverable urban extension is considered unacceptable. We strongly recommend the Council remove the High Tunstall allocation from the Plan and make provision to meet their housing requirement by allocating more suitable sites like Tunstall Farm phase 2. There is clearly a preference within the emerging Plan for new housing to be accommodated in urban edge extensions with provision of 51.9% of the future housing supply over the next 15 years coming from this source. We	Consideration will be given to the need for a 20% buffer in the preparation of the Publication document as it is appreciated that it would allow flexibility should sites stall and help to reflect the findings of the Local Plan expert group. It is considered that HBC used the upper target identified within the 2015 SHMA to illustrate the Council's desire to meet the requirements of the NPPF in terms of boosting significantly the housing supply within the Borough. The larger Tunstall Farm site is not proposed as a housing site for a number of reasons. The main reason it is not included is that the site covers an area of countryside which acts as the entrance to the Burn Valley Green Wedge. The town benefits from a number of green wedges which run from the countryside into the heart of the town. To allow development of this area would have a severe detrimental impact on the Burn Valley Green Wedge. Consideration will be given to whether the area is shown as countryside or whether a green wedge allocation is included as part of the Publication version. Access to the wider Tunstall Farm site would also not be straightforward. Without the High Tunstall development access from the north would be problematic, access to that quantum of dwellings down Valley Drive would not be acceptable, meaning that access would have to cross

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			agree that this is an appropriate approach to spatial distribution of housing within Hartlepool. Tunstall Farm offers a more logical site for an urban extension than other proposed strategic allocations including High Tunstall. Indeed, the Council themselves accept that the site is suitable for residential development with a yield of 400 dwellings within the most recent Strategic Housing Land Availability Assessment. Notwithstanding the recommended buffer increase, Tunstall Farm must be considered suitable, deliverable and achievable for residential development and be allocated for approximately 400 dwellings within the emerging Plan. The proposed settlement boundary must also be revised to reflect this allocation and the importance of Tunstall Farm as part of the Borough's wider strategic housing requirement. Tunstall Farm offers a viable and sustainable opportunity to assist in achieving this buffer and forms a much more logical site in relation to the surrounding built environment than the proposed allocation at the High Tunstall Strategic Site and is as, if not more sustainably located. Moreover, the site will form Phase 2 of the Tunstall Farm development and be able to draw from the infrastructure which will be implemented as part of Phase 1. Key Comments The evidence base for establishing the housing requirement lacks clarity on a number of factors which have informed the final requirement figure. As such, further assessments and evidence should be provided to clearly demonstrate that the 400dpa figure across the plan period is sound. Notwithstanding the ambiguities outlined above, delivery figures require a more substantial buffer than the 1.2% currently proposed. A 20% buffer will provide a much more suitable quantity particularly given historic under-delivery. Tunstall Farm offers a suitable, deliverable and achievable option for residential development, which compares favourably in terms of site context and sustainability to the proposed High Tunstall strategic allocation and Tunstall Farm Phase 1 which now has planning permission. Allocation of the site will allow for new residential development to contribute towards achieving the housing requirement and mix of the Borough whilst	Summerhill towards Summerhill Lane – again, this is not considered appropriate or desirable. The quantum of development proposed at High Tunstall allows it to provide and contribute towards new infrastructure and community facilities which will help to ensure the sustainability of the site – development within this area of the town requires a new one form primary school to be provided – the Quantum of development at Tunstall Farm would not viably allow the development of a new school. In regard to concerns regarding the assumptions which underpinned the SHMA it is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. It is also questioned whether the SEP based projections are only over the period of the SEP rather than the plan period – when the SHMA was prepared the scenario was extrapolated over the whole of the plan period to give the dwelling projection for the whole of the plan period. Sensitivity testing was undertaken within the SHMA

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			providing numerous social, economic and environmental benefits to the surrounding area. NB. The representation includes a table in response to HSG1 - original submission should be referred to.	preparatory work however there was only limited variances which could be looked at regarding the SEP figures given the desire of the SEP to reduce the unemployment level as stipulated above. This will also be the case when a SHMA addendum is produced. In regards to your concern regarding the affordable housing need and the suggestion additional sites should be allocated to help meet this will be considered in the preparation of the Publication document. It is agreed that we will add some additional text to the Publication Version of the Local Plan to explain the assumptions and the background to the SHMA.
Brenda Road Holdings Ltd	LP0244	DP0212	Housing Land The Preferred Options document acknowledges the historical under-delivery of housing in the borough over the previous plan period and makes plans for the Council to have a six year as opposed to a five year supply. We note the comment at paragraph 6.13 of the document that that "The locational strategy is to prioritise, economically viable, brownfield land and other suitable and available sites inside the existing urban areas for new housing". We agree, and would contend that the SECAAH site is an ideal example of this type of potential housing site delivering 580 housing units in this plan period. Despite the size of the SECAAH site, no mention is made of the development whatsoever. This is particularly concerning given that the preferred options document makes reference to the requirement for homes designed around the needs of older people (Para 9.34 & 10.20) We further note that following our successful appeal the site is no longer	The land at Brenda Road which was subject to the planning application known as Seecah Village which was approved on appeal was changed on the Proposals map to white land and had the previous employment designation removed during the Preferred Options Stage. No extant permissions, with the exception of the South West Extension (given its strategic nature and need to guide future reserved matters applications), are shown on the proposals map. The Publication Local Plan may take account of the 210 C3 units which have planning permission within the revised housing figures should it look as if the reserved matters application will be submitted within the timescales identified on the conditions of the outline permission. Elements of C2 dwellings which form the remainder of the permission are not included in housing numbers in terms of

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			designated as employment land. However the site has not been classified as a housing site under policy HSG1 or HSG3 and is currently classed as white land. As the development will deliver a significant portion of the 6000 homes to be built over the plan period we contend that the site should be classed as housing land.	the Local Plan.
Stovell & Millwater Ltd	LP0247	DP0216	HSG1: New Housing Provision This policy restricts new housing provision to extant planning permissions and identified strategic sites. This seems to us to be short sighted. As we have previously discussed there would be little prospect that all these sites would be developed. How this policy is written provides no scope for housing sites to be brought forward though the local plan. We believe there should be some flexibility to allow for potential undersupply which recent trends suggest could occur again. The policy states "all sites are suitable, available and deliverable". We believe this is a dangerous statement to make, especially given the reliance on extant planning permissions and large strategic sites. It might be the case that they are available but not all sites are going to be deliverable and it could be the case that some sites become unsuitable for various reasons. We believe there should be some exception 7 with the policy to allow for sites to be brought forward through the local plan. We confirm that the Glebe Farm site we refer to in our LPPO submission relates to the SHLAA Site 2 plus the farmstead and the paddock immediately to the rear. The farmstead includes one dwelling and planning permission for a barn conversion. We attach a plan showing the site edged red. We confirm that we are seeking to include this land as part of the housing provision for Hartlepool. The SHLAA confirmed site 2 is suitable for housing development but that it will have to come forward with sites 4 and 5. It makes the point that the land would deliver only “half yield” due to noise constraints, we assume from the road (A179). Site 4 and part of Site 5 has been allocated for housing within the LPPO. We propose extending the housing site westwards into site 2 as suggested in the SHLAA. The land has natural defensible barriers in existing roads and can provide	Note comments however believe that the policy as drafted is acceptable as an exercise was undertaken to consider planning permissions for their deliverability risk – where considered too risky for inclusion some sites have been excluded from the figures. It also has to be considered that the figures within the Local Plan are not a ceiling on development numbers. Over the period of the plan where applications are received and they are in conformity with policies within the Local Plan they would be approved and viewed as a windfall development. Additional development within Hart Village over and above that proposed within the Preferred Options document is not considered desirable. It is considered that the sites included will help the village to grow sustainably over the plan period and in a manner which will create an appropriate village form. Additional development encroaching towards the A179 is not desirable or appropriate.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			an attractive landscaping setting to the approach into the village from the west. We also suggested in our submission that a second option could be the inclusion of just the farmstead and paddock to the south as an extension of HSG8b. However, the SHLAA has confirmed the acceptability of the site for housing and incorporating all of our clients land would enable a more comprehensive scheme to be delivered. Hart Reservoir We confirm that the Hart Reservoir site we refer to in our LPPO submission relates to SHLAA housing site 25. Our client is Mr Wilkinson. We bring this site to your attention in our LPPO submission for completeness, since it is presently the subject of a planning application (H/2015/0354). We attach a copy of the layout plan. The site brings forward a number of advantages to the community. The SHLAA considered the site unsuitable for housing because of the reservoir. On the contrary, the proposed housing development represents one of the few realistic opportunities to maintain the body of water formally Hart Reservoir, together with its heritage assets. This is explained in our planning application and covered in our submission to the LPPO. We believe that this is appreciated by your fellow officers involved in the planning application. 6. In addition the proposed development would provide a landscaped pedestrian link from an existing green corridor to the north east through the site to link to Hart Lane in the west, a landscaped footpath to the south and a proposed footpath to the north, enhancing the provision and use of green infrastructure in this part of Hartlepool. The proposal would bring forward general ecological benefits. It is in flood zone 1 and has adequate access. The site is well located with suitable public transport connections and nearby amenities within walking distance. 7. Insofar as the development would be reflective of the development on adjoining land and the area would still be dominated by open space. We do	It is not proposed to include the reservoir site within the Local Plan. It is noted that a planning application is in and is currently awaiting determination and that significant additional work has been undertaken from the date of the SHLAA which did not consider the site appropriate for housing. If the planning application is approved the limits to development will be adjusted to include the site and the units will be included within the planning permissions.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			not believe that the proposal would have a material effect on the character and appearance of the area. Our planning application submission covers the various benefits of the housing/park scheme in more detail. 8. It is a location where people wish to live. It offers the opportunity for a different type of housing provider. The proposal would be in accordance with the NPPF presumption in favour of sustainable development. The proposal would contribute more to the fulfilment of the various existing and emerging Local Plan policies on housing provision; overall housing mix; quality of place; green infrastructure; ecological network and sustainable development, than remaining in its present state. 9. Thank you for the opportunity to present this supplementary statement to our LPPO submission and clarify particular aspects to the proposed housing sites at Glebe Farm and Hart Reservoir.	
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	3.0 New Housing Provision 3.1 Table 6 (Housing Target Breakdown) identifies an annual requirement for 400 dwellings which equates to a total of 6000 dwellings over the Plan period. Policy HSG1 (New Housing Provision) identifies a supply 6,072 for a combination of sites with extant residential planning permissions and draft allocations. However, Regeneris, in their report entitled 'Review of Hartlepool Borough Council: Housing Policy and Evidence Base' (attached to these representations) highlights that the Planning Policy Framework Justification document, referred to within the SHMA and produced in 2015, explains how the Council have progressed from an OAN of 325 dpa to a target of 400 dpa. This includes making further additions to take account of demolitions which might take place over the Plan period in order to continue housing market renewal initiatives within Hartlepool. Any housing lost would therefore need to be replaced so the Council have added 35 dpa to the gross housing requirement although the net figure remains the same. A housing target of 400 dpa is therefore the gross requirement after making an allowance for the demolitions with a net housing target and effectively the OAN is 361 dpa (325 dpa as a starting point plus 36 dpa to address previous under-supply). 3.2 Regeneris also consider that, whilst the methodology used in the SHMA is consistent with the requirements of the NPPF and PPG, and therefore	It is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. The issue regarding the appropriate buffer level is considered above under the HBF's comments on this section. In relation to the issue of a buffer, it is agreed that the site for 220 at Quarry Farm 2 will be added into the Local Plan – it is considered that this site has a strategic benefit of helping to ensure that the costs of the bypass and grade separated junction as well of the costs of a new one form entry primary school on the High Tunstall development can be met. Action – Quarry Farm 2 to be included in Publication Version of Local Plan for up to 220 dwellings.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			sound, they do not agree with some of the under-pinning modelling assumptions and the scale of the adjustments. These comprise; • The recent CLG household projections have been highly influenced by the recent trend of out-migration from Hartlepool. This may have been caused in part by the under-delivery of housing over the past 5 years. The SHMA should therefore have considered a scenario based on a ten-year trend in migration to yield the higher starting point projection; and • The SHMA does not use ambitious assumptions about economic growth. The SHMA drew upon two sets of job forecasts, but used the lower of the two for its preferred scenario. This represents a cautious approach to economic growth. The SHMA should therefore have considered a higher growth scenario which uses more realistic assumptions about the potential falls in unemployment. 3.3 Based on the above observations, Regeneris consider that the OAN for Hartlepool should be somewhat higher than 362 DPA. Based on a longer term migration scenario and a higher uplift for economic growth, Regeneris consider that the true OAN could be in the region of 400 dpa. When the Council's adjustment for anticipated demolitions (35 dpa) is added in, the higher AON of 400 dpa yield an overall housing requirement of circa 450 DPA which equates to a plan requirement of 6750 dwellings. This creates an additional requirement of approximate 680 dwellings over the Plan period. 3.4 Even if the overall housing requirement of 6000 dwellings over the Plan period was accepted the Council are currently seeking to provide just 72 dwellings greater than this requirement. In effect this is just in excess of a 1% buffer to provide flexibility and choice, as required by para 50 of the NPPF. 3.5 Given the previous levels of under delivery within Hartlepool it is suggested that a greater buffer is applied over the Plan period to allow for both flexibility and choice, via additional allocations, to address any under-delivery through either non-delivery of sites comprising the overall housing supply or a reduced quantum of development on such sites. A buffer of 10% is suggested although a level of 20% is endorsed by the HBF. This would generate the need for an additional 600 units over the Plan period	Whilst the additional 450 dwellings proposed appear to be in a sustainable location and would assist in help towards repayment of the loan for the bypass and would contribute towards the cost of the new primary school on High Tunstall, it is not considered that this site is required within this Local Plan as a suite of sites across the Borough have been identified which will meet the objectively assessed need for the plan period and will provide a range of sites.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			(notwithstanding Regeneris' recommended uplift to 450 dpa) with such an approach being consistent with the NPPF requirements for the Plan to be positively prepared and flexible and seeking to ensure that it meets the clear aim of para 47 of the NPPF of a need to significantly boost housing supply. It should also be emphasised within the Plan that the overall housing land requirement settled upon is a minimum over the Plan period in order to meet the clear aims and objectives of para 47 of the NPPF in seeking to significantly boost housing supply. 6.0 Suitability of Additional Sites Required 6.1 Cecil M Yuill Ltd are the sole owners of land immediately adjacent to the existing built up area to the west of Hartlepool. Plan ref 3002-02 attached to these representations shows the precise extent of their land ownership. 6.2 Planning permission already exists for 81 dwellings on land directly north of Elwick Road which are currently under construction. A further area of land to the north of the site is currently the subject of a planning application for up to 220 dwellings over a site area of 11.3 hectares. The principle of development of this latter site is considered acceptable by the local planning authority. Plan ref HG3002/011/REV0, illustrating the nature of the proposed development, is attached to these representations. However, safety concerns over any increase in use of the Elwick A19 junction has resulted in Highways England issuing a Holding Recommendation until such time as this highways situation can be resolved. Discussions are ongoing between Cecil M Yuill Ltd, HE and the Highways Authority with a view to agreeing mitigation measures which would allow development on the site prior to the construction of the GSJ. These have been positive and a solution is being discussed further presently. All other issues have been resolved including ecology, trees, flood risk, drainage and archaeology addressed to the satisfaction of both the local planning authority and all statutory consultees. In light of this, Cecil M Yuill Ltd respectfully requests that this additional site be subject to an allocation within the emerging Local Plan for up to 220 dwellings. 6.3 In addition to the site currently the subject of a planning application	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Cecil M Yuill Ltd have a balance of 22 hectares of land adjoining the above mentioned site to the west (see Plan ref: 3002-02). This additional area of land is also fully deliverable given, first, it is in single ownership, secondly it already has been the subject of major housebuilder interest and, thirdly, has been subject to survey work which has confirmed there are no constraints to development. Indeed, the site has been identified in the Council's SHLAA (2014) as suitable and deliverable for housing. 6.4 An indicative masterplan has been prepared in support of these representations to demonstrate how the site could satisfactorily deliver around 450 dwellings over the Plan period. (Plan ref: HG3002-01 attached). The masterplan shows how the additional land can form a natural extension of the site currently the subject of a planning application. Given the nature of the site and also the relatively low density of both the proposed site to the east and the smaller site with planning permission for 81 dwellings, the indicative masterplan confirms a proposed quantum of 450 dwellings across the site at a density of 20 dwellings per hectare. This would ensure that a high quality, low density development could be achieved which is very much landscape-led, with a significant landscape buffer on the site's western extent reflecting the need for the western extension of Hartlepool to respect the rural nature of the land and avoidance for any potential for landscape or visual impact from the surrounding area. Development on this additional area would also represent a logical extension of the development proposed at High Tunstall to the south which, in fact, extends further west than the land in the ownership Cecil M Yuill Ltd. As such, an effective strategic gap can still be maintained between the site and village to the west. 6.5 Not only would an additional quantum of approximately 670 dwellings over the Plan period (220 + 450) help to provide the flexibility required by para 50 of the NPPF, including a buffer to address potential under delivery elsewhere in the Borough over the Plan period, together with making a significant contribution to the high level of affordable housing needed over the Plan period, as identified by the 2015 SHMA, an additional 670 units will, critically, reduce the financial burden on the other allocated sites	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			created by the major infrastructure costs associated with the grade separated junction by reducing the pro rata costs per dwelling to £9,207. This results in the following significant reductions in the level of financial contribution required from each of the other three sites; High Tunstall (1200) - £11.05M, Elwick Village (35) - £322,245, Hart Village (50) - £460,350 and Quarry Farm (670) - £6,168,690. As highlighted previously a reduction in the levels of financial contribution needed from the other allocated sites will also enable these to provide a greater percentage of affordable housing to help meet the need identified in the SHMA across the Borough, which the Council already acknowledges they will not to achieve given the present 36% threshold required on all sites over 15 units. 7.4 In order to address the issues listed above, and ensure that the Plan is made sound, the following revisions are required: 1. Reference to prioritising brownfield land within the existing urban areas to be removed from paragraph 6.3; 2. Table 6 needs to be revised to account for an uplift in the housing requirement over the Plan period to 7425 (allow for Regeneris' uplift to 6750 and a 10% buffer to allow for flexibility and under delivery) with an uplift in the annual requirement to 495; 3. Reference to the overall housing land requirement settled upon to be a minimum of the Plan period; 4. Inclusion of Quarry Farm in Table 8 with an additional approximate dwelling capacity of 670; 5. Inclusion of Quarry Farm with approximate dwelling provision of 670 within Policy HSG1 (New Housing Provision); 6. Inclusion of Quarry Farm in Policy HSG2 (Overall Housing Mix) to provide a full range of house types; and 7. New Policy HSG8: Quarry Farm Housing Development which relates specifically to the Quarry Farm site, with the wording relating appropriate latest site specific requirements to be agreed with the Local Planning Authority.	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
Landowner (Southbrooke Farm)	LP0254	DP0228	3.0 New Housing Provision 3.1 Table 6 (Housing Target Breakdown) identifies an annual requirement for 400 dwellings which equates to a total of 6000 dwellings over the Plan period. Policy HSG1 (New Housing Provision) identifies a supply 6,072 for a combination of sites with extant residential planning permissions and draft allocations. However, Regeneris, in their report entitled 'Review of Hartlepool Borough Council: Housing Policy and Evidence Base' (attached to these representations) highlights that the Planning Policy Framework Justification document, referred to within the SHMA and produced in 2015, explains how the Council have progressed from an OAN of 325 dpa to a target of 400 dpa. This includes making further additions to take account of demolitions which might take place over the Plan period in order to continue housing market renewal initiatives within Hartlepool. Any housing lost would therefore need to be replaced so the Council have added 35 dpa to the gross housing requirement although the net figure remains the same. A housing target of 400 dpa is therefore the gross requirement after making an allowance for the demolitions with a net housing target and effectively the OAN is 361 dpa (325 dpa as a starting point plus 36 dpa to address previous under-supply). 3.2 Regeneris also consider that, whilst the methodology used in the SHMA is consistent with the requirements of the NPPF and PPG, and therefore sound, they do not agree with some of the under-pinning modelling assumptions and the scale of the adjustments. These comprise; • The recent CLG household projections have been highly influenced by the recent trend of out-migration from Hartlepool. This may have been caused in part by the under-delivery of housing over the past 5 years. The SHMA should therefore have considered a scenario based on a ten-year trend in migration to yield the higher starting point projection; and • The SHMA does not use ambitious assumptions about economic growth. The SHMA drew upon two sets of job forecasts, but used the lower of the two for its preferred scenario. This represents a cautious approach to economic growth. The SHMA should therefore have considered a higher growth scenario which uses more realistic assumptions about the potential	It is considered that HBC used the upper target identified within the 2015 SHMA to illustrate the Council's desire to meet the requirements of the NPPF in terms of boosting significantly the housing supply within the Borough. In regard to concerns regarding the assumptions which underpinned the SHMA it is agreed that as part of the preparation of the Publication document an addendum to the SHMA will be produced to consider the impact of the 2014 Sub National Household Projections and to assess various scenarios. This will ensure the Publication version is based on the most up-to-date forecasts. Sensitivity testing was undertaken within the SHMA preparatory work however there was only limited variances which could be looked at regarding the SEP figures given the desire of the SEP to reduce the unemployment level as stipulated above. This will also be the case when a SHMA addendum is produced. In regards to your concern regarding the affordable housing need and the suggestion additional sites should be allocated to help meet this will be considered in the preparation of the Publication document. It is agreed that we will add some additional text to the Publication Version of the Local Plan to explain the assumptions and the background to the SHMA. Concern over past under delivery noted. It is proposed to consider the under supply from the adoption of the 2006 Local Plan and reflect that shortfall within the Publication document.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			falls in unemployment. 3.3 Based on the above observations, Regeneris consider that the OAN for Hartlepool should be somewhat higher than 362 DPA. Based on a longer term migration scenario and a higher uplift for economic growth, Regeneris consider that the true OAN could be in the region of 400 dpa. When the Council's adjustment for anticipated demolitions (35 dpa) is added in, the higher AON of 400 dpa yield an overall housing requirement of circa 450 DPA which equates to a plan requirement of 6750 dwellings. This creates an additional requirement of approximate 680 dwellings over the Plan period. 3.4 Even if the overall housing requirement of 6000 dwellings over the Plan period was accepted the Council are currently seeking to provide just 72 dwellings greater than this requirement. In effect this is just in excess of a 1% buffer to provide flexibility and choice, as required by para 50 of the NPPF. 3.5 Given the previous levels of under delivery within Hartlepool it is suggested that a greater buffer is applied over the Plan period to allow for both flexibility and choice, via additional allocations, to address any under-delivery through either non-delivery of sites comprising the overall housing supply or a reduced quantum of development on such sites. A buffer of 10% is suggested although a level of 20% is endorsed by the HBF. This would generate the need for an additional 600 units over the Plan period (notwithstanding Regeneris' recommended uplift to 450 dpa) with such an approach being consistent with the NPPF requirements for the Plan to be positively prepared and flexible and seeking to ensure that it meets the clear aim of para 47 of the NPPF of a need to significantly boost housing supply. It should also be emphasised within the Plan that the overall housing land requirement settled upon is a minimum over the Plan period in order to meet the clear aims and objectives of para 47 of the NPPF in seeking to significantly boost housing supply. 5.0 Suitability of Additional Sites Required	Consideration will be given to the need for a 20% buffer in the preparation of the Publication document as it is appreciated that it would allow flexibility should sites stall and help to reflect the findings of the Local Plan expert group. The issue regarding the appropriate buffer level is considered above under the HBF's comments on this section. In terms of the suitability of the Southbrooke Farm for housing development, whilst it is accepted that the site is locating near to services and facilities such as schools, shops and leisure facilities, it is also located directly adjacent to the Burn Valley Green Wedge – the green wedge is seen as a continuation of the countryside into the core of the town and as such the Publication version of the plan is proposing to amend the green wedge to include the area covered by Southbrooke Farm and Tunstall Farm to ensure the integrity of the green wedge continues to be protected. Agree to add reference to housing requirement into policy and note that this is a minimum not a ceiling.

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			5.1 Cecil M Yuill Ltd have control over a site of 10.9 hectares known as Southbrooke Farm to the west of Catcote Road and directly to the north of Catcote School. Plan reference AP-01 attached to these representations show the precise site boundary. Cecil M Yuill Ltd consider that this site should be included as a formal housing allocation for up to 200 dwellings, given the uplift in the overall housing requirement recommended by Regeneris over the Plan period together with a 10% buffer required to allow for flexibility and potential under delivery of existing sites within the Borough. 5.2 The site is in a highly sustainable location on the south-western edge of the main built up area, in close proximity to a range of serves and facilities that can be accessed via other means other than the private car. Survey work carried out in relation to the site have also confirmed that there are no constraints on development, with the site in single ownership, and therefore, also deliverable immediately. 5.3 The land itself, whilst located immediately outside the proposed development limits for Hartlepool, is not subject to any land use designation. Whilst land to the south, east and west are subject to various open space, green space and green wedge designations, the site at Southbrooke Farm falls outwith all of these in its entirety. Indeed, sensitive development of the site would have no impact on more valuable areas of 'green space'. In fact, any development could be restricted to align with the Tunstall Farm site a short distance to the west which was granted permission at appeal recently and the boundary of which extends as far south as Tunstall Farm itself. Tunstall Farm is located at point south which aligns with Southbrooke Farm which would provide the boundary to any development on Southbrooke Farm itself. 6.0 Summary and Conclusions In order to ensure that the Local Plan is considered sound by ensuring that the Council can demonstrate to meet, in full, their objectively assessed need for both market and affordable housing, the land at Southbrooke Farm should be allocated for 200 dwellings to assist the Council in this regard. In light of this, Cecil M Yuill	

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			Ltd request that draft Policy HSG1 (New Housing Provision) includes Southbrooke Farm for an approximate dwelling provision of 200, Draft Policy HSG2 (overall a housing mix) include Southbrooke Farm as a site with adding a full range of housing types and additional site specific policy be included under the title 'Southbrooke Farm' with the precise wording of this policy, including site specific requirement, to be agreed with the Local Planning Authority.	
Resident	LP0256	DP0230	The local plan/map doesn't identify the 500 homes, with outline planning permission; in Bishop Cuthbert ....this could be delayed with the downturn of house construction! (It is just a blank space on the map!)	Any sites which already benefit from planning permission are shown as white land on the plan. There is no need for the plan to allocate these sites. This is the case with the Upper Warren Development for 500 homes.
Sovereign Park	LP0260	DP0235	Comment: Hansteen reserve their position in relation to whether the plan adequately addresses all the objectively assessed need for housing within Hartlepool and the Council's duty to cooperate with the neighbouring districts. Our client is concerned that the plan seeks to release large area of greenfield land for housing development, ahead of previously developed sites like Sovereign Park. Hansteen is also frustrated that officers are not picking up on the work they have been involved in relation to the land at Sovereign Park. The draft plan still stes out the Coucnil's view that the land can be developed for employment use, even though officers have clear evidence to show that is not the case It is also a source of concern that base on the view that the site can be developed for empoloyment use, it has been considered unsuitable for housing development. This is at odds with the work Hantseen and council officers have been undertaking in relation to bringing forward a proposal for housing on the site. Hansteen is concerned that there is a disproporionate use of greenfield	Noted. The reason for this is due to deliverability. Where brownfield sites are considered deliverable and there is evidence to support this we have sought to include these sites. Where there is not the evidence to support this we have had to use the evidence within the Employment Land Review and the Strategic Housing Land Availability Assessment to help to create a portfolio of deliverable sites within the Plan Period. It is noted that the owners of Sovereign Park have had discussions with the Council regarding the future use of Sovereign Park due to concerns that it is not viable as an employment site and illustrated by the lack of development on the eastern part of the site despite attempts to attract businesses to the site. The Employment Land Review concluded that it did not recommend the site for de-allocation at the time it was undertaken but suggested further monitoring and study to

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			sites outside the existing urban area allocated to meet the district's housing need. Not only is this not a sustainable way of planning for the future, it is at odds with the principle of sustainable development that underpins planning policy. It also contradicts the council's aim, as set out in policy LS1, of bringing forward sustainable development involving the reuse of previsouly developed sites. The position set out in the local plan does not relfect in anyway the ongoing discussions with the Council as land owner in relation to bringing forward housing development on their joint land holdings. Officers from all council departments, including the planning department, have been in meetings to disucss the marketing evidence showing a lack of demand for the land, and the unviability of employment development on the site. At no point has this been challenged by officers; in fact, it seemed to have been generally accepted. In the context of the discussions, the local plan presented an ideal opportunity to reuse the site for housing - as a housing allocation. Given size of the joint land holding, had this approach been taken, it may have removed the necessity to allocate greenfield sites outside the existing built area. Hansteen accept it is unlikley officers would now support the deletion of the allocations they have worked for; however, it is sound planning policy practise to offer more sites for housing than required, to offer range and choice to the market. Sovereign Park Land should be included as one of the plan's housing allocations.	clarify if land here is viable for employment uses over the long term. In line with NPPF paragraph 22 the Council will keep the situation under review. The concerns over flooding at the site and the flood zone the land sits within have, at the meetings between the land owner and the Council, always been cited as a cause for concern. It is acknowledged that the Environment Agency flood zone map may be inaccurate with respect to the Sovereign Park area but until more detailed modelling work is undertaken and submitted the EA flood zone map cannot be amended.
HCA (Oakesway)	LP0086	DP0044	The Council cannot demonstrate a five year supply of deliverable housing land. There is a significant deficit of housing sites and whilst we are aware that certain strategic sites are being promoted elsewhere, there is a need for a varied supply to ensure the targets are met (and exceeded - it's not a maximum target). Any sites identified must be demonstrably deliverable in	Oakesway is an employment location in the north of the town. It was not recommended for de-allocation within the ELR and has a number of long term businesses located there which employ over 700 employees. The site is also an enterprise zone. Longer term it is hoped that a renewable contract to develop wind turbines at the Port will be realised and this

Company	Unique Ref	DP Ref	HSG1 New Housing Provision	Planning Policy Response
			terms of availability, suitability and viability. For instance the site presents a large brownfield opportunity within the main urban area that can provide just under 16 ha of land that is deliverable within the Plan period. The development of this site for residential uses would assist Hartlepool Borough Council to meet housing targets. The HCA as a Government agency are committed to delivering an element of Starter Homes on their residential developments, including Oakesway. This would provide a mix of housing, including homes for young first time buyers who are currently restricted from the market due to high house prices and lack of available housing for such buyers. This would also assist Hartlepool Borough Council to meet housing targets which they are currently unable.	could lead to new businesses establishing as supply chain. The provision of housing on sites within the Oakesway Estate would create issues given many of the businesses are 24 hour operations, some of which generate noise. Locating residential properties may create complaints regarding the noise and lead to businesses looking to locate elsewhere which is not desirable. The potential for a small site in the north west corner of the site will be considered as the Publication document is produced.

Pre-amble HSG2: Overall Housing Mix

Company	Unique Ref	DP Ref	HSG2 Preamble	Planning Policy Response
Resident	LP0048	DP0004	Regardless of the above, the proposed plans do not provide a suitable or indeed complimentary mix of housing types that will support the growth required in this area	Note concern, however, for the reasons set out in the plan, the Council believe the proposed plans do represent a complimentary mix of housing sites that will support growth.
Resident	LP0230	DP0194	Section 10.24 There is a statement 'the main proposed future housing types required to meet the future housing need are defined in Table 9. However Table 9 is Existing Housing Stock Mix in the Borough so it does not indicate the future requirement.	Note comment, this is a typo at 10.24 and it should say table 10.

Policy HSG2: Overall Housing Mix

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the policy and the types of housing intended for the new housing sites. It is noted that the North West Extension site from the Core Strategy has been replaced with High Tunstall, however this does not present any particular concerns.	Noted.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy HSG2: Overall Housing Mix The policy identifies that all sites in the borough with the exception of Wynyard Park will be required to deliver a full range of housetypes. This will include affordable dwellings, starter homes, family dwellings, bungalows, elderly persons housing and executive dwellings. Whilst the council can and should attempt to 'encourage' developers to deliver an appropriate mix across a site based on the findings of an up to date Strategic Housing Market Assessment, the final composition should be ultimately determined by the market to ensure that the sites come forward and address the wider housing needs within the borough. Flexibility within the policy is therefore key.	Note comments. The range of housing will be subject to determination at planning application stage – through seeking a full range of house types and making reference to the need identified within the SHMA this is to help ensure that where there are particular needs within an area that these needs are catered for and to ensure where there is a problem with an oversupply of one particular type of housing that planning applications take account of this within their designs to ensure the issue is not further exacerbated.
Story Homes	LP0219	DP0181	Story Homes broadly supports Policy HSG2: Overall housing mix, which supports the need to deliver a range, and mix of housing to meet local needs, including affordable housing. We consider that the inclusion of aspiration housing is significantly important consideration going forwards and this diversification of housing assist in both retaining existing residents and attracting future residents to the borough by providing developments which cater for higher expectations. This aspirational provision of homes also has knock-on effects in attracting economically active households. This approach towards increasing aspirational/executive housing is becoming increasingly important across the North East. Where positively and effectively planned for, this additional demand for higher specification properties will seek to ensure that stronger market areas within each LPA can retain and attract higher earners. This greater socio-economic retention of affluent household will also seek to assist in preventing economic stagnation and planning for deacline. Going forwards, Story	Note general support for policy. Reference to SHMA or future iteration of the SHMA will be included in the policy to ensure that developments help to deliver towards the need in a particular area.

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
			Homes suggests that the Council should ensure that Policy HSG2 is flexible in regard to housing mix to ensure that individual schemes can determine the appropriate mix dependent upon local needs and demand, and where appropriate deliver aspirational housing, which will subsequently ensure that housing sites are put to the most effective, efficient uses and enable viability to be maximised.	
HBC Housing Services	LP0228	DP0192	Policy HSG2 in particular gives significant weight to housing need when considering planning applications and in table 10 affordable dwellings and bungalows are included in the description of 'full range of house types'. The aim to deliver both affordable units and bungalows is supported as there is a high level of demand for this type of accommodation in the town. The Housing Services team experience high levels of demand for good quality affordable housing stock and for two bedroom bungalow accommodation and the provision of these units on new developments will help meet this need.	Support for approach noted and need for affordable units and bungalows noted.
Resident	LP0230	DP0194	HSG2 Overall housing mix The SHMA analysis is very detailed and does highlight trends and needs in words but it does not reduce this to a numeric split of the 325 by types of housing. This could be a range rather than an absolute number to allow a degree of discretion to the planners. Assuming demolition and underperformance are included they also need to be split. This could then be compared to the profile of the extant planning permissions to estimate the size of the gap to calculate an expectation for the future applications. A statement 'Full Range of House Types' does not give a signal to developers of the type of houses, which are needed to address the future requirement gap. It also does not give the planners a reference point for their discussions with developers. Anecdotally I have heard that bungalows were added in to a development following discussions, the HSG2 policy and SHMA would not give sufficient information to judge whether the number of bungalows added were in line with the need.	Reference to SHMA or future iteration of the SHMA will be included in the policy to ensure that developments help to deliver towards the need in a particular area. This will then mean the most up-to-date information on need can be used to help in the determination of planning applications without the need to include a figure within the policy which could lead to the policy becoming outdated.
Home Builders Federation	LP0234	DP0200	Policy HSG2: Overall housing mix 37. The HBF supports the need to deliver a range and mix of housing to meet local needs, including aspirational housing. Whilst the 2015 SHMA identifies current deficits these reflect a snap-shot in time and will vary	Support for approach noted.

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
			both geographically and over the plan period. 38. It is considered policy HSG2 provides a pragmatic approach to dealing with housing mix. It provides guidance upon need but also ensures that flexibility is maintained allowing individual schemes to determine the appropriate mix dependent upon local needs and demand as well as the ability to make the most beneficial use of the site.	
Land interest - Tunstall Farm 2	LP0243	DP0211	Policy HSG2: Overall Housing Mix Taylor Wimpey supports the need to deliver a range and mix of housing to meet local needs. Policy HSG2 should be reworded so that provision of a full range of house types can be made on allocated sites. Specification of 'House Type Requirement' is unacceptable and does not provide the necessitated level of flexibility required by the NPPF. Key Comments Emerging policy must ensure that sufficient flexibility for house type development on allocated sites. Tunstall Farm offers a viable opportunity to assist in addressing a property imbalance across the Borough as noted in the emerging local plan. Given the number of detached houses in Rural West it is clear that this is a suitable location for this type of property. In light of the above considerations, we recommend the Council allocate Tunstall Farm Phase II to address issues of housing imbalance across the Borough and demand in the local area. The Opportunity at Tunstall Farm Tunstall Farm offers an excellent opportunity for provision of a high quality residential neighbourhood to help address the current housing supply shortfall outlined earlier in this document. Taylor Wimpey UK has commissioned a number of technical reports to assess key attributes of the site and find that there are no constraints which would restrict residential development at this site. Further information on these assessments can be found within the accompanying Vision Document. The Vision The design principles for Tunstall Farm will provide a vibrant and sustainable new community, created through a holistic design approach and carefully considered scheme response. This will be achieved through a	Sites identified within Policy HSG2 in all cases, with the exception of Wynyard, are required to deliver a full range of house types. Reference is to be inserted into HSG2 to cross reference with Table 10: Housing Mix Definitions and also to refer to the SHMA. This will help to ensure that an appropriate housing type mix is delivered on those sites in line with need. It is considered this will help to meet the housing need but give flexibility. The Council notes the economic benefits Taylor Wimpey believe the site would deliver but also consider that the sites included within the Local Plan would also deliver similar benefits. It is also agreed that Tunstall Farm 2 could provide the additional enhancements within the local area noted, including the provision of infrastructure contributions which could be directed towards the bypass to help fund that, however, there are concerns the inclusion of this site within the plan period would not create a balanced strategy for the delivery of homes over the plan period and would put too much reliance on this area of the town to deliver the Borough's housing need. In terms of the suitability of Tunstall Farm 2 for housing development, whilst it is accepted that the site is locating near to services and facilities such as schools, shops and leisure facilities, it is also located directly adjacent to the Burn Valley

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
			realisation of the following key objectives: • The scheme will successfully integrate within the landscape context of the surrounding area through retention and celebration of key existing landscape features including existing hedgerows and tree planting through and around the perimeter of the proposed site. • Integration of important existing pedestrian connections through the site, and linkages with surrounding routes to the north, south and west will provide a permeable scheme which will improve pedestrian circulation in the local area. • The development will be configured with an outward aspect along key development edges with a primary access point to the west from Summerhill Park. An outward aspect along this edge and through a central primary route will help to celebrate the entrance to the development and draw residents and visitors in. • To create and maintain a 'landscape dominant' character, typified by the retention of important landscape features allied to a carefully considered design along the primary route through the site to create a landscaped boulevard route through the scheme incorporating generous verge planting and intersected with existing hedgerows. The development has the capacity to provide for extensive green linkages around and through the site with the retention of large informal areas of open space. • Identifiable focal points along the key route through the scheme will enhance the architectural character of the scheme whilst allowing way-finding points for pedestrian and vehicular circulation. • The scheme could provide formal play provision to enhance and increase facilities already provided to the south west of the site at Summerhill Park. Key landscape positions will be retained and route corridors will be utilised to frame views across the park and associated landscape features. • Through successful integration of exiting watercourses and the provision of SUDS areas, the ecological value of the site could be significantly enhanced whilst providing a natural and sustainable solution to surface water drainage – reducing risk of flooding in the surrounding area. • The scheme will turn the constraints created by existing services running through the site into opportunities by creating green corridors and public	Green Wedge – the green wedge is seen as a continuation of the countryside into the core of the town and as such the Publication version of the plan is proposing to amend the green wedge to include the area covered by Southbrooke Farm and Tunstall Farm to ensure the integrity of the green wedge continues to be protected. It is therefore **not proposed to allocate Tunstall Farm 2 as a housing site within the Publication Version of the Local Plan.**

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
			open spaces to enhance the 'landscape dominant' character of the scheme whilst minimising disruption to existing supply. Benefits Tunstall Farm offers an excellent opportunity for a sustainable, vibrant residential development in Hartlepool. Its development will provide numerous economic, environmental and social benefits to the Borough and local residents. Economic Benefits The economic benefits arising from delivery of 400 new homes at Tunstall Farm are likely to include: • £45 million private capital investment in the Borough; • 60 direct construction jobs per annum; • 95 indirect / induced jobs supported per annum in the supply chain and local services; • £5.8 million additional GVA per annum over an estimated 8 year build period; • £2 million first occupation expenditure on goods and services to make a house 'feel like home', a proportion of which would be captured locally; • £5 million net additional residential expenditure retained within the local economy; • 70 new operational jobs supported by increased resident expenditure in the local area; • A £2.9 million New Home Bonus payments to the Council from the Government over a 6 year period; • £550,000 additional Council Tax revenue each year; and • Additional S106 Payments to support local infrastructure. Social Benefits • Significant opportunity to meet local housing requirements, widening range and choice of: - Family housing - Affordable housing • Potential for new public open space / Children's play area; and • More spending power in local area to enhance vitality of local facilities. Environmental Benefits	

Company	Unique Ref	DP Ref	HSG2 Overall Housing Mix	Planning Policy Response
			• Reduce off-site flood risk; • Sustainable pedestrian and cycle routes; • High quality public realm and landscaping; • Improvements to Summerhill Country Park for leisure and play; and • Biodiversity and habitat improvements. Next Steps The Hartlepool Local Plan Preferred Options Document recognises that there is a requirement for 6,000 additional new dwellings across the authority during the plan period. We believe the claim by the Council that they have identified a total future supply of 6,072 dwellings over the plan period to be too narrow a margin to be acceptable given that this provides only a 1.2% buffer for flexibility and choice as required by the NPPF. Given previous levels of under-delivery within Hartlepool we recommend a significantly greater buffer over the plan period of 20%. This site offers a much more viable and sustainable proposal than surrounding proposed allocations within the Local Plan. As such, Tunstall Farm should be allocated in the Plan. This letter alongside the Vision Document which accompanies it illustrates how Tunstall Farm can be comprehensively delivered to contribute towards the housing requirement of Hartlepool. The site will provide a range of high quality homes in a highly sustainable location. In order that this is achieved it is imperative that the Tunstall Farm site should be considered suitable, available and deliverable and allocated for approximately 400 houses in the emerging Local Plan. The proposed settlement boundary contained within the Proposals Map should also be amended to accommodate the allocation. Taylor Wimpey UK looks forward to working proactively with the Council to progress the proposals for Tunstall Farm and welcome any feedback.	

Pre-amble HSG3: Urban Local Plan Sites

Company	Unique Ref	DP Ref	HSG3 Preamble	Planning Policy Response
Resident	LP0048	DP0004	This plan should be used to encourage housing developers to develop in areas that require regeneration and not in Greenfield areas that put additional strain on an already stressed infrastructure.	Unfortunately the Local Authority cannot require developers to build in a particular location. Whilst brownfield development does help regenerate central areas, there are limited sites, and very few are viable to develop. In order to develop a deliverable plan it has been necessary to propose greenfield sites to meet the housing need over the plan period.

Policy HSG3: Urban Local Plan Sites

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
Highways Agency	LP0029	DP0196	As stated in response to Policy HSG1, Highways England is supportive of the clarity provided in the policy through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the phasing of sites through the use of planning conditions. However, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	Support for cross referencing noted and appreciated. The Council will continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network. The ongoing meetings that have taken place over the course of the preparation of the plan have been useful in keeping both parties updated on a range of issues.
Environment Agency	LP0031	DP0190	Local Plan Policy HSG3: Urban Local Plan Sites We wish to raise significant concerns regarding the designation of the Coronation Drive site for housing development in Policy HSG3 (Proposals Map site HSG3 h). This area of land is completely underlain by a former historic landfill and was known as the Coronation Drive landfill site. The site was operated by Hartlepool District Council between 1977 and 1987 for the disposal of construction wastes and incinerator ash. The Environment Agency has no environmental monitoring results for this site. However, given the period of time this material was deposited, the site is assumed to contain a significant proportion of biodegradable wastes which may still have the potential to produce landfill gas. It is likely that we would object to the building of residential dwellings at this site without extensive ground contamination surveys beforehand which would need to demonstrate that the site could suitably mitigate any potential risk of	The site at Coronation Drive was included in the Preferred Options for 100 dwellings. Further ground investigation works have recently been undertaken, given concerns raised by the Environment Agency regarding the allocation of the site, and these have revealed that the full extent of the site could not be developed and the site is proposed to be included for circa 70 dwellings. The Council are currently investigating the level of contaminated material which may need to be moved from the site to an appropriate disposal facility and the costs involved in that – should these costs render the site unviable an alternative site would be sought, however, at present, the site is needed to help bring finance into the Council in order to help pay for the regeneration works at Seaton seafront and therefore is being fully investigated prior to any alternative

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			landfill gas, subsidence and land contamination issues. We would also wish to highlight that from a biodiversity perspective, there may be an opportunity to deculvert a section of a watercourse which is located adjacent to the site and to the east of Coronation Drive. This would improve fish passage and help towards naturalising the channel for wildlife.	being considered. Note comment – will seek engineers advice regarding this.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy HSG3 identifies sites within the urban area for residential development. In total the policy identifies 9 sites for approximately 336 dwellings. On behalf of the Leebell Consortium, Persimmon Homes wish to support the allocation of US1 land South of John Howe Garden for approximately 20 dwellings. We consider that this land forms a logical infill development opportunity within an established residential area. Future residents will benefit from sustainable links to local shops and services and therefore its allocation within the Local Plan is fully supported and should be maintained. At the same time, whilst we accept that sites US2 Bruntoft Avenue (25 units), US4 Carr and Hopps (70 units) and US7 Oxford Road (17 units) are considered suitable and available as per the SHLAA findings; we would question their attractiveness to the housebuilder market and therefore the likelihood of development over the plan period being achievable. These sites represent a delivery risk and raise serious concerns over the deliverability of the plan. Given the lack of any buffer built into the plan, the failure of any allocated sites to come forward will have significant consequences on the supply of housing within the borough, particularly given the fact that Table 7 of the plan identifies that in the final 5 years of the plan period, the council expect only to be able to demonstrate a 4.72 years supply of sites, contrary to paragraph 47 of the NPPF. It is imperative that any shortfall is planned for and further sites allocated to avoid such a situation.	Support for US1, John Howe Gardens, noted. Disagree. As noted these are found as suitable and available. In terms of Carr and Hopps there is already work being undertaken on the site and demolitions have taken place and Place First are taking the site forward to regenerate the area. We note comments regarding Bruntoft Avenue and Oxford Road and appreciate it would be a difficult site to find a developer for and therefore propose to take out this site from the Publication version. If developers were to be found they could be considered as windfall sites within the plan period. Para 47 of the NPPF only requires authorities “where possible” to illustrate a supply of housing for years 11-15. It is considered of greater importance to show a supply of housing

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			To resolve the identified housing shortfall and contribute towards the creation of a buffer within the housing supply on behalf of the Leebell Consortium Persimmon Homes wish to promote Land at Hart Farm for the residential development of up to 170 dwellings. As identified by the Location Plan (Appendix 1) the site is situated adjacent to the proposed Upper Warren development (which has outline planning permission for 500 units) and will form a continuation of this development towards the latter part of the plan period (years 11-15), thus addressing this identified shortfall. The SHLAA should be updated reflective of this site boundary and delivery timescale. The site is considered to be a sustainable solution to the town's housing needs and can deliver the following social, environmental and economic benefits: • The site forms a logical infill opportunity between the proposed Upper Warren development to the east and Hart Reservoir to the west. The site will form the natural completion of the wider Bishop Cuthbert estate. • The site is in close proximity to the local centres at Bishop Cuthbert and High Throston and will therefore support the existing business in these locations. Such convenient access to local shops and services will also naturally reduce the need to travel great distances to and from the site. • The site will not encroach residential development any further towards Hart Village than the proposed Upper Warren development and will therefore ease any coalescence concerns. • The site provides an opportunity to link in with the existing green finger through the Middle Warren estate and the proposed open space to be delivered as part of the Upper Warren development. The site can therefore make a positive environmental contribution to the area.	in the earlier years of the plan which we believe has been done. At present, and taking into account information elsewhere in this consultation statement, it is not currently considered that the site adjacent to Upper Warren is needed within the Local Plan in terms of housing numbers.

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			• Appropriate buffers between residential units and Hart Quarry to the west can be incorporated to protect the amenity of future residents. • The site can make a significant and positive contribution to the delivery of new housing in the borough and the economic benefits this brings in terms of job creation, New Homes Bonus and expenditure in the local economy. The site is supported by two of Britain's largest housebuilders in Persimmon Homes and Bellway Homes so should importantly be considered deliverable. A Site Deliverability Document will be produced and submitted to the Council shortly which demonstrates that the site is suitable, available and achievable with no legal, policy or physical constraints which would prevent or inhibit residential development coming forward. Both Persimmon Homes and Bellway Homes therefore request that the site is allocated for up to 170 units within the Hartlepool Local Plan and the Development Limits (LS1) amended to incorporate the site accordingly. Diagram 1 – The South West Extension Whilst Persimmon Homes accept that the diagram is indicative, in the interests of accuracy it would be beneficial to amend the diagram to reflect the existing approval. We would therefore like to see the following changes: • '144 Full Permission' hatching to be amended and reduced to reflect the first phase detailed area only; • The remaining residential land to the north of the site to be identified as part of the 'Outline Housing Permission'; • The proposed School land adjacent to Moffat Road to be identified on the diagram as 'School Land' rather than 'Green Wedge'.	As s106 not yet signed can not make change Given above change is not being made can not make this change Agree to make change

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			• The safeguarded route for the future road to be clearly identified as indicative.	As the land is being safeguarded it would be illogical to say it was indicative. The route of the road as far as identified within the planning application has been reflected, as the application did not show a link road we had to take the safeguarded route along the edge of the site.
Resident	LP0249	DP0219	I have raised objections to building on the land near Seaton Front both in Planning Scrutiny (where I was a member from 2000) and in every subsequent Local Plan and yet this plan seeks to allow building on HSG3h NE2e which is the open land from the Warrior Park turn off to the Wainwright Walk estate. 1. This land shouldn't have been include in any building plan as it breaks the council own agreement (given to residents when three nearby parcels of land were sold for building) that in subsequent development houses would never be built forward of the current Warrior Park building line. (This was challenged by a company wanting to develop there but the agreement upheld). Why would the residents believe anything the council subsequently says if the council were to renege on that condition now? 2. An additional point is that any building would ruin the visual amenity. The green space along the front acts as a visual break between Seaton Carew and Hartlepool. It is currently used by dog walkers, ramblers and tourists who want an elevated, uninterrupted view of the coast. Building so close to the main road would destroy that as well as the visual amenity of the houses already present. 3. I objected to any building near that area in the previous Local Plan for the same reasons. But specifically because that land is contaminated according to the testing done on it by the council whilst the Wainwright Walk Estate was undergoing testing. What's more, the large hill on that site is not a natural occurrence. It is actually contaminated topsoil that was removed from the footings of the more Northerly building site, during construction, and stored there as per the Council request, rather than the	The site at Coronation Drive was included in the Preferred Options for 100 dwellings. Further ground investigation works have recently been undertaken, given concerns raised by the Environment Agency regarding the allocation of the site, and these have revealed that the full extent of the site could not be developed and the site is proposed to be included for circa 70 dwellings. The site is needed to help bring finance into the Council in order to help pay for the regeneration works at Seaton seafront. Whereas in the past grants and funding schemes were available for these types of work, at present, there are no such funding opportunities available and given the recent years of austerity the Council's finances have been drastically impacted meaning that opportunities such as the sale of land for housing have to be considered. It is not proposed to build all the way along Coronation Drive and therefore the visual break between Seaton and Hartlepool will remain. Visual amenity will be considered at planning application stage to ensure impacts are minimised and mitigated where possible. It is accepted that this area is contaminated land due to previous uses. As noted above further ground investigation works have been undertaken to help give a sound understanding of what remediation works / land removal would be needed to make the site appropriate for housing development.

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			remedial work that had to be done on the Wainwright Walk Estate.	
			4. That land had been designated as for leisure activity. I think that around 1980 the council had proposed building a landscaped park and a children's play area on that land. Certainly the public were still being told this during land searches the following year. When this never happened, the council said that it didn't have enough money to complete the work. As a result, this and the adjoining land (over Warrior Park Road) were designated by Hartlepool Council as open area for walking and leisure activities (apart from golf and camping). The council erected information signs to this effect. How, then, can a housing estate be build on a designated site?	Each new Local Plan has the ability to change land uses within the town through an independent examination of the plan. If the proposed land is considered of real community or habitat benefit the land would not be considered for a change of designation however, in this instance, the land in question is not considered of great value.
			5. The junction leading to Warrior Park from the old Baths site is already to busy and cannot cope with more traffic. This road was constructed for Warrior Park residents. But has subsequently had to cope with the additional traffic of a self build estate (behind Saffron Walk) and a self build estate (behind the Schooner), as well as three additional estates to the seaward end (Seaton Reach?). I have personally sought traffic calming measures for this road, so it seems ludicrous to allow yet another estate to be added. These houses will have at least one, more likely two, cars each (judging by the current residents on Warrior Park), which will put even	No concerns have been raised by Highways in relation to the site.
			6. Seaton Infrastructure cannot cope with more sewerage.	Again, no objections in relation to sewerage capacity have been received from the Environment Agency or Council engineers.
			7. Disrupt wildlife, some of which are mentioned in the British Red Book.	The Habitats Regulations Assessment and Sustainability Appraisal considered wildlife in the preparation of the plan – no issues were raised in respect of this site.
			8. Not enough Dentists. When they built Warrior Park, many residents found that they needed to travel to Billingham and Middlesbrough in order to find dentists. There's a lack of dentists as a whole, but certainly those who are prepared to add NHS patients to their lists.	Dentists tend to be private practices. Where a practice believes there is a market they will look to locate in an area. This is not something we can influence within the Local Plan.

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			9. Not enough Doctors The doctor based at Seaton transferred patients years ago from that practice. Accessing medical help would require a lot of travel – with the nearest doctors based in Hartlepool.	Seaton is considered a sustainable location and has a doctors practice.
			10. No access to medical services. The people who purchase houses at that site would discover that the nearest accident and emergency department is at Stockton on Tees. (This takes three buses to reach if you don't have your own transport). The ambulance service is under great strain, as are the local sheltered housing and elderly care facilities in Hartlepool – several of which have recently been closed by the Quality Care Commission.	Access to other health facilities within the town is relatively good through public transport which can enable access to the One Life Centre on Park Road. It is accepted that there is no A&E but this is true for any site within the town.
			11. No public transport. Considering residents need to travel out of Seaton Carew to access amenities, and for work, this area is not served by public transport. The number 12 Stagecoach bus which travelled via Mainsforth Terrace and along the front was scrapped around a decade ago. Since then there are no buses to the North of Seaton Carew. In fact the only bus that travels to Seaton is the Number 1 and that services the other end of Seaton. The nearest bus stop to that site would be at the green or Queen Street. If these new residents were to walk all that way South to catch a bus, then it may be worth their while to walk North instead – directly into Hartlepool!	As stated, the number 1 bus service comes up through Warrior Park and turns right onto Queen Street and then right again onto the front. This route is less than five minutes walk from the site and is considered acceptable in highway terms as being accessible.
			12. There will not be enough Junior Schools to cope with even more building in this area. If this mirrors the previous discussions with the council, the new build will be high density and aimed at young families. Seaton has a small junior school that could not cope with the numbers wanting to use the school. (I put my child on the waiting list for that school the day he was born – but still with no guarantee that there would be a place!) The only other School at Seaton Carew is Golden Flatts (to the West of Seaton) - but that has a catchment which also covers children from Jutland Road, St Aiden's and the Rossmere areas.	The Local Infrastructure Plan and the Local Plan both consider educational needs as a result of proposed development. In areas where a new school is required this has been indicated in the Local Plan. In other areas where development will result in further pressure on existing schools, developer contributions can be sought to add additional capacity to the schools where appropriate.

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			13. This area has protected species. There are diverse flora and fauna there and British Red Book species accessing that site. I know for a fact that there are shrews and skylarks. There is a stream running through that site used by kingfisher. I know there were definitely water voles using that watercourse prior to the last development. Despite my own repeated representations to the council they allowed previous developers to re-profile the stream even though it is specifically illegal to disturb either the voles or their habitat. If we have managed to repopulate the stream then any future development must leave the watercourse and its environs untouched. I also want to object to the plan to build around the area of the old Steetley Magnasite/ Britmag coastal site. According to the council consultation paperwork they've given permission for 373 houses there. The public aren't aware that this permission has been given as I'm sure they would object. I objected to the previous plans to build there and all of my complaints are still relevant. In fact the last time I was aware that building here was discussed at the Planning Scrutiny it was agreed to merely landscape this strip to improve it as it acted as a Northern approach to Hartlepool for visitors with the railway running past. (I remember during that meeting that councillors wanted to plant hedges – whilst I thought these could block the sea views on maturity). The land in this area is contaminated through sustained industrial use. Developers and polluters alike have said the site is impossible to decontaminate. The planning department have apparently been told by developers that the pollution will eventually leach through the layers of soil and disappear. This is clearly nonsense and any contamination will affect the health of residents. It is bad enough when building land is subsequently discovered to be contaminated, but to actively seek to build houses on such contamination is despicable.	See comment above re: HRA and SA. The site at Britmag has planning permission already. This is a development which has commenced and therefore is currently happening. The Local Plan cannot reverse a previous planning decision which has commenced.

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			Meanwhile any leachate (caused by disturbance of contaminates) onto the bathing beach below the site or into the adjacent wildlife sites is unacceptable. The rare species of Castle Eden Brown Argus butterfly can be found here The council is well aware that a whole street of houses built around there actually fell down because of the substrate. This street was totally demolished as a result. What will stop the same thing happening there in future? Next time it could cause casualties to the homeowners and would the council accept responsibility given their prior knowledge? Part of the land around here was actually used as a Council landfill. Every council and developer knows that you should not build on tips! Apart from the contamination, leachate and methane ingress problems, it would require such excessive pile-driving of the foundations to do a proper build that there would be no profit in the construction. The East side of the site is open to the North Sea. Both Central Government and the Council are aware that this coastline is suffering devastating erosion. Residents will discover that anyone with houses destroyed by this erosion will be unable to claim restitution or compensation from insurance, effectively losing their life savings. Residents would also remain subject to any mortgages or debts on their property even though their property no longer existed, which would be financially crippling. Is this massive problem being disclosed to prospective purchasers in their land searches? I consider that it not only needs mentioning, it actually needs highlighting otherwise selling on such limited lifespan (and contaminated) properties would appear quite fraudulent. . I spoke to DEFRA about the government grant categorisation of Hartlepool - as it was listed in the same category as Stockton although we are subject to the cost of erosion by the North Sea and Stockton is merely on a river. But the Government wouldn't alter this categorisation. This meant there is no money for sea defences along this coast until you reach the mouth of the Tees. The council also told me that it had no money for sea defences and	

Company	Unique Ref	DP Ref	HSG3 Urban Local Plan Sites	Planning Policy Response
			the official policy was to let this area crumble into the sea. I was appalled at this because there are two cemeteries on this promontory, the Jewish Cemetery and Spion Kop Cemetery. I pointed out that people had already paid the council to maintain the graves in those cemeteries. But with erosion, the coffins would be falling out of the back of these cemeteries, onto the beach. From a Health, Aesthetic, Religious and Social viewpoint this was clearly horrendous! The council's answer to this problem was a policy of collecting such bodies and caskets from the beach and interring them in another cemetery. A solution that I personally find unacceptable. If the council has already made such plans for the cemeteries because of erosion, then why is it selling adjacent land for building? Surely it will be subject to the same erosion?	
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	2.0 Prioritisation of Brownfield Land 2.1 It is considered that the Council's strategy of prioritising brownfield land within the existing urban area for housing is contrary to the provisions of the NPPF and, specifically, para 17 which merely "encourages" effective use of (brownfield) land within urban areas. Indeed, while Cecil M Yuill Ltd wish to reserve their position presently, they consider that there are sites within the town's urban area with the benefit of both planning permission and draft allocation within the Local Plan Preferred Options which are not deliverable.	Disagree. Whilst the NPPF may only "encourage the effective use of land by reusing land that has been previously developed (brownfield land)…" this still directs Local Authorities to seek to re-use this type of land. Whilst the plan does seek to prioritise the use of brownfield land this has been done in a considered manner – where sites are likely not to be deliverable for viability reasons these sites have not been included within the Plan. It is worth noting that only a very small percentage of the new allocations are on brownfield sites as deliverable sites are in short supply.
Landowner (Southbrooke Farm)	LP0254	DP0228	2.0 Prioritisation of Brownfield Land 2.1 It is considered that the Council's strategy of prioritising brownfield land within the existing urban area for housing is contrary to the provisions of the NPPF and, specifically, para 17 which merely "encourages" effective use of (brownfield) land within urban areas. Indeed, while Cecil M Yuill Ltd wish to reserve their position presently, they consider that there are sites within the town's urban area with the benefit of both planning permission and draft allocation within the Local Plan Preferred Options which are not deliverable.	Disagree. Whilst the NPPF may only "encourage the effective use of land by reusing land that has been previously developed (brownfield land)…" this still directs Local Authorities to seek to re-use this type of land. Whilst the plan does seek to prioritise the use of brownfield land this has been done in a considered manner – where sites are likely not to be deliverable for viability reasons these sites have not been included within the Plan. It is worth noting that only a very small percentage of the new allocations are on brownfield sites as deliverable sites are in short supply.

Pre-amble HSG4: The South West Extension Strategic Housing Site

Company	Unique Ref	DP Ref	HSG4 Preamble	Planning Policy Response
Resident	LP0046	DP0001	For the SW development, the access issue is not significant as it is "obvious" that the estate traffic will exit onto the A689 and travel east or west as required.	
Resident	LP0090	DP0048	Having attended the drop-in session in the Baltic Suite on 7th July and spoke to members of the Planning Policy Team, they explained the Preferred Options for the South West Extension (Housing site HSG4). As residents of Fenton Road for the last 48 years, it was pleasing to see that the numbers of houses had been reduced to 1260 and a presentation of green space which provides a habitat for the wild life in this area, which is constantly under threat of urban development. The following observations are as follows: 1. We are worried that the possibility of flood protection has been understated and should be reviewed again. 2. The second point of concern is the access road into the site. The proposed access from the A689 is too close to the Sappers Corner traffic light system and will cause a back-up of traffic across Dalton Back Lane making it almost impossible to access and exit in heavy traffic. The entrance to the south West Extension should be via Dalton Back Lane. 3. Safeguarded land for future road (yellow INF2) This is shown to be connecting to Moffat Road. I would have thought that Moffat Road is incapable of carrying any traffic, considering it is 20mph limit with speedhumps and terraced houses with no parking facilities and therefore cars park on the road. We also observed that our road, FENTON is shown on the large map as MULLROY. This needs correction to avoid confusion.	Note support for the reduction in size of the SWE to 1260 from the previous In support of the outline application the developer submitted a flood risk assessment and a drainage strategy. The Council's engineer considered the proposal acceptable subject to conditions requiring a detailed scheme. It is considered therefore that any flood risk can be addressed. The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for

Company	Unique Ref	DP Ref	HSG4 Preamble	Planning Policy Response
				1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police. The intention is not to allow traffic, other than the bus, to use Moffat Road. The reason it is shown to there is to safeguard the land needed for a road in the future. The planning permission which was given only included a road from the A689 up to the point at Moffat Road. In the future there is an aspiration to join this road up with the northern part of the SWE and northwards of Brierton Lane to create a route from the A689 up to Elwick Road to help relieve some pressure on Catcote Road.
Resident	LP0201	DP0159	Diagram 1 - South Western Extension (Page 85) You show the southern end of the access road as meeting the A689 between Sappers Corner and Dalton Back Lane. I and many others believed	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it

Company	Unique Ref	DP Ref	HSG4 Preamble	Planning Policy Response
			that the developers planned to make the Dalton Back Lane junction into a crossroads with lights. It seems that there has been a change of mind. There was a fatality there in 2012 and another very recently. There is no excuse for not making the access road have a junction with the A689 at an improved cross roads, no longer staggered.	was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Resident	LP0204	DP0162	Building more shops, pubs, community centre and primary school is a detriment to local villages. Pubs and shops, community centre in nearby villages already struggling for business and should be protected.	It is considered the facilities which will be provided within new developments will cater for those developments and should not impact on the viability of existing facilities within the villages.

Company	Unique Ref	DP Ref	HSG4 Preamble	Planning Policy Response
Resident	LP0205	DP0163	Safety and quality of road needed new traffic lights onto A689 would cause more congestion and come to standstill if any accident or road works on A689 or A19. Even reducing speed allowed to 50mph lots motorists will ignore it as they often do at Newton Bewley. When hold up in traffic will use Greatham as rat run even just ot bypass lights. Do not need more shops (especially supermarket) pubs, community centres in area as can be detriment to local villages. Pubs, shops already struggling.	See comments below regarding new junction and Dalton Back Lane. The scale of retail offer is considered appropriate to the scale of the development and is seen as a local offer for that development. It is not considered that it would impact upon services in nearby villages.
Resident	LP0230	DP0194	Section 10.29 It is noted that the South West Extension's southern access road meets the A689 between Dalton Back Lane and Sappers Corner, making 3 junctions within a short length of busy road. As indicated on earlier plans the entry/exit to the new estate should be via a signalised crossroads replacing the existing dangerous staggered junction at Dalton Back Lane. The most recent fatality there on 23rd June underlines the necessity for this. Section 10.31 New estates are to have green wedges. Developers' plans look good on paper. Very importantly, the method of funding on-going maintenance over the next 25 years should be established as soon as practical. It should be by a sum commuted to HBC, then ring fenced to make sure that the money is spent on the extra staff and equipment needed for the extra work. This also links to policy NE3.	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers.

Company	Unique Ref	DP Ref	HSG4 Preamble	Planning Policy Response
				In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.

Policy HSG4: The South West Extension Strategic Housing Site

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
Fens Residents Association	LP0011	DP0010	We have already provided comments in our letter of 24th June. One of the issues was the notorious staggered junction of the A689/Dalton Back Lane/road to Greatham Bank. At the time of writing the last fatality at the site was in December 2012. Tragically, yet another fatality occurred on 23rd June, which we became aware of after delivering the letter. Obviously this awful incident underlines even further the desperate need for the problem to be resolved with the use of developer contributions from the South West Extension. The fact that the southern access road was part of the detailed approval should not stand in the way of preventing future deaths and serious injuries. The magnitude of the problem is just too great. We also trust that no signing of legal agreements which would allow the dangerous junction to stay as it is will take place until the matter has been thoroughly investigated. Most certainly it should go on hold until the Independent Examination of the Local Plan, if necessary.	Noted. See response under Policy INF1.
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG4 – SOUTH WEST EXTENSION – (5) and (6) The proposed link road between the approved south-west extension and the proposed High Tunstall Development is insufficient for future needs. It will become yet another access to the A689 – the existing road must be improved.	Highway colleagues have advised planners of the potential need for such a link over the plan period, however given there are no firm proposals the land has been safeguarded. The route is considered to offer a way of reducing congestion on Catcote Road.
Greatham Parish Council	LP0018	DP0167	Obviously due to its location adjacent to the Parish Greatham Parish Council has a particular interest in this development and is eager that it should fit into the vicinity with as positive an outcome as possible. The Parish Council particularly supports the green infrastructure including most importantly the green wedge along Greatham Beck and landscape buffers to the rural boundaries and along the A689. The treatment of these areas is crucial to the success of locating the proposed development in this greenfield location. The Parish Council questions whether sufficient land is being set aside for	In terms of the road link between the south west extension and High Tunstall officers have included the link which represents what has currently been approved within the south west extension planning application and safeguarded land for a future link – at this stage there is no guarantee that the road will link from Brierton Lane to the A689 but to ensure if any future proposals come forward we are able to secure the link. At present the money is not available to create a western relief road which would be larger than an estate road.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			the suggested road which would link the development at High Tunstall to the A689. If this should ever become a reality it would appear the current suggested meandering route through the housing estates would be entirely insufficient and lead to a reducing quality of life of residents of any new housing along the route. This road will become a western bypass and would need to be planned as such or repeat the same mistake of Catcote Road where a residential street has become the main north-south route bypassing the town centre. Serious concerns remain regarding the proposed new access from the A689 which will add new junction on the A689 and hinder the smooth flow of traffic on the main access into Hartlepool. The existing staggered junction that provides access to Greatham Village and Dalton Back Lane is already considered to be dangerous. The extra flow of traffic from the large new development and link road to the High Tunstall site can only serve to exacerbate the dangers. Dalton Back Lane will become a rat run linking to the A19 at an equally if not more dangerous junction near Dalton Piercy. This junction is essential to the village of Greatham. The junction is part of the main bus route between Hartlepool and Teesside. Greatham is extremely fortunate to be served by this route which is greatly valued and enhances the sustainability of the village. The route relies on access via the junction with Dalton Back Lane. It is a most unfortunate wasted opportunity for the new development not to use the existing junction for access thus improving safety for all users, existing and new. Should a completely new access remain the focus for the developers of the South West Extension legal agreements should be in sought for improvements to the existing staggered junction in the same way that High Tunstall contributes to an Elwick by-pass. Any proposed local centre must be located centrally within a new development in order to be fully accessible to and serve the new community. Locating any Centre adjacent to the A689 will clearly intend to draw custom and traffic from the A689 rather than serve a new community. This will increase traffic problems and draw trade from Greatham Village and existing Centres such as The Fens shops. This should	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			be resisted in the policy. The Parish Council expects the landscape buffer along the A689 to contribute to the strategic gap which protects the village and therefore would like to see it being given the double protection of being included in the Strategic Gap. As with policy HSG5 for the High Tunstall Strategic Housing Site, the Parish Council would ask policy HSG4 also include the criteria "appropriate vehicular, pedestrian and cycle linkages to the adjoining urban and rural area must be provided with each phase of the development" It is particularly important that the development of the South West Extension while avoiding the flood plain itself does not increase the risk on the existing low lying properties alongside Greatham Beck.	50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police. Policy HSG4 has reflected the approved south west extension permission in terms of the quantum of development at the local centre and this was considered within the planning application and was not considered to threaten the vitality and viability of the shops within Greatham Village. It is not considered necessary to include the landscape buffer within the strategic gap – the landscape strip will be conditioned so no development will occur within it. Agree to add text "appropriate vehicular, pedestrian and cycle linkages to the adjoining urban and rural area must be provided with each phase of the development."
Highways Agency	LP0029	DP0196	During consultation on the Core Strategy, Highways England had concerns with the proposals for the South West Extension. These concerns predominantly related to the lack of evidence in relation to the potential impact of the scale of housing proposed and the ability of the proposed supporting infrastructure set out in policy and the LIP, to address these impacts. Therefore, considering the strategic and integral nature of the site and its importance to the soundness of the strategy as a whole, it was considered that additional work would still need to be undertaken to ensure that the impact of proposals would be fully understood and the supporting infrastructure provisions identified in the LIP could be confirmed as being appropriate, deliverable and capable of mitigating such	Comments regarding previous withdrawn plan and the process are noted, however it is noted that things have moved on significantly since the previous plan was withdrawn including the scale of the SWE almost being halved and the fact that the SWE has now gained outline planning consent for 1116 and full consent for 144 (subject to the completion of the S106 legal agreement). The Council will however continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			impacts. In the run up to the EiP, Highways England developed further evidence which was submitted in response to the Inspectors Further Matters. On the basis of the analysis undertaken, it was suggested that Plan and the Local Infrastructure Plan should be updated to refer to the following measures: • The implementation of the committed improvements (improvements to the A19(T) northbound off slip) associated with the proposed Wynyard Hospital development irrespective of the advancement of the hospital development, to be funded through developer contributions and to be implemented at a point when the development impact reaches a level that deems it necessary. • Depending on the advancement of developments, further investigation of additional capacity improvements (likely to be through improvements to maximise the use of the existing road network) that may be required to serve the development aspirations by virtue of a safe and efficient strategic road network. As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Given the differing spatial aspirations that are now proposed (along with the identified measures), it will be necessary to reconsider the potential implications of the current development proposals, from an individual and cumulative perspective, and the requirements for supporting transport	the strategic highway network.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			infrastructure measures. It is expected that the Tees Valley AAP that is currently being updated will present this evidence and will seek to review and confirm its findings at the earliest opportunity. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	
Persimmon Homes (Teesside)	LP0045	DP0209	Policy HSG4: The South West Extension Strategic Housing Sites Persimmon Homes acknowledge the Policy governing future Reserved Matters applications on the Hartlepool South West Extension. It is important to stress however that any Phase 1 Reserved Matters applications will be informed by the Masterplan and the suite of approved documentation currently before the Council and detailed within the proposed conditions. In its current format Persimmon Homes would therefore question the requirement for such a policy. However, given the need to for additional housing within the borough as discussed above, it is considered that the policy should be revised to govern the future development of Phase 2 of the Hartlepool South West Extension. Persimmon Homes would be happy to assist the Council in the production and wording of such a policy to ensure that it takes forward a sound, justified strategy that works for both parties.	Please also refer to response under HSG1. It is considered that through enshrining the basic principles and key infrastructure elements into policy within the plan will help to ensure the scheme is delivered in the agreed way and is in line with the outline and full planning permission. Through its inclusion within the Local Plan it helps to give certainty to both developers and members of the public over how the site will develop. Whilst the Council recognises and appreciates Persimmon Homes continued presence and developments within Hartlepool, the plan has only allocated the 1260 at the South West Extension as it is considered that this is a deliverable number of dwellings within one locality over the 15 years of the plan period – whilst it is accepted that the previously withdrawn plan included a larger allocation at the South West Extension, it is not considered that that plan would have lead to the strategic infrastructure improvements that this plan will lead to. These strategic infrastructure benefits of including another strategic site mean that the High Tunstall development is favoured over a larger south west extension – reliance on one such large site delivering over 2,000 homes over the plan period of 15 years is not the considered the

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
				most appropriate approach.
Resident	LP0055	DP0012	With reference to the South West Extension/Local Plan Preferred Options consultation---Please note that I strongly support the conversion of the A689 junction to a signal controlled crossroads--to save lives and prevent injuries. Also I support the need for additional flood shelving to be provided by the developers to protect against the loss of permeable land and climate change.	As part of the planning permission which was permitted for the SWE in October 2015 there is some flood shelving provided. This was considered to be appropriate at the time of the decision by both the Environment Agency and the HBC Engineers. As such no more can be required from the developer.
Resident	LP0056	DP0013	We have just discovered that it is proposed that ANOTHER junction be built on the A689 between Sappers' Corner and the Dalton back lane to accommodate traffic for a large housing development. How can this possibly be allowed to happen? Quite apart from the fact that it seems a mystery who will buy these houses, where children will go to school, the impact on green spaces and the number of empty houses already in the town, the ludicrous idea of another junction on an already dangerous road is plain ridiculous. If this unnecessary housing development must go ahead then surely the council must insist that the Dalton/ Greatham junction has traffic lights which at least could improve safety. Currently when heading into town on the A689, motorists pay no heed whatsoever to slow signs on the road and believe me, as a cyclist, I know. My brother just escaped a very nasty accident a few weeks ago at this junction when fortunately he could swerve into the outside lane to avoid a car which shot out of Dalton back lane. In addition, as we all know Hartlepool basically has no hospital and the A689 is the main artery for ambulances and people travelling to North Tees hospital. Surely safety on this road is of far more importance than anything else at	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			all. We do not live anywhere near the Fens Estate, infact live much closer to the town centre, but this concerns everyone in our town and surrounding area.	Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Resident	LP0057	DP0014	My wife and I strongly believe that if you don't want any more deaths on your consciences you should be telling Persimmon what needs to happen with the access/exit to the SWE, not allowing them to tell you where they want to put it. There desperately needs to be a signal controlled junction installed at the above area on the A689 which can be used for the new development. This is the ideal time to do it. Putting this junction in won't eat into their profits by that much. Let's not see profits being put before yet another life, after all isn't the safety and welfare of our town's residents, and visitors to our area of the most paramount importance?	See comment above
Resident	LP0059	DP0016	With reference to the Dalton back lane- Greatham turn off on the A689. As it has been tragically proven, this junction is clearly an area that needs improvement and the South West Extension offers the ideal vehicle for this to be achieved if both planners and developer's are sincere in their quest to ensure that public safety is a high priority within the scope of the development proposals. Should the decision be taken not to include improvements in this area then both parties are merely disregarding both public opinion and the safety of thereafter. I would urge the planning committee to ensure the developer's are mandated to include this area for improvement within the development plan.	See comment above.
Resident	LP0067	DP0024	After the death of our very dear friend on 23rd June 2016 we fervently urge the Planning Officer, Planning Committee and Planning Inspectorate to review their decision on the above and have the developers make this into a signal controlled crossroads. The previous casualty on this road was	As part of the planning permission which was permitted for the SWE in October 2015 there is some flood shelving provided. This was considered to be appropriate at the time of the decision by both the Environment Agency and the HBC

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			also a friend of my husband's, so he has been to two funerals in the space of a few years with this dangerous road at the core of the fatalities. How many more will die before someone gets their finger out of their backside and do something sensible? Also, just one area of flood shelving on the far side of the beck at the top of the South Fens area is not enough, to protect nature and land more areas of shelving need putting in place. Please ask the developers to reconsider their plans.	Engineers. As such no more can be required from the developer.
Resident	LP0068	DP0025	I live near to the Sapper`s Corner Junction. Traffic is supposed to travel at less than 50 mph at this point along the A689 (heading north). I have seen much higher speeds than this, 70 mph and above being common. Recently I saw a car from the south heading at high speed through the red lights here when the pedestrian crossing was on green (not for the first time). While drivers such as this can only be prosecuted when recorded in the act, a general lowering of traffic speed limits before they reach this point is desirable. Thus when the new junction to/from the new South West extension is planned, please arrange for a 50 mph limit (with active speed warning panels) is imposed from well south of the current Dalton Back Lane/A689 junction. This hopefully will improve safety at this junction and also at the new South West extension junction.	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
				at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Resident	LP0069	DP0026	I wish to express my support for a signal controlled crossroad on the A689/Dalton road junction no what is being proposed. Also more flood plain area need creating upstream.	As part of the planning permission which was permitted for the SWE in October 2015 there is some flood shelving provided. This was considered to be appropriate at the time of the decision by both the Environment Agency and the HBC Engineers. As such no more can be required from the developer.
Resident	LP0071	DP0028	Dear Sir, I support the FRA in their campaign re Dalton Back Lane to Greatham beck Rd junction, Speed kills so the slower the traffic the safer people will be and other motorists,	The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
				design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity in consultation with the emergency services and, in particular, Cleveland Police.
Resident	LP0073	DP0030	The access for the Housing SWE Development in and out should feed into Dalton Lane and feed on to the A689 with a traffic light controlled roundabout linking the Greatham, Dalton Lane and the A689 there should not be a extra junction on the A689 this would cause more accidents on this very fast road people do not adhere to the speed limits and unfortunately this would not be a safe option. I regularly travel to Stockton and Hartlepool and well a wear of the traffic on the A689 so please give this suggestion your consideration and help save lives.	See comment above.
Resident	LP0074	DP0031	The present staggered junction on the A689/Dalton Back lane/old Stockton Road should be converted to Signal Controlled Crossroads as part of the plans for the South West Extension. It would also serve as the way in and out of the new estate. There is no need for new extra junction. I am also of the opinion that more areas of flood shelving on the other side of the beck should be provides	See comment above re junction. As part of the planning permission which was permitted for the SWE in October 2015 there is some flood shelving provided. This was considered to be appropriate at the time of the decision by both the Environment Agency and the HBC Engineers. As such no more can be required from the developer.
Resident	LP0078	DP0036	I am writing to you as part of the Local Plan Preferred Options Consultation process with regard to Policy HSG4 the new housing proposal at the SWE. In particular the new road junction from the A689 into the new development which at present is proposed about 400 yards west of	See comment three reps above regarding junction.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			Sappers Corner. From the very beginning of consultation about this development Fens Residents Association (FRA) has stated that the logical, safest option for any new junction would be from Dalton Back Lane. At the same time marry up the junction to Greatham to remove the present staggered junction with Dalton Back Lane and control both junctions and the A689 traffic with lights. These could be timed with the Sappers Corner lights to alleviate any traffic tail backs. We all know that this junction is an accident black spot highlighted by a very recent fatality. This golden opportunity to remove a known traffic problem area is not only supported by FRA but by HBC Planners and Highways people but Police as well. The only people opposed to this sensible and logical proposal are the developers because of extra cost. Although they can't legally be forced to comply with this proposal every effort should be made by all parties concerned to make them change their mind in the interests of everyone who uses this road junction.	
			Another concern of residents is the level of flood protection planned by the developers at the SWE. At present because of the loss of permeable land caused by new build the developers are planning to install reed beds and SUDS as well as some shelving along the west bank of Greatham Beck. Because the beck reached the highest water level in living memory and was within inches of breaking its banks in 2012 FRA has long proposed that the planned shelving should be extended north towards Fenton Road. This extra shelving would be at little cost to the developer but would go a long way to alleviate many concerns particularly to the residents of Newark Road.	As part of the planning permission which was permitted for the SWE in October 2015 there is some flood shelving provided. This was considered to be appropriate at the time of the decision by both the Environment Agency and the HBC Engineers. As such no more can be required from the developer.
			Electricity Power Lines run through the centre of this development and opposite the southern end of Newark Road they reach a 'pinch point'. The developers plan to build houses within 9 meters of these lines at this point. Although not illegal the jury is still out with regard to possible harmful health risks in regard to the prolonged close proximity of magnetic fields from power lines, plus the high noise issue in certain weather conditions.	This concern was considered as part of the planning application and was considered to be acceptable.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			Because of these potential risks FRA has asked the developers to increase the distance between new build and power lines without success. This is an opportunity for HBC Planners to insist on more space between housing and power lines and develope 'best practice' approach for the people of Hartlepool. Incidentally many countries insist on a minimum distance of 30mts between power lines and housing	
Resident	LP0084	DP0042	The inclusion of a completely new junction on the A689 between Dalton Back Lane and Sappers Corner goes against all common sense. This is a dangerous stretch of road with many accidents which cause holdups, diversions, injuries and two fatalities in the last five years. Instead of the dangerous staggered junction at Dalton Back Lane/A689/Stockton Road from Greatham, a safe signal controlled crossing would save lives, prevent injuries and traffic chaos as well as providing the southern entry to the proposed South West Extension. • There is insufficient flood prevention. One area of flood shelving on the western side of Greatham Beck is not enough. Even before any new housing is erected, this area floods after heavy rain and Greatham Beck fills to capacity. Climate change and the loss of permeable land must be taken into consideration and more areas of shelving included into the Green Belt. • It is good to see that strong policies covering energy efficiency and eco friendly features in new housing are incorporated into the document. • It is also good to see policies protecting the natural environment are also included.	See comment 3 reps above regarding Highways. In support of the outline application the developer submitted a flood risk assessment and a drainage strategy. The Council's engineer considered the proposal acceptable subject to conditions requiring a detailed scheme. It is considered therefore that any flood risk can be addressed. Note support for energy efficiency policies. Note support for Natural Environment Policies.
Resident	LP0206	DP0164	Once the South West Extension has been built, many more people will have to use Dalton Back Lane in order to gain access to and from the A689. As a frequent user of this main road, I have seen many potentially dangerous situations at this junction. The obvious solution to this problem is to install traffic lights here. This would immediately lead to motorists having to slow down which, in turn, would alleviate the possibility of accidents and more fatalities at this dangerous, staggered junction.	See comments above regarding Highways.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			It is surely your responsibility to insist on traffic lights at this junction in order to prevent more unnecessary deaths. Whilst writing, I would also ask for careful consideration of the need for more areas of shelving on the new estate beyond the Beck. This region is prone to flooding and now is the time to ensure that this situation is alleviated for the sake of the birds and small animals who live there.	
Resident	LP0212	DP0173	I wish to lodge an objection to the change of plans regarding the dangerous junction on the A689 Dalton back lane and the Greatham turn off. This is a known accident black spot and needs urgent attention. I understood the intention was to re align the two junctions making it into crossroads with traffic lights, why the change of plan? How many more accidents will there have to be before this is addressed? I feel that the SW extension plans should be put on hold until this is resolved.	See comments above regarding Highways.
Resident	LP0221	DP0183	My second point covers the access from the new proposed South West Fens development onto the A689. (Policy HSG4) It would appear from what I have read and inferred from the proposed Local Plan, that the suggestion do not reflect the hoped for development of improvements in connectivity within Hartlepool. (Policy INF2). The proposed access creates a new junction which is out of keeping with the current layout of the roadway, and presents as an additional hazard on an undulating road. It would appear more in keeping with the proposed local plan to use existing infrastructure and develop the junction which joins Greatham to the lower part of the A689 to create a robust junction which would provide access to both sides of the duel carriage way in a safe and consistent manner. Having two sets of lights across the duel carriageway into the two Greatham entrances must surely be safer than having one large junction and two smaller ones which would all include the potential to cross the carriageways.	See comments above regarding Highways.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
Resident	LP0226	DP0189	I write, as a survivor of a fatal motor vehicle accident, which occurred at the aforementioned junction on December 23rd 2012, which claimed the life of my wife, Sallyann Holbrook. The accident also left me with life threatening injuries, and subsequent life changing personal difficulties. At the inquest into my late wife's death, the coroner, Malcolm Donnelly, expressed concerns about the junction, and indicated that he would be approaching the relevant officers at the Hartlepool Borough Council, with recommendations regarding changes to the junction. As you will be aware, since our accident, there have been, I believe, two more fatalities, as a result of collisions at this junction, including one, which happened within this month. I understand that when the South West Extension first came to prominence in 2009, it was suggested that developer contributions from the housing development should fund the conversion of this dangerous junction into a safe, signal controlled crossroads. This was at least three years prior to the accident, which claimed Sally's life. In October 2015, before the Hartlepool Borough Council Planning Committee meeting, at which the SWE was approved by Councilors, plans indicated that the conversion would take place. However, when the application reached Committee stage, only a completely new junction between Dalton Back Lane and Sappers Corner was put forward, disregarding the dangerous junction, mentioned above, and missing a real opportunity to alter that junction, and save lives in the future. Indeed, this month, just over six months after this decision was made, Mr. William Angus lost his life at this junction. It would seem that the Hartlepool Borough Council Planning Committee decision to allow the application, including the new, as yet un-built junction, has allowed the developer, Persimmon Homes, to profit, to not	Planning Policy wish to pass on condolences and appreciate that this issue must be very close to you. The Borough Council acknowledges that there may be a safety issue at the A689 Dalton Back Lane junction, and the Council has taken steps in the past to improve the situation including repositioning of road signs to improve visibility (although it was acknowledged at the time that the sign did not contribute to an accident that occurred at that location it was relocated at the request of the Coroner). Original proposals for the South West Extension were for up to 2,500 dwellings, and the scheme at the time did propose to incorporate the access to/from Dalton Back Lane as part of the new access to the development from the A689. The South West Extension scheme included in the Preferred Option Local Plan reflects the existing planning permission for 1,260 dwellings (144 full permission and 1,116 outline permission) with a new access from the A689 which does not include an access to Dalton Back Lane. The new access junction to the South West Extension will operate under traffic signal control and the principles of its design have been accepted by the Council's traffic engineers. In order to promote the safety of all highway users including pedestrians and cyclists using the adjacent National Cycle Route 14 the speed limit on the A689 between Greatham High Street to a point west of Dalton Back Lane will be reduced to 50 mph. This reduced speed limit will help to improve safety at the Dalton Back Lane junction. The Borough Council will ensure that the measures introduced as a result of the development will improve safety concerns in this location and will be instigated at the earliest opportunity

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			an insignificant financial degree, from the sale of hundreds of houses, whilst not being forced to commit to developing a safe and secure access at the A689/Dalton Back Lane junction. It is surely not an unreasonable request, to insist that Persimmon Homes, as part of developer contributions, offer to carry out a moral responsibility to provide alterations to this junction, thus preventing any more deaths and serious injuries at this now notorious black spot, which cut short the young life of my late wife, Sallyann Holbrook. It seems obvious to me, that the building of so many houses in the area will inevitably result in a vast increase in road traffic, wishing to access the A689, resulting in a greater potential for deaths in road traffic accidents, at this fatal junction. I would be grateful to the Hartlepool Borough Council Planning Committee, if it could consider my correspondence, and include in the plan, the conversion of this junction, into a safe crossroads, at the very least. I would be grateful if you could acknowledge receipt of this e-mail.	in consultation with the emergency services and, in particular, Cleveland Police.
Resident	LP0229	DP0193	We wish to add our support to the conversion of the above junction in order to make it safer. We feel that it should be a signal controlled junction in order to save lives and prevent injuries and traffic chaos in the future. Also we wish to add support to the effort to persuade the developers and planners that just one area of flood shelving (a mini flood plain) on the far side of the beck is not enough.	See comments above regarding highway junction. In support of the outline application the developer submitted a flood risk assessment and a drainage strategy. The Council's engineer considered the proposal acceptable subject to conditions requiring a detailed scheme. It is considered therefore that any flood risk can be addressed.
Resident	LP0255	DP0229	Local Plan - Policy HSG4 I would like to register my concerns with respect to policy HSG4 in the consultation document for the proposed Local Plan. I understand that there is no provision to provide access to the new south west extension via a remodelled signal controlled junction at Greatham Back Lane / Dalron Back Lane.	See comments above regarding Highways.

Company	Unique Ref	DP Ref	HSG4 The South West Extension	Planning Policy Response
			Instead, the existing staggered junction, which a long history of KSI RTA's, is ro remain untouched whilst an additional junction is proposed between Greatham Back Lane and Greatham High Street. Given the long history of KSI's at that junction, which includes yet another fatality in the last month or so, I find it difficult to understand why the option of taking out the stagger to the junction, adding the access to the south west extension and signalising the lot all in one go was not insisted upon by your highways department. As Local Highway Authority, they not only have the power to impose this on the developer, they also should have a duty to do it (duty of care) given the accident record at that location. As a consequence I would like to register my strongest objection to HBC's failure to take this golden opportunity to resolve this long standing hazardous road junction and recommend a reconsideration of this matter.	
Resident	LP0257	DP0232	I would like to object to the proposals for access to the south west extension. There have been numerous accidents, including several fatalities, at the Dalton Back Lane/Greatham Village junction on the A689. The proposed new development to the south west of Fens Estate was the ideal opportunity to re-align the crossroads improving safety along the A689 and also providing access into the new housing development. To leave the junction as it is and put an access into the new development between Dalton Back Lane and Greatham Village traffic lights will only increase the risk of accidents along this stretch of road. The alteration of the Dalton Back Lane/Greatham Village junction as I have outlined was in the original Local Plan and is acceptable to Fens and Greatham Village residents. I understand that it was the developers who decided against doing this and this was agreed at a planning meeting. I would strongly urge the Planning Committee to reconsider their decision and put the safety of travellers along the A689 first before the wishes of the developers.	See comments above regarding Highways.

Pre-amble HSG5: High Tunstall Strategic Housing Site

Company	Unique Ref	DP Ref	HSG5 Preamble	Planning Policy Response
Resident	LP0046	DP0001	The report talks about making appropriate traffic linkages for the new development at High Tunstall. Clearly there will be a northern exit from the estate into Elwick Road (see previous comments about upgrade to this road). However given the size of the proposed estate, it would seem obvious that there should be a southern / and or eastern exit as well for traffic heading towards the town centre. Rather than waiting for the developers to produce their plans, I think that the council should identify the best routes at this time and impose them on the plan.	There is actually a planning application in for High Tunstall (H/2014/0428). The Masterplan proposes two points of entry on Elwick Road. The Preferred Options also safeguards a strip of land from the south of the development down to Brierton Lane – during the plan period the Local Authority will investigate the feasibility of a link road between Brierton Lane and High Tunstall.
Resident	LP0230	DP0194	Section 10.33 should also include money for the Wooler Road/Elwick Road junction.	Agree to make reference to wider infrastructure requirements and cross reference with the Local Infrastructure Plan.

Policy HSG5: High Tunstall Strategic Housing Site

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG5 (4) (5) and (6) HIGH TUNSTALL STRATEGIC HOUSING SITE We support the above parts of the policy. There must be a strategic gap between sites – It is important that the proposed Elwick By-pass junction is for Local Traffic with weight restrictions. It is vital it does not become a 3rd access to the A19. Additionally the proposed link road to the south-west extension is insufficient for future needs.	Highway colleagues have advised planners of the potential need for such a link over the plan period, however given there are no firm proposals the land has been safeguarded. The route is considered to offer a way of reducing congestion on Catcote Road. Note desire for a strategic gap. It is hoped that the Strategic Gap element of LS1 and the inclusion on the proposals map will help to ensure the strategic gaps are maintained. The Elwick bypass will have a weight limit. It is inevitable it will become a 3rd main access for residential traffic, however, the weight limit will ensure the heavy goods vehicles are directed to the A179 and the A689. The safeguarded route between High Tunstall and the South West Extension has been included at the request of Highways given the current pressures experienced by Catcote Road.
Highways Agency	LP0029	DP0196	As stated in response to Policy HSG1 and HSG3, Highways England is supportive of the clarity provided in the policy through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2. However, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and	Support for cross referencing noted. The Council will however continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network.

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	
High Tunstall Homes	LP0060	DP0017	Turning to Policy HSG5 first, we fully support the proposed allocation of land at High Tunstall for a housing led development and the allocation of land running through the overall site as a Green Wedge under Policy NE3(5). The site lies at a sustainable location on the edge of the urban area of Hartlepool and adjacent to existing areas of housing. The site benefits from ready access to local schools, access to the local bus network and whilst shopping facilities may be more distant the scale of development proposed is such that it would support the provision of new shopping facilities in a local centre, as proposed in the current outline planning application. Significantly, the proposed development would play an important role in addressing the five year housing land supply requirement in an on-going manner throughout the Plan period. We would submit that the site represents a sustainable location for new housing development and the proposed local facilities and primary school will increase the sustainability of the development. Indeed, it is our opinion that the site is a suitable location for a mixed housing development, noting that the proposed development will take the form of an appropriate extension to the urban area of Hartlepool. The site is accessible by walking and cycling and in due course by improved access to public transport and development of the site is in line with the relevant national, sub-regional and local transport policies. The residential development of the site will fulfill all three dimensions of sustainable development identified at paragraph 7 of The National Planning Policy Framework. The development will make a positive contribution to the economic dimension through the jobs that will be created by the development during the construction period and the custom that the occupiers of the proposed houses should bring to the shops, public house etc in the proposed local centre. The development will make a positive contribution to the social dimension through the	Support for housing allocation noted. Agree that it is in a sustainable location on the edge of the urban area and would note that the new primary school is required on site due to the capacity issues in Primary schools nearby and within the North West of Hartlepool in general. It is worth noting that there is a gas pipeline running north south through the site, but it is understood this has been taken into account in the design of the Masterplan.

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			additional population it will bring to Hartlepool, helping to sustain the shops, public houses, restaurants and other leisure facilities within the town, adding vitality to the social life of Hartlepool. Finally, the development will fulfill the environmental dimension in that it will not have any undue adverse impact upon the surrounding area, visually, ecologically or environmentally. Indeed, the local environment will be protected. The site is available and the development is achievable within the timeframe of a local plan, with development commencing within the first five years. However, the scale of development is such that completion could not be anticipated within the first five year period. In this regard, the site would provide Hartlepool with an on-going supply of housing land for a significant period, in much the same way as the land at Middle Warren has done previously. There are no known constraints (services/utility arrangements, contamination, major infrastructure or flooding) that would impact on the deliverability of the proposed development.	
Resident	LP0064	DP0021	My main concern regarding this very large development is the inadequacy of the local road infrastructure. The requirement for an Elwick Village bypass and improved junctions on the A19 as required by Highways England is welcome from the Elwick Village and safety viewpoints. However the bypass will increase the amount of traffic on Elwick Road and this will add to the traffic generated by the High Tunstall Strategic Housing Site itself. The local roads in the vicinity of High Tunstall school and in the area of the Elwick Road / Wooler Road junction will be totally incapable of handling this traffic. The High Tunstall Strategic Housing Site development should not be included in the Local Plan Preferred Options unless there is a complementary proposal to upgrade the local road infrastructure.	Support for the benefits to Elwick Village and safety in terms of bypass and new A19 junction noted. Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured.

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
				In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made. There will be a weight limit on the new bypass – it is the intention that this will be a residential access point.
Resident	LP0075	DP0033	I attended your recent presentation at the Place in The Park 27-06-16. I was quite astonished at the amount of the new proposed property's being built in the next decade. I reside in Elwick Road opposite High Tunstall School I cannot believe the amount of building work being carried out without any new infrastructure being carried out to the road system. At present I have great difficulty getting out of my drive at certain times of the day especially at High Tunstall School starting and finishing times, the volume of traffic can be constant. Parking outside of our drive can cause problems both entering and exiting. When exiting our drive we can meet pedestrians stood waiting to cross the road and at times vehicles being parked either side of our drive. I have spoken to my local councillors regarding this problem to no avail. I have also spoken to the Highways Department regarding the problem and I was told to contact the police when we have parking problems. Before these proposals are executed I believe that various road calming proposals should be put in place speed limits, speed bumps also resident parking. Weight limits of vehicles travelling from the A19 down Elwick Road should	Support for the benefits to Elwick Village and safety in terms of bypass and new A19 junction noted. Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			be kept at a minimum. The proposed 1200 houses this could mean each house having a minimum of two cars this would mean 2400 cars even more. For an example on our drive there are three houses with seven vehicles	Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made. There will be a weight limit on the new bypass – it is the intention that this will be a residential access point.
Resident	LP0076	DP0034	I attended your recent presentation at the Place in The Park 27-06-16. I was quite astonished at the amount of the new proposed property's being built in the next decade. I reside in Elwick Road opposite High Tunstall School I cannot believe the amount of building work being carried out without any new infrastructure being carried out to the road system. At present I have great difficulty getting out of my drive at certain times of the day especially at High Tunstall School starting and finishing times, the volume of traffic can be constant. Parking outside of our drive can cause problems both entering and exiting. When exiting our drive we can meet pedestrians stood waiting to cross the road and at times vehicles being parked either side of our drive. I have spoken to my local councillors regarding this problem to no avail. I have also spoken to the Highways Department regarding the problem and I was told to contact the police when we have parking problems. Before these proposals are executed I believe that various road calming proposals should be put in place speed limits, speed bumps also resident parking. Weight limits of vehicles travelling from the A19 down Elwick Road should be kept at a minimum. The proposed 1200 houses this could mean each house having a minimum of two cars this would mean 2400 cars even more.	Support for the benefits to Elwick Village and safety in terms of bypass and new A19 junction noted. Concern regarding the local road network as a result of the High Tunstall Development is noted at and around High Tunstall School and the Elwick Road / Wooler Road junction is noted. Highways engineers and Highways England have been, and continue to be, involved in assessing the impact of the High Tunstall Development. As part of the detailed design scheme for the bypass we will consider whether there are any improvements which can be carried out to Elwick Road between the bypass and the urban area. The Local Infrastructure Plan also assesses the impact of developments on existing junctions around the town and where possible improvements to existing roads and junctions will be secured. In terms of the Wooler Road / Elwick Road / Park Road junction some improvements have been secured as part of the Tunstall Farm planning permission – these involve improvements involve clearer / improved road markings to ensure people waiting to turn do not hinder other movements

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			For an example on our drive there are three houses with seven vehicles	of vehicles. The improvements also include the addition of sensors to the pedestrian crossing as well as the addition of another pedestrian crossing outside of the White House pub. Further work is ongoing to assess whether there are further improvements which could be made. There will be a weight limit on the new bypass – it is the intention that this will be a residential access point.
Sport England	LP0079	DP0037	Sport England welcomes and supports the setting aside of land within this allocation as multifunctional green infrastructure in order to provide formal and informal leisure, education related sports provision and recreational facilities.	Support welcomed.
Resident	LP0202	DP0160	I really do not understand why the original local plan was scrapped when these new proposals are a lot more controversial and will upset a lot more residents. Why do you have to have two very large developments:- The South West extension and the proposed High Tunstall site where 1200 dwellings are proposed in each. We moved to this area because of the semi-rural nature and we are disgusted at the amount of green-belt that will be lost. You always try to protect the villages but what about the houses which are close to countryside on the edges of the town. Is the wildlife not important. This area is already very busy with traffic and all these extra houses will increase the dangers and congestion already experienced. High Tunstall pupils will be more at risk with all the proposed extra traffic. We have no traffic calming measures near here or in Cairnston Road where the buses run every ten minutes. You should spend a decent length of time in these areas and you would witness the speed some of the motorists drive.	This Local Plan has been developed to have less reliance on one strategic site and also in a way which will address some of the highway infrastructure problems which have become an issue over recent years. The Government sets national planning guidance which local authorities must seek to adhere to. One of the key drivers for government is the delivery of additional homes. Given the geography of Hartlepool there are limited locations where this is possible and therefore westward development is inevitable over the coming years, however, as far as possible, the integrity of the villages needs to be protected. The countryside around Hartlepool is not formal green belt in planning terms. Traffic calming measures will be introduced where considered necessary by the Highways Department.

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			Surely some of this development could take place in other areas of the town. What about the land near the Hart By Pass couldn't you develop some of this land. I am sure some of these land-owners would like to make a fortune as well. You are proposing to build another care home in the High Tunstall development. Why do you have to do this when there are a number of them empty in the town. There is very little provision for green space in this proposed development. The South-West extension has been planned a lot more sympathetically and seems a lot more spread out. There are large green spaces separating the existing houses from the new ones. The new development looks in very close proximity to the houses in the High Tunstall development. I thought that the A689 and the A19 where not capable of taking higher amounts of traffic. Also the roads leading to these would not be suitable as the roads to Elwick are very windy and are not made for huge volumes of traffic. I hope that the views of the residents will be taken into account but I think all the Council are worried about is the money they will obtain from the developers for their new by-pass road. I wonder how many people who plan these developments actually live in the areas where these sprawling developments are proposed.	There are planning permissions in place which will see another 500 units delivered to the north west of Middle Warren. Note comments regarding green space at SWE in comparison with High Tunstall. Much of this relates to the route of overhead power lines, other utilities and Greatham Beck which has necessitated the scale of green wedge which is indicated within the plan. There are issues regarding the capacity and safety of the Elwick junctions with the A19 in their current format which is one of the reasons the new grade separated junction and bypass are included within the plan. There are also ongoing issues with the A19, in particular to the south of the A689 towards the Tees flyover – the responsibility for that lies with Highways England.
Resident	LP0203	DP0161	I, like my daughter, Mrs Cartwright, do not understand why you have to have two very large developments where you have a proposed 1200 dwellings in each. We moved here to be in a semi-rural area where we could enjoy the green belt. We already have a large amount of traffic using these roads with the children at High Tunstall School and West Park. It will put more pupils at risk plus in the icy conditions the road up to Elwick Road is dangerous, plus	See above response.

Company	Unique Ref	DP Ref	HSG5 High Tunstall	Planning Policy Response
			the traffic that flies along Cairnston Road at speed is already dangerous. I am sure there are other areas in the town which could be used for development and I trust all the objections which I know are being logged with the Council will be taken into consideration by them.	

Pre-amble HSG6: Wynyard Housing Developments

Company	Unique Ref	DP Ref	HSG6 Preamble	Planning Policy Response
Resident	LP0048	DP0004	The proposal for nearly 1000 new homes at Wynyard: I) is unsustainable without massive infrastructure improvement particularly on the A19 Tees crossing. Minor road improvements on A689 and A19 between A689 and Norton will not ease these issues; ii) the development is not in keeping with the stated aims of maintaining green belt areas iii) will increase the use of Greenfield land at the expense of using land that is ready for redevelopment closer to the town and the existing infrastructure in the area iv) negatively impacts on the amenity of the Wynyard area destroying the village culture that was initially established v) imbalances the housing market in the area and will imbalance the council tax structure in the area vi) does not take into account the present facilities available and does not address the additional facilities required to support this massive population growth.	Although the Preferred Options notes that in total there will be 975 dwellings at Wynyard, 475 of those are existing planning permissions. The Local Plan can not change or stop those dwellings. The Local Plan Preferred Options does then propose an additional 500 new dwellings on top of the planning permissions which exist. It is agreed that there is an issue at the Tees flyover and this causes queuing on the A19. The Tees Valley Combined Authority and local authorities are actively looking at ways to address this which may include a new Tees Crossing. In the shorter term Highways England have secured funding to increase the A19 between Wynyard and Norton from two lanes to three to help capacity issues. Highways England and the Local Highway Authority will have to be happy with mitigation/improvement measures to both the Strategic and Local Road Networks proposed by the development. The proposed developments are on greenfield land / countryside. This is not greenbelt land which is a specific planning classification. There is no green belt land in Hartlepool or the Tees Valley. There is not either the quantum of brownfield land or viable sites available to meet the housing need. Therefore greenfield land releases have been necessary. The vast majority of the proposed housing development within Hartlepool lies to the north of the A689 – this has historically benefitted from an employment permission which was always the original vision for Wynyard and would have seen development on the site proposed.

Company	Unique Ref	DP Ref	HSG6 Preamble	Planning Policy Response
				The properties proposed at Wynyard will mainly be at the higher end of the market and reflect the housing types at Wynyard presently – there is a shortage of high end, executive dwellings within the Borough and these developments will help to provide this type of housing over the plan period. It is noted that at present facilities at Wynyard are limited. As such, the Wynyard housing policy seeks to ensure that a range of community facilities, recreation and leisure facilities, improved cycling and walking links and a new local centre are provided.

Policy HSG6: Wynyard Housing Developments

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG6 – WYNYARD HOUSING DEVELOPMENTS (4) (5) (6) (7) We support the above policy. However, it is essential that woodland which is such a significant feature is protected. Regarding (6) the gap between woodland edge and garden fences to be planted with woodland trees should be at least 50 metres and not 10 metres as proposed. The Borough's tree cover is far below the average for the country and reducing it at Wynyard exacerbates the situation.	Note support for policy. In relation to the separation distances between the woodland and the garden fences, whilst 50m is not possible to request, advice has been received that the statutory distance between ancient woodland and housing, as stipulated by Natural England and the Forestry Commission, is 15m. Where the woodland is plantation the distances agreed have been 10m. As such Policy HSG6 to be amended within the Publication version to reflect this guidance. This amendment should help in protecting the woodland cover within this part of the Borough.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports the protection this policy seeks to afford the woodland at Wynyard which is part of the landscape visible from Greatham. Improved pedestrian and cycle linkages are also welcomed and supported. The Parish Council questions the continued emphasis of executive housing allocations at Wynyard. With a major employment site also at Wynyard why are ordinary workers in these businesses required to travel into Wynyard. This is only increasing traffic flows as it seems equally clear that that many executives cannot be employed in one Business Park. As Wynyard continues to grow into a new town it needs to have a more balanced population.	Note support for woodland and improved pedestrian and cycle links. Whilst policy HSG2 allocates the north pentagon for executive style houses, it also identifies that the main site at Wynyard for 400 dwellings will be required to provide a full range of house types.
Stockton Borough Council	LP0022	DP0032	Wynyard In summary the following proposals are identified within the Hartlepool Local Plan Preferred Options at Wynyard: • Policy HSG6: Wynyard Housing Development- o North Pentagon- 100 dwellings o Wynyard Park North- 400 dwellings and a local centre o Appropriate pedestrian and cycle linkages to the adjoining areas at Wynyard and linking to Hartlepool along the A689 must be provided by the development.	It is agreed that Wynyard is a cross boundary issue and that there are capacity issues associated with the A689 / A19 junction which are currently being considered by highways consultants, both Highway Authorities and Highways England in line with the planning applications which have been received by both authorities. This is clearly an issue which needs to be closely monitored and the correct mitigation measures put in place at the correct time.

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			• The Council consider Wynyard to be a strategic cross boundary issue. As you will be aware there is highway capacity issues associated with the A689/A19 junction. Further consideration needs to be given to how development proposals within the both Hartlepool and Stockton can be delivered alongside necessary infrastructure improvements; the precise details of which have not yet been established. In this regard, the Council advocate a collaborative approach between local planning authorities, landowners and developers to deliver a masterplan for the Wynyard area.	Whilst at present both authorities have received a number of planning applications covering the site, officers within Hartlepool are taking a strategic approach to the land within Wynyard and looking at the impact the overall development will have and the infrastructure that will be needed to ensure the sustainability of the area improves over time. The strategic elements of these infrastructure provisions will be included within the Local Infrastructure Plan and will also be secured as part of legal agreements associated with the planning applications should they be approved prior to the Local Plan moving forward. The Planning Services Manager has been collating all of the individual applications onto one plan and HBC agree that moving forward in a collaborative way, sharing information and forming a plan of how all the applications sit together would be advantageous and will help to ensure the correct infrastructure is put in place to support the developments in Wynyard.
Wynyard Park	LP0027	DP0223	Context These representations are prepared in the context of previous representations that have been submitted regarding the Local Plan Issues and Options consultation document. The previous representations were dated 17th July, 1st August and 24th October 2014 respectively and proposed the inclusion of allocations for up to 732 dwellings on land at Wynyard Park (beyond those which already have planning consent or minded to grant planning consent) and requested that land which is currently allocated for employment purposes be de-allocated. Following the submission of these representations, Wynyard Park has since held positive discussions with senior representatives of the Council regarding the aspirations to deliver this quantum of development at Wynyard Park which will in turn assist in the creation of a community that is large enough to be sustainable. No objections were raised during these meetings to the content of the previous representations and the aspiration to deliver an additional 732 homes across the plan period. Indeed, these	Noted. Note comments that Wynyard has had ongoing discussions with a range of Council officers, senior managers and councillors. However it should be noted that within meetings with officers (both planning and highways) which often included a representative from Highways England, ongoing issues with the capacity of the Highway network within the area has always been raised as an issue which needs to be

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			aspirations were supported and encouraged during these discussions. Mindful of the above, Wynyard Park welcome the draft allocations for a total of 500 dwellings contained within the consultation document and welcome the opportunity to continue working with Hartlepool to deliver a sustainable community in the future. However, it is considered that the strategy set out in the consultation document is the wrong approach in the context of the positive discussions held to date regarding the future of Wynyard Park and there are concerns that this approach will act as an unnecessary impediment to growth during the forthcoming plan period. Based on the positive discussions and feedback received to-date, Wynyard Park have acted positively and proactively to bring forward planning applications for development in the short term and helping to boost the supply of homes in the borough. Indeed, a significant amount of development has taken place at Wynyard Park in the last 5 years (across the entire estate which falls within the Boroughs of Hartlepool and Stockton), with four major housebuilders comprising Taylor Wimpey, Barratt, Avant and Storey Homes either constructing dwellings on site or in the latter stages of seeking planning consent for additional development to meet a clear demand for new homes. When viewed in the context of levels of demand and development in the wider Borough of Hartlepool, this is an opportunity to deliver and increase the supply of homes at an attractive and marketable location that should be capitalised upon. In our view, the current proposal to omit the additional 232 dwellings that were proposed in previous representations in favour of an allocation for prestige employment land will only serve to restrict delivery within the plan period. It is counter-productive to the positive future planning of the estate. The remainder of these representations provide additional detail in this regard and a pro-forma is attached where comments are made regarding specific references and policies within the plan.	addressed. Support for allocation of 500 noted and the desire to create a sustainable community at Wynyard – this desire is in line with the draft Policy which seeks to ensure a range of community facilities and sustainable transport links are delivered alongside the housing. Comments noted regarding the recent activity and success of Wynyard in general. Indeed officers do see Wynyard as the prime area for the development of higher end, executive properties within the Borough which helps to ensure that the Local Plan can illustrate it is delivering homes in a variety of locations which help to meet the future needs of the Borough. Again, officers must highlight the issues which have been ongoing regarding the highways. The two sites had been included as there were planning applications submitted for both and it was the understanding of officers that adequate highway modelling would be undertaken to support the planning applications. However, to date only the North Pentagon site has been justified in highway terms. There is therefore a need for Wynyard Park to produce evidence to justify not only the additional 232, but also the Wynyard Park North site for 400. This evidence must illustrate that the sites are deliverable in highway capacity terms and indicate any mitigation which will be needed and whether the developments at Wynyard can viably deliver any necessary highway mitigation work along with meeting the cost of the necessary community infrastructure.

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			The Need to Plan Positively - Wynyard Park's objection to the Preferred Options Strategy Mindful of the above, Wynyard Park object to the proposed quantum of development to be allocated at Wynyard Park under draft Policies HSG1 and HSG6 (insofar as they omit the additional 232 houses proposed in previous representations) and strongly object to the retention of 54.15 ha of land at Wynyard Park for prestige employment land under draft Policy EMP1. Paragraph 14 of the National Planning Policy Framework (NPPF) clearly states that in plan making "Local planning authorities should positively seek opportunities to meet the development needs of their area" and "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change" (GVA emphasis). Indeed, mindful of paragraph 182, the NPPF also states that in order to ensure that a development plan is sound it must be positively prepared, justified, effective and consistent with national policy. Wynyard Park consider that additional development can be delivered at Wynyard Park in a justified and effective manner to ensure that the Local Plan is sound when viewed in the context of the requirements of national policy. A development plan should be "aspirational but realistic" and set out "opportunities for development" (NPPF paragraph 154). However, the omission of the remaining 232 dwellings which were proposed in previous representations, in favour of retaining the remainder of Wynyard Park for employment purposes are neither aspirational nor realistic and act to deny a clear opportunity for development in an area which is subject to an exceptional level of demand from house builders. As set out in the accompanying covering letter, the allocation at Wynyard Park for 500 new homes (as part of a wider set of allocations across the Borough for up to 2,000 new homes) is welcome. However, Wynyard Park feel that it is imperative that additional land is allocated for housing at Wynyard Park, over and above that which is allocated elsewhere in the Borough. As such, Wynyard Park strongly objects to the quantum of development proposed in Draft Policies HSG1 and HSG6 and queries the	Note objections to policies HSG1 and HSG6 in so far as they omit the additional 232 dwellings – See comments above as to reason why. The Council consider that the retention of a prestige employment allocation on land within the Borough of Hartlepool is crucial for the economy of the Borough over the coming years. This area benefits from good links to both the A19 and the A1 which national and international businesses looking to locate to the area require in making there investment decisions. Wynyard Business Park therefore has an important sub-regional and regional role in encouraging new inward investment to the Tees Valley including Hartlepool. It is critical to retain a portfolio of land that includes high quality business sites so that the local authorities can respond positively to investment requirements over the next 15 years. It is considered that from the 2006 Local Plan, the local authority has taken a proactive approach to development on Wynyard Park and has worked with the landowners to bring forward land for housing to sit alongside the employment allocation in order to create a sustainable community. The Preferred Options Local Plan has sought to provide a range of policies at Wynyard all of which are mindful of the NPPF's desire for all development to be sustainable and in particular mindful of paragraph 7 of the NPPF which sets out the three dimensions to sustainable development; an economic role, a social role and an environmental role. The policies within the Preferred Options consider all 3 of these dimensions and seek to ensure the development at Wynyard is delivered in line with these. The allocation of the employment land alongside the housing allocations and other community facilities and green

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			overall housing target as set out in Tables 6, 7 and 8. Table 6 of the consultation document sets out the annual dwelling need identified by the 2015 Strategic Housing Market Assessment (SHMA) and the 'proposed baseline housing target'. Returning to the 2015 SHMA, it provides a 6 series of population and household projections from 2016 to 2031. This is despite the fact that the latest demographic estimates of population available to the SHMA would have been (at the time it was written) 2013 based. The OAN should therefore be based in 2013 and housing performance since 2013 should be taken into account when assessing the five year housing land supply position. The effect of the 2015 SHMA rebasing its OAN to a future date in 2016 (as it has done) is to ignore housing needs in the present and the extent to which they've been met and or need to be met going forward. Between 2013 and 2015 the Council delivered just 460 dwellings or 230 dwellings per annum. No account has been taken of this undersupply. The plan identifies a supply figure of 6,072 dwellings over the plan period which is only 72 dwellings above the predicted requirement. As such, there is insufficient flexiblity within the plan to ensure that targets can be met, should under-delivery continue to be an issue across the Borough as it has been. Mindful of this and mindful of the previous levels of under supply that should be accounted for, it is clear that it will be necessary to allocate additional land for residential development in order to create a sound plan that is aspirational, deliverable and flexible. Wynyard Park represents a suitable and deliverable location for further allocations in order to address	recreational space is vital in order to create a sustainable community. Given that the existing areas of employment at Wynyard (which sit within Stockton Borough Council) are already developed and occupied without the employment allocation proposed within Hartlepool the continued growth of housing at Wynyard ,without additional jobs, could just create additional need for travel as there will be no jobs at Wynyard for new residents. It is therefore critical both for the economy of Hartlepool and the need to create a sustainable community that an employment allocation is retained within the Local Plan. The SHMA was developed using the most up to date population figures available at the time of drafting which were the 2012 SNPP. The Local Authority in the preparation of the Publication version of the Local Plan will assess the impact of the 2014 SNHP population figures. Despite the SHMA indicating no pent up demand, the Local Plan Preferred Options did make an allowance for past under supply of 10% (or 540 dwellings). Comments regarding a buffer to the housing figures are considered under the HBF's representation to HSG1.

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			this issue and notwithstanding the above point regarding the housing numbers, draft Policy HSG1 should clarify that the housing target of 6,072 is a target to be exceeded rather than a ceiling.	As noted previously, policy HSG1 will be amended to reflect that the overall figure is a minimum rather than a ceiling.
			With regard to paragraphs 10.35 and 10.36, Wynyard Park recognise the need to ensure that Wynard becomes a sustainable community. However, in order to achieve that the settlement will need to reach a critical mass to support additional services and facilities that will in turn ensure that a sustainable community is achieveable. As stated above in Section 8, the accompanying highways note suggests that infrastructure needs could be included within draft Policies such as HSG6.	Note that Wynyard Park recognise Wynyard must be a sustainable community. Whilst HBC recognise that there is a need for a quantum of housing to ensure that the delivery of the other infrastructure is viable, this needs to be done alongside the development of employment as well.
			With specific reference to HSG6, Wynyard Park have the following comments/concerns: - Whilst the allocation is welcome, parts of the draft Policy relating to Wynyard Park North has been drafted based upon an indicative layout prepared for a live outline application. As such the policy will need to allow for flexibility as required by NPPF and avoid overly prescriptive and specific requirements such as "no more than 16.8ha of land can be developed for a full range of house types" and " the development will incorporate 8.99 ha of green infrastructure, informal open space and recreational and leisure land". Whilst it is agreed that these recreational facilites are required, an overly prescriptive approach such as this can lead to uneccesary policy conflicts at a later date.	Note concerns that Policy as currently drafted is too restrictive as it is based on the outline planning applications. While there may be scope to move away from the exact areas within the planning applications, it is considered that there is a need specify a minimum area for green space etc to help to ensure that the area develops in a sustainable manner. Recreational space and green infrastructure within developments is seen as a crucial element in helping to fulfil the environmental dimension of sustainable development; however, in the past where developments have come forward without policies to guide them it has been very hard to get any green space within the developments as developers want to maximise profits.
			- With regard to the North Pentagon, the reference of 6.7ha and 2.12ha of land for various uses is overly prescriptive as above. Reference is also made to the provision of a Skate Park, this site is currently subjec to a live planning application by Taylor Wimpey and as part of on-going discussions it is the developers view that a skate park would not fit with the character of the North Pentagon development. - As set out in the indicative masterplan for Wynyard Park, there is a need and aspiration to deliver a local centre. however, policy wording should take into account that it will be necessary to attract operators to this local centre which in turn requires the critical mass that the additional 232	Agree to remove reference to skate park, however will replace this with “teenage play facility” as it is considered that on a site of the overall size as the pentagon (including the south pentagon which is only providing a play area for younger

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			dwellings would begin to achieve. The draft Policy & proposals map should allow for flexibility for the final location of the local centre as it does currently. - The draft Policy (and proposals map) shows the extent of a proposed Green Wedge for recreational purposes. Wynyard Park objects to the designation of a Green Wedge and the extent of this as shown on the proposals map. As above, the proposals map has been based on an indicative layout submitted at outline stage which will be subject to change and as such this proposed allocation fails to accord with paragraph 157 of the NPPF which states that local plans should "allocate sites to promote development and flexible use of land". A policy requirement to provide open space and recreational facilities would secure it's provision whils also ensuring that the final location could be defined at a later date. In it's current form, with several small Green Wedges shown in vague locations across the site, the allocation would unecessarily and negatively effect delivery in the future. Furthermore, the large area of land designated in the centre of the site under allocation NE3 has been left free of development on previous masterplans due to it's archaeological sensitvity, Wynyard Park maintain their view that some development should be permitted on this land, such as the development of sports and recreational facilities (as agreed with Officers in previous discussions)and development within the footprint of the former Newton Hanzard Farmstead. -With regard to point 5 of the draft Policy, the proposals map does not clarifiy the location of a landscape buffer. Wynyard Park have an aspiration to deliver a landscape buffer between the southern boundary of the site and the A689 but would object to any additional policy requirements for a landscape buffer. This is on the basis of all recent landscape appraisals for residential development to the south of the allocation demonstrating that there would be no significant adverse visual effects. The need for landscaping should be judged on an application by application basis, where landscaping is required, this can be controlled via general policies documented elsewhere within the plan.	children) and taking into account area Y and the 27 units at Manorside there will be approximately 300 units and it is considered there is a need for an area for older children to play. This is especially important given that it could be a number of years before some of the other community facilities and recreational opportunities may develop on Wynyard Park. Given that Wynyard Park has taken the approach of submitting a large number of smaller applications rather than applying for an overall outline in line with their Masterplan document it has created uncertainty over the location of particular elements of the development. Wynyard Park must appreciate that it is necessary, when preparing a local plan, to produce a proposals map which must illustrate land allocations, including green infrastructure such as green wedges, protected green space, retail allocations, education and leisure and recreational land uses. Noting the above the local authority has produced the proposals map on the basis of the best information available at the time. If Wynyard Park wish to submit a plan which they believe more accurately reflects how the land allocations should be illustrated the Council will consider this going forward. The large area shown as NE3 between the two housing areas is shown given its archaeological importance. Whilst some sort of recreational use may be appropriate on the site, providing the archaeological ground is protected in the appropriate manner, Policy officers note that a high quality dwelling on the footprint of the former farmstead may be appropriate, however this must be considered against how the green space may be used and also must ensure the archaeological

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			Furthermore, as stated elsewhere within these representations, Wynyard Park do not consider there to be sufficient demand to develop neighbouring land for employment purposes and as such have no intention to do so. As such, the potential need for a landscape buffer between neighbouring uses will not be required. -With regard to point 6, the need for a 10m buffer between woodland edges and garden fences is noted. However, the policy should specify that this only applies to Ancient Woodland.	importance of the site is preserved. Note comment regarding the landscape buffer between the A689 and the southern boundary. The proposal map will be amended to include a landscape buffer along the A689. The allocation of the employment land alongside the housing allocations and other community facilities and green recreational space is vital in order to create a sustainable community. Given that the existing areas of employment at Wynyard (which sit within Stockton Borough Council) are already developed and occupied without the employment allocation proposed within Hartlepool the continued growth of housing at Wynyard ,without additional jobs, could just create additional need for travel as there will be a restriction on additional employment opportunities at Wynyard for new residents. It is therefore critical both for the economy of Hartlepool and wider north east region and the need to create a sustainable community that an employment allocation is retained within the Local Plan. On the proviso that this can be illustrated, and taking account of the need for the plan to include a buffer as requested by the HBF, the Publication Version will include the additional 232 as it is noted that it is a strong market within the Wynyard area.
Highways Agency	LP0029	DP0196	As stated in response to the other strategic housing sites, Highways England is supportive of the clarity provided in the policy through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	Support for cross referencing noted.

Company	Unique Ref	DP Ref	HSG6 Wynyard	Planning Policy Response
			However, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that accompanies this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	The Council will however continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network.

Pre-amble HSG7: Elwick Village Housing Development

No comments made

Policy HSG7: Elwick Village Housing Development

Company	Unique Ref	DP Ref	HSG7 Elwick Village	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG7 – ELWICK VILLAGE HOUSING DEVELOPMENT (Option 10.40) The proposed road to link with the A19 should be for local traffic only and have a weight restriction. It should not become 3rd access to the A19.	Whilst it is agreed that the new bypass will have a weight limit to restrict use by articulated lorries etc and will be a single road rather than dual carriageway, the route is still considered to act as a third main access to the A19 for residential traffic.
Highways Agency	LP0029	DP0196	As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction which are specifically identified as being required to support this development) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks.	Support for cross referencing noted. The Council will however continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network.
Historic England	LP0044	DP0213	Page 91 and Policy HSG7, Elwick Housing Site: The proposed housing site at Elwick is directly adjacent to, and shares a boundary with, the Elwick Conservation Area. The Conservation Area is mentioned in paragraph 10.39, but its proximity to the development site is not mentioned. The Conservation Area also contains a number of listed buildings, but these have not been mentioned in the text. Given the proximity of, and shared boundary with, the designated heritage assets, we would have expected to see some reference to these within the policy wording for HSG7. While it cross references to Policies HE1, HE3, HE	Agree to amend Policy HSG7 to include reference to adjacent heritage assets to ensure that development is designed in an appropriate way which respects the adjacent heritage assets.

Company	Unique Ref	DP Ref	HSG7 Elwick Village	Planning Policy Response
			4 and HE5, the policy would be considerably strengthened by referring to the adjacent heritage assets, and would also support the intentions which have been identified so well in previous sections on Quality of Place and design.	

Pre-amble HSG8: Hart Village Housing Developments

Company	Unique Ref	DP Ref	HSG8 Preamble	Planning Policy Response
Hartlepool Rural Plan Working Group	LP0017	DP0210	Section 10.43 states that the sites proposed by the Local Plan in Hart, are both proposed by the Rural Neighbourhood Plan, helping to ensure conformity between the documents. This is out of date. In considering the consultations, a housing survey conducted by the Rural Plan Group and the developments already having planning permission at Hart the rural plan group concluded that two sites representing an additional 50 houses was too much for Hart village in light of the aim to provide incremental growth in keeping with the size of Hart village. The Rural Plan Group opted to removed the Glebe Farm site. The Nine Acres Site was retained as this allowed for the creation of some much needed green space the need for which is well described in section 10.46 of the Borough Council preferred options document.	Thank you for the update regarding the development of the Rural Plan and the comments with regard to the removal of the Glebe Farm housing site after consideration of the scale of development proposed within the village. One of the key considerations in terms of considering housing sites within the villages is the future sustainability of the villages and facilities within them. By including two sites within the village for approximately 50 houses it is considered that much needed investment in community facilities can be secured and help to protect the long term viability of services such as the school and the village hall. Also it is considered that the exclusion of the Glebe Farm site would lead to an unusual village form. As such, no change is proposed to the Local Plan.
Resident	LP0207	DP0165	We are writing to you with regard to the proposed development of houses, a green area and a playground, which will be adjacent to our property Whilst we have no objections to the housing or green area, we would like to voice a few concerns we have regarding the playground. To be concise, we are worried about noise and disturbance, plus anti-social behaviour. We are concerned that litter, bottles and even hypodermic needle could be thrown into our garden. (We have five grandchildren who play in our garden). It's a sad fact of modern life that playgrounds attract gangs of teenagers and rowdy behaviour. May we point out to you the trouble that the residents of Osprey Road, Bishop Cuthbert, have had with anti-social behaviour at the playground opposite their homes? We have friends who live there, so we know what has been going on. Police have had to be called out numerous times to move on gangs of noisy teenagers.	Note that there are no objections to the principle of housing on the proposed site. With regards to the potential play area, we note your concern if it were located adjacent to your garden and the potential for anti-social behaviour. Paragraph 10.45 of the preamble to the Policy does note that one option is for the play area to be installed near to the school playing fields and it is considered that this is the most likely option for delivery. If this is the case the area would adjacent to the housing would be developed as a green space. The option of the housing fronting onto the green space is something that is seen as good practice and acts as natural surveillance. Policy HSG8 will be amended to reflect this requirement.

Company	Unique Ref	DP Ref	HSG8 Preamble	Planning Policy Response
			We feel that older children and teenagers from areas outside our village will congregate at the playground at unsocial hours. Of course, it is not only ourselves who would be affected by the above concerns, but also our very good neighbours and surrounding residents, all living peacefully within our lovely village. We would like to offer a couple of solutions which could be acceptable to all parties concerned. Firstly, we would like to ask that the front elevation of the proposed houses face the playground, thus ensuring the householders would be able to keep an eye on the children playing, and also report any wrongdoing. Secondly, we would like to ask that the Council erect a two-metre high random stone wall along the boundary of our land, where it adjoins the field, the stone to be in keeping with older walls around and about the village. The wall would be built one yard from our present boundary fence, which we would like to keep. This would allow us access to maintain the fence from both sides, and also maintain the trees, bushes and hedges in our garden. We would allow the Council access, when necessary, to our garden to allow for maintenance of the wall. Thanking you for your kind and patient attention to our concerns PS Another suggestion would be for the Council to look at providing a buffer zone, approximately 4 metres wide, which would run along the boundary line, between the new wall and our fence. This would offer more privacy and could be enhanced with trees and shrubs. We would be able to buy this strip of land if it was offered to us. We would plant the area and maintain it at our own expense.	Given the above change to the policy and comments in relation to the location of the play area it is not considered that there will be a need for the erection of a stone wall, however we could request planting of shrubs / bushes / trees along the boundary to act as a barrier.
Resident	LP0258	DP0233	Section 10.42 The distance between Hart Village is a 3.5 mile round trip, therefore	The distance to the Sainsburys from the White Hart Pub in the centre of the village is 1 mile. Whilst it is excepted that there

Company	Unique Ref	DP Ref	HSG8 Preamble	Planning Policy Response
			improving the footpath will have little affect on its current use. I am a keen walker/hiker and walk to Sainsbury's regularly to obtain groceries, but have to use my backpack to carry the necessities i.e. Milk, Potatoes which alone are quite heavy. Expecting people to do this on a daily basis, in rain, hail or shine both in daylight and darkness is totally unacceptable / unpredictable and in some cases not at all possible due to ill health, Age, having young children. The only alternative to get to these shops, which is how the majority of resident's do today, is use a car Section 10.44 The Village as highlighted in this report does not have any local services in regards to Shop or Post Office Section 10.45 Why do Hartlepool Council not come to some agreement with the school and make provision for a play area and not expect a private development company to have this as a bargaining point to get planning permission. Surely its the councils responsibility to make sure all children of Hartlepool have easy to access outdoor playing facilities.	will inevitably be some people who use their car to travel to the shop at Middle Warren, the provision of a safe and well maintained walkway between the village and the shop is considered to be important, especially given there is no shop within the village. It is agreed that there is no shop or post office in Hart Village, however there are some community facilities such as the church, village hall, school and two public houses. It is unusual for a village of this size not to have a play area, but at present, in this time of austerity, the Council do not have the finances to install a play area. The developments proposed are not done so purely in order to pay for a play area, they are proposed to help the sustainable growth of the village and to help protect the continued viability of the existing community facilities. However, if an inspector finds the site to be acceptable, the local authority would seek to provide improved facilities within the village.

Policy HSG8: Hart Village Housing Developments

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG8 – HART VILLAGE HOUSING DEVELOPMENTS – (1) to (4) The figure of 50 new dwellings in this village is far too high.	One of the key considerations in terms of considering housing sites within the villages is the future sustainability of the villages and facilities within them. By including two sites within the village for approximately 50 houses it is considered that much needed investment in community facilities can be secured and help to protect the long term viability of services such as the school and the village hall. Also it is considered that the exclusion of one of the sites would lead to an unusual village form. As such, no change is proposed to the Local Plan.
Highways Agency	LP0029	DP0196	As stated in response to the other strategic housing sites, Highways England is supportive of the clarity provided in the policy through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks. However, as detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that accompanies this response, the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements – these reflect some changes from the previous Core Strategy. However, the scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences.	Support for cross referencing noted. The Council will however continue to work closely with Highways England to ensure that HE has sufficient data and evidence to fully assess the implications of the Local Plan on the strategic highway network.
Hedley Planning Services on behalf of John Littlefair	LP0085	DP0043	We have reviewed the Hartlepool Local Plan (Preferred Options) Consultation Document and would reiterate our comments in relation to the submission made to the Rural Neighbourhood Plan (HRNP) in the context of our landholding at Hart Village. We have submitted representations previously to have my clients wider landholding included not just “phase 1” on the attached plans. Accordingly to address the	Comments regarding findings of assessments relating to your clients land are noted. You state that no assessment has been made of the land at Nine Acres in terms of deliverability or sustainability and therefore you consider there are more appropriate sites – this is incorrect, the land at Nine Acres was assessed as site 3 within the SHLAA adopted in 2015 which

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			omission of a significant parcel of land from draft Policy HSG8 and to address inaccuracies within the draft document we once again submit the plan for inclusion of the identified land. In this submission I refer to the Hartlepool SHMA (2015), SHLAA (2014), Emerging and adopted Local Plan and a Policy update statement from HBC 2014. For clarity I attach a copy of my client's landownership plan, the SHLAA extract from the 2014 assessment and an extract from your document. My client owns the freehold of the land associated with Home Farm including land to the south and east of Glebe Farm, which has been identified in various Strategic Housing Land Availability Assessments (SHLAA) as being suitable for development within the next 15 years, some in years 0-5. The sites are outside of the current development limits and have historically been divided into two distinctive parcels of land known as Sites 30 and 31. In 2013 Sites 30 and 31 were considered suitable for development within years 6-10 with a potential yield of circa 103 units. The breakdown is detailed below. A subsequent review of the SHLAA process and an updated Draft Final Report December indicates the site is now, following formal submissions, annotated as Sites 4, 5 and 6 as having a yield of 81 units in the first 15 years with approximately 27 units available within years 0-5. Within the emerging draft Local Plan and HRNP (2015-2029) a 15 year timeframe is applied in accordance with the latest SHLAA document. Policy H1 HRNP identifies that within Hart Village only Site 4 (of my clients land interests) is deliverable with an allocated number of units of between 15 and 17 and the potential to provide a significant area of open space. Clearly this does not allow for an efficient use of land and excludes the wider land take potential. Draft Policy H1 of the HRNP refers to a 15 year supply of housing land within the rural areas of "at least 117 new dwellings" in the Plan area by 2029. This we are told equates to a requirement to provide 30-34 units in Hart Village up to 2029. The Rural Areas Document seeks to identify the eastern part of 9 acres (eastern part 3) within Hart within Council ownership for 15/17 units. This	identified the site at Nine Acres as available, suitable and deliverable. We therefore disagree with your stance that there are other more sustainable sites. A significant number of your comments relate to the Draft Rural Neighbourhood Plan and are noted. In relation to your comments relating to the affordable housing need within the Hart Ward the SHMA identifies a need of 31 dwellings annually over the next five years – it is the case across the town that no sites are delivering the full affordable need within that area as it is simply not viable for developers. There are a number of sites contributing to the affordable need within that ward at present. One of the sites of your client is included under policy HSH8 for approximately 20 dwellings at Glebe Farm (site 4 in the SHLAA). Whilst the other sites (5&6) were assessed by the SHLAA as having potential to be included as a housing site within the Plan period they were not considered necessary when considered against other sites which the SHLAA identified as being deliverable within the plan period. It is considered that two sites totaling approximately 50 dwellings which will create a sensible urban form for the village was sufficient for the plan period. The SHLAA also identified noise issues with sites 5 and 6 given the proximity of the A179 – this is prevalent on the Raby Arms site in Hart village when on site and is another reason sites 5 and 6 are not included within the plan.

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			land has not been formally assessed for its deliverability and sustainability by Hartlepool Council (The current land owners). There are more sustainable options which are eminently more deliverable. The justification provided by Draft HRNP for the proposed allocations states that the Plan has relied upon evidence in the SHLAA undertaken to evidence the emerging Hartlepool Local Plan. The SHLAA report states that a sites inclusion or otherwise does not confirm that a site has been justified robustly. Paragraph 8.28 of the Draft HRNP identifies that the site should provide a mixture of house types, mainly two bedroom houses and bungalows laid out around an open space and should contribute towards the provision of the "proposed" Community Open Space. There is no reasoned justification for the house types or the provision of open space on these sites and indeed there is no justification for what appears to be a constrained number of residential units which does not accord with the Local Plan evidence base for this settlement. Whilst there remains no Objectively Assessed Need (OAN) in Hartlepool, stipulating housing numbers, this document is currently unreliable. It is understood that neighbourhood planning provides local communities power to share a vision of the way their towns and villages are shaped through assessed growth however without a rational assessment of need (OAN) and site deliverability we cannot support the proposals. The neighbourhood planning tool seeks to ensure that communities get the right type of development for their community where the ambition of the neighbourhood is "aligned with the strategic needs and priorities of the wider local area". In this regard NPPF paragraph 16 is clear that neighbourhoods should: • Develop Plans that support the strategic development needs set out in Local Plans, including Policies for housing and economic development. • Plan positively to support local development, shaping and directing development in their area which is outside the strategic elements of the Local Plan. • Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their Neighbourhood Plan to	

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			proceed. We understand that where a Neighbourhood Plan is brought forward before an up to date Local Plan is in place, the qualifying body and the Local Planning Authority should discuss and aim to agree the relationship between Policies in: • The Emerging Neighbourhood Plan. • The Emerging Local Plan. • The Adopted Development Plan. • With appropriate regard to National Policy and Guidance. It is in this regard we query the scale of development proposed in the emerging local plan and the time period in which the delivery of the housing numbers are suggested. We are of the opinion that the numbers are low and the timing of the delivery. We assume that 30-34 houses could be delivered in Hart up to 2019, then beyond this timeframe there should be a further allowance to reflect the Governments Growth Agenda enshrined in NPPF specifically to boost the supply of housing. We request that the emerging Local Plan can be amendment to include the delivery of residential development of all of the land identified within my client's ownership, over the period of the Plan as detailed in the table below as supported by the 2014 SHLAA. Document Date Site reference Potential Yield Suitable SHLAA 2013 October 2013 30 & 31 37 & 66 (Total 103) Y SHLAA 2014 December 2014 4,5 & 6 27, 36 &18 (Total 81) Y Draft HRNP 2015 18 February 2015 Hart Glebe Farm East 4 15-17 (Total 15-17) Y Draft Local Plan 27 May 2016 Glebe Farm (Total 20) Y Draft Allocation The table above indicates the relationship between my clients land potential yield as assessed within the HBC SHLAA off-set against the HRNP assessment of a smaller percentage of the land along with the draft local plan. Of further note is the March 2015 SHMA which states that the future of	

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			the Hartlepool Housing Market will be determined as follows; "The population of Hartlepool Borough is estimated to be 92,600 in 2014 and this is projected to increase by 5.2% to 97,400 by 2037. Over the next few decades, there will be a marked increase in the number and proportion of residents aged 65 and over which is expected to increase by 50.6% from 17,000 in 2014 to 25,600 in 2037." A key driver in determining the tenure and type of future development is stated in the SHMA as including: • The need to continue development to satisfy household aspirations, in particular the development of detached and semi-detached houses and a range of property sizes to offset identified market imbalances; • Developing an increasing range of housing and support products for older people; • Delivering additional affordable housing to help offset the identified net shortfalls; and diversifying the range of affordable options by developing intermediate tenure dwellings and products; and • The economic viability of delivering affordable housing on sites across Hartlepool Borough. The 2015 SHMA also identifies at Para 10.50 the overall annual net affordable housing requirements for Hartlepool Borough by ward, designation (general needs and older person) and property size 2014/15 to 2018/19. What is acutely clear is that the General need for the Hart Ward is for 5x 2 bed properties and 32 x 3+ beds. The Net total for the ward (Deducting Old person) is 32 affordable units. Affordable housing includes social rented, affordable rented and intermediate tenure dwellings. New affordable development by Registered Providers will be affordable rented (with rents of up to 80% of open market rent) and in order to recommend an appropriate split between social rented and intermediate tenure, Table B10 summarises the preferences of both existing households in need and newly forming households by tenure. Overall, this gives a tenure split of 70.4% social/affordable rented and 29.6% intermediate tenure across Hartlepool Borough.	

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			To deliver the required 32 Affordable units over the pan period to 2029 in the Hart Ward alone would require the delivery of some 107 units. This is based upon Policy H2 of the HNRP which sought 30% (27.5%) affordable provision on development sites of 5 or more units or on land greater than 0.4ha. The proposed housing allocation for Hart of a maximum of 34 units will only yield the delivery of 9 units over the next 15 years (should viability allow). The draft Policy of the Local Plan indicates a minimum target of 18%, therefore the delivery would be 9 units in Hart, far short of the ward target. The Hart Ward (The northern area in the HRNP) has a requirement to deliver 32 affordable units which equates to the delivery of 178 units on the northern area alone. Clearly the proposed allocation cannot sustain the future needs of affordable housing. For this reason alone the numbers should be increased to reflect this identified need. The Housing Need in Hartlepool as a whole has been under severe scrutiny. HBC has now accepted (Nov 2014 – Planning Policy Justification Statement) that there has been a record of persistent under delivery of housing. As a result there is a requirement to significantly increase the provision over the first 5 years by an additional 20% (moved forward from later in the plan period). In the years 2015/16 to 2019/20 which constitute the next 5 years, the Council cannot demonstrate a 5 year supply of deliverable housing sites. Currently the Council is approximately 290 dwellings short of demonstrating a 5 year supply, which equates to a 4.2 year supply of deliverable housing sites. What this means is that housing decisions for potential development sites will be made in accordance with the Development Control Policies of NPPF specifically Paragraph 14. It is incumbent upon the Local Plan and therefore also the HRNP to get it right and allocate sufficient housing land in a deliverable and sustainable manner. My clients land is not only deliverable but has been shown to be sustainable with no encumbrance upon title. It is available now and could assist in delivering the requisite numbers of housing required over the 15 year period and assist in delivering the assessed need for affordable	

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			housing in the Hart Ward. In summary, we object strongly to the exclusion of the wider land take potential in Hart (As submitted), we also object to the limited site yield proposed for a sustainable, deliverable site with road frontage access. Our representations request the amendment of Policy HSG8 to reflect the wider allocation of land in Hart to deliver the following; Site Open Market Yield Provision of Affordable (18%) Timeframe (years) Glebe Farm East (4) 27 Y 0-5 Glebe Farm South (5) 36 Y 5-10 Home Farm (6) 18 Y 10-15.	
Resident	LP0208	DP0166	Re the proposed housing development in Hart Village 1. The increased volume of traffic will cause major problems within the village also when trying to exit the village at the roundabout on the A179, compounded by the new gen2 development. 2. The proposed access to the developments north and south of the road leaving the village at the west end will also create traffic problems. 3. The proposed housing will increase the number of children living in the village needing to attend the village school – this school will be unable to cope due to lack of space. 4. Lack of amenities within the village – no shop – no post office. 5. As a resident of Buckingham Avenue I strongly object to the proposed development of housing on the field between my property and Glebe Farm. 6. If the proposed development takes place the value of my property will be reduced therefore I will apply for a reduction in council tax. 7. This will no longer be a village.	No highway concerns have been raised by Highway engineers which would mean that the proposals could not go ahead. Where mitigation is required as part of housing developments, this will be secured through the planning application process. Planning Obligations will be secured to help fund additional pupil places within the local primary school. Whilst it is agreed that there is no village shop or post office there are some services which additional housing will help to support in the future such as the village hall, playing fields and school as well as the village pubs. The developments will offer an opportunity to install facilities such as a play area and provide developer contributions to improve existing facilities. It is not considered that the new development will have a particular negative impact on existing house prices nor is it considered that the additional housing growth would mean that Hart is not a village anymore.
Resident	LP0210	DP0169	I refer to our telephone conversation last week regarding the proposed	Your concern regarding the potential for a housing allocation

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			housing development in Hart Village (on the field behind Buckingham Avenue and Tudor Cottage). I write to you with sincere concern regarding the proposal, please see the objections below. • The scenic view we have admired for the last forty two years will be ruined. • Our peaceful setting will become over ridden with traffic and noise – at least a hundred more cars in the village, which will be more dangerous as already an issue with cars speeding in the village. • The main road from the Hart Lane to the Quarry is already dangerous and the road would not be able to facilitate for the extra traffic. • The iconic village setting will be destroyed and it will compromise existing wildlife. • House prices will be decreased. To conclude, legal advice will be sought in relation to the incompetency of the decision making process should the proposal go ahead. A claim for substantial compensation will be submitted. Not enough schooling (additional point taken from separately submitted email).	in the field behind your property is noted, however, as with all potential development sites the impact the proposal will have on an existing residents view is not something which is considered a material planning viewpoint. The site was put forward for consideration within the Strategic Housing Land Availability Assessment (SHLAA) by the landowner – the site was assessed by officers who consider a number of criteria on a standard assessment form. The SHLAA also included a working group which included a range of representatives from council officers, estates agents, utility providers and developers who assessed each site which had been put forward. Sites were grouped into timescales by which they could be brought forward and from the portfolio of deliverable sites a range of sites were selected for inclusion within the Local Plan. This site is considered suitable, achievable and deliverable. As part of the SHLAA process the impact in highway terms was considered to be acceptable by highway colleagues and no issue with the capacity of Hart Lane was identified. It is not considered that this scheme will impact on the setting of Hart Village in an unacceptable way. Again, house prices are not a material impact in the determination of a planning application. A contribution towards education provision will be sought which would likely be directed by the education team towards Hart Village School.
Stovell & Millwater Ltd	LP0247	DP0216	HSG8: Hart Village Housing Developments This policy allocates two sites for housing on the western edge of Hat Village. It would seem to us there	In terms of housing sites, the Local Plan has been prepared taking note of the emerging Rural Neighbourhood Plan and trying to ensure general conformity with that document. As

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			would be some sense in including Glebe Farm within site B to round off the western expansion of the village. If this is not possible we feel it should at least be included within the limit of development. There is already existing development there and it would create and manageable limit to the village.	such, and due to the housing need within the Local Plan it is not considered necessary to include Glebe Farm as part of the housing allocation. In relation to including Glebe Farm within the Village Envelope this is considered appropriate as it will help to square off the village boundary and as such an amendment will be made to the proposals map.
Resident	LP0259	DP0234	To whom it may concern I am writing to formally oppose the Local plan between Buckingham Avenue & Glebe Farm in Hart Village. As a resident at 6 Buckingham Avenue, Hart Village, Hartlepool TS273BD we oppose the planned building of housing on the land previously mentioned for a number of reasons: - Traffic - with an increased number of housing it will even more traffic through the village, creating more congestion within rush hour and more difficult access to Buckingham Avenue and surrounding areas. It will also increase risk of accidents within the village due to higher volume of cars around the rural area including those on horseback, dog walkers etc - School - building more houses will increase families in the area which in turn will put a larger strain on the primary school which is already at full capacity - drop in house prices - due to the obstruction of the view that the new houses would create it will significantly decrease the house value of those living at Buckingham Avenue, Glebe Farm, Hollyrood Crescent and possibly other homes in the village who will be indirectly affected by issues previously mentioned. Because of these issues we would firmly oppose the Local plan and ask that	Your concern regarding the potential for a housing allocation in the field behind your property is noted, however, as with all potential development sites the impact the proposal will have on an existing residents view is not something which is considered a material planning viewpoint. The site was put forward for consideration within the Strategic Housing Land Availability Assessment (SHLAA) by the landowner – the site was assessed by officers who consider a number of criteria on a standard assessment form. The SHLAA also included a working group which included a range of representatives from council officers, estates agents, utility providers and developers who assessed each site which had been put forward. Sites were grouped into timescales by which they could be brought forward and from the portfolio of deliverable sites a range of sites were selected for inclusion within the Local Plan. This site is considered suitable, achievable and deliverable. As part of the SHLAA process the impact in highway terms was considered to be acceptable by highway colleagues and no issue with the capacity of Hart Lane was identified. A contribution towards education provision will be sought which would likely be directed by the education team towards Hart Village School.

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			an alternative is sought after	It is not considered that this scheme will impact on the setting of Hart Village in an unacceptable way. Again, house prices are not a material impact in the determination of a planning application.
Hart Parish Council	LP0264	DP0239	Following the meeting at Hart Village Hall on 13th instant; the Parish Council directed me to prepare its comments on meeting requirements for future housing developments. It is evident, particularly in the example of the development south of the Raby Arms, that insufficient width of the carriageway will inhibit movement of vehicles in and out of developments. A basic family saloon car has an overall width of around 2030mm to 2050mm which includes the mirrors. On a curve this dimension will necessarily increase and the present 4700mm way width, which the Parish Council understands is that recommended, is insufficient. Coupled with the unavoidable fact that the provision for accommodating two cars per household on a new development is totally unrealistic present day. This leads to pavement or half pavement parking further reducing the carriageway space. The increased use of larger 4 by 4 vehicles exasperates the situation. It is necessary to consider the daily arrival of delivery and emergency vehicles that have themselves become wider and longer over the years to accommodate more equipment. Observation of this activity on John Howe Gardens where I look onto the entrance to this estate has brought home the need to reconsider recommended carriageway widths. A recent example in Hart showed that Hart Pastures was a problem for the larger fire engine. Going back to the Raby Arms example in the previous paragraph the entrance width, and the radius of it, is so small that emergency vehicles will find it difficult to negotiate. Plans should show clearly the location of hydrants on developments of any size. The Parish Council is also concerned that the state of the ancient gully system throughout Hart and elsewhere at times of heavy rain, a situation which appears to be increasing in activity, leads to deep surface water if	Thank you for the invite to present at the Parish Council Meeting. It is hoped it gave residents the opportunity to see the way in which the plan is developing and to ask questions regarding it. At the meeting the issue of the road width of residential roads within new developments was an issue of concern and a number of examples within Hart Village were referred to by residents. Officers noted these concerns and have subsequently spoken with Highways colleagues regarding the issue and whether anything could be done. However it was noted by Highway colleagues that the specifications of roads are set within a design guide which is used across the Tees Valley and it was not considered that the authority could deviate from that or it could create issues with the developers. They also note that the emergency services are contacted on planning applications for new housing developments where necessary which helps to ensure that emergency vehicles can access locations. In all developments the Councils engineers as well as NWL will be consulted to ensure that flood risk is not increased, and where possibly measures help to reduce flood risk. Where

Company	Unique Ref	DP Ref	HSG8 Hart Village	Planning Policy Response
			not outright flooding. Provision of storage for excess water has not always been satisfactory as was found recently in nearby Redcar. Our concerns on this must rest primarily in Hart which has several episodes as has the nearby Clavering area. It is the impression that despite the survey and minor repairs by Northumbrian Water the quality and capability of the hydraulics to move sewerage and surface water is long overdue a complete overhaul or replacement. Continually adding loads to existing systems is a recipe for disaster. Cleaning gullies alone is not sufficient as the linking pipework is usually the source of bother. The provision of green areas within new developments regardless of size is applauded but not necessarily as a result of recommendation by the local authority. The P.C. strongly suggests that this is addressed and incorporated in all future housing developments.	necessary Sustainable urban Drainage Schemes will be used to help control flows of water. Support for the provision of green areas within new developments is noted.

Pre-amble HSG9: Affordable Housing

No Comments

Policy HSG9: Affordable Housing

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
Wynyard Park	LP0027	DP0223	With regard to Affordable Housing, the Council's SPD and their request for a contribution of 18% is noted. However, this level of provision may not be viable on all sites.	The level of 18% was established as part of the work on the Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing.
Persimmon Homes (Teesside)	LP0045	DP0209	Policy HSG9: Affordable Housing Provision Persimmon Homes support the approach of addressing the affordable housing need through the plan however we have the following concerns with the current policy. Persimmon Homes' first concern stems with the wording of the policy. The	Note support for the approach of addressing affordable homes through the plan. The concern with the use of the word minimum is noted and it is agreed that "minimum" will be removed from the policy. The level of 18% was established as part of the work on the

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
			policy sets a 'minimum' affordable housing target of 18%. This immediately provides the council with the opportunity to argue upwards on individual sites and therefore creates uncertainty within the planning process. Paragraph 174 of the NPPF is clear that local plans must set out the burdens that will be placed upon the development industry whilst paragraphs 17 and 154 state that local plan policies must be clear so that applicants know what they must do to submit an application that is likely to be approved, and decision-takers know how to react to that application. In its current format the policy does not comply with these principles of the NPPF and is therefore unsound. Persimmon Homes therefore request that the policy identifies a 'cap' or maximum 'range' which will provide developers and landowners with a degree of certainty in respect of the policy burdens. In addition, the policy identifies the minimum target of 18% on sites of 15 or more dwellings despite the SHMA identifying an annual target of 144 dwellings which represents 36% of the proposed housing requirement. There does not appear to be any up to date viability study in the public domain and therefore the figure of 18% cannot be justified. Further viability work is therefore necessary not only to justify the 18% target but to also demonstrate that the cumulative policy burdens set out within the whole plan are viable as per paragraphs 173 and 174 of the NPPF. As discussed, if the full affordable housing target of 36% is found to be unviable, Persimmon Homes advocate the provision of further sites and a higher overall housing requirement to reduce the burden upon individual developments and meet this need. That being said, Persimmon Homes welcomes the flexibility provided by the policy in so much that the tenure and mix of affordable housing will be negotiated on a "site-by-site basis, having regard to the economic viability of the development and the most up-to-date evidence of housing need, aspiration and the local housing market." This is critical given the current state of the 'affordable' rental market	Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing.

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
			which is currently crippled following the Rent Controls announced by the Government in the summer of 2015.	
Story Homes	LP0219	DP0181	Story Homes supports the broad aims of this policy which seeks to respond to and address the affordable housing requirements identified within Hartlepool. We acknowledge that the SHMA (2015) identifies a target of 144 affordable dwellings per anum which represents 36% of the proposed housing requirement. However, we consider that the Council should take great consideration of the NPPF, which seeks to ensure that the affordable housing policies should take account of housing need as well as viability. Policy HSG9 currently includes a minimum 18% affordable housing requirement on sites of 15 units or more; however, we consider that there is currently insufficient evidence underpinning this requirement. This emerging policy should be underpinned by an up-to-date and robust viability study, which would take account of the cumulative impacts of policy burdens set out within the emerging Plan. The NPPF is explicit in this regard, and for the avoidance of doubt, Paragraphs 173 and 174 should be taken into account in this regard. We therefore consider that this 18% requirement is unjustified given the lack of clarity as to how this target was derived. Policy HSG9 is therefore unsound and ultimately has an adverse negative impact on development, which will hinder sustainable development over the next plan period. Lastly, and in respect of commercial considerations, we must also stress that unjustified policies which lack clear evidence or associated metholodologies create uncertainties and adverse viability implications for both developers and landowners due to the actual affordable housing requirement being unknown from the outset. Further viability work is required should the Council seek to justify their 18% target and we consider that the word 'minimum' should be deleted to avoid further uncertainty over the next plan period and to ensure that there is a ceiling to affordable housing requirements.	The concern with the use of the word minimum is noted and it is agreed that “minimum” will be removed from the policy. The level of 18% was established as part of the work on the Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing. The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing. This is in line with guidance. Delivery has not been hindered – this is reflected in the net completions over the last two years. The option of considering the inclusion of additional sites to

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				help increase the delivery of affordable housing will be considered moving forward to Publication.
HBC Housing Services	LP0228	DP0192	Policy HSG9 is supported as it seeks to deliver increased affordable housing provision. The minimum affordable housing target is supported and the aim for affordable units to remain affordable in perpetuity. The policy seeks to secure affordable housing on-site where possible and this is likely to have a positive impact on the availability and quality of affordable homes. The Council has a increasing affordable housing portfolio and Housing Services welcome the opportunity where possible to work in partnership with developers to deliver on-site affordable accommodation.	Support for HSG9 noted.
Home Builders Federation	LP0234	DP0200	Policy HSG9: Affordable housing provision 39. The HBF supports the need to address the affordable housing requirements of the borough. It is noted that the 2015 SHMA identifies an annual target of 144 dwellings, this represents 36% of the proposed housing requirement. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Whilst the need for affordable housing is not disputed the policy requirement is considered unsound and is likely to hinder development within Hartlepool. 40. The policy identifies a minimum 18% affordable housing will be required on sites of 15 units or more. The HBF is currently unaware of an up to date viability study undertaken by Hartlepool which takes account of the cumulative policy burdens set out within the plan (NPPF, paragraphs 173, 174). It is, therefore, unclear how the 18% requirement is justified. Furthermore the affordable housing requirement is identified as a minimum. This will create inherent uncertainties and viability implications for developers when negotiating with landowners as the actual requirement to be delivered on a site is unknown. 41. The HBF, and our members, are unaware of any post-NPPF policy similar to the one proposed which has survived examination. The NPPF (paragraph 174) is clear that local plans must set out the burdens that will be placed upon the development industry. The draft policy clearly wouldn't	Note support for the approach of addressing affordable homes through the plan. The concern with the use of the word minimum is noted and it is agreed that "minimum" will be removed from the policy. The level of 18% was established as part of the work on the Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing.

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
			do this as it allows the Council to argue upwards on individual development. Furthermore the NPPF (paragraphs 17 and 154) also state that local plan policies must be clear so that applicants know what they must do to submit an application that is likely to be approved, and decision-takers know how to react to that application. Again we do not consider that the proposed policy would provide this certainty. 42. It is recognised that an 18% requirement from sites of 15 units or more is unlikely to address the affordable housing needs set out within the 2015 SHMA. There are, however, other mechanisms available to address this shortfall which would not have implications upon site viability and delivery. The Council should consider these alternatives. As previously noted this could include the provision of further sites and / or a higher overall housing requirement to reduce the burden upon individual developments. 43. The HBF recommend that further viability work is undertaken to justify the 18% target identified. In addition, if 18% can be justified, it is recommended that the word minimum be deleted from the second paragraph and policy justification.	The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing. The option of considering the inclusion of additional sites to help increase the delivery of affordable housing will be considered moving forward to Publication.
Brenda Road Holdings Ltd	LP0244	DP0212	Affordable Housing The preferred options document sets a minimum requirement of 18% of new housing to be classed as affordable. We welcome the comment at paragraph 10.54 that this policy should be flexible, taking account of market conditions and that the viability of affordable housing provision needs to be considered on a scheme by scheme basis. In addition the above considerations, we would further suggest that the wider community benefits of a particular scheme are assessed when making a decision on affordable housing requirements. If the scheme is to deliver particular types of homes (for example homes for older people) or community assets these factors should be taken into account.	These factors would be considered through the proposal to include reference to the SHMA or similar document. As noted above the reference to minimum will be removed.
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	4.0 Affordable Housing Provision 4.1 Paragraph 10.50 of the Local Plan Preferred Options confirms that the 2015 SHMA advocates an annual affordable delivery target of approximately of 144 dwellings. Compared to the current net additional	The concern with the use of the word minimum is noted and it is agreed that “minimum” will be removed from the policy. The level of 18% was established as part of the work on the

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
			dwelling provision of 400 dwellings identified by the Council (notwithstanding the uplift recommended by Regeneris) this net affordable housing delivery target equates to approximately 36%. Notwithstanding this the Local Plan Preferred Options continues at paragraph 10.51-10.54 by acknowledging that providing an element of affordable housing as part of a private development effects the economic viability of schemes. Bearing this in mind, the Council rightly highlight that it is necessary to ensure that affordable housing is provided at a level that is economically viable and does not prevent development from taking place. This approach is reflected in Policy HSG9 (Affordable Housing Provision) which seeks a minimum affordable housing target of 18% on all sites above the 15 dwelling threshold. This approach clearly brings into question, first, the soundness of a policy which seeks to apply no negotiation below a level of 18% and, equally significantly, the ability of the Council to deliver anywhere near the level of affordable housing need over the Plan period. 4.2 In terms of the NPPF's clear requirement, at para 47, for local planning authorities to ensure that their Local Plan meets the full objectively assessed need for both market and affordable housing the local planning authority already acknowledge that, due to viability issues, there will be a significant shortfall in affordable housing over the Plan period. In light of this, the Council need to identify other methods of delivering affordable housing. In this regard, Cecil M Yuill Ltd consider that increasing the overall housing requirement over the Plan period is the only realistic mechanism to assist in reducing the percentage requirement per site which would, in turn, ensure that more sites were viable and, therefore, deliverable. 4.3 Cecil M Yuill Ltd, as a consequence, consider that an uplift of 680 units to allow for the increased requirement recommended by Regeneris, together with a 10% buffer applied to this requirement of 680, would increase flexibility and address potential under delivery, and importantly also help address what will clearly be a significant under supply of the affordable housing required over the Plan period, as identified within the 2015 SHMA.	Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing. The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing. This is in line with guidance. The option of considering the inclusion of additional sites to help increase the delivery of affordable housing will be considered moving forward to Publication.
Landowner	LP0254	DP0228	4.0 Affordable Housing Provision	The concern with the use of the word minimum is noted and it

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
(Southbrooke Farm)			4.1 Paragraph 10.50 of the Local Plan Preferred Options confirms that the 2015 SHMA advocates an annual affordable delivery target of approximately of 144 dwellings. Compared to the current net additional dwelling provision of 400 dwellings identified by the Council (notwithstanding the uplift recommended by Regeneris) this net affordable housing delivery target equates to approximately 36%. Notwithstanding this the Local Plan Preferred Options continues at paragraph 10.51-10.54 by acknowledging that providing an element of affordable housing as part of a private development effects the economic viability of schemes. Bearing this in mind, the Council rightly highlight that it is necessary to ensure that affordable housing is provided at a level that is economically viable and does not prevent development from taking place. This approach is reflected in Policy HSG9 (Affordable Housing Provision) which seeks a minimum affordable housing target of 18% on all sites above the 15 dwelling threshold. This approach clearly brings into question, first, the soundness of a policy which seeks to apply no negotiation below a level of 18% and, equally significantly, the ability of the Council to deliver anywhere near the level of affordable housing need over the Plan period. 4.2 In terms of the NPPF's clear requirement, at para 47, for local planning authorities to ensure that their Local Plan meets the full objectively assessed need for both market and affordable housing the local planning authority already acknowledge that, due to viability issues, there will be a significant shortfall in affordable housing over the Plan period. In light of this, the Council need to identify other methods of delivering affordable housing. In this regard, Cecil M Yuill Ltd consider that increasing the overall housing requirement over the Plan period is the only realistic mechanism to assist in reducing the percentage requirement per site which would, in turn, ensure that more sites were viable and, therefore, deliverable. 4.3 Cecil M Yuill Ltd, as a consequence, consider that an uplift of 680 units to allow for the increased requirement recommended by Regeneris, together with a 10% buffer applied to this requirement of 680, would increase flexibility and address potential under delivery, and importantly also help address what will clearly be a significant under supply of the	is agreed that "minimum" will be removed from the policy. The level of 18% was established as part of the work on the Planning Obligations SPD which was adopted in November 2015. The Planning Obligations SPD considered the need for 144 affordable dwellings per annum which was identified within the SHMA (which was endorsed in March 2015). Appendix 1 of the Planning Obligations SPD shows the testing which was undertaken to consider the viability of housing schemes across the Borough when the various obligations such as affordable housing, education, play etc are factored in – it was through this exercise that it was determined that most housing developments could afford 18% affordable housing along with the other obligations required. This work did look at the cumulative policy burdens and as such there is no need for further work. Following this viability work and adoption of the SPD the Local Plan Preferred Options document therefore set 18% as a target for affordable housing. The Policy is deliverable and this is known as it is the approach the Council has been using over the past 12+ months and it has proved successful. Where there has been the viability in schemes the Council has been successful in achieving 18% and where there have been schemes where the developer could not deliver 18% viability testing has been used to find a viable level of affordable housing. This is in line with guidance. The option of considering the inclusion of additional sites to help increase the delivery of affordable housing will be considered moving forward to Publication.

Company	Unique Ref	DP Ref	HSG9 Affordable Housing	Planning Policy Comments
			affordable housing required over the Plan period, as identified within the 2015 SHMA.	

Pre-amble HSG10: Housing Market Renewal

No comments

Policy HSG10: Housing Market Renewal

Company	Unique Ref	DP Ref	HSG10 Housing Market Renewal	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	POLICY HSG10 – HOUSING MARKET RENEWAL (Option 10.57) Where possible existing houses should be renovated – perfectly soundly-built houses are being demolished and replaced by smaller new-built properties. Thornton Street is a good example of the quality of renovated housing in a central area and - an environmental improvement. (POLICY CC1 (6) – Encourage re-use, adaptation and repair of existing buildings and vacant floors where possible). In the Borough we also have a social issue of properties being bought up by out-of-town landlords.	Where renovation of existing properties is a possibility this approach may be taken either for the whole development or for an element of the development. Such an approach is currently being undertaken at Perth Street housing market renewal scheme where some of the older properties have been demolished with others being renovated to provide an enhanced housing area.
HBC Housing Services	LP0228	DP0192	Policy HSG10 is supported and in-line with the Council's Housing Strategy. Evidence suggests that there remains an imbalance of supply and demand in the existing housing stock and that stock condition remains a issue in the central area of town. This is currently being addressed through coordinated housing market renewal programmes and future programmes if necessary will be set out within the Housing Strategy. The housing regeneration programme includes both housing market renewal and empty homes refurbishment projects.	Support for the housing market renewal policy noted.

Pre-amble HSG11: Extensions to Existing Dwellings

No Comments

Policy HSG11: Extensions to Existing Dwellings

No Comment

Pre-amble HSG12: Residential annexes

Company	Unique Ref	DP Ref	HSG12 Preamble	Planning Policy Response
Environment Agency	LP0031	DP0190	In reference to Sections 10.60-10.63 (Extensions to Existing Dwellings and Residential Annexes) we wish to highlight that residential extensions and annexes are a common cause of pollution from domestic wrong connections into the surface water sewer rather than to the foul sewer and therefore, can contribute to poor bathing water quality in coastal towns and impact upon watercourses. We support the use of SuDS, in this instance, as well designed sustainable drainage systems can reduce the impact of domestic wrong connections by providing passive treatment of organic wastes which support bacterial communities. A large proportion of the Hartlepool area is served by a combined foul and surface water system. Therefore, new developments will utilise the existing infrastructure and treatment works. To avoid new development unnecessarily taking up capacity of the combined sewer, surface water should be discharged to the environment, wherever possible, to protect the infrastructure and prevent uncontrolled surging and internal flooding. Fluctuating volumes of surface water in the combined sewer is the main reason for Combined Sewer Overflow (CSO) discharges i.e. the release of sewage into the environment.	Comments in relation to the impact of incorrect connections noted and support for the use of SuDS is also noted as a way of avoiding surface water taking up capacity in the combined sewer.

Policy HSG12: Residential annexes

No comment

Pre-amble HSG13: Gypsy and Traveller Provision

No comment

Policy HSG13: Gypsy and Traveller Provision

Company	Unique Ref	DP Ref	HSG13 Gypsy and Traveller Provision	Planning Policy Response
Highways Agency	LP0029	DP0196	It is noted that some amendments have been made to the policy, however we have no concerns with its provisions with regard the influences at the SRN and welcome the clarity provided through cross referencing to Policy INF2 ensuring development at sites will be required to consider and improve access to sustainable transport.	Note that Highways England have no concerns with this policy.
NFU North East	LP0047	DP0003	• While the policy provides that sites will be approved where there is 'no significant detrimental effect' on the amenity of the occupiers of adjoining or nearby land uses it does not give any provision of space or consideration for any associated livestock (horses, etc.) that the community may have. We would welcome details on how the authority would treat such livestock within the plan to avoid any adverse issues (e.g. highways, trespass, etc.).	Comment noted. Policy HSG13 will be updated to include a criteria to ensure sufficient space is available within the curtilage of the site to accommodate grazing horses to avoid damage to neighbouring properties.
TM Darling & Son	LP0245	DP0214	The evidence base on Travellers Site Needs (Hartlepool Borough Gypsy and Travellers Accommodation Needs Assessment, Dec 2014) supporting Policy HSG13 in your Preferred Options Document adds to our cross boundary understanding of the likely permanent and transit accommodation needs of Travellers. This usefully informs our own understanding of potential cross boundary issues affecting this community.	Comment noted.

Section 5 of the Consultation Statement, covering:
Strengthening the Local Economy

- Pre-amble EMP1: Prestige Employment Site Wynyard Business Park
- Policy EMP1: Prestige Employment Site Wynyard Business Park
- Pre-amble EMP2: Queen's Meadow Business Park
- Policy EMP2: Queen's Meadow Business Park
- Pre-amble EMP3: General Employment Land
- Policy EMP3: General Employment Land
- Pre-amble EMP4: Specialist Industries
- Policy EMP4: Specialist Industries
- Pre-amble EMP5: Safeguarded land for new Nuclear Power Station Policy
- EMP5: Safeguarded land for new Nuclear Power Station
- Pre-amble EMP6: Underground Storage
- Policy EMP6: Underground Storage

Pre-amble EMP1: Prestige Employment Site Wynyard Business Park

Company	Unique Ref	DP Ref	EMP1 Preamble	Planning Policy Response
Campaign to Protect Rural England	LP0015	DP0199	CPRE notes that the overall intention is to create 1700 net new jobs in Hartlepool by 2031 (para 11.4) and that these will be filled entirely by in-migration into the Borough. We take this to mean people moving into the region rather than simple in-migration from neighbouring authorities, since the economic strategy for Tees Valley and the complementary one produced by NECA do not allow for "competition" for job creation between the authorities. We have some concerns about the translation of this aspiration into housing need and housing provision. At most the 1700 new jobs represents 1700 new households, though this may be lower if some of them are two income households. We are also aware that neighbouring planning authorities, includling Durham CC and Stockton Borough CC, and proposing to build extensive commuter housing to cater for workers in Tees Valley. It is more than likely that many of these (max) 1700 new households will not be established within the Brough. CPRE re-iterates its desire to see evidence of strategic co-operation between local authorities to avoid duplication of provision and hence overprovision of housing.	The assumption made in the independently produced Hartlepool Strategic Housing Market Assessment (SHMA) is that the 1700 jobs are absorbed by new residents coming into Hartlepool. This is a somewhat less optimistic scenario than that suggested by the Tees Valley Strategic Economic Plan. The total number of new households expected to be formed in Hartlepool over the 15 year plan period includes other factors as well as reflecting economic growth and its associated migration implications. These include factors such as more single person households, an increase in lone parent households and other demographic changes. The SHMA has demonstrated that Hartlepool is a single housing market area based on DCLG guidance, although it is acknowledged that in terms of workplace Hartlepool is part of the wider economy of the Tees Valley and parts of Co. Durham. Co. Durham and Stockton-on-Tees have evidence to show that they are both single housing market areas. While there will inevitably be some cross-boundary commuting from new housing areas in Durham and Stockton neither local authority is planning to build extensive commuter housing to cater for workers in the Tees Valley. A duty to co-operate report will be produced by Hartlepool Borough Council and will be assessed by the independent Inspector at the Local Plan Public Examination.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Strengthening the Local Economy policies within the Local Plan.	Support welcomed.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports the deallocation of the former “Centura Works” previously RHM/Cerebos from the employment land allocations (table 12). The site is isolated and only accessible via a long winding country lane which runs through Greatham village. The de-allocation of North Burn (table 12) is also welcomed as open countryside	The Parish Council’s support for the Council’s efforts to achieve high quality landscaping and the protection of woodland at Wynyard is welcome. The Parish Council raises a valid point about the height of buildings in the Wynyard area. While the Borough Council is keen to support opportunities

Company	Unique Ref	DP Ref	EMP1 Preamble	Planning Policy Response
			which would require new access from the A19. There remains ample land allocated at nearby Wynyard to meet needs.	for new inward investment at the Wynyard site all proposals should be of an appropriate scale and have regard to the character of the Wynyard area. To cover this point it is proposed to amend bullet point 1) under the second paragraph of policy EMP1 to read "The buildings are of an exceptionally high quality of design and finishing and respect the character of the Wynyard area" The point about colour of cladding is perhaps more subjective but is an element that will be taken into account in determining a detailed planning application.
Wynyard Park	LP0027	DP0223	These comments relate to paragraph 11.19 and more important draft Policy EMP1. It is stated that Wynyard Park still plays a key role in attracting high quality employment and investment in Hartlepool and the subsequent draft Policy allocates 54.15 hectares of land for employment uses at Wynyard Park. This draft Policy also seeks to ensure that the buildings are of an "exceptionally high quality standard of design and finishing" with high quality landscaping and "no more than a 25% per cent coverage of each developable site by buildings". Wynyard Park strongly object to this policy, particularly the amount of land that is proposed to be allocated for employment uses. Mindful of the NPPF which discourages the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose; the accompanying covering letter demonstrates that when viewed in the context of the findings of the Employment Land Review, past take up rates and market conditions in recent years Hartlepool has a significant over supply of employment land. The prospects of developing 54.15ha of land at Wynyard Park within the forthcoming plan period for 8 employment uses (particularly prestige employment of a high quality design) are minimal and there is no reasonable prospect of the site coming forward for these uses. Mindful of the above, Wynyard Park consider that in relation to employment land the Preferred Options are overly asperational, undeliverable and un-sound. As Hartlepool have sufficient employment land to be able to meet their predicted employment needs on sites elsewhere that are now established	The Council notes that the position of Wynyard Park Ltd is to seek the removal of the employment land allocation at Wynyard and replace this with other uses, principally housing. While the Employment Land Review did conclude that there is a general oversupply of employment land in Hartlepool the Review did not conclude that the business park allocation at Wynyard should be de-allocated or re-allocated. The Review did refer to strategic highways issues and these affect future housing development as well as the business park. The Council is in discussion with Highways England and other stakeholders to resolve any ongoing strategic housing issues. The Council remains firmly convinced that Wynyard Business Park has the potential to play a regional, sub-regional and local role in the Tees Valley's employment land portfolio over the next 15 years and beyond. The NPPF requires local authorities to plan for sustainable communities. The provision of land for employment uses plays an integral part of creating sustainable communities, providing opportunities for work close to where people live and therefore reducing commuting levels. Wynyard park Ltd has stated that it wishes to create a sustainable community at Wynyard. The employment land allocation at Wynyard should therefore be retained in the Local Plan.

Company	Unique Ref	DP Ref	EMP1 Preamble	Planning Policy Response
			employment sites , it is requested that the proposed employment allocation at Wynyard Park be removed. Particularly as Wynyard Park is now being actively developed for residential uses. Please see the attached covering letter for further details regarding land supply.	
Resident	LP0048	DP0004	It is difficult to see how the local economy can be strengthened without massive improvements to the road infrastructure in the area particularly the A19 Tees crossing which is the major pinch point in the area.	It is agreed that there is an issue at the Tees flyover and this causes queuing on the A19. The Tees Valley Combined Authority and local authorities are actively looking at ways to address this which may include a new Tees Crossing. In the shorter term Highways England has secured funding to increase the A19 between Wynyard and Norton from two lanes to three to help capacity issues.
Homes and Communities Agency	LP0063	DP0020	The HCA agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. We consider that to achieve economic growth it is imperative that a range of appropriate development is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level. The HCA believes that a mixed use development would enhance the housing offer within the town and allow for a sustainable community with a range of employment opportunities.	Wynyard Business Park has an important sub-regional and regional role in encouraging new inward investment to the Tees Valley including Hartlepool. It is critical to retain a portfolio of land that includes high quality business sites so that the local authorities can respond positively to investment requirements over the next 15 years.
Health and Safety Executive	LP0211	DP0170	Workplace Allocations Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m² total floor space are compatible with the inner zone. Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator. Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with the middle zone. Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone.	As suggested by the Health & Safety Executive a compatibility assessment has been undertaken for Local Plan housing and employment land allocations that are within the consultation zone distances of major hazard establishments and major accident hazard pipelines. This has been undertaken using the HSE's Land Use Planning Methodology and the conclusions of the assessment will be included in the next version of the Local Plan.

Company	Unique Ref	DP Ref	EMP1 Preamble	Planning Policy Response
			Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m² total floor space are compatible with the outer zone. This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on Development Type Tables of HSE's Land Use Planning Methodology, which is available at: http://www.hse.gov.uk/landuseplanning/methodology.pdf Mixed-Use Allocations Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to the Web App to determine HSE's advice regarding mixed-use developments.	
Resident	LP0217	DP0179	4) Although Hartlepool is an integral part of the Tees Valley Strategic Economic Plan (SEP) and Infrastructure, it has been rightly identified as having specific expertise, infrastructure and premises in certain hi–tech business areas. However it must be emphasised that over reliance on the TV economic model must not be to the detriment of its own autonomy, which must be retained, to afford adoption of aggressive policies to attract new business "outside" the TV economic model. Is there a formal procedure for resolving any conflicts of interest/competition which might arise between local authorities operating unilaterally?	The Council recognises that Hartlepool has a number of 'unique selling points' in respect of economic development and inward investment and will continue to sell and promote these. The Council is also represented on the Tees Valley Local Enterprise Partnership and the Tees Valley Combined Authority and recognised the benefits of joint working and co-operation. It is anticipated any potential 'conflicts' can be resolved satisfactorily as part of this process.
Northumbrian Water	LP0241	DP0207	We support economic development across the North East region and generally enter into early discussions with any potential land user that may require specific drainage solutions such as industrial effluent and excessive waste water from production and manufacturing. We always encourage Local Authorities to join these discussions or inform us of any proposed strategic development. We note that there is a longer term intention to redevelop the Hartlepool nuclear power station and if this is to occur we would expect to be involved in discussions regarding any waste water	The Council does have regular briefing sessions with Northumbrian Water and an update on Local Plan progress, including potential land allocations, forms part of this briefing. Should a decision be taken to proceed with a new nuclear power station in Hartlepool Northumbrian Water, along with other statutory consultees, will be involved in the process. A reference to surface water management and the integration of SuDs will be included within the economy section of the

Company	Unique Ref	DP Ref	EMP1 Preamble	Planning Policy Response
			treatment / storage. It should be recognised in policy that economic development also has a duty to manage surface water and policies relating to it should encourage the integration of SUDS as the housing policies do.	Local Plan.

Policy EMP1: Prestige Employment Site Wynyard Business Park

Company	Unique Ref	DP Ref	EMP1 Prestige Employment Wynyard	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	EMP1 – PRESTIGE EMPLOYMENT SITE WYNYARD BUSINESS PARK A number of the existing commercial building are too large and too high (eg Lion Court) – the supposed ethos of Wynyard (New Town!) was that business and residential would blend into the rural landscape. It is vital that applications for development should be refused if they are over 3 storeys in height – where they can be visible over a 'natural' landscaping height. (4) - We strongly support this policy - provide a landscaped buffer (which will need to include visual and noise abatement screening where necessary) between development and adjacent residential areas.	Policy EMP1 requires buildings at Wynyard Business Park to be of an exceptionally high standard of design and finishing. The height of proposed buildings and their relationship to landscape features (both existing and proposed) will be part of the Council's assessment of 'high quality' design. It would not be appropriate for the local plan policy to impose a restriction on all buildings over 3 storeys in height as there may be cases where a taller building is acceptable depending on its location and siting. Each case must be considered on its merits.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes the requirement for high quality landscaping and protection of the woodland at Wynyard which is a valuable asset in a local authority area with below average tree cover. The Parish Council would also like to see a control on the height of buildings. One office building already exists which rises above the tree line to be highly visible from the surrounding area including Greatham. This is unfortunate in what is otherwise an area which contributes greatly to an area of high landscape value. A control on height would also sit alongside the control on density. A control on the colour of the cladding used on some of the very large factory units is also desirable to prevent them from being excessively obtrusive in the landscape.	The Parish Council's support for the Council's efforts to achieve high quality landscaping and the protection of woodland at Wynyard is welcome. The Parish Council raises a valid point about the height of buildings in the Wynyard area. While the Borough Council is keen to support opportunities for new inward investment at the Wynyard site all proposals should be of an appropriate scale and have regard to the character of the Wynyard area. To cover this point it is proposed to amend bullet point 1) under the second paragraph of policy EMP1 to read "The buildings are of an exceptionally high quality of design and finishing and respect the character of the Wynyard area" The point about colour of cladding is perhaps more subjective but is an element that will be taken into account in determining a detailed planning application.
Stockton Borough Council	LP0022	DP0032	Wynyard In summary the following proposals are identified within the Hartlepool Local Plan Preferred Options at Wynyard: • Policy EMP1: Prestige Employment Site Wynyard Business Park o 54.15 ha of land for prestige employment use	Hartlepool Borough Council agrees that Wynyard is a strategic cross-boundary issue. The Council has held and will continue to hold regular discussions with Stockton BC on Wynyard and other cross boundary issues as part of the 'duty to co-operate'. Hartlepool Council is also a member of all working

Company	Unique Ref	DP Ref	EMP1 Prestige Employment Wynyard	Planning Policy Response
			The Council consider Wynyard to be a strategic cross boundary issue. As you will be aware there is highway capacity issues associated with the A689/A19 junction. Further consideration needs to be given to how development proposals within the both Hartlepool and Stockton can be delivered alongside necessary infrastructure improvements; the precise details of which have not yet been established. In this regard, the Council advocate a collaborative approach between local planning authorities, landowners and developers to deliver a masterplan for the Wynyard area.	groups dealing with cross boundary issues in the Wynyard area.
Wynyard Park	LP0027	DP0223	Employment Land Supply As stated in recent planning applications, the latest Employment Land Review ("ELR") prepared by BE Group in December 2014 has identified a clear oversupply of employment land across the borough. The key points of this document in relation to Wynyard are summarised as follows: • The ELR concludes that against past take up rates, the demand across the plan period will range from 19.5ha to 67ha of employment land. • As of March 2014, HBC had a supply of 409ha (over 29 sites) • The ELR recommends de-allocation of 151ha of employment land which is clearly undeliverable, including 39ha of land at Wynyard which effectively comprises the sites allocated under draft Policy HSG6. Supply at this point becomes just under 258ha • Whilst the ELR does not suggest further allocations and suggests that the remaining land be safeguarded. This still leaves a considerable over supply when viewed against the relatively low plan requirement (a surplus ranging between 192 and 238ha depending on take up rates) • Following the de-allocation of the 39ha above, the ELR notes that 54 ha of employment land would still be available at Wynyard (the remainder of the Wynyard Park land in Hartlepool). It is noted that the ELR concludes that no further de-allocations were suggested as the forecasts were heavily influenced by recession and that sufficient flexibility should be allowed to facilitate positive growth. However, when viewed in the context of the lack of demand for B-class uses in recent years and the predicted need for between 19.5-67ha across the whole plan period; at 54ha Wynyard Park is currently allocated to accommodate 80% of the upper level of demand, or best case scenario, on a single site. This is before taking into account 65ha of committed land at	The Council notes that the position of Wynyard Park Ltd is to seek the removal of the employment land allocation at Wynyard and replace this with other uses, principally housing. While the Employment Land Review did conclude that there is a general oversupply of employment land in Hartlepool the Review did not conclude that the business park allocation at Wynyard should be de-allocated or re-allocated. The Review did refer to strategic highways issues and these affect future housing development as well as the business park. The Council is in discussion with Highways England and other stakeholders to resolve any ongoing strategic housing issues. The Council remains firmly convinced that Wynyard Business Park has the potential to play a regional, sub-regional and local role in the Tees Valley's employment land portfolio over the next 15 years and beyond. The NPPF requires local authorities to plan for sustainable communities. The provision of land for employment uses plays an integral part of creating sustainable communities, providing opportunities for work close to where people live and therefore reducing commuting levels. Wynyard park Ltd has stated that it wishes to create a sustainable community at Wynyard. The employment land allocation at Wynyard should therefore be retained in the Local Plan.

Company	Unique Ref	DP Ref	EMP1 Prestige Employment Wynyard	Planning Policy Response
			Queens Meadow (Draft Policy EMP2) and the wider "general" employment sites at North Hartlepool and the Southern Business Zone which identify a further 42ha of available employment land. Even in the unlikely event that market conditions were to improve significantly, with investors specifically seeking a prestige location next to the A689, Wynyard Park are confident that there would not be sufficient demand to develop 54ha of land for employment purposes over the forthcoming plan period and this is reflected within the evidence base. Rather, based on current market conditions it is likely that the level of demand will remain around the lower end of the ELR forecast for the foreseeable future which would in turn ensure that a large surplus of employment land will continue to exist and act as a barrier to housing delivery, for which there is significant demand. In short, Wynyard Park considers that the current plan proposals to allocate 54ha of land at Wynyard Park for B-Class uses with a view to achieve positive growth in the future are excessive, unrealistic and fails to accord with the principles of sustainable development set out within the NPPF. National policy makes it clear that: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose" (paragraph 22, GVA emphasis). There is no reasonable prospect of achieving this quantum of employment development at Wynyard Park and as such the plan is overly aspirational in this regard and un-sound, in the respect that it prevents positive growth where it is required. In our view the EMP1 allocation should be removed or at the very least significantly reduced to allow for additional residential development and associated services to be delivered, which will ensure that the Council are seen to be planning positively with regard to the need to maintain a five year housing land supply.	
Highways Agency	LP0029	DP0196	During consultation on the Core Strategy, Highways England had concerns with the proposals for Wynyard Business Park. These concerns predominantly related to the lack of evidence in relation to the potential impact of the scale of prestige employment proposed and the ability of the proposed supporting infrastructure set out in policy and the LIP, to address these impacts and the policy did not identify the quantum of development proposed. As stated in response to Policy HSG4 regarding the South West	The Council has provided additional information to Highways England regarding potential jobs targets for Wynyard Business Park and will work closely with Highways England to ensure that impacts of development on the strategic road network can be accommodated.

Company	Unique Ref	DP Ref	EMP1 Prestige Employment Wynyard	Planning Policy Response
			Extensions, considering the strategic and integral nature of the site and its importance to the soundness of the strategy as a whole, it was considered that additional work would still need to be undertaken to ensure that the impact of proposals would be fully understood and the supporting infrastructure provisions identified in the LIP could be confirmed as being appropriate, deliverable and capable of mitigating such impacts. Again, in the run up to the EiP, Highways England developed further evidence which was submitted in response to the Inspectors Further Matters. On the basis of the analysis undertaken, it was suggested that Plan and the Local Infrastructure Plan should be updated to incorporate the recommended measures. As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, there exist two issues: • While the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements, it is not possible to determine the overall employment aspiration or understand specifically the contributions of the identified sites to the overall requirement. • The scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Given the differing spatial aspirations that are now proposed (along with the identified measures), it will be necessary to reconsider the potential implications of the current development proposals, from an individual and cumulative perspective, and the requirements for supporting transport infrastructure measures. It is expected that the Tees Valley AAP that is currently being updated will present this evidence and will seek to review and confirm its findings at the earliest opportunity.	

Company	Unique Ref	DP Ref	EMP1 Prestige Employment Wynyard	Planning Policy Response
			Further, we support the clarity provided through cross referencing to Policy INF1 ensuring prestige employment development at Wynyard Business Park will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	

Pre-amble EMP2: Queen's Meadow Business Park

Company	Unique Ref	DP Ref	EMP2 Preamble	Planning Policy Response
Resident	LP0096	DP0054	Make sure all units in Enterprise Zones i.e. Queens Meadow, Oakesway and Brenda Road are fully occupied before opening new sites as they already have the necessary infrastructure.	The Council always encourages the use of vacant units where appropriate and where these can meet the requirements of new or expanding businesses.
Resident	LP0204	DP0162	Specialist industry – Ensure no sky lights, noise and smells impact on nearby village and nothing hazardous.	The Borough Council will take action over noise and smells and works alongside the Environment Agency when necessary. If hazardous materials are involved then the Council must seek the advice of the Health and Safety Executive before granting any planning permission.
Resident	LP0205	DP0163	Specialist industry should have no sky lights, noise, smells which would impact on nearby village.	The Borough Council will take action over noise and smells and works alongside the Environment Agency when necessary. If hazardous materials are involved then the Council must seek the advice of the Health and Safety Executive before granting any planning permission.

Policy EMP2: Queen's Meadow Business Park

Company	Unique Ref	DP Ref	EMP2 Queens Meadow	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	EMP2 – QUEEN'S MEADOW BUSINESS PARK (1) and (3) There should be a restriction on height as there is little point in landscaping unless the height of the building is appropriate to that landscaping.	The Local Plan policy seeks high quality design and landscaping particularly along main road frontages and close to the boundary with Greatham village. Proposed building height will be considered as part of the Council's assessment of design and landscaping but it would not be appropriate for the local plan policy to impose a strict restriction on height. Each case should be treat on its merits in relation to existing and proposed landscape features.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports the requirements for a high standard of design and high quality landscaping including the restoration, creation and enhancement of wildlife habitats. The quality of landscaping and woodland planting on the areas alongside the A689 and Greatham village are particularly important to prevent the business park from dominating the village setting. The Parish Council would also like to see a control on the height of buildings, preferably nothing over the equivalent of two stories high. If structures are built that rise above the woodland planting they in effect destroy the effectiveness of such planting and landscaping. A control on height would also sit alongside the control on density. The Parish Council welcomes the requirement the proposals for general industrial development and warehousing will only be allowed on sites away from the A689 (South Fens) and Greatham village.	The Parish Council's support for achieving high standards of design and landscaping at Queen's Meadow, particularly in the vicinity of Greatham village and the A689 is welcome. The Parish Council makes a valid point about the height of buildings, and while not seeking to unduly restrict employment opportunities it is important that new development respects the scale and character of the surrounding area and does not impact on the amenity of neighbours. To cover this point it is proposed to amend bullet point 1) under the second paragraph of policy EMP2 to read "The buildings are of a high standard of design and respect the character and amenity of the surrounding area".
Highways Agency	LP0029	DP0196	Highways England previously stated in relation to Core Strategy Policy CS12 regarding Queens Meadow Business Park that based on the scale of development proposed that it was unlikely to have particular implications at the SRN. Whilst the policy is generally consistent with the previous Core Strategy (along with the identified measures), given the differing spatial aspirations that are now proposed, it will be necessary to reconsider the potential implications of the current development proposals, from an individual and cumulative perspective, and the requirements for supporting transport infrastructure measures. It is expected that the Tees Valley AAP that is currently being updated will present this evidence and	The Council has provided additional information to Highways England regarding potential jobs targets for Queen's Meadow Business Park and will work closely with Highways England to ensure that impacts of development on the strategic road network can be accommodated.

Company	Unique Ref	DP Ref	EMP2 Queens Meadow	Planning Policy Response
			will seek to review and confirm its findings at the earliest opportunity. As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, there exist two issues: • While the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements, it is not possible to determine the overall employment aspiration or understand specifically the contributions of the identified sites to the overall requirement. • The scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at Queens Meadow Business Park will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	
Historic England	LP0044	DP0213	Page 109, Policies EMP2 and EMP4(d): The proposals map suggest that these employment sites may be relatively close to the Greatham Conservation Area, which contains a number of listed buildings. However, there does not appear to be any mention of these designated heritage assets, or cross referencing to appropriate policies, either within the text or policy wording. Depending upon the scale and type of industrial development, there might be the potential for harmful impacts. In order to provide the necessary protection for these assets, and/or to identify opportunities for enhancing their significance, the wording of these policies may need amending.	With regard to EMP2 Queen's Meadow the policy does require high standards of design and landscaping along the boundary with Greatham village. The impact of any proposed development on Greatham Conservation Area/listed buildings will be considered as part of the Council's assessment. Policies within the Historic Environment section of the Local Plan also provide for the impact of developments of the setting of conservation areas and listed buildings. These policies are adequate for considering impact from any development on the South Works site which is a well established and important industrial area.

Pre-amble EMP3: General Employment Land

No Comments

Policy EMP3: General Employment Land

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council is concerned at the location of 'bad neighbour' uses on the Graythorp Industrial Estate. These will be in the same general area as the Specialist Industries (hazardous and potentially polluting (policy EMP4). There are significant problems of a degraded environment in this area which can affect Greatham and Seaton Carew particularly in terms of smells and noises. Light pollution is also a cause for concern. There needs to be a much more strict enforcement of the conditions, but past experience gives little faith in this. A requirement for buffer areas similar to that being required for the strategic housing sites would be welcomed. Such buffer areas should be planted appropriately for the benefit of wildlife and to compensate for the 'bad neighbour' uses by providing an improved environment and visual screening.	The Borough Council understands the concerns of the Parish Council with regard to 'bad neighbour' developments at Graythorp industrial estate. While such uses can be visually unattractive the Borough Council does exercise strict control over such aspects as smell, noise and vibration, and works alongside the Environment Agency where necessary. If hazardous materials are involved then the Council must seek the advice of the Health and Safety Executive before granting any planning permission. The Borough Council also recognises the generally poor environment of the Graythorp area and, where funding and resources allow, will undertake environmental improvements in the area. The Council will also pursue where appropriate contributions for developers to secure landscaping and improvements to individual sites in the Graythorp area.
Highways Agency	LP0029	DP0196	During consultation on the previous Core Strategy, Highways England stated its concern that the scale of development intended for each general employment site was not identified, preventing the potential level of impact from being assessed. Our previous consideration of general employment sites identified that these sites individually would be unlikely to have a significant impact on the SRN, although further consideration of the cumulative impacts was necessary to ensure that the transport infrastructure improvements proposed would be sufficient to address such impacts. As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, there exist two issues: • While the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and	The Council has provided updated information to Highways England on potential jobs targets for all the employment sites and will continue to work closely with Highways England to ensure that impacts on the strategic road network can be mitigated and/or minimised.

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			the sites that contribute to these requirements, it is not possible to determine the overall employment aspiration or understand specifically the contributions of the identified sites to the overall requirement. • The scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	
Resident	LP0201	DP0159	TABLE 12 – OAKESWAY This site should become available for affordable housing and housing for the elderly. It is ideally located for this.	Oakesway industrial estate was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council's recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be given time to take effect and it is considered that the majority of the site should be retained for employment purposes. However there may be scope for some housing development in the north west area of Oakesway subject to creating a satisfactory residential environment and assessment of the impact on nearby industrial premises. The Council will explore options with the landowner and other relevant bodies.
Landowner -	LP0242	DP0208	Policy EMP3	It is acknowledged that the area of land referred to in the

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
Junction of Belle Vue & Brenda Rd			My client owns an L-shaped parcel of land at the junction of Belle Vue Way with Brenda Road to the southwest of the Stag and Monkey Hungry Horse public house/ restaurant (see plan attached to these representations). The site measures 0.45 ha and has frontage to Belle Vue Way and Brenda Road. Access is taken from Brenda Road via a new access created as part of the development of the Hungry Horse, which includes a dedicated right turn lane on Brenda Road. Surrounding uses are a mix of commercial, retail and industrial. Belle Vue Local Centre is located 100m to the north east on the opposite side of the roundabout. The emerging Local Plan proposes that this land be allocated as General Employment Land under Policy EMP3c. Policy EMP3c allocates a larger area than the land in question and extends to an area of 33.3 hectares. The subject site is physically separated from the remainder of the allocation by an access road off Brenda Road. My client considers that continuation of the employment designation of this part of EMP3c is unhelpful and inappropriate and that the employment allocation should be deleted. The reasons for this are set out in detail below: 1. The site has been allocated for employment purposes for many years but has never come forward for development for this purpose. My client purchased the site in 2004 and from mid 2005 to date the site has been actively and clearly marketed for sale. From 2005-2010 the land owner marketed the site by means of an advertising board on the site. Since May 2010 the site has been marketed by CoStar Group UK – a leading commercial real estate company. CoStar has approximately 12,000 companies subscribing to their service and as such, the land has been marketed to a wide national audience for a lengthy period of time. Despite intensive marketing of the site, there has been limited interest and any expressions of interest have not been carried forward into offers or proposals. A total of 72 enquiries have been made regarding the site, however only 8 enquiries have been received since 2010. Many of the	representation has been vacant for some time and there has been little market interest to date. However given its location on the south west side of the Belle Vue Way/Brenda Road junction it is not considered appropriate for retail use. It could not be regarded as an extension to or part of the Belle Vue Local Centre which is on the other side of the A689 roundabout with no safe crossing points. The Borough Council is however prepared to consider its de-allocation/re-allocation for uses other than retail and will consider any alternative suggestions put forward by the owner.

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			enquiries have not been for the use of the site for employment purposes but have been in relation to alternative non employment uses. Having regard to these facts, it is our view that the site is of no interest to the market for employment development, namely B1, B2 and B8 uses and thus, notwithstanding its designation, it is unlikely to come forward for redevelopment for this purpose. 2. Although the Employment Land Review 2014 recommends the site be retained for employment development, it does acknowledge that whilst the prominence of the site is good its environmental quality is average and thus it cannot be considered to be anything better than Grade C employment land which is employment land which is primarily geared towards local businesses. We also question whether it is realistically Grade C employment land given surrounding vacant land, the environmental quality of the wider employment area and the fact it has been vacant for so long. 3. Paragraph 22 of the NPPF makes it clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Given how long this site has remained vacant and the fact that there has been no real interest in developing it for employment uses there is in our view a very clear planning policy justification for its de-allocation. 4. Part of the allocation to the northeast has in recent years been developed for a non-employment / Class B use, namely for a pub / restaurant. Importantly, planning permission for the premises was granted on the basis that it was extremely unlikely that the site would come forward for employment development in the foreseeable future and thus that it was preferable to release it for development generating some employment and community benefits from the site rather than see it lie vacant. 5.The site is small in size and it is difficult to see how it could viably be developed for employment development. A site in this location is certainly	

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			not likely to come forward as a speculative development particularly considering the absence of any interest over the last 10 years in developing it for employment uses. The current economic climate will further make this unlikely. 6. There is currently an oversupply of employment land in Hartlepool with 33,622 sq m of industrial space currently vacant and a growing surplus of land going forward. It is thus considered that the loss of 0.45 ha of employment land would not have an adverse impact on future employment growth in the town and in particular, will not prejudice the availability of land to meet current and future employment needs, particularly considering the size and shape of the site. 7. If the allocation were to remain then it is will undoubtedly sit vacant and un-used. This runs contrary to government guidance contained in the NPPF which not only seeks the re-use of vacant and under used land but also requires that where there is no reasonable prospect of a site being used for the allocated employment uses, alternative uses are treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Based on the interest that has been received for the site, the market signals indicate that there is interest in the site for alternative commercial uses. Such development also has the potential to deliver significant benefits which would not be released if the site were to remain vacant including new jobs, community facilities and improvements to the visual amenities of the area. 8. The site has not historically been in an employment use. The last use of the site was a Child Guidance Centre and before that an Occupational Therapy centre. Planning permission has also previously been granted for a car dealership on the site which was subsequently renewed, although this was never implemented. The site does not therefore have a history of employment development on it. 9. Pre-application discussions were undertaken with the Council in relation to the redevelopment of the site for alternative commercial uses, namely a small commercial development comprising uses in Class A1/A2/A3 and A5,	

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			in March 2014. A copy of the response is attached to these representations. It is noteworthy that the development of the site for non-employment uses was considered acceptable in principle having regard to the benefits that the development would bring and taking into account the fact that "the development site has been vacant for over a decade with no economic activity taking place over that time. Officers are satisfied that there is no reasonable prospect of the site being used for the allocated employment use and when considering the long term vacant and the prominent location, alternative uses should be considered and treated on their merits". Having regard to the information set out above, it is clear that there a number of different reasons why it is not appropriate to maintain the current employment allocation of the site and therefore we respectfully request that the employment allocation be deleted in relation to the subject site. This requires an amendment to the proposals map accompanying the emerging plan. As is set out elsewhere, we consider that this land should be re-allocated for an alternative use thereby making a productive and efficient use of this sustainable site to the benefit of the community.	
Brenda Road Holdings Ltd	LP0244	DP0212	Employment Land The preferred options document notes that the borough has a substantial surplus of employment land and has no need identify any further land. At paragraph 11.15 it notes the conclusion of the December 2014 Employment Land Review (ELR) that 152 hectares of employment land are de-allocated and used for other purposes. Whilst we certainly agree that the council de-allocate this land for other uses, we would contend that the council could de-allocate more employment land and still meet future demand from businesses. The council should note the proof of evidence submitted by Mr M Lytollis of Lambert Smith Hampton in preparation for the planning appeal relating to our site. In his proof of evidence Mr Lytollis suggests that much more employment land could be de allocated. In his conclusion Mr Lytollis sets out six tests which emerge from the existing employment land policy and the ELR. In his conclusion of test 2 on page 63 of his proof he notes:	The 2014 Employment Land Review was prepared as part of the evidence base for the Local Plan. The Council is also conscious of paragraph 22 in the National Planning Policy Framework which requires planning policies to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The Local Plan reflects the key recommendations from the Employment Land Review for de-allocations and has gone further by proposing the de-allocation of the North Seaton Channel site. The employment land allocations in the Local Plan reflect the need to maintain a arrange of different sites within the Council's industrial land portfolio which are flexible enough to

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			The ELR proposes land supply deductions totalling 151.8 hectares, leaving a reduced or adjusted employment land supply of 257.9 hectares. My own corresponding figure is 299.64 hectares. The ELR could go much further in its proposed land supply deductions without compromising the range and choice of available sites when the ELR's highest forecasted employment land need until 2036 is 65.78 hectares. The full document is available in the Hartlepool Planning archives at: http://edrms.hartlepool.gov.uk/AnitePublicDocs/12994491.pdf Businesses along Brenda Road The preferred options document notes (at paragraph 11.15) the conclusion of the 2014 ELR which includes the need to "protect smaller employment sites along Brenda Road in the Southern Business Zone to provide opportunities for the development of modern small business space." We would agree and would contend that the town needs modern small to medium business and office space that encourages new and start up business to settle in Hartlepool. For this reason the SECAAH development will include an element of B1 space along Brenda Road.	meet unforeseen requirements. As required by NPPF paragraph 22 land allocations will be kept under regular review. Brenda Road remains a key industrial and employment area, and the Council will continue to support schemes that provide modern business space in appropriate locations and will continue to promote Hartlepool to new and start up businesses.
Network Rail	LP0250	DP0220	Regarding policy EMP3: General Employment Land: We would ask that paragraph three on page 112 relating to class B2 use is extended to cover level crossings as follows: In this respect planning condition may be imposed to restrict general industrial developments to appropriate operations within the B2 use class, A high quality of design and landscaping will be required for development fronting the main approach roads and estate roads and, where necessary adjacent to the main railway line and consideration of the requirement for level crossing improvements. LEVEL CROSSINGS The safety, reliability and efficiency of the rail infrastructure are of paramount importance to Network Rail and we cannot agree to any proposals which jeopardise these requirements. Level crossings are safe if	The safety considerations associated with the use of level crossings is acknowledged. With regard to the first point in the representation it is suggested that rather than refer specifically to level crossings the final sentence of the fourth paragraph of policy EMP3 be amended to read: ".....and, where necessary, adjacent to the main railway line subject to operational considerations." Regarding the wider point made about level crossings it is not considered appropriate to include a policy statement as suggested. Network Rail is consulted as a matter of course by the Borough Council on all planning applications for developments that are likely to involve the use of level crossings. To include a broad statement as suggested in the representation may cause undue constraints on the use of land. Proposals should be dealt with on a case by case basis in accordance with current guidelines.

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			used correctly. Most level crossing risk has resulted from user error or abuse. We are committed to reducing the risk at level crossings where reasonably practicable and will seek to close and/or divert crossings or enhance their safety through the provision of improved safety features or equipment. We will work with local councils to take a holistic approach to reducing level crossing risk and will encourage planning authorities to co-operate in securing level crossing closures or improvements in connection with new developments. Only in exceptional circumstances will we permit new crossings to be introduced onto the network. We would encourage the inclusion of a policy statement which makes it clear to developers that no new crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will require to be provided at the developers expense. LDP site assessments must take cognisance of the impact of development proposals on level crossings. Transport assessment and developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured. A number of the sites identified in the current local plan are close to Level Crossings and we would expect as part of any Planning submissions that a full risk assessment of the impacts of the development upon the nearby level crossings is completed and any mitigation required is funded as part of the development.	
Sovereign Park	LP0260	DP0235	Hansteen object to the continued allocation of the undeveloped land at Sovereign Park as General Employment Land (EMP3d). Through continued working with council officers, Hansteen has demonstrated there is no market for employment related development on the Sovereign Park land. This is due to a variety of reasons, including: - low demand for employment related development in the area; - better located sites nearby; - better quality sites in the area; - the increased cost of development of Sovereign Park land due to previous	The Employment Land Review, which forms part of the evidence base for the Local Plan, does acknowledge potential flooding and other issues associated with Sovereign Park. However the Employment Land Review does recommend that the employment land allocation be retained. The Council is aware of the advice in the National Planning Policy Framework which that land should not be retained for employment uses if there is no reasonable prospect of land

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			industrial activity. Officers are fully aware that the land was previously the site for a large smelting works, which was demolished some decades ago. The site has been marketed by various owners for employment related development since. Unfortunately, the past use left a legacy of environmental damage that can only be addressed through the sites redevelopment. Much of the surface appears to be covered by a layer of clinker and building rubble mixed with soil, although the precise depth of the made ground is still to be established. It is likely that there may be sub-surface foundations, etc that will require removal before development can take place. It is also clear that development is hampered environmental issue relating to the land-forming required to create a development platform. The site is scarred and rutted, and the cost of creating a level developable surface alone makes employment development unviable. Hansteen and council officers have explored all possible avenues for public subsidy/ grant, in an effort to make employment development viable. There are no such regimes available to help. At one point the council considered buying some of the site and an existing empty unit for a new depot facility. Despite extensive negotiations (not least on price), the council decided their needs were better met by a site in Tofts Farm. Part of the reason given by officers was the expense of development of the land at Sovereign Park due to land forming and uncertainties about environmental legacy issues. The Council's own ELR from December 2014 refers to some of the difficulties associated with the site. Whilst the report did "not recommend deallocation from employment uses at this time, but does suggest further monitoring and study to clarify if land here is viable for employment uses over the long term". In Hansteen's view, the further proof provided to Officers over the past over a year and a half amply shows the concerns expressed in the ELR about the sites unsuitability for employment are borne out. The NPPF provides guidance to LPA's on local plan policy matters. In relation to employment allocations in particular, it urges LPAs not to continue to allocate sites for employment where there is little prospect of development. All this should be enough to deallocate the site for employment purposes.	being used for that purpose. The Council notes the comments made about flooding and acknowledges that the Environment Agency flood zone map may be inaccurate regarding the Sovereign park area. However unless more detailed modelling work is undertaken and submitted the EA flood zone map cannot be amended. Given the constraints the Council does not accept that Sovereign Park is a viable housing site that could be delivered during the plan period. Nevertheless in line with National Planning Policy Framework paragraph 22 the Council will keep the employment land designation under regular review and will remain open to consideration of alternative uses. Comments about the previous use of the site as a smelting works are noted – however early ordnance survey maps suggest that the smelting works (which eventually formed part of British Steel North Works) did not extend as far south as the Sovereign Park site.

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			However, it is apparent from the ELR, that part of the Council's reasoning for keeping the employment allocation, rather than re-allocating it for housing use was because it is within flood zone 2. The council view is counter intuitive; ie, assuming the flooding issues are as they consider them to be, this would place an additional financial burden further undermining already unviable employment development. Recent work on the adjacent SEECAH site has shown that the EA flood map for the area (which includes Sovereign Park land) is inaccurate. Discussions with the council officers and the EA have shown that there is an expectation that the flood map for Sovereign Park is equally wrong. Hansteen's flood study work has been accepted by both the Council and EA, but the only way to amend the EA's flood map is complete modelling work to the same standard as that done for SEECAH. At the time of writing, Hansteen are about to commission such modelling work, but it will not be available until after the closing day for consultation responses. However, there seems little doubt that this will show that the inaccuracies in the EA flood map for SEECAH will be replicated on the flood map for Sovereign Park land. It is likely both sites are in flood zone 1. Once it is established that the flood issue is irrelevant, the intention is to formalise an agreement with the council as land owner of the strip of land facing Seaton Lane to create a new separate access that will allow residential development on both the Council and Hansteen land holdings. Hansteen is concerned that these discussions, which have been going on for years, are not reflected in any way in the local plan.	
HCA (Oakesway)	LP0086	DP0044	The HCA agrees in principle with the ambition of the Council for growth and economic development in Hartlepool. We consider that to achieve economic growth. It is imperative that a range of appropriate development is supported in sustainable locations and that targets for growth should be seen as a minimum figure rather than be subject to any maximum target level. The SWOT analysis indicates successful allocation of Enterprise Zones, although these have not all delivered, for instance at Oakesway which has remained undeveloped for around 30 years. Paragraph 22 of the NPPF states that planning policies should avoid long term protection of sites allocated for employment use where there is not a “reasonable prospect” of the site being used for that purpose. The NPPF further states that if there is no “reasonable prospect” of the site being used for the allocated employment use, applications for alternative uses should be considered relating to	Oakesway industrial estate was designated as an Enterprise Zone in 2012 to support development at the nearby Hartlepool Port Enterprise Zone . The Port, with its deep water facilities, is in a position to attract a number of key growth sectors including renewable energy manufacturing, advanced engineering and advanced manufacturing. The Council’s recent Employment Land review concluded that a release to housing is not justified at this time given the Enterprise Zone status and the occupier interest that is being recorded. Oakesway is home to a number of existing businesses and is the only main general industrial area in the north of the town. The Enterprise Zone designation should be

Company	Unique Ref	DP Ref	EMP3 General Employment Land	Planning Policy Response
			market signals and the need for different land uses to support sustainable development. The currently Enterprise Zones and LDO's have provided a framework for attracting development, although clearly at Oakesway this has not been successful. At Oakesway, given the current employment market., and the track record of employment delivery on the site, it is reasonable to conclude that the whole of the remainder of the Oakesway site will not come forward and be used for employment use in the short term despite its Enterprise Zone status. Residential development on this site should be supported because there is no realistic prospect of the site being taken up for employment uses and indeed there are other suitable employment sites elsewhere in the Authority area. There is therefore no evidence to suggest that residential development on this site would result in a strong impact on the economy or have a strong impact on the supply of employment land. The ELR suggests an oversupply of employment land in the borough. It indicated a minimum need of 19.58 ha per year, comprising 15.13 ha, plus a five year buffer of 4.45 ha to reflect a choice of sites and to provide a continuum of supply beyond the end of the plan period. Measured against the Borough's current realistic supply, there is a supply surplus of 238.32 ha to 2031. It is clear that a range of sites is required to ensure that there is a versatile and flexible employment land supply to meet changing demands for the borough. For instance, Oakesway has not delivered in 30 years and prospects for employment development on a site that does not have the same level of prominence as others, should be re-evaluated - we suggest that residential development is appropriate here	given time to take effect and it is considered that the majority of the site should be retained for employment purposes. Further discussion with the Council's inward investment team has reinforced the view that Oakesway should be retained for employment uses, particularly as PD Ports are still actively pursuing renewable energy projects at the main port EZ site. Oakesway currently supports about 700 jobs on the existing businesses at the site and some of these businesses may wish to expand their operations during the lifetime of the local plan. Development of housing even on parts of the Oakesway site may restrict the ability of existing businesses to expand or change the nature of their operations, and raises doubts about the ability to achieve a high quality, sustainable residential environment and community within the constraints of the site.

Pre-amble EMP4: Specialist Industries

No Comment

Policy EMP4: Specialist Industries

Company	Unique Ref	DP Ref	EMP4 Specialist Industries	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council is very concerned regarding the allocation of North Graythorp for specialist industries which can include those of a hazardous and polluting nature. There are significant problems of a degraded environment in this area which can affect Greatham and Seaton Carew particularly in terms of smells and noises. Light pollution is also a cause for concern; the night sky can be awash with very bright floodlights as well as the glow of assorted flares. Such problems do not appear to be addressed anywhere in the policies. This area is very close to Greatham which already too frequently tolerates unusual odours, strange noises and glowing or throbbing red skies. There should be a limit to the number and diversity of specialist industries and greater policing of the effects on neighbouring residential areas. There needs to be a much more strict enforcement of the conditions, but past experience gives little faith in this. There are already enough specialist industries in this area which have reserved space to expand and combined with a Nuclear Power Station with a reserved site there is enough now this is as much as any community should be expected to live alongside. The impact on the special protection area and Ramsar sites need to be very closely controlled. Any potentially negative impact on the environmental value of these locations must be avoided. Protection of these environmentally sensitive areas is paramount. Similar conditions should be imposed as those on renewable energy proposals:- 1/ All proposals should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties during construction, operational lifespan and decommissioning. 2/All proposals should also include details of how the site will be satisfactorily restored. 3/Developers will be expected to work constructively with local communities and local authorities (including Parish Councils) to secure appropriate community benefits	The North Graythorp area is within the consultation zone distances of a number of hazardous installations and has been identified as suitable for similar developments for a number of years. Such industries remain subject to a number of strict controls and regulations imposed by the Environment Agency, the Borough Council and others to reduce impact on neighbouring uses. The Health & Safety Executive imposes consultation distance zones around hazardous installations to restrict the types of development permitted nearby.
Highways Agency	LP0029	DP0196	During consultation on the previous Core Strategy, Highways England	The Council has provided updated information to Highways

Company	Unique Ref	DP Ref	EMP4 Specialist Industries	Planning Policy Response
			previously stated its concern that the scale of development intended for each specialist industry site was not identified, preventing the potential level of impact from being assessed. Our previous consideration of general employment sites identified that these sites individually would be unlikely to have a significant impact on the SRN, although further consideration of the cumulative impacts was necessary to ensure that the transport infrastructure improvements proposed would be sufficient to address such impacts. As detailed in full within the supporting paper (Hartlepool Local Plan – an evidence base) that is provided alongside this response, there exist two issues: • While the Local Plan text and the housing policies can be pieced together to understand the overall housing requirements of the Plan as a whole and the sites that contribute to these requirements, it is not possible to determine the overall employment aspiration or understand specifically the contributions of the identified sites to the overall requirement. • The scale / location of development in combination with the identified measures (such as the Elwick bypass and the new A19 junction) have the potential to influence the operation of the SRN with a different dynamic to that considered at the time of the previous Core Strategy. An evidence base will need to be available to fully explore these influences. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks.	England on potential jobs targets for all the employment sites and will continue to work closely with Highways England to ensure that impacts on the strategic road network can be mitigated and/or minimised.
Historic England	LP0044	DP0213	Page 109, Policies EMP2 and EMP4(d): The proposals map suggest that these employment sites may be relatively close to the Greatham Conservation Area, which contains a number of listed buildings. However, there does not appear to be any mention of these designated heritage assets, or cross referencing to appropriate policies, either within the text or policy wording. Depending upon the scale and type of industrial development, there might be the potential for harmful impacts. In order to provide the necessary protection for these assets, and/or to identify	With regard to EMP2 Queen's Meadow the policy does require high standards of design and landscaping along the boundary with Greatham village. The impact of any proposed development on Greatham Conservation Area/listed buildings will be considered as part of the Council's assessment. Policies within the Historic Environment section of the Local Plan also provide for the impact of developments of the setting of conservation areas and listed buildings. These

Company	Unique Ref	DP Ref	EMP4 Specialist Industries	Planning Policy Response
			opportunities for enhancing their significance, the wording of these policies may need amending.	policies are adequate for considering impact from any development on the South Works site which is a well established and important industrial area.
Resident	LP0201	DP0159	TABLE 12 – PORT - A close eye should be kept on this as PD Port's ambitions may have to be scaled down as time goes by.	Noted – at present the Port is designated as an Enterprise Zone and the Council supports ambitions to encourage development associated with the renewable energy sector, advanced engineering and advanced manufacturing, utilising where appropriate the deep water facilities.

Pre-amble EMP5: Safeguarded land for new Nuclear Power Station Policy

Company	Unique Ref	DP Ref	EMP5 Preamble	Planning Policy Response
EDF energy	LP0019	DP0227	11.18 The existing nuclear power station is due to be decommissioned in 2024. A new replacement nuclear power station would have considerable economic benefits for Hartlepool and the Tees Valley. The power station currently supports up to 700 high quality jobs (and up to 3,000 jobs would be supported during the construction phase of a new power station and the decommissioning of the existing power station) and £19m of local supply chain spend. One of the Tees Valley Investment Fund 'asks' outlined in the Strategic Economic Plan is for investment to be made in the medium term (2017-2020) to work up detailed proposals to construct a new nuclear power station, together with accompanying infrastructure. EDF Energy believes that given the national importance of nuclear energy generation, nothing should jeopardise safeguarded land nominated for nationally significant infrastructure. EDF Energy, therefore, welcomes the inclusion of Policy EMP5 (Safeguarded Land for New Nuclear Power Station). However, we would suggest that the wording of that policy EMP5 should be amended to reflect, as far as possible, the matters included within National Policy Statement EN-6; with the second paragraph to read as follows: Original text Development of a new nuclear power station in this area is likely to have an adverse impact on the Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar site (including any potential extension to the SPA), the Teesmouth National Nature Reserve, and a number of Sites of Special Scientific Interest. If a decision is made to proceed with the nuclear power station on the basis of overriding public interest, then further studies should be undertaken to identify the scope for avoidance and mitigation. Proposed text The Appraisal of Sustainability, undertaken by Government in support of preparing the relevant national policy, has concluded that the potential for	The second paragraph of policy EMP5 will be amended in line with EDF Energy's suggested wording.

Company	Unique Ref	DP Ref	EMP5 Preamble	Planning Policy Response
			adverse effects on sites (e.g. the Teesmouth and Cleveland Special Protection Area (SPA)/Ramsar site, the Teesmouth National Nature Reserve and a number of Site of Special Scientific Interest) and species considered to be of European nature conservation importance means that significant strategic effects on biodiversity cannot be ruled out at this stage. Studies are required to identify ways to either avoid, minimise, mitigate, or if necessary compensate for, any significant impacts. In recognition of the national significance of the existing power station and the potential for the deployment of new nuclear at this site, EDF Energy requires assurance that this overrides the local authority's commitment to protect specialist industries (specifically the Zinc Works Road site (Policy EMP3 General Employment Land (sub-section (i)) and Able Seaton Port (Policy EMP4 Specialist Industries (sub-section (g)), should a conflict arise. Such a commitment should be reflected in the relevant policies. EDF Energy seeks the inclusion of an additional policy which deals with development in proximity to nuclear power stations. As a responsible operator, EDF Energy has established emergency plans in place for each of its nuclear power stations, which would be activated in the unlikely event of an emergency. This is a requirement of the nuclear site licence granted by the Office for Nuclear Regulation (ONR). As you will be aware, these operator arrangements form part of a wider and distinct emergency response plan, the Offsite Emergency Plan, owned by the relevant Council under the Radiation (Emergency Preparedness and Public Information) Regulations 2001. These plans also bring together many other agencies (e.g. emergency services and regulatory bodies such as the Environment Agency). We refer the Council to Policy NH7 of the emerging West Somerset Local Plan, which requires the ONR to be consulted when various specified types and scales of development are proposed within specific distances of the power station. A similarly worded policy should be included within the Hartlepool Local Plan. The West Somerset Local Plan Appendix B is attached to this letter for reference.	

EMP5: Safeguarded land for new Nuclear Power Station

Company	Unique Ref	DP Ref	EMP5 Nuclear Power Station	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council is alarmed to read the statement that development of a new power station is LIKELY to have an adverse impact on the SPA and Ramsar sites. If this is the case one would expect there to be a requirement for avoidance and mitigating measures not just studies. Similar conditions should be imposed as those on renewable energy proposals:- 1/ All proposals should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties during construction, operational lifespan and decommissioning. 2/All proposals should also include details of how the site will be satisfactorily restored. 3/Developers will be expected to work constructively with local communities and local authorities (including Parish Councils) to secure appropriate community benefits	A new nuclear power station would be classified as a nationally significant infrastructure project and an application for development consent would be examined by the Planning Inspectorate who will make a recommendation to the relevant Secretary of State. The planning Inspectorate would determine the elements that an application would need to cover and the Borough Council would be a consultee in the process. Essentially all the Local Plan can do at present is identify the area of land that would be required should a proposal come forward. Given the proposed location of any proposed new nuclear power station and the process likely to be involved in its construction it is inevitable that there may be some direct or indirect impact on the integrity of the Special Protection Area. The site for a potential new nuclear power station In Hartlepool is identified in annex C3 to the Government's National Policy Statement for Nuclear Power Generation (EN-6). The annex refers to an Appraisal of Sustainability which considered the local ecology around the Hartlepool site. The Appraisal concluded that the potential for adverse effects on sites and species considered to be of European nature conservation importance cannot be ruled out at this stage of the appraisal. A Habitats Regulations Assessment was also carried out for the Hartlepool site in 2010. This Assessment has set out a number of avoidance and mitigation measures. However the Government has acknowledged the need for more detailed studies should an application for development consent come forward. Nevertheless the Government also concluded that there is an Imperative Reason of Overriding Public Interest to include Hartlepool in the National Policy Statement. Should the proposal advance towards the stage for a

Company	Unique Ref	DP Ref	EMP5 Nuclear Power Station	Planning Policy Response
				development consent application then the further studies referred to above will need to be carried out.
Stockton Borough Council	LP0022	DP0032	It is noted that a strategic site of approximately 140 ha is safeguarded near to the existing power station for a potential new Nuclear Power Station (EMP5). It should be noted that a recommendation in the 'Tees Valley: Opportunity Unlimited- An independent report' is that Hartlepool Borough Council should undertake work to consider whether the proposed new nuclear site at Hartlepool would be suitable to host a Small Modular Reactor.	The Council is aware of the comment made by Lord Heseltine in the 'Tees Valley Opportunity Unlimited' report. Clearly in terms of the Government's national nuclear strategy, this is very much under review at present given recent events and changes in Government. Should there be an opportunity to pursue options for Hartlepool this will be pursued through the Council's representation on the Local Enterprise Partnership and the Tees Valley Combined Authority.
Highways Agency	LP0029	DP0196	Highways England would welcome the identified "further studies" to also cover transport influences, such that Highways England are in a position to fully understand the potential influences of this potential development at the SRN, during both the construction and operational stages.	Noted – the Council will continue to work closely with Highways England in the preparation of additional research and studies required to ensure that the impact of new development on the strategic road network is fully taken into account.

Pre-amble EMP6: Underground Storage

No comments

Policy EMP6: Underground Storage

Company	Unique Ref	DP Ref	EMP6 Underground Storage	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	This represents another alarming proposal for areas adjacent to Greatham. It does begin to feel as though the South of the Borough is the place to deposit all that causes concern for the quality of the environment both natural and human. Should proposals ever be brought forward there needs to be requirements for compensatory measures/funding that benefit the environment and local communities. Bullet point 1) should be for no 'stand-alone' potential increase risk to people from this use. With so many other potentially hazardous facilities in the area is any significant increase in risk likely (cumulative effect). Depositing any radioactive material should explicitly exclude. Similar conditions should be imposed as those on renewable energy proposals:- 1/ All proposals should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties during construction, operational lifespan and decommissioning. 2/All proposals should also include details of how the site will be satisfactorily restored. 3/Developers will be expected to work constructively with local communities and local authorities (including Parish Councils) to secure appropriate community benefits.	This policy is included to cover for the potential of a proposal coming forward at some point in the future to store materials in the existing former brine cavities adjacent to Greatham Creek A178 bridge. As the policy indicates the Council will seek advice from all relevant agencies to assess all potential risks before making any decisions.

Section 6 of the Consultation Statement, covering:
Protecting, Managing and Enhancing the Rural Area

- Preamble RUR1: Development in the Rural Area
- Policy RUR1: Development in the Rural Area
- Preamble RUR2: New Dwellings Outside of Development Limits
- Policy RUR2: New Dwellings Outside of Development Limits
- Preamble RUR3: Farm Diversification
- Policy RUR3: Farm Diversification
- Preamble RUR4: Equestrian Development
- Policy RUR4: Equestrian Development
- Preamble RUR5: Rural Tourism
- Policy RUR5: Rural Tourism

Preamble RUR1: Development in the Rural Area

Company	Unique Ref	DP Ref	RUR1 Preamble	Planning Policy Response
Park Residents Association	LP0014	DP0187	Members welcome and support both RUR1 and RUR2 policies in order to protect our rural area.	Noted.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council fully supports the policies on Protecting, Managing and Enhancing the Rural Area contained within the Local Plan and welcomes the reference to the Rural neighbourhood Plan as being a key element.	Support welcomed.
Greatham Parish Council	LP0018	DP0167	Paragraph 12.5. The statement regarding owner occupancy and larger housing is more prevalent is not the case in Greatham village. The older part of the village is largely owned by the Hospital of God estate while in the 1940s, 1950s and 1970s streets of Council housing were added to the village. There is also Saltaire Terrace which was built as workers housing for the nearby Salt works and which has partially been combined with the remnant of social housing now in the hands of Thirteen Housing Association. Greatham village is quite different to the rest of the rural area. The following figures give a more realistic picture of the situation in Greatham village. 31% of the housing stock is rented from the Hospital of God estate, 44% of these (14% of total) are alms houses. Alms houses are for people over the age of 50 who are of limited financial means and who require housing in a sheltered setting. A further 14% are rented from Housing Hartlepool, 31% of these (4% of total) are bungalows built for the elderly. There are known to be another 2% rented from private landlords. In total 47% of the housing stock in the village is rented and 18.5% is specifically allocated for occupation by older/retired persons. There are of course numerous elderly residents living in their own homes. These figures do not include the care home run by the Hospital of God in the village.	Noted. In general it is the case that rural areas have higher rates of car ownership, larger housing and an aging population, however as highlighted by Greatham Parish Council, there are differences across the rural area and villages. Paragraph 12.6 has been updated to reflect comments made by Greatham Parish Council.
NFU North East	LP0047	DP0003	• We would hope that the increase in agri-businesses will continue to be supported by the authority such as diversification on existing farms which strengthen the existing business. Whilst development in rural areas should be considered carefully, applications associated with existing developments should be looked upon favourably when strengthening the business.	Noted. The policies set out in the plan support farm diversification in the rural area.

Company	Unique Ref	DP Ref	RUR1 Preamble	Planning Policy Response
			• Again, Public Rights of Way and the permissive access are a useful resource, but should not be developed to the detriment of landowners – consultation at an early stage is expected. • While appropriate controls should be put in place, the NFU believe farming can play a key role in meetings the Governments renewable energy targets. The Government is commitment to produce at least 15% of energy from renewable sources by 2020. Since 2007, the NFU has led a joint agricultural Climate Change Task Force in recognising the many opportunities for agriculture and land management to tackle climate change, and in developing a Greenhouse Gas Action Plan for our sector. We have submitted robust responses to government consultations on its Renewable Energy Strategy and incentive schemes for renewable electricity, heat and transport fuels. With 75 per cent of UK land area in the agricultural sector, the NFU believes that its members are well-placed to capture renewable natural energy flows, while maintaining our traditional role in food production as well as the delivery of other environmental and land management services. It is the NFU's stated aspiration that every farmer and grower should have the opportunity to diversify their businesses and create 'green' jobs by supplying renewable energy services.	Public rights of way – the preamble has been updated to reflect this comment. The preamble has been updated to strengthen support for such development, although reference is also made to the cumulative impact on landscape character of the rural area.
Resident	LP0048	DP0004	"Wynyard is on the western edge of Hartlepool within the rural area, much of the village is within the neighbouring borough of Stockton. Recent development and planning permissions at Wynyard have extended the village to the north of the A689 which will increase the population of the Borough living in this location. There is a small centre which services the village and a new school and community facilities are proposed as part of the village expansion to the south of the A689. The provision of public transport is anticipated to improve over the years as the developments in both Stockton and Hartlepool progress." This is very unlikely to happen leaving the area without public transport and very stressed road infrastructure.	Noted. Road infrastructure issues are being assessed with Highways England, Stockton Borough Council and Hartlepool Borough Council to assess capacity and future infrastructure requirements. The developer is required to provide planning obligations contributions towards the provision of sustainable transport, in addition walking and cycling routes are being established / improved in Wynyard.
Resident	LP0082	DP0040	Section 12.10 and RUR1 I agree with the proposal that careful consideration must be given to renewable energy projects impact on the landscape character rural areas.	Noted.
Resident	LP0096	DP0054	Maintain the greenbelt between town and countryside, wildlife in the area suffers mostly from poachers and dogs.	Noted. There is no land within Hartlepool designated as Green Belt. The local plan does propose a strategic gap and

Company	Unique Ref	DP Ref	RUR1 Preamble	Planning Policy Response
				looks to protect the countryside from development beyond the allocation of strategic housing sites.
Tees Valley Local Access Forum	LP0214	DP0175	We have studied the detail on the proposed Local Plan for Hartlepool and have a number of observations to make…. At 12.9 'connectivity across the rural areas (is) important to support the rural enterprise, leisure and tourism related infrastructure. These routes (PRoW 96km) require protection and there are opportunities for improvement as identified in the Infrastructure and Green Infrastructure sections of the Plan'.	Noted.
Story Homes	LP0219	DP0181	Story Homes generally supports the Council's intention to developing and strengthening the local economy. Strengthening the local economy and ensuring a plentiful supply of housing are mutually beneficial and important considerations of robust and positively planned LDFs.	Noted.
Resident	LP0220	DP0182	Very much in agreement on the Council's intentions to protect the rural areas.	Noted.
Resident	LP0258	DP0233	Section 12.2 - The unique character of Hart Village will be affected in a negative manner by a potential new development marked as HSG8 a & b. It will turn a village into a housing estate, which a lot of people like to live but for some do not and that is why people pay a premium price to live in a rural village. Section 12.5 - Residents do have a satisfaction of living rural area and as such paid a premium price for doing so. Increasing the population and households will have a negative affect on this satisfaction.	Noted. The Local Plan contains policies which require high design standards within developments. Local residents will be consulted as part of any planning application process giving residents the opportunity comment on design and integration of developments into the village. If endorsed the sites covered in HSG8 would be within the development limits of the village. The development would have positive impact on the village, providing a range of housing options within the village and increasing availability of homes within the village, providing further options for existing and new residents.

Policy RUR1: Development in the Rural Area

Company	Unique Ref	DP Ref	RUR1 Development in the Rural Area	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society supports this policy.	Noted.
Campaign to Protect Rural England	LP0015	DP0199	The Rural area is clearly very important to CPRE. Generally, we support the proposals in this section. However, we wish to make the following comments 1) We are very pleased to see the qualifications listed in point 4 of Policy RUR1. However, we represent that there are two issues of a general nature that should also be considered. First, tranquillity is a very important concept to CPRE. CPRE nationally has conducted a study concerning tranquillity throughout the country. The rural areas fo Hartlepool can be surprisingly tranquil notwithstanding the A19. Secondly, while we note and welcome the reference to light pollution, we represent that the concept of Dark Skies should also be considered here. It is again a concept that has been considered by CPRE nationally and the public are becoming increasingly aware of this issue. We therefore represent that Policy RUR1 should also include a reference to protecting the tranquillity of this area and maintaining the concept of dark skies. CPRE welcomes the recognition of and reliance on the Hartlepool Rural Neighbourhood Plan (Policy RUR1), and looks for ongoing Council support to ensure that it is reviewed and renewed as appropriate, reflecting the wishes of the rural community.	Noted. Further to consideration of CPRE's comments, it is considered that policy RUR1 in conjunction with other policies in the plan adequately covers concerns in relation to tranquility and light pollution. The Council is committed to the reduction of carbon emissions, in terms of the reduction of light pollution, all street lights have been changed to LED units, these direct the light and reduce light pollution.
Elwick Parish Council	LP0016	DP0222	We should particularly wish to see the rural economy supported in line with proposals contained within the Rural Neighbourhood Plan, including better access to high speed Broadband.	Noted. Reference to broadband made in the preamble to the policy and connectivity referenced in the policy.
Greatham Parish	LP0018	DP0167	Greatham Parish Council welcomes and supports this policy. The	Noted. Reference to relevant design guides and statements

Company	Unique Ref	DP Ref	RUR1 Development in the Rural Area	Planning Policy Response
Council			referencing of Greatham Village Design Statement would be welcomed.	included within the policy.
Historic England	LP0044	DP0213	Page 121, Policy RUR1: While we welcome this policy, it could provide greater protection and opportunities for enhancing the historic environment. Many parts of the rural area contain, or may contribute to the setting of, heritage assets. However, while the policy refers to cultural heritage, character and distinctiveness, and cross references to heritage policies, it could be strengthened and afford the necessary protection to heritage assets by referring to them specifically.	Noted. Wording of the policy to be strengthened to include a bullet point on heritage assets. First paragraph of the policy to be strengthened by reference to built heritage.
Resident	LP0208	DP0166	The proposed housing development in Hart Village is NOT enhancing the rural area !!	Noted. Policy HSG8 sets out the requirements for development at Hart Village which identifies incorporation of green infrastructure, informal open space and recreational and leisure land as part of any development, it is envisage that this will provided additional amenities within the village assessable for all residents.
Brenda Road Holdings Ltd	LP0244	DP0212	We note the comment at paragraph 12.16 that new development is generally to be encouraged with Hartlepool development limits. We agree that the rural areas of Hartlepool need to be protected and suggest that more needs to be done to identify and utilise existing brownfield and fill in sites rather than develop outside the urban fence.	Noted. The Housing Section of the plan identifies deliverable urban sites for housing development. The levels of housing required to meet need cannot be achieved by brownfield development only. The draft policies within the plan do encourage development of brownfield land.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RUR2: New Dwellings Outside of Development Limits

Company	Unique Ref	DP Ref	RUR2 Preamble	Planning Policy Response
Park Residents Association	LP0014	DP0187	Members welcome and support both RUR1 and RUR2 policies in order to protect our rural area.	Noted.

Policy RUR2: New Dwellings Outside of Development Limits

Company	Unique Ref	DP Ref	RUR2 New Dwellings Outside Development Limits	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	In general, the Society supports the policy however, policy numbers - (1) (2) (3), (4) (after second para) is very subjective and could end up with totally inappropriate dwellings being built in the countryside.	Noted. Criteria of the second paragraph reflects Paragraph 55 of the NPPF.
Campaign to Protect Rural England	LP0015	DP0199	We note that much of the detailed policy (RUR2) on dwellings outside development limits echoes national policy on Green Belt, and that the Plan could be much simpler in this respect if a strategic Green Belt were designated.	Noted. HBC do not intend to allocate any Green Belt within the borough. This policy in conjunction with the Natural Environment and Green Networks chapter will ensure that development does not occur in protected areas.
NFU North East	LP0047	DP0003	• While we support the authorities decision to allow new dwellings outside the development limits when linked to agricultural, forestry or other rural based enterprise. We request classification on what is meant by "considered acceptable by the Council".	Noted. Proposals would be considered against the policy and the tests set out in the New Dwellings Outside of Development Limits Supplementary Planning Document. In determining an application, appropriateness of a proposal as an appropriate business or enterprise use will be considered in line with this local policy to determine acceptability. The intention of this wording is to ensure that the policy does not present an exclusive list for acceptable development allowing proposals to be assessed on their own merit. It would be the responsibility of the applicant to evidence how their proposal meets the policy and the justification test within the New Dwellings Outside of Development Limits Supplementary Planning Document.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RUR3: Farm Diversification

No Comment

Policy RUR3: Farm Diversification

Company	Unique Ref	DP Ref	RUR3 Farm Diversification	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	In principle – the Society supports this policy.	Noted.
Campaign to Protect Rural England	LP0015	DP0199	With regard to farm diversification, we have commented on wind turbine development in the countryside above. We note the reference to biomass in paragraph 12.27 of the text. While CPRE welcomes renewable energy projects that do not harm the rural nature and tranquillity of the countryside, we are conscious that schemes such as biomass can remove large areas of land from food production to growing crops for energy. We represent that there has to be limits to the amount of land that can be lost to food production and this should be a factor in determining applications for schemes such as biomass.	Noted. The criteria elements of this policy allow for the specific assessment of farm diversification schemes, development requires an integrated use to into the farming landscape and the rural economy. The policy protects against the loss of best and most versatile land and any development in the rural area would also be assessed against policy RUR1.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Note.

Preamble RUR4: Equestrian Development

No Comment

Policy RUR4: Equestrian Development

Company	Unique Ref	DP Ref	RUR4 Equestrian Development	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	On the face of it this seems fairly straightforward, however, there are/can be problems for residents of nearby properties to equestrian businesses. There are smells and piles of used bedding are burned for long periods of time causing constant rancid smoke. Neighbouring residents are often reluctant to report these problems but they should be borne in mind. Policy QP4 (9) – Impact on adjoining properties.	Noted. Policy updated to include bullet point in criteria relating to amenities of neighbours.
Elwick Parish Council	LP0016	DP0222	The equestrian sector would be strengthened by an increase in the number of bridleways available in the area, linking into a wider regional network, which could enhance horse related tourism, such as pony trekking.	Noted. The policy does require the provision of additional safe bridleways where existing routes are not in close proximity of existing routes.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council is concerned at the number of stand-alone 'equestrian developments' that have been appearing in the rural area which are not associated with farm diversification and thereby support continued agricultural use. As such the Parish Council would support any policy which controls the proliferation of such uses and would go further in restricting any new developments to being part of a farm diversification scheme. The Parish Council would also like to see the inclusion of a clause protecting the best quality and most versatile agricultural land from equestrian uses. There is experience that equestrian centres can be a source of nuisance, particularly smells when they are unequipped to deal with the quantities of manure and used bedding (and have been known to resort to burning). The Parish Council feels this policy would benefit from the inclusion of "proposal should include details of measures to mitigate any adverse effects on the amenities of occupiers of nearby properties" (enjoyment of garden presumed to be and amenity of an occupier) and/or subject to satisfactorily addressing the "impact on the amenity of local residents and nearby occupiers, including visual intrusion, air, dust, noise, odour, traffic generation and access".	Noted. In relation to the development of equestrian related activity, it is considered that limiting this to farm diversification may inhibit growth in this sector which can be beneficial for the rural economy and wider economy of Hartlepool. Any development for equestrian development would also have to comply with RUR1 (Development in the Rural Area) and RUR4 (Equestrian Development) which addresses the concerns raised by Greatham Parish Council in terms of best and most versatile agricultural land and the concerns in relation to the amenities of occupiers of nearby properties.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RUR5: Rural Tourism

No Comment

Policy RUR5: Rural Tourism

Company	Unique Ref	DP Ref	RUR 5 Sustainable Rural Tourism	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council would again like to see some protection for the best and most versatile agricultural land within this policy. There is a welcome for an emphasis on such development supporting farm diversification and therefore continued agricultural use or being linked to long term conservation and enjoyment of heritage assets.	Noted. Any development for rural tourism would also have to comply with RUR1 (Development in the Rural Area) which addresses the concerns raised by Greatham Parish Council in terms of best and most versatile agricultural land. The policy has been updated to include reference to the historic environment.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Section 7 of the Consultation Statement, covering:

Retail and Commercial Development

- Preamble RC1: Retail and Commercial centre Hierarchy
- Policy RC1: Retail and Commercial centre Hierarchy
- Preamble RC2: The Town Centre
- Policy RC2: The Town Centre
- Preamble RC3: Innovation and Skills Quarter
- Policy RC3: Innovation and Skills Quarter
- Preamble RC4: Avenue Road / Raby Road Edge of Town Centre Area
- Policy RC4: Avenue Road / Raby Road Edge of Town Centre Area
- Preamble RC5: The Brewery and Stranton Edge of Town Centre Area
- Policy RC5: The Brewery and Stranton Edge of Town Centre Area
- Preamble RC6: East of Stranton Edge of Town Centre Area
- Policy RC6: East of Stranton Edge of Town Centre Area
- Preamble RC7: Lynn Street Edge of Town Centre Area
- Policy RC7: Lynn Street Edge of Town Centre Area
- Preamble RC8: Mill House Edge of Town Centre Area
- Policy RC8: Mill House Edge of Town Centre Area
- Preamble RC9: Park Road West Edge of Town Centre Area
- Policy RC9: Park Road West Edge of Town Centre Area
- Preamble RC10: West Victoria Road Edge of Town Centre Area
- Policy RC10: West Victoria Road Edge of Town Centre Area
- Preamble RC11: York Road South Edge of Town Centre Area
- Policy RC11: York Road South Edge of Town Centre Area
- Preamble RC12: The Marina Retail and Leisure Park
- Policy RC12: The Marina Retail and Leisure Park
- Preamble RC13: West of Marina Way Retail and Leisure Park
- Policy RC13: West of Marina Way Retail and Leisure Park
- Preamble RC14: Trincomalee Wharf Retail and Leisure Park
- Policy RC14: Trincomalee Wharf Retail and Leisure Park
- Preamble RC15: Tees Bay Retail and Leisure Park
- Policy RC15: Tees Bay Retail and Leisure Park
- Preamble RC16: The Local Centres
- Policy RC16: The Local Centres
- Preamble RC17: Late Night Uses Area
- Policy RC17: Late Night Uses Area
- Preamble RC18: Hot Food Takeaway Policy
- Policy RC18: Hot Food Takeaway Policy
- Preamble RC19: Main Town Centre Uses on Employment Land
- Policy RC19: Main Town Centre Uses on Employment Land
- Preamble RC20: Business Uses in the Home
- Policy RC20: Business Uses in the Home
- Preamble RC21: Commercial Uses in Residential Areas
- Policy RC21: Commercial Uses in Residential Areas

Preamble RC1: Retail and Commercial centre Hierarchy

Company	Unique Ref	DP Ref	RC1 Preamble	Planning Policy Response
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the policies on Retail and Commercial Development. We should wish to see reference to rural public transport being a key element in allowing residents in rural area access to the town centre, and edge of town retail and professional services.	Support welcomed. Rural area accessibility is referenced within the plan and the Local infrastructure plan and HBC do try, where possible, to get improvements to rural public transport, however within this chapter is it not deemed necessary to make specific reference to rural residents, it is the case that all residents and visitors are vital to sustain and improve the retail and commercial areas across the borough.
Historic England	LP0044	DP0213	Page 129, Chapter 13 Retail and Commercial Development: The centre of Hartlepool contains an extraordinary wealth of heritage assets, including the Church, Stranton and Grange Conservation Areas, along with a number of listed buildings. However, the role that the historic environment might play in increasing the vitality and attractiveness of the town centre does not come across from the text or policies in this chapter. Nor do all the relevant policies appear to provide the heritage assets sufficient protection in accordance with the NPPF. For example, Policy RC3 refers to the Church Street Conservation Area, but only in relation to improvements to the public realm, and then only refers to the need to 'respect' the designation. The wording of this section should be amended to ensure that heritage assets are sustained and enhanced, and that their potential contribution for regeneration is recognised.	Noted. It is not the purpose of the retail and commercial hierarchy policy to set out the role and importance of heritage assets. It is the role of subsequent policies to do so. The wording 'respect the Church Street Conservation area where applicable' has been amended to remove 'where applicable'. It is considered that this strengthens the heritage aspect of the policy adequately. It should also be noted that the pre-amble to the policy references the significance of the Church Street Conservation Area.
Teesmouth Bird	LP0227	DP0191	Local village have often produced their local community plans - too	Noted. The local plan refers to emerging local plans.

Company	Unique Ref	DP Ref	RC1 Preamble	Planning Policy Response
Club			often these can be subordinated by greated local plans. There should be methods of complying with expressed local wishes.	The Rural policies refer specifically to the Hartlepool Rural Neighbourhood Plan which is at an advanced stage.
Middleton Grange Shopping Centre	LP0265	DP0240	Typo 13.1 'But clothes' 13.34 Incomplete sentence	Noted and amended.

Policy RC1: Retail and Commercial centre Hierarchy

Company	Unique Ref	DP Ref	RC1 Retail Hierarchy	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	It must be borne in mind that the area includes a large Conservation Area. A mix of uses should be considered.	Noted. This policy relates to the retail hierarchy it does not define a specific location. The subsequent policies consider the various areas and have due regard to Heritage.
Greatham Parish Council	LP0018	DP0167	Where does Greatham village fit in this hierarchy?	Greatham village is not within the retail hierarchy as it is not a designated centre. The commercial units within the village are not all in one location they are spread throughout the village therefore it is not possible to designate a specific area for retail and commercial activity. Proposals for new commercial uses within all villages will be assessed on a case by case basis and will be subject to sequential tests and impact assessment. The importance of rural businesses to the villages is acknowledged in the plan and will be factored in at application stage.
Highways Agency	LP0029	DP0196	Highways England is generally supportive of the hierarchy and sequential preference proposed which focuses development towards the town centre, edge of centre sites and then other local centres and support the provision of sustainably accessible commercial and retail development that is commensurate with an identified level of need that contributes towards the delivery of sustainable communities and a reduction in the need to travel. Ensuring that locations are accessible by a choice of means of transport is particularly welcomed. It is noted that some amendments have been made to this policy compared to the previous Core Strategy, including the removal of reference to the marina as part of the hierarchy of centres and the inclusion of retail and leisure parks. However, these	Support noted.

Company	Unique Ref	DP Ref	RC1 Retail Hierarchy	Planning Policy Response
			amendments do not present any particular concerns with regard the operation of the SRN.	
Resident	LP0220	DP0182	It is vital that Middleton Grange offers an enhanced range of outlets and that maximum effort is put into attracting occupants for empty units. Improving and providing cheaper car parking in the town centre is very necessary if the council is to entice people to shop there. Currently the options in Hartlepool are uncompetitive with, for example, Middlesbrough and Teesside Retail Park. 13.33 : Presume a typing error when it states that applications for A4 and A5 will not be strictly controlled. How will the council control the responsibility for maintaining the condition of the water - currently it has unsightly slicks of oil, debris and rubbish?	Noted. The policy framework allows for a wide range of uses within the town centre. Noted. HBC are working with the town centre manager to investigate parking options. Yes. Sentence should read applications for A4 and A5 will be strictly controlled. The Environment agency is responsible for maintaining the quality of water courses. Northumbrian Water is responsible for maintaining the sewerage system.
Landowner - Junction of Belle Vue & Brenda Rd	LP0242	DP0208	Policy RC1 This policy proposes that proposals for main town centre uses, within local centres, in excess of 300 sq m are required to be supported by a sequential and impact test. This runs entirely contrary to government guidance which only requires such assessments outside of designated centres and not for development within designated centres.	The policy seeks to apply the approach set out in NPPF paragraph 24. Paragraph 24 requires a sequential test for applications not within a designated centre and then goes onto state that main town centre uses should be in the town centre, edge of centres and then other sustainable locations. HBC consider that the phrase "existing centre" must relate to the town centre, given that the subsequent sentence sets out a town centre first approach. HBC are of the opinion that units below 300m2 are not in direct competition with the town centre and thus seek to apply a policy threshold. No wording changes, policy is likely to be debated at examination.

Company	Unique Ref	DP Ref	RC1 Retail Hierarchy	Planning Policy Response
			As currently worded the policy would also require a sequential and impact assessment for development comprising more than one unit where the total floorspace is in excess of 300 sq m but where individual units may be less than 300 sq m. This seems to be at odds with the purpose of the policy. We consider that the requirement to undertake a sequential and / or impact assessment for development within a local centre should be removed entirely in order to ensure consistency with national planning policy. In the event that the Council do not wish to do this for specific local reasons, the policy should be amended to make it clear that sequential and impact assessments are only required for those elements of a scheme where an individual unit is in excess of 300 sq m. This ensures that schemes of in excess of 300 sqm in size but where individual units are not in excess of 300 sq m in size, are not required to undertaken a sequential and/ or impact assessment.	Within the local centre the policy requires a sequential test and impact test for any proposal in excess of 300m2. Noted. No policy change. HBC are of the opinion that units below 300m2 are not in direct competition with the town centre and thus seek to apply a policy threshold. No wording changes, policy is likely to be debated at examination. HBC consider the policy wording to be clear and transparent and specifically states “in excess of 300m2 floor space”.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Support welcomed.

Preamble RC2: The Town Centre

Company	Unique Ref	DP Ref	RC2 Preamble	Planning Policy Response
Resident	LP0096	DP0054	Encourage business - retail and cafe culture into Middleton Grange Shopping, have cheaper or free car parking from 3pm onwards several days a week to all car parks in the town centre area. People picking up children from school will pop in for 1-2 hours on the way home, it is one of the more pleasant centres in our region so make the most of this.	Noted, the planning policy framework does allow for a mix of uses and the Council works closely with the shopping centre owners to bring about improvements in MG. Car parking options are being investigated.

Policy RC2: The Town Centre

Company	Unique Ref	DP Ref	RC2 The Town Centre	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	It is important that the 'sense of arrival' into town is improved. It is regrettable that the entrance to the town both from north and south has the back of the Shopping Centre on one side of the road and on the corner what was the attractive facade of the Binns Department Store now reduced to advertisements and cheap looking shop name - the Society has complained about this on several occasions. Similarly, the poor design of the commercial properties off Burn Road Roundabout spoils the setting of All Saints Church, Stranton.	Noted. The retail policies seek to improve the offer within the town centre and the town centre environment.
Park Residents Association	LP0014	DP0187	Policy RC2 - The Town Centre - members feel that this policy needs to be enforced at every opportunity in order to ensure that the Town Centre can once again become a relevant retail environment. Car parking must be addressed as Hartlepool as a shopping destination is not competitive with other towns within easy reach.	Noted.
Highways Agency	LP0029	DP0196	Highways England was previously generally supportive of the provisions within this policy and focusing development in the town centre, which generally provides the most sustainably accessible locations for development, thereby helping to facilitate a potential reduction in the need to travel, particularly by private car. Given, the policy approach is relatively similar to the previous Core Strategy, we can continue to be supportive of this policy. Further, we welcome the clarity provided in relation to the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	Support welcomed. However, the cross-referencing to Policy INF2 has been removed. The introduction to the Publication draft states that the plan should be read as whole.
Resident	LP0217	DP0179	2) The town centre, particularly the shopping centre, is a definite turn-off for locals and potential visitors alike and requires significant, imaginative regeneration. This has to be top priority. For this to occur, the goodwill and co-operation of the business	Noted.

Company	Unique Ref	DP Ref	RC2 The Town Centre	Planning Policy Response
			community, private landlords and the general public (see below) must be forthcoming. Until that regeneration has been achieved there would be little point in spending time and money on improvements to town centre peripheral interfaces, be they cosmetic or otherwise. Imaginative, sustainable regeneration is key but as most of the downtown area is a brownfield site it needs selective demolition and rebuild, preferably providing some additional green space and traffic-free zones.	
Resident	LP0218	DP0180	Cheaper car parking/initial free period a high priority to encourage people to use town centre. Proposed visual improvements to exterior of Middleton Grange shopping centre very welcome. Range of shops improving but not quality - all the mythical migrant executives will not frequent the existing shops but the situation is chicken and egg – retailers will not come to Hartlepool if there is no guarantee of trade. Improved pedestrian linkages in town centre sorely needed.	HBC are liaising with the town centre manager to re assess the parking situation. Noted. Noted. Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.
Middleton Grange Shopping Centre	LP0265	DP0240	I believe reference to the formation of the passport group of other groups to formally manage town centres with Hartlepool Borough Council should be made. This is to be accompanied by reference to marketing and promotions of the town centre.	It is considered that reference to the group or to marketing and promotions of the town centre would contribute to the policy.

Preamble RC3: Innovation and Skills Quarter

No Comments

Policy RC3: Innovation and Skills Quarter

Company	Unique Ref	DP Ref	RC3 Innovation and Skills Quarter	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society strongly supports this policy.	Noted.
Highways Agency	LP0029	DP0196	Highways England generally does not have any concerns regarding the provisions of this policy given the location, type and likely scale of development supported.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC4: Avenue Road / Raby Road Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC4 Preamble	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	(Option 13.40) The listed former Odeon Cinema has been an eyesore for many years – it is vital all legal might should be used to provide a future for it.	Noted. The Council will continue to work with the land owners and Historic England with regard to the future of the building.
Tees Valley Local Access Forum	LP0214	DP0175	Further we read, under 13.45 'there is a need to improve the physical links between the Town Centre and the edge of centre locations. Residents and visitors alike should have the option to move between between the town centre and the edge of centre locations and vice versa by means of pleasant walking/cycling routes. At present many are uninviting and the car dominates. The Council will seek to ensure that development contributes to the improving connectivity...'	Noted.

Policy RC4: Avenue Road / Raby Road Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC4 Avenue Rd/Raby Rd Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Support noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC5: The Brewery and Stranton Edge of Town Centre Area

No comment

Policy RC5: The Brewery and Stranton Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC5 The Brewery and Stranton Edge of Town Centre Area	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	It is important that the area around Vicarage Gardens (itself of course in the Conservation Area) should be maintained. Together with the Burn Valley Gardens it makes a green corridor. The approach on the A689 to the town is poor – the vista of the ancient All Saints Church – situated high up has been spoiled by the poorly-designed retail outlets and their advertising hoardings on the roundabout corner.	Noted, that is the intention of the policy along with the heritage policies. Noted. HBC cannot revoke an existing permission, but HBC does seek to gain improvements from development where possible and is aware that the route into the town centre via the A689 could be enhanced.
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC6: East of Stranton Edge of Town Centre Area

No Comments

Policy RC6: East of Stranton Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC6 East of Stranton Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC7: Lynn Street Edge of Town Centre Area

No Comments

Policy RC7: Lynn Street Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC7 Lynn Street Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC8: Mill House Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC8 Preamble	Planning Policy Response
Resident	LP0046	DP0001	There is clearly an option for the Hartlepool United Football ground to be relocated to the outskirts of the town. This would allow for better parking for supporters at the ground, allow for a better stadium to be developed and release space in the town centre for new housing, shops, or sports facilities. The plan should be clear as to whether this option is rejected - or whether it is something that the council wishes to discuss with the football club.	The option to relocate the stadium to the outskirts of the town is not an option proposed by the Local Plan. There is land around the football ground which is suitable for uses mentioned.

Policy RC8: Mill House Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC8 Mill House Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC9: Park Road West Edge of Town Centre Area

No Comments

Policy RC9: Park Road West Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC9 Park Road West Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC10: West Victoria Road Edge of Town Centre Area

No Comments

Policy RC10: West Victoria Road Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC10 West Victoria Road Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC11: York Road South Edge of Town Centre Area

No Comments

Policy RC11: York Road South Edge of Town Centre Area

Company	Unique Ref	DP Ref	RC11 York Road South Edge of Town Centre Area	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in this town centre area and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC12: The Marina Retail and Leisure Park

Company	Unique Ref	DP Ref	RC12 Preamble	Planning Policy Response
Environment Agency	LP0031	DP0190	In section 13.91, it is recommended that reference is made to Estuary Edges: Ecological Design Guidance which has been developed by the Environment Agency. The guidance provides examples from the United Kingdom of techniques to improve the wildlife and visual impact of the waterfront. For further information please view attached link below: http://www.ecrr.org/RiverRestoration/Whatisriverrestoration/tabid/2614/www.restorerivers.eu/Publications/tabid/2624/mod/11083/articleType/ArticleView/articleId/3563/Estuary-Edges.aspx.	Noted. The plan is for 15 years and HBC are reticent to list all guidance used today the situation could change over the 15 years and thus become out of date.

Policy RC12: The Marina Retail and Leisure Park

Company	Unique Ref	DP Ref	RC12 The Marina Retail and Leisure Park	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development at the Marina and we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and Support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC13: West of Marina Way Retail and Leisure Park

No Comments

Policy RC13: West of Marina Way Retail and Leisure Park

Company	Unique Ref	DP Ref	RC13 West of Marina Way Retail and Leisure Park	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	There have been a number of changes in the Marina Area. The retail outlets could have been much more attractive and reflect the proximity to the sea. The 'sheds' could have been faced with natural materials eg the brick facing of the Maritime Experience/Museum of the Royal Navy. There is an opportunity here to link this area to the Headland by means of a 'Water Taxi' – not only would this provide a tourist attraction but it could reduce a number of car journeys between these areas of the Borough.	Noted. HBC cannot change the applications of the past, however new application will be expected to comply with the new LP policies. This is an option HBC are investigating.
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development to the west of Marina Way Retail and Leisure Park. Further, we support the clarity provided through cross referencing to Policy INF1 ensuring development at general employment sites will be required to consider the impact on and delivery of effective and efficient sustainable transport networks, and the need to consider and improve access to sustainable transport through the cross referencing to Policy INF2.	Noted and Support welcomed. However, policies INF1 and INF2 are no longer cross-referenced as the introduction to the Publication draft now includes the statement that the plan should be read as a whole.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC14: Trincomalee Wharf Retail and Leisure Park

No Comments

Policy RC14: Trincomalee Wharf Retail and Leisure Park

Company	Unique Ref	DP Ref	RC14 Trincomalee Wharf Retail and Leisure Park	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development at the Trincomalee Wharf Retail and Leisure Park. Further, we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC15: Tees Bay Retail and Leisure Park

No Comments

Policy RC15: Tees Bay Retail and Leisure Park

Company	Unique Ref	DP Ref	RC15 Tees Bay Retail and Leisure Park	Planning Policy Response
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development at the Tees Bay Retail and Leisure Park. Further, we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted and support welcomed.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC16: The Local Centres

No Comments

Policy RC16: The Local Centres

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	It is vital to support local centres. It is unfortunate that Greatham cannot be considered a local centre and given support for the shops, etc. It would help to maintain the character of the Conservation Area. Public transport is vital to maintain a good quality of life for residents – particular where there are areas of a high percentage of older people. Journeys to hospital, doctors, the One Life Centre, banks, council offices, etc are all part of daily life. Social needs are often sought outside of the immediate vicinity and transport should be available for those needs.	Noted. Greatham is not viewed as a local centre as the retail and commercial units are located throughout the village, they are not in one concentrated location as is the case with other local centres across the borough. Noted. HBC seeks to improve public transport links across the borough, HBC can do this via legal agreements on planning applications or by other means not directly related to town planning. HBC are also seeking to improve walking and cycling links across the borough and have many mechanisms for securing such improvements.
Greatham Parish Council	LP0018	DP0167	A lot of the descriptions of local centres (para 13.9, 13.3, 13.19, 13.125, 13.126 & 13.130) regarding how they serve local communities could be applied to the facilities Greatham village is still fortunate to enjoy, but the facilities in Greatham village are afforded none of the support or protection the urban local centres enjoy through this policy. Greatham Parish Council find this alarming and unreasonable. There needs to be some similar policy which supports and protects the services provided to local residents of Greatham in the form of small shops, etc. located in the traditional streets of the village. This would also be of benefit to the character of Greatham Conservations Area helping to preserve the variety of uses in shops, pubs and community buildings mixed in with the housing, typical of a village like Greatham.	A new policy relating to the protection of retail and commercial units within the villages will be included within the Rural chapter.
Wynyard Park	LP0027	DP0223	Wynyard Park recognise the need to deliver a local centre at Wynyard, subject to Wynyard Park achieving a critical mass via a larger allocation. However, it is requested that any future policy allows for flexibility on the final location of the local centre in order	The policy does not stipulate where the local centre should be located. The Council are currently working with Wynyard Park to ascertain where the best location for the local centre may be.

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
			to allow Wynyard Park to respond to demand accordingly.	
Highways Agency	LP0029	DP0196	Highways England has no particular concerns with the intended approach for development in the local centres. Further, we support the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Support noted. However, Policy INF2 is no longer cross-referenced as the introduction to the Publication draft now includes the statement that the plan should be read as a whole.
Landowner - Junction of Belle Vue & Brenda Rd	LP0242	DP0208	My client owns an L-shaped parcel of land at the junction of Belle Vue Way with Brenda Road directly to the southwest of the Stag and Monkey Hungry Horse public house/ restaurant (see plan attached to these representations). The site measures 0.45 ha and has frontage to both Belle Vue Way and Brenda Road. Access is taken from Brenda Road via a new access created as part of the development of the Hungry Horse, which includes a dedicated right turn lane on Brenda Road. Belle Vue Local Centre is located 100m to the north east on the opposite side of the roundabout. Together the subject site and Stag and Monkey public house comprise a discreet and well defined parcel of land and one which is separate and has different characteristics to the adjacent employment development to the south. It is our view that in land use planning terms it is distinctly different and it should therefore receive an alternative and more appropriate designation in the development plan. As has been set out elsewhere in these representations, its current and emerging employment designation is inappropriate as there is no market interest in developing the site for Class B1, B2 and B8 uses. Indeed, this has been shown to be the case over a long period of time (circa 12 years). The result is that the designation is preventing and stifling redevelopment of the site and effectively sterilising the site. With this background in mind, my client considers that the land to the southwest of the Stag and Monkey Hungry Horse (shown outline	Noted. The area of land is allocated as EMP3C General Employment Land, and forms part of the Usworth Road/Park View West employment site. It is acknowledged that the site referred to has been vacant for some time and there has been little market interest to date. However given its location on the south west side of the Belle Vue Way/Brenda Road junction it is not considered appropriate for retail use. It cannot be regarded as an extension to or part of the Belle Vue Local Centre which is on the other side of the A689 roundabout with no safe crossing points. The Borough Council is however prepared to consider its de-allocation/re-allocation for uses other than retail and will consider any alternative suggestions put forward by the owner. Hartlepool has sufficient vacant retail space within existing centres and there is no need to create additional floorspace. The Council seeks to ensure existing centres are at capacity first before allowing extensions to such centres or identifying new build locations.

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
			in red on the attached plan), together with the Stag and Monkey site should be re-allocated to be designated as local centre and specifically part of Belle Vue Local Centre. The reasons for this are set out in detail below: 1. As per the comments made regarding Section 11 of the proposed Local Plan there are no realistic prospects of the site being developed for industrial/employment uses as per the proposed designation and therefore alternative uses/ allocations need to be considered. If alternative uses / allocation are not considered, then the site will unquestionably continue to sit vacant and underutilised and detract from the visual amenities of the area. This is in our view a significant missed opportunity given the positive attributes of the site which would make it attractive location for other types of commercial development which would in themselves deliver significant benefits to the area, namely its previously developed status, its prominent location on a main road, its siting on a principle route into Hartlepool, its sustainable location, its good and safe vehicular access following the construction of the new access and right turn lane and is close proximity to both a business and residential population. 2. The site is located less than 100 metres from Belle Vue Local Centre and directly adjacent to the Stag and Monkey public house. It would thus make a natural extension to the Local Centre and offers the opportunity to broaden the range of facilities available within the local centre thereby reducing the need for people to travel. A present there only 8 units providing a limited range of services and facilities, allocation of the site as part of the local centre would offer the opportunity to provide additional and a wider range of facilities. The attached plan provides an indication of how the site could be developed with a small retail parade and single stand alone unit for uses within Class A1/A2/A3/A4/A5. The	

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
			plan gives an indication of just one way in which the units could be subdivided but this would depend upon commercial interest. Paragraph 13.126 of the LPPO states that local centres should not be expanded where there is current capacity within existing vacancy units. There are currently no vacant units at Belle Vue Local Centre and as such, we consider its expansion to be both appropriate and acceptable. The centre is also very well placed to serve both the local business and residential population. Allocation of the site would thus be consistent with the aims of paragraph 70 of the NPPF which states that LPAs should "plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. It also requires an integrated approach to considering the local of housing, economic uses and community facilities and services. 3. The local centre has good vehicular, public transport, pedestrian and cycling links to the surrounding area serving both the residential and business population. It is thus a sustainable location for such a facility. Given the site lies next to the public house and across the road from existing shops it also offers good potential for linked trips thus reducing journeys. It also lies adjacent to the retail park offering further scope for linked trips. 4. The redevelopment of part of the land for alternative commercial uses has already been established by the development of the Hungry Horse public house / restaurant which has fundamentally changed the character of the land at the junction of Belle Vue Way with Brenda Road. The allocation of the site as an extension to the local centre thus makes logical sense in land use planning terms.	

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
			5. In allocating the site as part of the Belle Vue Local Centre it will facilitate early redevelopment of the site to the benefit of the local community. Development of the site for commercial uses in Class A1/A2/A3/A4 and A5 will bring a number of benefits: significant financial investment in the site, creation of new jobs, additional business rates revenue, increased spending in the local area and increased retention of spending, significant improvement in the appearance of the site and this key route into Hartlepool and a signal of investor confidence in the area. Allocation will also assist in maintaining the long term viability of the centre and helping it to thrive. 6. If it were not allocated as an extension to Belle Vue Local Centre, it is difficult to see how the site will be developed. Marketing evidence and agent's advice confirms that the site will not come forward for traditional employment development. It is not a suitable location for residential development and is too small for a commercial leisure development. It is thus difficult to see how alternative uses it could be put to. Having regard to this information, we respectfully request that the site, together with the adjoining public house, receives a local centre designation in the emerging local Plan and that it forms part of the Belle Vue local centre and is according referenced as part of Policy RC16.	
Brenda Road Holdings Ltd	LP0244	DP0212	We note that the preferred options document defines a number of "local centres" where the council will encourage retail development away from the centre of Hartlepool. Whilst we broadly support such a measure, the ability of the local population to access local shops to buy essentials should be considered. The needs of the older members of the community or those who have reduced mobility should be considered.	The needs of all residents have been considered and this is the reason that Hartlepool has a number of local centres spread across the borough. The Borough is deemed to be well served by local centres.

Company	Unique Ref	DP Ref	RC16 The Local Centres	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC17: Late Night Uses Area

No Comments

Policy RC17: Late Night Uses Area

Company	Unique Ref	DP Ref	RC17 Late Night Uses Area	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	These uses should not dominate an area and account and consideration should be given to those other uses. In particular the success of the Skills and Innovation Quarter should not be prejudiced by the activities of those socialising in Church Street.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC18: Hot Food Takeaway Policy

No Comments

Policy RC18: Hot Food Takeaway Policy

Company	Unique Ref	DP Ref	RC18 Hot Food Takeaway	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham used to enjoy the presence of a Fish & Chip Shop, sadly closed. The return of some limited hot food takeaway service may be acceptable in the village. While Greatham Parish Council generally supports the thrust of this policy it is very prescriptive in saying hot food takeaways will not be permitted outside of any designated retail or commercial centre. Consideration should be made for rural residents to be able to benefit from a similar service in their locality should they support such.	The Council is seeking to ensure that the vitality and viability of designated retail and commercial areas is preserved along with tackling the health inequalities of residents. It is noted that villagers may wish to frequent a hot food takeaway (A5 use) close to their home. However in order to ensure the Council`s aims are achieved future applications for hot food takeaways will be strictly controlled. It is considered that there are sufficient A5 premises within the vicinity of Greatham to access such facilities if need be.
Wynyard Park	LP0027	DP0223	It is noted that draft Policy RC19 would restrict A5 hot takeaway uses to no more than 40 sqm. Whilst Wynyard Park do not have any current aspirations to develop a hot food take away, there may be scope to provide accommodation for such businesses in the future. Mindful of the quantum of development requested and the long term objective of creating a large scale development of critical mass, it is unclear whether 40sqm is a sufficient ceiling when viewed in the context of other development caps set out within the policy (40sqm is clearly the smallest amount of development permitted). It is considered that a larger A5 development cap would prevent any restrictions on catering for the needs of a larger scale settlement in the future. It is noted that High Tunstall can accommodate 75sqm and Wynyard Park has the potential to be of a similar size during the plan period.	The size of the local centre proposed within Wynyard is 400m2, where the local school health statistics are relatively acceptable then the council seek to apply a 10% threshold or as close to 10% as possible. 10% of 400 metres squared is 40metres squared which is deemed to be sufficient and would not over dominate the Wynyard Local Centre. The High Tunstall local centre is proposed at 750metrtes squared and thus 10% of the local centre is 745 metres squared. Each area has a bespoke threshold and there are no higher or lower targets, each area is assessed on the individual local centre and primary school statistics.
Resident	LP0236	DP0202	Too many takeaways.	Noted, the Council is seeking too, over time, reduce the number of hot food takeaways. The Council also seek to prevent new takeaways opening particularly where they would have an impact upon the vitality and viability of an area and have a detrimental impact upon health.

Company	Unique Ref	DP Ref	RC18 Hot Food Takeaway	Planning Policy Response
Stockton Road Residents Association	LP0237	DP0203	Too many takeaways.	Noted, the Council is seeking too, over time, reduce the number of hot food takeaways. The Council also seek to prevent new takeaways opening particularly where they would have an impact upon the vitality and viability of an area and have a detrimental impact upon health.
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	Too many takeaways.	Noted, the Council are seeking too, over time, reduce the number of hot food takeaways. The Council also seek to prevent new takeaways opening particularly where they would have an impact upon the vitality and viability of an area and have a detrimental impact upon health.
Resident	LP0239	DP0205	Too many takeaways.	Noted, the Council is seeking too, over time, reduce the number of hot food takeaways. The Council also seek to prevent new takeaways opening particularly where they would have an impact upon the vitality and viability of an area and have a detrimental impact upon health.
Health Improvement Team	LP0240	DP0206	The Health Improvement Team within the Public Health department whole heartedly endorse the Hot Food Takeaway policy as this is closely aligned with and supports the actions and priorities within the Council's 10-year Healthy Weight Strategy, launched in 2015. The policy will help deliver the outcomes of the strategy and help tackle rising levels of obesity in Hartlepool by help to (where appropriate and feasible) prevent the proliferation of A5 hot food takeaway units which can limit and/or prevent healthier food choices in certain retail areas and commercial centres.	Support welcomed.
Landowner - Junction of Belle Vue & Brenda Rd	LP0242	DP0208	This seeks to restrict the amount of class A5 floorspace in local centres. For Belle Vue Local Centre it is restricted to 225 sq m. It is our view that there is no planning policy basis for seeking to restrict Class A5 floorspace in local centres. Indeed, such uses are common place in modern society and outside of the town centre are most appropriately located in local and district centres. To restrict such uses to a specified floorspace is entirely inappropriate	Noted. Policy now stipulates a percentage threshold.

Company	Unique Ref	DP Ref	RC18 Hot Food Takeaway	Planning Policy Response
			and not only prevents the introduction of new A5 uses but also removes any flexibility for switching uses around within centres. In doing so it also directs such uses to locations outside of the local centres where there are more likely to be highway safety, parking and amenity issues. If the LPA considers that there is too much Class A5 floorspace within a centre then the more appropriate control mechanism would be to restrict the amount of Class A5 development as a percentage of the overall floor area of the centre.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC19: Main Town Centre Uses on Employment Land

No Comments

Policy RC19: Main Town Centre Uses on Employment Land

Company	Unique Ref	DP Ref	RC19 Main Town Centre Uses on Employment Land	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC20: Business Uses in the Home

No Comments

Policy RC20: Business Uses in the Home

Company	Unique Ref	DP Ref	RC20 Business Uses in the Home	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble RC21: Commercial Uses in Residential Areas

No Comments

Policy RC21: Commercial Uses in Residential Areas

Company	Unique Ref	DP Ref	RC21 Commercial Uses in Residential Areas	Planning Policy Response
Highways Agency	LP0029	DP0196	This policy does not present any particular concerns for Highways England and we welcome the clarity provided through cross referencing to Policy INF2 and the need for development proposals to consider and improve access to sustainable transport.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Section 8 of the Consultation Statement, covering:
Leisure & Tourism Development

- Preamble LT1: Leisure and Tourism
- Policy LT1: Leisure and Tourism
- Preamble LT2: Tourism Development in the Marina
- Policy LT2: Tourism Development in the Marina
- Preamble LT3: Development of Seaton Carew
- Policy LT3: Development of Seaton Carew
- Preamble LT4: Tourism Accommodation
- Policy LT4: Tourism Accommodation
- Preamble LT5: Caravan Sites and Touring Caravan Sites
- Policy LT5: Caravan Sites and Touring Caravan Sites
- Preamble LT6: Business Tourism, Events and Conferencing
- Policy LT6: Business Tourism, Events and Conferencing

Preamble LT1: Leisure and Tourism

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the Leisure and Tourism elements of the Local Plan, although there appears to be limited reference to tourism development in the rural area, other than mention of caravan and camping sites. See comment on bridleways.	Noted. Reference to the tourism opportunities provided by the rural area has been enhanced.
Environment Agency	LP0031	DP0190	Bathing Waters Our previous comments relating to the issue of Bathing Waters as detailed in the Issues and Options consultation response are still relevant and are detailed below for reference. The Local Plan should have regard to the importance of the local economy in achieving the standards of the revised Bathing Water Directive. For example, the designated Bathing Water at Seaton North failed guideline standards in 2013. Any additional sewage discharges or loads could therefore increase the likelihood of compliance sample failures, which could in turn have a negative impact on tourism in the area. Ensuring at least sufficient bathing water quality should be a consideration for the Local Plan. Planning development can play a part in achieving this by ensuring that not only new development but the downstream network of sewerage facilities, pumping stations and treatment facilities have sufficient capacity to accommodate increased loading without compromising environment quality through worsening of effluent quality or increased frequency of both emergency and storm overflows. Domestic wrong connections can contribute to poor bathing water quality in coastal towns. It can be difficult to eliminate all wrong connections as they arise on an ongoing basis. Although not eliminating the effects, well designed sustainable drainage systems can reduce the impact of domestic wrong connections by providing passive treatment of organic wastes which support bacterial communities. We note that the issue of Bathing Waters does not appear to be specifically mentioned in the local plan.	Noted. Leisure and Tourism Section to include reference to bathing waters. Reference also to be made to bathing waters in the Natural Environment and Green Networks Chapter, this will be cross referenced. In relation to concerns regarding increased sewerage, this is an issue that would be addressed through the planning application process.
Historic England	LP0044	DP0213	Page 176, Chapter 14 Leisure and Tourism: We welcome the recognition within this chapter of the role that heritage assets can play in helping to promote leisure and tourism. However, the level of protection afforded heritage assets needs improving in some policies.	Noted. Policy to widen reference to historic environment and heritage assets and this is covered within the Historic Environment policies.

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
			For example, Policy LT1 recognises the importance of the historic environment of the Headland. However, the wording suggests it will be 'protected from development which would be detrimental to the sustainability and character of the area'. This does not appear to give adequate protection to the significance of the assets, including any contribution made by their setting. Nor is there any cross reference to the heritage policies.	
Resident	LP0096	DP0054	Most of the area has a good range of facilities.	Noted.
Resident	LP0201	DP0159	14.5 Saltholme is not within the borough. This paragraph should be revised to acknowledge all the green assets WITHIN the borough, the miles of beaches and sand dunes between the Tees and Crimdon Beck. Before any mention of Saltholme we should be highlighting what we have. Notable omissions are the Hart to Haswell and Burn Valley Gardens. Saltholme is excellent at promoting itself, Hartlepool should be doing the same for its own reserves.	Noted. Whilst the visitor centre of Saltholme is within Stockton Borough, there wider reserve does cross over Greatham Creek to land within Hartlepool's jurisdiction. As noted Hart to Haswell and Burn Valley Gardens have not been directly mentioned in the chapter, only a limited number of examples have been used from across the borough. Wording of the 14.5 to be improved to make clear that these are examples and not an exhaustive list.
Tees Valley Local Access Forum	LP0214	DP0175	We are pleased HBC recognise under 14.12 Green Tourism the ' enjoyment of these assets could be enhanced by improving access to the networks of paths and cycleways'.	Noted.
Resident	LP0230	DP0194	Section 14.5 we think there may be an opportunity to highlight more in this paragraph, here is our suggestion: Recreation and leisure infrastructure is critical for the sustainable future of Hartlepool, through ensuring a range of facilities for residents and visitors to encourage physical and cultural activity. There are various green spaces, parks and nature reserves across the borough. In addition our cemeteries are being enhanced by being made into wildlife havens, which in turn makes them interesting to visit. To the west, Summerhill Country Park combines attractive woodland walks with outdoor activities and is a principle gateway to the countryside site, whilst Ward Jackson Park preserves its Victorian heritage alongside modern facilities and opportunities for wildlife to thrive. The traditional seaside resort of Seaton Carew offers a modern promenade stretching from the edge of the sand dunes to Newburn Bridge and then onwards to the Marina. It is extremely	Noted. Paragraph 14.5 to be updated with suggested text.

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
			well used by walkers, cyclists and runners, many of whom come from other areas. South of the promenade and village is the impressive Seaton Dunes, the most extensive dune system between the Humber and Lindisfarne. The dunes reach as far the mouth of the Tees. Seaton Dunes and Common together form a SSSI, whilst the nearby Seaton Golf Course is complementary to its wildlife value and sense of space. All of this is bordered by miles of clean, sandy beaches. To the north, the historic Headland is a key destination, with its town moor and heritage features such as St Hilda's Church and the Heugh Battery. Beyond the Headland is Spion Cop Cemetery, renowned for combining its historic value with preserving important coastal grassland. A little further up the coast the Hart to Haswell Walkway is very popular with walkers, cyclists and naturalists. There are also smaller Local Wildlife Sites such as the Greatham Beck Local Nature Reserve, as well as the smaller parks at Rossmere and Seaton. Just outside the borough boundary are the Saltholme RSPB reserve and the Teesmouth National Nature Reserve. They are all of immense value to residents who live around them. Taken as a whole, Hartlepool's combined assets of heritage, abundant nature reserves and green spaces make it both a pleasant place to live and a very attractive proposition for a few days visit. In addition Seaton Carew offers sports domes (including a golf dome, footbal dome and gym) and caravan parks; there is an aspiration to develop leisure facilities such as crazy golf, a bowling alley, market square and other public realm improvements in this locality. Paragraph 14.6 refers to Summerhill only the as a tourist attraction. Summerhill also represents a significant educational asset used extensively by schools for visits that support the curriculum areas of science, environment and nature as well as physical eductation. In adddition work has been done, and more is underway, to increase the level of disabled access to forest schools areas, pond dipping and pond viewing platforms. LT1 should reflect the educational dimension. The Hartlepool Green Infrastructure Supplementary Planning Document (SPD) – Action Plan Page 11 lists as follows Item: Resurfacing of main site route	

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
			Details: Shared walkers/cyclists section of the main route that travels around Summerhill. Route is 2km long x 2.5m wide with two sections of non-slip tarmac Funding:The full route requires resurfacing. Costs depend on specifications and designs and could range from £80,000 to £250,000 Status: Top surface has fully eroded If the main site route is not maintained access will be come more difficult for all users but in particular the disabled, push chairs, young children and any one else who has mobility difficulties. To maintain the attractiveness of Summerhill the resurfacing of the main site route should be considered within the next two years and this should be reflected in LT1.	
Friends of Hartlepool's Wild Greenspaces	LP0231	DP0195	Section 14.5 we think there may be an opportunity to highlight more in this paragraph, here is our suggestion: Recreation and leisure infrastructure is critical for the sustainable future of Hartlepool, through ensuring a range of facilities for residents and visitors to encourage physical and cultural activity. There are various green spaces, parks and nature reserves across the borough. In addition our cemeteries are being enhanced by being made into wildlife havens, which in turn makes them interesting to visit. To the west, Summerhill Country Park combines attractive woodland walks with outdoor activities and is a principle gateway to the countryside site, whilst Ward Jackson Park preserves its Victorian heritage alongside modern facilities and opportunities for wildlife to thrive. The traditional seaside resort of Seaton Carew offers a modern promenade stretching from the edge of the sand dunes to Newburn Bridge and then onwards to the Marina. It is extremely well used by walkers, cyclists and runners, many of whom come from other areas. South of the promenade and village is the impressive Seaton Dunes, the most extensive dune system between the Humber and Lindisfarne. The dunes reach as far the mouth of the Tees. Seaton Dunes and Common together form a SSSI, whilst the nearby Seaton Golf Course is complementary to its wildlife value and sense of space. All of this is bordered by miles of clean, sandy beaches. To the north, the historic	Noted. Paragraph 14.5 to be updated with suggested text.

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
			Headland is a key destination, with its town moor and heritage features such as St Hilda's Church and the Heugh Battery. Beyond the Headland is Spion Cop Cemetery, renowned for combining its historic value with preserving important coastal grassland. A little further up the coast the Hart to Haswell Walkway is very popular with walkers, cyclists and naturalists. There are also smaller Local Wildlife Sites such as the Greatham Beck Local Nature Reserve, as well as the smaller parks at Rossmere and Seaton. Just outside the borough boundary are the Saltholme RSPB reserve and the Teesmouth National Nature Reserve. They are all of immense value to residents who live around them. Taken as a whole, Hartlepool's combined assets of heritage, abundant nature reserves and green spaces make it both a pleasant place to live and a very attractive proposition for a few days visit. In addition Seaton Carew offers sports domes (including a golf dome, footbal dome and gym) and caravan parks; there is an aspiration to develop leisure facilities such as crazy golf, a bowling alley, market square and other public realm improvements in this locality. Paragraph 14.6 refers to Summerhill only the as a tourist attraction. Summerhill also represents a significant educational asset used extensively by schools for visits that support the curriculum areas of science, environment and nature as well as physical education. In addition work has been done, and more is underway, to increase the level of disabled access to forest schools areas, pond dipping and pond viewing platforms. LT1 should reflect the educational dimension. The Hartlepool Green Infrastructure Supplementary Planning Document (SPD) – Action Plan Page 11 lists as follows Item: Resurfacing of main site route Details: Shared walkers/cyclists section of the main route that travels around Summerhill. Route is 2km long x 2.5m wide with two sections of non-slip tarmac Funding: The full route requires resurfacing. Costs depend on specifications and designs and could range from £80,000 to £250,000 Status: Top surface has fully eroded	

Company	Unique Ref	DP Ref	LT1 Preamble	Planning Policy Response
			If the main site route is not maintained access will become more difficult for all users but in particular the disabled, push chairs, young children and anyone else who has mobility difficulties. To maintain the attractiveness of Summerhill the resurfacing of the main site route should be considered within the next two years and this should be reflected in LT1.	

Policy LT1: Leisure and Tourism

Company	Unique Ref	DP Ref	LT1 Leisure and Tourism	Planning Policy Response
The Theatres Trust	LP0012	DP0002	The Theatres Trust welcomes the inclusion of preferred policy LT1, which aims to promote leisure, tourism and cultural uses. The variety and quality of the cultural and entertainment offer can be a key factor in promoting regeneration, and support of culture is increasingly seen as an investment in an area's present and future quality of life. The infrastructure provided for communities is also an increasingly important element in attracting new residents and tourist. However, the policy should reflect Para. 70 of the NPPF which states that 'established cultural facilities and services are retained and able to be developed for the benefit of the community', and there should be policies to guard against the unnecessary loss of valued cultural and community facilities. In this regard, we suggest additional policy criteria is needed along the lines of - The council will protect existing tourism, cultural and leisure facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or it has been demonstrated that there is no demand for another similar use on the site. The local plan should also reflect guidance in Para 123 of the NPPF and the noise PPG and ensure any new development, particularly residential/ mixed use development in these areas, is designed with noise mitigation in mind to ensure there is no impact on the ongoing operation of your existing cultural and leisure facilities.	Noted. This chapter aims to promote and protect leisure and tourism uses in Hartlepool. Whilst it is accepted that there is scope to improve the wording of the policy to resist against the loss cultural and community facilities, it is also accepted that sometimes business decisions are made which are outside of the scope of planning. Wording of policy will be updated to reflect this. In relation to the issue of noise, the policy LT1 to be updated to consider the impact on a development in terms of noise and disturbance in relation to existing leisure, tourism and cultural facilities and not just housing as set out in the policy presently.
Hartlepool Civic Society	LP0013	DP0231	(3) SEATON CAREW - The Society supports the continuing enhancement and conservation of the Conservation Area – particularly with the preservation of the character of the buildings. (4) THE HEADLAND - We support this policy and particularly the intention to encourage schemes to enhance the historic nature of the Headland. We would also suggest a re-instatement of the ferry across to the Marina to	Noted. The re-instatement of the ferry would be a commercial decision; however this policy would be used to assess any associated planning application. Summerhill is considered to be a town wide amenity.

Company	Unique Ref	DP Ref	LT1 Leisure and Tourism	Planning Policy Response
			have a dual effect – transport and tourism. We support future for Summerhill – an asset to the Borough – unfortunately, it is too far north to be a realistic asset to the south of the Borough, eg. Greatham and the Fens.	
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council supports this policy and would wish to ensure the economy of Greatham village is able to benefit from its location at the southern end of the Borough in close proximity to Teesmouth National Nature Reserve, RSPB Saltholme (including its developing satellite site at Greatham Creek) and Cowpen Bewley Wildlife Park. The vicinity of Greatham is ideal for the provision of facilities for the observation and interpretation of wildlife, habitats and the natural environment. The Parish has an excellent network of rights of way. Greatham village has the potential to develop as a gateway site for the above locations and walking/cycling combined with the added benefit of the quite unique heritage of the village. Summerhill is rather too far north to fully function as a focus for accessing sites south of Greatham. The Parish Council is not suggesting that Greatham village is suitable to become a major tourist destination but there is certainly the opportunity for benefits from the support that could be offered its small businesses from an increased footfall from visitors. This is worthy of some attention from the Borough Council and reflected in policies such as this. The policy should allow for the potential of Greatham to develop as a gateway to the countryside.	Noted. It is acknowledged that the policy refers to major tourism development and a few smaller specific sites. In light of this it would be of benefit to add text to the policy to address the concerns raised by Greatham Parish Council. Wording of policy to be updated to incorporate reference to smaller scale tourism benefits.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble LT2: Tourism Development in the Marina

Company	Unique Ref	DP Ref	LT2 Preamble	Planning Policy Response
Resident	LP0096	DP0054	Jacksons Landing on the Marina could be an excellent leisure / retail / food outlet the framework and vista is already there.	Noted. Supports policy wording.

Policy LT2: Tourism Development in the Marina

Company	Unique Ref	DP Ref	LT2 Tourism Development in the Marina	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	We support these policies.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble LT3: Development of Seaton Carew

Company	Unique Ref	DP Ref	LT3 Preamble	Planning Policy Response
Resident	LP0096	DP0054	Seaton Carew has potential for some leisure to be close to its centre especially in the summer.	Noted. Supports policy wording.
Resident	LP0236	DP0202	Seaton Carew landfill smells put visitor off also no transport after 6.30 pm, which puts people off visiting the area.	Noted. Considerable investment is planned for Seaton Carew which is supported by Leisure and Tourism policies of the plan. Trains run from Hartlepool to Seaton Carew until 10:03pm and from Seaton Carew into Hartlepool until 9:34pm.
Stockton Road Residents Association	LP0237	DP0203	Seaton Carew landfill smells put visitor off also no transport after 6.30 pm, which puts people off visiting the area.	Noted. Considerable investment is planned for Seaton Carew which is supported by Leisure and Tourism policies of the plan. Trains run from Hartlepool to Seaton Carew until 10:03pm and from Seaton Carew into Hartlepool until 9:34pm.
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	Seaton Carew landfill smells put visitor off also no transport after 6.30 pm, which puts people off visiting the area.	Noted. Considerable investment is planned for Seaton Carew which is supported by Leisure and Tourism policies of the plan. Trains run from Hartlepool to Seaton Carew until 10:03pm and from Seaton Carew into Hartlepool until 9:34pm.
Resident	LP0239	DP0205	Seaton Carew landfill smells put visitor off also no transport after 6.30 pm, which puts people off visiting the area.	Noted. Considerable investment is planned for Seaton Carew which is supported by Leisure and Tourism policies of the plan. Trains run from Hartlepool to Seaton Carew until 10:03pm and from Seaton Carew into Hartlepool until 9:34pm.

Policy LT3: Development of Seaton Carew

Company	Unique Ref	DP Ref	LT3 Development of Seaton Carew	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	We support this policy.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble LT4: Tourism Accommodation and Preamble LT5: Caravan Sites and Touring Caravan Sites

No Comments

Policy LT4: Tourism Accommodation

Company	Unique Ref	DP Ref	LT4 Tourist Accommodation	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Policy LT5: Caravan Sites and Touring Caravan Sites

Company	Unique Ref	DP Ref	LT5 Caravan Sites and Touring Caravan Sites	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble LT6: Business Tourism, Events and Conferencing

No Comments

Policy LT6: Business Tourism, Events and Conferencing

Company	Unique Ref	DP Ref	LT6 Business Tourism, Events and Conferencing	Planning Policy Response
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Section 9 of the Consultation Statement, covering: Historic Environment

- Preamble HE1: Heritage Assets & HE2: Archaeology
- Policy HE1: Heritage Assets
- Policy HE2: Archaeology
- Preamble HE3: Conservation Areas
- Policy HE3: Conservation Areas
- Preamble HE4: Listed Buildings and Structures
- Policy HE4: Listed Buildings and Structures
- Preamble HE5: Locally Listed Buildings and Structures
- Policy HE5: Locally Listed Buildings and Structures
- Preamble HE6: Historic Shopping Parades
- Policy HE6: Historic Shopping Parades
- Preamble HE7: Heritage at Risk
- Policy HE7: Heritage at Risk

Preamble HE1: Heritage Assets & Preamble HE2: Archaeology

Company	Unique Ref	DP Ref	HE1 and HE2 Preamble	Planning Policy Response
Park Residents Association	LP0014	DP0187	We fully support all of the Policies within this section , many of our members live within the Park Conservation area, which is currently "at risk" . Whilst we recognise that despite the hard work of Council Officers , the Planning Committee made up of elected members can often totally ignore the recommendations. We would welcome any additional measures that can be put in place to preserve our historic environment and built heritage.	Noted.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the policies on the Historic Environment contained within the Local Plan, which are in agreement with the proposals of the Rural Neighbourhood plan.	Noted and support welcomed.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council widely supports all the policies for the protection of the historic environment. It is key to the identity, pride and sense of place reflected in a community. There are also benefits for the local economy and well-being given the general attractive nature of the historic environment.	Noted and support welcomed.
Historic England	LP0044	DP0213	Page 186, Chapter 15 The Historic Environment: The chapter on the historic environment is extremely thorough and comprehensive, and we congratulate the council on its positive and proactive approach. As we have noted above, there is a clear strategy throughout the document for integrating heritage considerations, a thorough and clearly articulated evidence base supporting the plan, and the development of a separate Strategy for the Historic Environment is an excellent approach. We particularly welcome the references to constructive conservation and using positive planning powers, along with the potential for a future Heritage Supplementary Planning Document. However, it might be helpful to define what is meant by 'constructive conservation' (potentially by inclusion in the glossary), particularly as Policy HE3 refers to taking a 'constructive conservation approach'. The initial assessment within the Strategy for the Historic Environment of the impact of development on heritage assets is extremely helpful, and an	Noted. Constructive Conservation to be included in the Glossary. In terms of the consideration of the historic environment as part of the SHLAA process, site assessments considered the prevalence of historic assets within and in proximity to sites. The assessment as part of the Heritage Strategy only includes sites which have been selected following assessment of suitability as part of the SHLAA process. Policy duplication has been addressed.

Company	Unique Ref	DP Ref	HE1 and HE2 Preamble	Planning Policy Response
			essential component of a sound plan. However, as we have noted above, this needs to be cross-referenced and thoroughly integrated into the methodology for the SHLAA, which currently has not identified heritage assets as a constraint. The policies for the historic environment are extremely comprehensive, and we particularly welcome the policy on Heritage at Risk. However, in attempting to ensure the highest level of protection for the historic environment, there may be some duplication and/or potentially conflicting language between the policies, which may give rise to confusion and may not be fully compliant with the NPPF.	
Resident	LP0096	DP0054	Hartlepool has a reasonable amount of saved heritage in all areas.	Noted.
Resident	LP0201	DP0159	Would like to see more significant allocated to the Old Manor House (Friarage) on the Headland.	Noted. Specific listed buildings are not identified in the preamble to the policy, however the principles of the policy applies to all listed buildings. In addition, due to the location of the Friarage Manor House within the Headland Conservation area (which is identified as being at risk) the heritage asset is covered by a number of policies.
Brenda Road Holdings Ltd	LP0244	DP0212	We broadly support the suggestions made in this section of the document, especially the plans for the regeneration of The Front at Seaton Carew as it will greatly improve the quality of amenities available to residents and attract further inward investment.	Noted.

Policy HE1: Heritage Assets

Company	Unique Ref	DP Ref	HE1 Heritage Assets	
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted and support welcomed.
Historic England	LP0044	DP0213	For example, Policy HE1 states the Council will seek to 'refuse proposals which create harm impacting upon heritage assets'. Paragraph 133 of the NPPF is clear that consent should be refused if there is 'substantial harm to or total loss of significance of a designated heritage asset', unless it can be demonstrated that the public benefits outweigh that harm or loss. However, if there is less than substantial harm, the NPPF advises that the harm should be weighed against the public benefits (paragraph 134), or in the case of non-designated assets, a balanced judgement will be required (paragraph 135). The wording of Policy HE1 may therefore need refining in order to be compliant with the NPPF. The use of this wording in Policy HE1 may also not be fully in accordance with the fourth paragraph of Policy HE4 or the third paragraph of HE5. In addition, there appears to be some duplication and overlap between the policy wording relating to Conservation Areas in Policy HE1, and Policy HE3. There may also be some duplication of wording (or intent) within Policy HE1 – for example, between the third paragraph (referring to any development which has an impact on a heritage asset), and the paragraph referring to proposals for any heritage asset or building within a Conservation Area.	Noted. Policy wording to be updated to ensure that it is compliant with the NPPF (para 133, 134 and 135). Reword policy HE1, HE4 and HE5 to that overlap between policies is not detrimental to ensuring they can be implemented effectively.
Story Homes	LP0219	DP0181	Story Homes generally supports the Council's approach to protecting the Historic Environment and the NPPF compliant approach to ensuring that policy seeks to protect, enhance and promote Hartlepool's heritage. However we consider that Policy HE1 is currently inconsistent with the NPPF as it states that the '...Council will seek to refuse proposals which create harm impacting upon heritage assets, and great weight should be given to the assets conservation, protection and enhancement'. Paragraph 133 of the NPPF sets out that where a proposed development will lead to substantial harm to or total loss of	Noted. The policy has been amended to ensure compliance with the NPPF.

Company	Unique Ref	DP Ref	HE1 Heritage Assets	
			significance of a designated heritage asset LPAs should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. In order to ensure that the plan is considered the be in conformity with the NPPF, Story Homes consider that the wording in paragraph 6 of Policy HE1 should be amended to set out that proposals will only be refused where there is 'substantial harm' impacting upon heritage assets.	
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Policy HE2: Archaeology

Company	Unique Ref	DP Ref	HE2 Archaeology	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble HE3: Conservation Areas

No Comments

Policy HE3: Conservation Areas

Company	Unique Ref	DP Ref	HE3 Conservation Areas	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble HE4: Listed Buildings and Structures

No Comments

Policy HE4: Listed Buildings and Structures

Company	Unique Ref	DP Ref	HE4 Listed Buildings and Structures	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Historic England	LP0044	DP0213	The use of this wording in Policy HE1 may also not be fully in accordance with the fourth paragraph of Policy HE4 or the third paragraph of HE5. In addition, there appears to be some duplication and overlap between the policy wording relating to Conservation Areas in Policy HE1, and Policy HE3. There may also be some duplication of wording (or intent) within Policy HE1 – for example, between the third paragraph (referring to any development which has an impact on a heritage asset), and the paragraph referring to proposals for any heritage asset or building within a Conservation Area.	Noted. Policies HE1, HE4 and HE5 to be reworded to ensure that overlap between policies is not detrimental to ensuring they can be implemented effectively.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble HE5: Locally Listed Buildings and Structures

No Comments

Policy HE5: Locally Listed Buildings and Structures

Company	Unique Ref	DP Ref	HE5 Locally Listed Buildings and Structures	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Historic England	LP0044	DP0213	The use of this wording in Policy HE1 may also not be fully in accordance with the fourth paragraph of Policy HE4 or the third paragraph of HE5. In addition, there appears to be some duplication and overlap between the policy wording relating to Conservation Areas in Policy HE1, and Policy HE3. There may also be some duplication of wording (or intent) within Policy HE1 – for example, between the third paragraph (referring to any development which has an impact on a heritage asset), and the paragraph referring to proposals for any heritage asset or building within a Conservation Area.	Noted. Policies HE1, HE4 and HE5 to be reworded to ensure that overlap between policies is not detrimental to ensuring they can be implemented effectively.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Preamble HE6: Historic Shopping Parades

No Comments

Policy HE6: Historic Shopping Parades

Company	Unique Ref	DP Ref	HE6 Historic Shopping Parades	Planning Policy Response
Hartlepool Arthritis Group (HARK)	LP0238	DP0204	He6: I object to Stranton has a conservation area with its mixed shop fronts.	Noted. Stranton presents one of the few historic shopping parades within the borough. The position of the parade within the Stranton Conservation area is one of the key features of this conservation area. The protection and enhancement is considered to be vital to enhance and protect the conservation area for future generations.
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Resident	LP0236	DP0202	He6: I object to Stranton has a conservation area with its mixed shop fronts.	Noted. Stranton presents one of the few historic shopping parades within the borough. The position of the parade within the Stranton Conservation area is one of the key features of this conservation area. The protection and enhancement is considered to be vital to enhance and protect the conservation area for future generations.
Resident	LP0239	DP0205	He6: I object to Stranton has a conservation area with its mixed shop fronts.	Noted. Stranton presents one of the few historic shopping parades within the borough. The position of the parade within the Stranton Conservation area is one of the key features of this conservation area. The protection and enhancement is considered to be vital to enhance and protect the conservation area for future generations.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.
Stockton Road Residents Association	LP0237	DP0203	He6: I object to Stranton has a conservation area with its mixed shop fronts.	Noted. Stranton presents one of the few historic shopping parades within the borough. The position of the parade within the Stranton Conservation area is one of the key features of this conservation area. The protection and enhancement is considered to be vital to enhance and protect the conservation area for future generations.

Preamble HE7: Heritage at Risk

No Comments

Policy HE7: Heritage at Risk

Company	Unique Ref	DP Ref	HE7 Heritage at Risk	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The society strongly supports all of these policies which appear to provide a clear strategy which should protect the future of our heritage assets.	Noted.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan	Noted.

Section 10 of the Consultation Statement, covering:

Natural Environment and Green Networks

- Preamble NE1: Natural Environment
- Policy NE1: Natural Environment
- Preamble NE2: Green Infrastructure
- Policy NE2: Green Infrastructure
- Preamble NE3: Green Wedges
- Policy NE3: Green Wedges
- Preamble NE4: Ecological Networks
- Policy NE4: Ecological Networks
- Preamble NE5: Playing Fields Policy NE5: Playing Fields
- Policy NE5: Playing Fields Policy NE5: Playing Fields
- Preamble NE6: Protection of Incidental Open Space
- Policy NE6: Protection of Incidental Open Space

Preamble NE1: Natural Environment

Company	Unique Ref	DP Ref	NE1 Preamble	Planning Policy Response
Fens Residents Association	LP0011	DP0010	The Natural Environment include aspirations and aims which deserve support and endorsement from residents and their representatives. Indeed, if they are ultimately to influence development for the better, these chapters are supportive of the additional measures and amendments needed and which we set our below. We consider them absolutely essential for the best outcomes, not only for residents of the Fens Estate and future residents of the South West Extension (SWE), but for all of Hartlepool.	Support noted and welcomed.
Park Residents Association	LP0014	DP0187	This policy welcomed and is supported by members.	Support welcomed.
Woodland Trust	LP0023	DP0226	We welcome the statement in paragraph 16.26 that the council will ensure that there is no loss of ancient woodland to development. This is important, as ancient woodland is an irreplaceable habitat and once destroyed it cannot be replaced by any amount of additional woodland planting. We were therefore disappointed to see that this strong wording is not repeated in the wording of Polic NE1 para 6 where the qualification "unless the need for and benefits of the development clearly outweighs the loss" is introduced. This repeats wording in the NPPF para 118 and so should not need repeating in your local plan. In view of the very small amount of ancient woodland remaining in Hartlepool, we would like to see you go further than the NPPF wording by specifying unambiguously that ancient woodland (and ancient and veteran trees) should be protected as you do in para 16.26. Alternatively, you could use the wording which was recommended by the CLG Select Committee when they reviewed the NPPF: that ancient woodland should only be allowed to be damaged or destroyed by development in "wholly exceptional circumstances". That gives ancient woodland the same level of protection as historic buildings, which we believe to be appropriate.	Policy NE1, sub-paragraph 6 (2nd sentence) will be amended to read “Areas of ancient woodland, including ancient semi-natural woodland (ASNW), plantations on ancient woodland sites (PAWS), and aged or veteran trees outside ancient woodland, will be protected unless there are exceptional circumstances.”
Environment Agency	LP0031	DP0190	We recommend that Section 16 Natural Environment and Green Networks should consider both open and culverted watercourses.	An additional paragraph will be inserted in section 16 to read: “Watercourses throughout Hartlepool in both rural and urban

Company	Unique Ref	DP Ref	NE1 Preamble	Planning Policy Response
				areas can play a valuable role as wildlife corridors, assisting in the movement of species between different habitats. There may be opportunities as part of development/re-development proposals to improve water courses through measures such as de-culverting and maintaining open buffers from development.
Historic England	LP0044	DP0213	Page 199, Chapter 16 Natural Environment and Green Networks: As noted above, historic landscapes, parks, gardens and cemeteries can all be designated heritage assets in their own right. In addition, the setting of a heritage asset will often comprise the natural environment, and can contribute to its significance. It might therefore be helpful to reference the historic environment in paragraph 16.2 and the section on Green Infrastructure from paragraph 16.38. It is worth noting that Historic England is actively working with partner organisations to ensure that the Ecosystems approach (referenced in paragraph 16.19) effectively integrates cultural services in order to monitor the historic environment, in addition to the natural environment.	Paragraph 16.2 summarises the purpose of the policies in the Natural Environment section of the Local Plan and clearly states protecting and enhancing varied natural landscapes. It is acknowledged that natural landscapes can be designated as heritage assets but it is considered that the policies in the plan as a whole cover this point. Similarly paragraph 16.38 just provides some examples and a reference to historic assets is not felt to be necessary.
Resident	LP0048	DP0004	The biodiversity comments do not appear to match with the recent observations in the area of Wynyard in particular.	Development in the Wynyard area (in both Hartlepool and Stockton-on-Tees Boroughs) has inevitably had some impact on biodiversity. However the Borough Council will always seek to ensure that impacts are kept to a minimum where possible. Where appropriate mitigation or compensation will be required from developers and the Council explores all opportunities to provide new and/or enhance habitats as part of new developments. This can range from natural planting and sustainable drainage ponds to providing bat and bird boxes on new buildings.
Resident	LP0096	DP0054	Living close to your work are gives one more freetime and less stress, if you have jobs, schools and retail people will stay close to home and this should benefit Hartlepool.	A good quality natural environment, as proposed through the Local Plan policies, will help to retain and attract people to Hartlepool.
Teesmouth Bird Club	LP0227	DP0191	Trees of ancient biodiversity and/or local historic sense and place should be defined and protect in the same way as buildings are.	Sub-paragraph 5 in policy NE1 does state that “existing woodland and trees of amenity value and nature conservation

Company	Unique Ref	DP Ref	NE1 Preamble	Planning Policy Response
			Mitigation for loss of biodiversity should have more emphasis when viewing planning applications. See NPPF clauses 117 and 118. Where particular species loss cannot be mitigated, then opportunities for biodiversity enhancement for other species should be required. If the site does not lend itself to such measures financial requirements for biodiversity mitigation compensation at other sites should be required - i.e. off-setting. The fact that the built environment can have its own biodiversity, should be acknowledged and become an opportunity for appropriate biodiversity enhancement.	value will be protected..." It also states that "aged or veteran trees outside ancient woodland will be protected unless the need for, and benefits of, development clearly outweigh the loss". It is considered that this adequately cover the first point made in the representation. With regard to the second point it is proposed to amend the final sentence of policy NE2 to read: "……..as part of development on a case by case basis and that where appropriate new development incorporates measures to enhance biodiversity."

Policy NE1: Natural Environment

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society supports this policy in its entirety.	Support noted.
Campaign to Protect Rural England	LP0015	DP0199	While CPRE recognises that this Section is more relevant for wildlife organisations, we also consider that a landscape without wildlife is a sterile concept. We are very aware of the importance of Hartlepool in general and the Tees Estuary in particular for wildlife. We acknowledge that many people come to this area especially for its wildlife. We therefore support all proposals to retain and enhance the natural environment.	Support noted.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council supports the policies identified within the Local Plan. Most of these areas fall within the rural area and as a such are of particular concern. We are pleased to see the Borough Council's policies will protect and enhance these assets, vital to the health and well-being of all in the Borough.	Support welcomed.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports the protection of the natural environment. Protection for existing woodland and trees is particularly important and increasing the tree cover in the Borough is to be welcomed.	Support noted and welcomed.
Woodland Trust	LP0023	DP0226	We welcome the reference in the policy to increasing tree cover in line with the Council's Tree Strategy. We encourage councils to have tree strategies and it is good to see them referenced in planning policy. We also welcome your requirement for a buffer of at least 15 metres to protect ancient woodland from nearby new development. The words "at least" here are crucial, as for some larger developments we would hope to see a much larger buffer and it needs to be looked at on a case by case basis.	Support welcomed.
Wynyard Park	LP0027	DP0223	With regard to Policy NE1, the proposals map shows a local wildlife site has been identified on Wynyard Park land and within the EMP1 employment allocation. It is noted that this site is allocated for development and as such, this designation should not prevent future re-development of the site. Previous representations have demonstrated that this land would accommodate the additional 232 dwellings that have been proposed	The local wildlife site on the Wynyard employment land allocation is to be recommended to the Local Nature Partnership (Local Sites Group) for deletion as it no longer meets the relevant criteria. The existing access track from the A689 towards High Newton Hanzard is also designated as a local wildlife site. This is to be recommended for review to

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			within these (and previous) representations.	assess whether it still meets the designation criteria.
Environment Agency	LP0031	DP0190	We suggest that the wording in Local Plan Policy NE1 reflects that watercourses are wildlife corridors and that they should be retained, buffered and deculverted where the opportunity arises through redevelopment.	An additional paragraph will be inserted in section 16 to read: "Watercourses throughout Hartlepool in both rural and urban areas can play a valuable role as wildlife corridors, assisting in the movement of species between different habitats. There may be opportunities as part of development/re-development proposals to improve water courses through measures such as de-culverting and maintaining open buffers from development.
Marine Management Organisation	LP0036	DP0171	The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants. Marine Licensing Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species. Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its	The Preferred Option Local Plan has made reference to the MMO and the UK Marine Policy Statement – see paragraph 16.35. However this will be updated to refer to the ongoing production of the North East Marine Plan. Additional references will also included in section 2 (National Planning Policy Context) and section 6 (Locational Strategy).

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. Minerals and waste plans and local aggregate assessments If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below: • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK)	

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained. If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.	
Natural England	LP0043	DP0178	Ecological Designations It is noted that the area covered by the Local Plan contains various designated sites, including Special Protection areas (SPAs), Special Areas of Conservation (SACs) and Sites of Scientific Special Interest. These are: European sites: • Teesmouth and Cleveland Coast SPA/Ramsar • Northumberland Coast SPA/Ramsar • Castle Eden Dene SAC • Thrislington SAC • Durham Coast SAC and lies in proximity to: • North York Moors SAC • North York Moors SPA	Natural England's comments on the ecological designations are noted. The policies in the draft Local Plan adopt a hierarchical approach to the protection of ecological designations (as advised in the National Planning Policy Framework), and the policies specify that a precautionary approach will be taken towards developments that may have an indirect impact on internationally and nationally important sites. A Habitats Regulation Assessment for the Local Plan will consider the potential impacts of housing, employment land and other allocations on internationally/nationally important sites. This could include for example the provision of Suitable Alternative Green Space (SANGS) to reduce recreational pressure on designated sites and habitats.

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			National sites: • Hart Bog SSSI • Tees and Hartlepool Foreshore and Wetlands SSSI • Seaton Dunes and Common SSSI • South Gare and Coatham Sands SSSI • Seal Sands SSSI • Cowpen Marsh SSSI Although it is noted that no specific development proposals or land designations are proposed for these areas, the plan should seek to ensure the conservation and protection of those sites mentioned above. This protection should extend to adjacent areas, where development may have an effect on the special features of the designated sites. It should be noted that this approach would be especially relevant where new housing sites are proposed in areas close to designated sites, which has the potential to increase the levels of recreational disturbance at these sites. It is also relevant where designated employment and industrial sites are in close proximity to designated sites and may present impacts on the interest features of those designated sites. We do note that a thorough and detailed Sustainability Appraisal and Habitat Regulations Assessment has been carried out in the preparation of the Local Plan and we welcome the approach taken in identifying sites, their risk levels and the approach taken in recognising appropriate assessment levels. The works carried out provide a sound framework for Natural Environment Policies and development assessment and provides detailed analysis of requirements for such development. Opportunities for enhancing the natural environment The Local Plan and subsequent proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space	Comments noted and welcomed. It is proposed to include a further statement in policy NE2 (Green infrastructure) referring to the need for new development to include, where appropriate, measures to enhance biodiversity.

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			provision and access to and contact with nature. The commitment to promoting these strategies through the Local Plan is welcomed and Natural England would wish to see this emphasis carried through to the published Local Plan document. Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.	
			Priority habitats, ecological networks and priority and / or legally protected species populations The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by Paragraph 165 of the National Planning Policy Framework (NPPF) to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure land of least environmental value is chosen for development and to ensure the mitigation hierarchy is followed. Priority species and habitats are those listed under Section 41 of the Natural Environment and Rural Communities Act 2006 and the UK Biodiversity Action Plan (UK BAP). Further information is available here. Local Biodiversity Action Plans identify the local action needed to deliver UK targets for species and habitats. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any area.	Comments noted – The Council is aware of the importance of having an up to date evidence base. The Council has started to assess the potential components of an ecological network, and will work closely with the Tees Valley Local Nature Partnership and others to develop such a network. Policy NE4 (Ecological Networks) provides a sound basis on which to build on this work.
			Soil and Agricultural Land Quality The Local Plan documents should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our well-being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.	The Council is aware of the advice regarding protection of the best and most versatile agricultural land and has made a number of attempts to obtain up to date maps showing the split of grade 3 agricultural land into grades 3a and 3b. This has included an approach to Natural England but no information has yet been forthcoming and it seems that grade 3 land has not been further divided in the Hartlepool area. It

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			The Plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)) as a resource for the future. To assist in understanding agricultural land quality within the Plan area and to safeguard 'best and most versatile' agricultural land quality in line with Paragraph 112 of the National Planning Policy Framework, strategic scale ALC maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both of these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The Planning Authority should ensure that sufficient site specific ALC data is available to inform plan making. New ALC surveys may be required for sites allocated in the plan. Air pollution We would expect the plan to address the impacts of air quality on the natural environment and we welcome the inclusion of air quality protection as a component of various policies within the Local Plan document. In particular, air quality policy components should address the traffic impacts associated with new development, particularly where these impact on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the plan are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can	is considered therefore that the wording in policy NE1 remains the most appropriate unless the Council can be provided with more detailed information on agricultural land classification. The impact of air pollution, including emissions from traffic, on designated European sites will be considered as part of a Habitats Regulation Assessment. The Council's Ecologist will also consider the full range of impacts of new development on designated nature conservation sites. This will include air pollution and emissions form road traffic where appropriate. It is considered that policy NE1 sets out an appropriate approach to safeguarding the health of designated sites from the impact of development.

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.	
Resident	LP0208	DP0166	Building the proposed housing developments at Hart Village WILL NOT be protecting or enhancing the green area, in fact it will be destroying the natural environment.	In line with Government guidance the Local Plan must address the need to provide a wide choice of homes. The Government also seeks to promote sustainable development in rural areas through the provision of housing where it will enhance or maintain the viability of rural communities. Additional growth in Hart will help to protect the viability of local services, particularly the school. Opportunities to create new habitats will be explored as part of any new development.
Story Homes	LP0219	DP0181	Policy NE1: Natural Environment Story Homes broadly supports the aims of Policy NE1 which seeks to protect, manage and enhance Hartlepool's natural environment. However, we raise significant concerns that sub point 3 currently states that '...where appropriate an ecosystems services approach will be used to assess the impact of development proposals...'. This is a relatively unusual policy wording for this type of policy and therefore raises significant concerns. As presently drafted it is unclear as to what the 'ecosystems services approach' comprises of and appears to be significantly onerous from the outset. We would have expected this sub point to clearly state that Ecology Surveys would be required as this is common practice in other Local Plans across the region. We consider that this policy should be amended going forwards to respond to our concerns. In relation to sub point 7, we consider that TPOs should only be used to protect trees of 'importance'. This policy should be amended to reflect this point as it currently states that TPOs can be used to protect 'any' trees under threat from development proposals.	Paragraphs 16.19 – 16.22 of the supporting statement to policy NE1 do provide some further detail about an ecosystems services approach and how it could be applied to the local planning process. Paragraph 109 of the National Planning Policy Framework states clearly that the planning system should contribute to and enhance the natural and local environment by.....recognising the wider benefits of ecosystem services. An ecosystem services approach is about more than just undertaking ecological surveys. The Borough Council will have regard to best practice emerging from work on an ecosystem services approach when developing and reviewing planning policies, and in considering development proposals. Sub point 7) states that TPOs will be used “where appropriate” to protect trees under threat. It does not use the word ‘any’ as stated in this representation. TPOs will only be used in

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
				circumstances where a particular tree or group of trees meets the necessary criteria for TPO designation.
Durham Bird Club	LP0222	DP0184	Along with Teesmouth Bird Club, DBC has an interest in this area as it is within the former vice county of Durham. DBC has collected and maintained records of bird sightings and prepares an Annual Report which includes Hartlepool. It has also published Birds of Durham, a book which considers the history of birding throughout the County and includes a section on habitats. The north bank of the Tees Estuary is featured in the book as an important habitat in the area covered by the Club. The importance of the Tees Estuary for birdlife is perhaps difficult to over-emphasise. It attracts birders from a wide area, not just to RSPB Saltholme and Seal Sands in Stockton but also to the coast at Seaton Carew and Hartlepool Headland. DBC therefore considers that strong policies to protect and enhance this beneft for Hartlepool must be welcome. There are however two issues I would like to address 1) I believe "green infrastructure" should also be defined to include "homes for nature". Current design of buildings discourages nesting birds but the provision of nest boxes for example may well remedy this problem, not just encouraging wildlife back into our urban areas but also, as outlined in the text, potentially benefitting health and well-being. I represent that this should be encouraged on major developments. As I understand the Report of the Natural Capital Committee, this may not only assist with health and well-being issues but also actually help to improve productivity of the workforce. 2) Biodiversity offsetting is a controversial concept. There tends to be a reason why wildlife inhabits a particular habitat. Birds will not just go to a new site because that has been allocated as an "offset". The new site may not have the same features at all and be totally unattractive to birds that are displaced as a result of new development on their current site.	The Council welcomes support for the Natural Environment policies. The Council agrees with the point made in the representation about 'homes for nature' and proposes to amend the final paragraph of policy NE2 to read: "The Council will seek to ensure that the development of a high quality green infrastructure network complements high quality design in the built environment in accordance with policies QP4 and QP5, and will also seek to ensure that sufficient green space is provided as part of development on a case by case and that where appropriate new development incorporates measures to enhance biodiversity." With regard to comments about biodiversity offsetting, it is acknowledged that this may be a difficult concept to put into practice and it may not be an appropriate solution in many cases. Offsetting is still an evolving and developing concept but the Borough Council considers it appropriate to include the potential of biodiversity offsetting as part of the policy as it may offer a way forward in certain circumstances, particularly around the Tees Estuary.

Company	Unique Ref	DP Ref	NE1 Natural Environment	Planning Policy Response
			This is a vital issue. Hartlepool is important for many bird species, some common, some not so common and quite a few rarities. If their existing habitat is destroyed by new development then there is no guarantee that they will go to a new site, partivcularly if it is some distance away. The species may then be lost to the area. I note the comments in the text about the recent apparent loss of a number of birds from the area and every effort must be taken not to accelerate this.	

Preamble NE2: Green Infrastructure

Company	Unique Ref	DP Ref	NE2 Preamble	Planning Policy Response
Woodland Trust	LP0023	DP0226	In para 16.43, we would like to see the role which trees can play as part of sustainable drainage systems at least mentioned in the paragraph. Whilst man-made solutions (eg flood walls and water treatment plants) will continue to play a substantial role in many schemes, it is increasingly accepted that natural approaches to water management can also offer significant benefits. What is also clear is that both approaches need to be looked at in tandem, to address both short and long term risk and to ensure that more affordable and appropriate options are considered alongside costly capital schemes see Woodland Trust report Stemming the Flow – The role of trees and woodland in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/. Replying to Parliamentary Questions in March 2014, Lord De Mauley, Under Secretary of State for Natural Environment and Science, supported this approach: 'Trees planted in the right places can do much to help with flooding before it happens'.	The Council is very supportive of sustainable drainage systems as part of development schemes and recognises that these can be an integral part of the green infrastructure network. Clearly trees can play a part in sustainable drainage schemes along with other elements such as reed beds, ponds and meadows. Different circumstances will involve different solutions but the Council will always encourage as many natural elements as possible and appropriate.
Environment Agency	LP0031	DP0190	We support the key elements to the green infrastructure policy included in Section 16.43 of the Local Plan, in particular, the paragraph entitled 'Alleviating flood risk'.	Support noted.
R Newcomb & Sons	LP0054	DP0011	Policy NE2 has the specific aim of protecting green infrastructure within the borough from inappropriate development. Our client's property does not meet the definition of green infrastructure as it has been previously developed and is considered brownfield land. The site has no amenity function or environmental value and should therefore not be restricted under this policy. The requirement to replace the area of developed land within an NE2 area would be inappropriate due to the current use of the land. It is therefore imperative that this property is amended on the proposed plan to release it from the restrictions under this code.	It is noted that the site within the red line boundary is not currently green space and formed the building and compound relating to the landfill site. As such the proposals map will be amended to show this as white land**.** However, as noted previously under other policies, this site is not considered appropriate for redevelopment as a residential site due to the proximity of the bad neighbour uses area at Sandgate Industrial Estate and the former use of the adjacent land as a landfill site.
Sport England	LP0079	DP0037	Finally we note that the draft proposals map identifies all land covered by draft policy NE2, and allocates a letter to sites to denote the type of green infrastructure. Whilst there are a significant number of playing field sites in Hartlepool to check it appears that Catcote School's playing is not	This will be checked against the Open Space Strategy and the proposals map amended if necessary.

Company	Unique Ref	DP Ref	NE2 Preamble	Planning Policy Response
			recognised as playing field, and this should be rectified.	
Tees Valley Local Access Forum	LP0214	DP0175	And under 16.43 Green Infrastructure the three target areas of the A178 Tees Road, the route between Hartlepool and Elwick and west of the A19, with 'opportunities taken to expand the RoW network making it accessible for all.'	The Borough Council will continue to explore all opportunities to improve and expand the footpath and cycle network.
Resident	LP0230	DP0194	I am pleased at the extent to which the plan highlights the green infrastructure in NE2 and NE3. It is important that the new wedges are not just created but also that there is a management plan, and long term funding, to support their on-going maintenance. Whether the maintenance is by third parties, HBC staff or volunteers HBC should have an oversight role. If volunteers are to be relied on they will need on-going support by the Parks and Countryside team, or similar, to provide supervision, expertise, tooling, equipment and transport. This will require on-going funding. To tap into additional volunteers consideration would need to be given to organising weekend work days, which would create the need for additional staffing. Policy NE3 should highlight the need for long-term maintenance and HBC oversight.	Support for policies NE2 and NE3 is welcomed. The point about ongoing maintenance and the resources to undertake this on a long term basis is a valid one and clearly an issue of concern to many, including the Council. It is proposed to amend the final paragraph of policy NE3 to read: “Proposals for landscape design, planting and other features within green wedges should be accordance with policy QP5, and should address the need for long term maintenance. Where an integral part of development green wedges should be implemented at an early stage in the development process.”
Friends of Hartlepool’s Wild Greenspaces	LP0231	DP0195	We are pleased at the extent to which the plan highlights the green infrastructure in NE2 and NE3. It is important that the new wedges are not just created but also that there is a management plan, and long term funding, to support their on-going maintenance. Whether the maintenance is by third parties, HBC staff or volunteers HBC should have an oversight role. If volunteers are to be relied on they will need on-going support by the Parks and Countryside team, or similar, to provide supervision, expertise, tooling, equipment and transport. This will require on-going funding. To tap into additional volunteers consideration would need to be given to organising weekend work days, which would create the need for additional staffing. Policy NE3 should highlight the need for long-term maintenance and HBC oversight.	Support for policies NE2 and NE3 is welcomed. The point about ongoing maintenance and the resources to undertake this on a long term basis is a valid one and clearly an issue of concern to many, including the Council. It is proposed to amend the final paragraph of policy NE3 to read: “Proposals for landscape design, planting and other features within green wedges should be accordance with policy QP5, and should address the need for long term maintenance. Where an integral part of development green wedges should be implemented at an early stage in the development process.”

Policy NE2: Green Infrastructure

Company	Unique Ref	DP Ref	NE2 Green Infrastructure	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society supports this policy	Noted.
Hartlepool Rural Plan Working Group	LP0017	DP0210	Regarding Policy NE2 Green Infrastructure. There is a site in Greatham village between Saltaire Terrace and Hill View identified on the map as NE2i (amenity open space) which is identified in the Rural Neighbourhood Plan as a potential housing site. This site is shown in red on the sketch below and is described in the Rural Neighbourhood Plan thus:- The site at Hill View is within an established housing estate with good access and would be suitable for most housing types. There is a strip of land at the south of the site, which fronts the main road route through the village, with a line of trees which includes a location reserved for the erection of a former salt pump reflecting the history of the location. To the north of the site is a rectangular area of grass with children's play area. A row of existing houses already overlook this and there is the opportunity to create an enhanced civic space if new properties were to front onto this area. The site is the major part of the SHLAA site 106 Hill View and was considered deliverable. The northern part of the 106 site includes an equipped children's play area which it is desirable to retain as part of a green space. This would appear to be an area of potential nonconformity and we would ask this location, which is in Local Authority ownership, remain open to the potential of a housing site as identified in the Rural Neighbourhood Plan.	The open space designation will be removed from the proposals map and the site shown as 'white land'. Any proposal for housing development on the land will be considered as a 'windfall' development.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports this policy. The Parish Council is particularly interested in improving the extensive right of way network around Greatham which would link in to policies INF2 & LT1. There is a clash with the designation of a small rectangle of land at Hill View which this policy includes in an allocation of amenity open space (NE2i) but which has been identified during the consultation process as a potential housing site by the Rural Neighbourhood Plan.	The open space designation will be removed from the proposals map and the site shown as 'white land'. Any proposal for housing development on the land will be considered as a 'windfall' development.
Woodland Trust	LP0023	DP0226	In Policy NE2, we would like to see woodland listed as a type of	Taken as a whole the Natural Environment policies in the Local Plan

Company	Unique Ref	DP Ref	NE2 Green Infrastructure	Planning Policy Response
			natural greenspace which can form part of green infrastructure in development. We favour the use of access standards to determine the amount of different types of GI. Natural England has an access to natural greenspace standard and we have developed an access to woodland standard, which aspires that everyone should have a wood of at least two hectares within 500m of their home and a 20 ha wood within 4km. We can supply information on how your council performs against this standard on request.	provide appropriate protection for existing woodland as well as encouraging more tree planting as part of the green infrastructure network and enhancing habitats for wildlife. Natural and semi-natural green space includes woodland as well as other types of habitat and it is not considered necessary to refer to them all within the policy. The Council is also aware of Natural England's green space standards (ANGST+) and will consider these, along with any appropriate local standards when implementing policies and supporting strategies.
Environment Agency	LP0031	DP0190	We also support Policies NE2: Green Infrastructure and NE4: Ecological Networks. Section 16.43 discusses key elements to the green infrastructure policy including alleviating flood risk. The first paragraph states 'Undeveloped Greenfield areas often have water flow pathways or watercourses running through them. These watercourses should be retained where possible and, where heavily modified, returned to a natural course'. We recommend a slight amendment to the text as follows. 'These watercourses will be retained and where heavily modified returned to a natural open channel'.	Support noted. The suggested amendment will be made to paragraph 16.43
Natural England	LP0043	DP0178	Green Infrastructure Multi-functional green infrastructure (GI) can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. We welcome the inclusion of a Green Infrastructure Strategy as a major component to the local plan complimenting the Natural Environment Policies emerging within it. Natural England encourages the incorporation of GI provision into the Local Plan. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.	Comments noted.
R Newcomb & Sons	LP0054	DP0011	This consultation document is in specific reference to a client's property East of Mainsforth Terrace (plan attached) that has been included in the landuse code in the plan of NE2e. The land is	It is noted that the site within the red line boundary is not currently green space and formed the building and compound relating to the landfill site. As such the proposals map will be amended to show this

Company	Unique Ref	DP Ref	NE2 Green Infrastructure	Planning Policy Response
			considered as brownfield land as it was previously used for industrial use. The sustainable re-development of brownfield land is encouraged in the NPPF on pages 6, 21 and 26 where there is no strong environmental benefit from the site. Allocating this site within NE2e is unecessarily protects the site from reasonable development which is a contradiction of the core principles of the NPPF. We therefore request that the allocation of this landuse code is revised to exclude our client's site, therefore enabling sustainable development of the brownfield land.	as white land. However, as noted previously under other policies, this site is not considered appropriate for redevelopment as a residential site due to the proximity of the bad neighbour uses area at Sandgate Industrial Estate and the former use of the adjacent land as a landfill site.
Sport England	LP0079	DP0037	Support for policy NE2.	Support noted and welcomed.
Northumbrian Water	LP0241	DP0207	We support policy NE2 Green Infrastructure which cross-refers to policies CC1 and CC2 encouraging green infrastructure initiatives that can help alleviate flood risk by incorporating surface water drainage (SUDS). We have recommended revisions to policy CC2, as set out above, and if that policy is amended we still support the cross-referral to it here at policy NE2.	Noted.
Resident	LP0256	DP0230	Several green spaces are incorrect.... NE2d Barnard Grove school has been rebuilt on part of the green area shown and needs to be changed! NE2j doesn't reflect the actual green space needs to include the area behind the Tall Ships pub and wider alongside Hart Road and Easington Road, to include the large footpath/grassed area behind Daisy Close, Buttercup Close and Siverbirch Road; it appears that you have drawn/outlined NE2i correctly, the boundary abuts the housing built but in the aforementioned boundary is too far away from the houses already built for about 4/5 years for Buttercup and about 6/7years for Silverbirch. There is also a little green space omitted on Meadowsweet Road, which is similar in size to several other NE2i!	These comments are welcomed – the Proposals Map will be amended to reflect any necessary changes.
Sovereign Park	LP0260	DP0235	Hansteen broadly support this section of the plan. However the land covered by NE2e (as it is shown along Seaton Lane), and NE2j,(as it is shown covering the spoil area to the rear of Sovereign Park land) are the subject of on-going discussions with officers (including those in	With regard to the open space allocations along Seaton Lane, it is considered that these perform an important function as a green space buffer between housing areas to the south and the existing employment uses to the north, and are an integral part of the green

Company	Unique Ref	DP Ref	NE2 Green Infrastructure	Planning Policy Response
			the planning department), which could result in bringing forward a joint housing development on land owned by the council and Hansteen. Hansteen is concerned that the policy as currently does not allow for the possibility of moving/ utilising open space in order to facilitate development and in a way that would result in an improvement to Hartlepool's green infrastructure. If this is the policy makers' intention, Hansteen would object to the policy as drafted. If it is not, some clarification within the policy to allow for such improvements woud be welcomed.	infrastructure network. With regard to the open space shown on the proposals map as NE2j it is considered that this area should be retained as semi-natural green space. It already has grassland species diversity and there is potential to increase the species diversity, create more open areas and enhance the value of the ponds. There is no requirement to allocate additional general employment land and the Council that this is an area where a sustainable housing area could be created given surrounding land uses and constraints affecting the site.

Preamble NE3: Green Wedges

Company	Unique Ref	DP Ref	NE3 Preamble	Planning Policy Response
Resident	LP0201	DP0159	It is very important that where green wedges are created as part of a development, work should start on them as soon as building commences. This is so that planting has time to mature. 16.52 South West Extension green wedge future maintenance should be via a sum committed to the Council. It should be sufficient to cover a 25 year period and allow for an extra member of staff for the Countryside Team. Parks and Countryside staff and volunteers already look after the Greatham Beck LWS and the grassy banks parallel to the A689, so it makes absolute sense for them to be funded for the care and upkeep of the green wedge.	The Council agrees that green wedges, and other elements of green infrastructure, should be in place as soon as practical so that they can be used by new residents. As stated this is particularly important for new planting to allow it to be established and the Council will work closely with developers to get planting in place before substantial building work commences. Where appropriate a timescale for new planting and green infrastructure will be agreed as part of a master plan approach. The Council will also work closely with developers and other relevant agencies to ensure that maintenance agreements/arrangements are in place for green infrastructure.

Policy NE3: Green Wedges

Company	Unique Ref	DP Ref	NE3 Green Wedges	Planning Policy Response
Hartlepool Civic Society	LP0013	DP0231	The Society supports this policy.	Noted.
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council welcomes and supports this policy. In particular the green wedge along Greatham Beck, part of the South West Extension, is considered to be of particular benefit to Greatham and supported fully as it is indicated on diagram 1.	Support noted and welcomed.
Wynyard Park	LP0027	DP0223	Wynyard Park has set out site specific concerns regarding the proposals map and its designation of various parts of land as a Green Wedge in the context of draft Policy HSG6 . These comments also apply to draft Policy NE3 and as these designations have not been based on a detailed layout plan, they would likely cause unnecessary policy. 11, conflict issues in the future. Furthermore, it is noted that the woodland surrounding Wynyard Park from north to south also falls within the NE3 designation. It is not considered an appropriate designation for woodland and Wynyard Park object to this designation.	It is noted from other comments made by Wynyard Park on the Local Plan that they seek to ensure that Wynyard Park is a sustainable development. Green wedges as part of a green infrastructure network are an integral part of sustainable development. The Council also contends that woodland is entirely appropriate as part of a green wedge designation. Nevertheless the Council will work closely with Wynyard Park Ltd to minimise any potential policy conflicts.

Preamble NE4: Ecological Networks

Company	Unique Ref	DP Ref	NE4 Preamble	Planning Policy Response
Environment Agency	LP0031	DP0190	Tees Estuary Partnership Hartlepool Borough Council is a partner in the Tees Estuary Partnership (TEP). The TEP vision is; 'to create an estuary that is an exemplar for nature conservation, with thriving habitats and populations of birds and animals, and which drives sustainable economic growth and business investment in the area. All users of the estuary will have a common understanding of the environmental and socio-economic value of the Tees and the needs of other stakeholders. This promotes integrated planning and sustainable development of the estuary alongside improvement of the habitats and infrastructure.' We are aware that work is being carried out during 2016/17 to produce a masterplan of habitat enhancement opportunities that can then be delivered proactively through seeking project funding, and reactively through biodiversity and offsetting obligations associated with development proposals. Lord Heseltine's report, 'Tees Valley Opportunity Unlimited - June 2016', included the recommendation; 'The Combined Authority should take the lead on the natural environment agenda, recognising the significance of the river corridor and enabling increased access through strategic footpaths, pedestrian and cycle river crossings, and further development of moorings or marinas, and completing the "missing link" in the new England Coast Path.' In light of the above, we recommend that the Hartlepool Borough Council Local Plan include specific mention of the Tees Estuary Partnership and the upcoming Tees Estuary Habitat Masterplan within Policy NE2: Green Infrastructure, which focuses on enhancing green infrastructure management and maintenance.	With regard to the Tees Estuary Partnership it is proposed to replace paragraph 16.17 with the following text: "The wider Tees Estuary is an area of significant economic importance, not only for the Tees Valley, but also in a national and international context. The area is of particular importance to the chemical and processing sectors as well as the port. The Borough Council, along with other local authorities in the Tees Valley, will continue to support further growth and investment in the area, while recognising the national and international importance of the Estuary and its surroundings for nature conservation. The Borough Council is a partner in the Tees Estuary Partnership (TEP) which has set a vision to 'create an estuary that is an exemplar for nature conservation, with thriving habitats and populations of birds and animals, and which drives sustainable economic growth and business investment in the area. All users of the estuary will have a common understanding of the environmental and socio-economic value of the Tees and the needs of other stakeholders. This promotes integrated and sustainable development of the estuary alongside improvement of the habitats and infrastructure'. The TEP is currently in the process of producing a Strategic Master Plan for the estuary with key components relating to economic development and improving the environment where economic development takes place, and to habitat creation and enhancement opportunities. The TEP is also working with regulators and businesses to produce a Memorandum of Understanding in relation to the provision of advice, consents and assent. The Borough Council supports the production of a Strategic Master Plan and Memorandum of Understanding for the Tees

Company	Unique Ref	DP Ref	NE4 Preamble	Planning Policy Response
				Estuary and will have regard to these when implementing Local plan policies.

Policy NE4: Ecological Networks

Company	Unique Ref	DP Ref	NE4 Ecological Networks	Planning Policy Response
Greatham Parish Council	LP0018	DP0167	Greatham Parish Council strongly supports this policy.	Noted.
Brenda Road Holdings Ltd	LP0244	DP0212	Generally we support the development of the Green Infrastructure Network especially the designation of Golden Flatts as a “Green Wedge”. We would encourage the council to work with developers where there is an opportunity to enhance and protect the natural environment. We would point out that our proposal includes several features designed to enhance local biodiversity including the opening up of the River Stell.	Comments noted and welcomed.

Preamble NE5: Playing Fields Policy NE5: Playing Fields

Company	Unique Ref	DP Ref	NE5 Preamble	Planning Policy Response
Resident	LP0096	DP0054	Keep sports fields and pitches, encourage beach / sea sports.	The policy seeks to retain existing sports fields and pitches unless there are exceptional circumstances. Where such facilities are lost to development the Council will normally require alternative provision. Beach and sea sports can be encouraged in appropriate locations such as Seaton Carew which has a role as a traditional seaside resort.

Policy NE5: Playing Fields

Company	Unique Ref	DP Ref	NE5 Playing Pitches	Planning Policy Response
Sport England	LP0079	DP0037	Sport England notes and welcomes the intention of this policy, but we would suggest that it should refer to playing fields rather than playing pitches. Paragraph 74 of the NPPF and Sport England's statutory role in the planning system both relate to playing field rather than playing pitches. Whilst the two are related, they are not interchangeable terms. For clarity, the GDPO defines a playing field as; "the whole of a site which encompasses at least one playing pitch". Whilst a playing pitch is defined as being; a delineated area which, together with any run off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo." Sport England protects playing field because it is the resource that accommodates playing pitches. It is not possible to protect playing pitches per se as their delineation on playing field does not constitute development and their number and type can vary on playing field from season to season and year to year. So the policy as currently written would not protect an area of playing field if it was not marked out with a playing pitch (since it only protects pitches). It could therefore be circumvented by reducing the size and number of playing pitches set out on a playing field – or not setting any out at all – then seeking permission to develop those areas that do not contain a pitch. In light of the above Sport England must object to policy NE5 because it inadvertently fails to offer adequate protection to playing fields	The Council accepts the advice of Sport England and will amend references in policy NE5 and the supporting text (and where necessary elsewhere in the Plan) to refer to playing fields instead of playing pitches.

Preamble NE6: Protection of Incidental Open Space

No Comments

Policy NE6: Protection of Incidental Open Space

No comment.

Section 11 of the Consultation Statement, covering:

- **Comments on appendices**
- **Any other comments**

Comments on appendices

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
Environment Agency	LP0031	DP0190	Sustainability Appraisal We have assessed the Sustainability Appraisal Report and have no comments to make. We support the changes suggested by the Environment Agency, which have been taken forward in the Local Plan and identified in the Sustainability Appraisal.	Noted.
Historic England	LP0044	DP0213	Monitoring and Review: We note that there is currently no reference within the plan of how it will be monitored and reviewed? The draft Strategy for the Historic Environment has included a number of actions which might help to inform a more strategic monitoring programme for heritage assets, including the setting of key targets.	A monitoring framework will be submitted at Publication stage.
Sport England	LP0079	DP0037	Finally we note that the draft proposals map identifies all land covered by draft policy NE2, and allocates a letter to sites to denote the type of green infrastructure. Whilst there are a significant number of playing field sites in Hartlepool to check it appears that Catcote School's playing is not recognised as playing field, and this should be rectified.	This will be checked and the proposals map amended if necessary.
Resident	LP0217	DP0179	Preferred Options Proposals Map It would have been preferable to have a grid reference for the map to facilitate comments on specific locations. This could be done retrospectively. At the next Revision, more detailed Drawings should be prepared for specific areas where change of land use is being proposed, eg destruct/ construct, to facilitate clarity. Some of the green spaces on the Drawing are new, but this cannot be readily determined from the Key. It would be preferable to list the new green spaces by grid reference - see above.	The Council will endeavour to make the proposals map key and the designation on the map itself clearer in the next version of the Local Plan.

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
Resident	LP0230	DP0194	Appendix 6: Sites of Nature Conservation Importance - Summerhill is not listed as a Local Wild Life Site Appendix 10: Existing and Potential Components of an ecological Network - Summerhill is not listed as a Local Nature Reserve. The Hartlepool Green Infrastructure - Supplementary Planning Document February 2014 lists Summerhill as a LNR on Page 30 and a LWS on Page 29.	Summerhill is a Local Wildlife Site and Local Nature Reserve. The appendices will be brought up to date in the next version of the Plan.
Friends of Hartlepool's Wild Greenspaces	LP0231	DP0195	Appendix 6: Sites of Nature Conservation Importance - Summerhill is not listed as a Local Wild Life Site Appendix 10: Existing and Potential Components of an ecological Network - Summerhill is not listed as a Local Nature Reserve. The Hartlepool Green Infrastructure - Supplementary Planning Document February 2014 lists Summerhill as a LNR on Page 30 and a LWS on Page 29.	Summerhill is a Local Wildlife Site and Local Nature Reserve. The appendices will be brought up to date in the next version of the Plan.
RSPB - Northern England Region	LP0253	DP0225	RSPB comments on the Habitat Regulations Assessment (HRA) of the Hartlepool Local Plan Preferred Options Consultation Document - May 2016 Thank you for consulting the RSPB on the above named document. We commend Hartlepool Borough Council (HBC) in commencing the HRA process at this stage of the local plan development so that it can be progressed alongside other local plan preparations and its evidence utilised to underpin the Local Plan (Plan). In general, the RSPB is concerned about the approach taken by HBC in its HRA, which we consider raises significant uncertainties about the overall soundness of the plan. The RSPB is concerned about the way in which the screening exercise has been undertaken both with regards to internationally designated sites and which parts of the Plan need to go through to an appropriate assessment. Our comments regarding the former are detailed within Annex 1. It is the overall aim of the screening exercise to decide which parts of the Plan need to go through to an appropriate assessment. Any additional stages within this (i.e. effectively a screening within a screening) unnecessarily complicates the screening process and risks the introduction	Version 2 of the Hartlepool Local Plan includes the following statements with regard to the RSPB consultation statement: A comprehensive response was received from the RSPB (dated 22/07/2016) and this version of the HRA has addressed many of the issues raised. 'The RSPB proposal of examining Likely Significant Effect (LSE) through the source-pathway-receptor method has been adopted'. 'In deciding which internationally designated sites should be considered, as to a Likely Significant Effect (LSE) of the Local Plan on them, it should be born in mind that policies within a plan could have effects outside of the geographical area to which the plan pertains. For example environmental variables such as changes in air quality or water table levels may have effects some distance beyond their source. For this reason it is general practice to consider at the screening stage internationally designated sites within 15km of the geographical boundary to which a plan pertains. In this HRA all internationally designated sites within 15km of the boundary of Hartlepool Borough have been considered in the

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
			of errors. The RSPB recommends assessing the policies based upon a clear understanding of the overall spatial implications of each policy, both on its own and ultimately in combination with the other policies within the Plan: the latter step is particularly important as the legal obligation upon the Council is to assess the overall effect of the Plan and not the individual policies within it. Failing to assess the totality of the Plan risks missing potentially damaging implications. We believe that there is excessive deferral to the planning application stage and a significant reliance upon Policy LS1 - the Locational Strategy- within the HRA to conclude that the individual policies will avoid a likely significant effect (LSE) upon the relevant designated sites. This approach does not evaluate the likelihood that developers will be able to bring these schemes forward at the planning application stage. Consequently the evidence base for the Plan (in particular the HRA) does not provide adequate information to enable the soundness of the Plan to be evaluated as required under paragraph 182 of the National Planning Policy Framework. In particular, we are concerned that it is not possible to demonstrate that the Plan is justified, because there is insufficient evidence to show whether it is the most appropriate strategy. It is not possible to demonstrate that the Plan is effective as the HRA raises profound questions about whether the allocations are deliverable, but does nothing to address those questions. We consider that the solution to the issue we have highlighted is to evaluate the likely impacts of each of the schemes to determine the likely prospects of its delivery. For ease of presentation we suggest the adoption of a "traffic light" approach: Red: there are serious concerns that a project-level assessment would conclude that the scheme cannot be consented – such allocations should be rejected from inclusion in the Plan. The onus would be on the landowner promoting the site as a departure from the Plan to demonstrate	screening process for LSE from the Hartlepool Local Plan. However, it is better to work to ecological units and cause and effect relationships, rather than hypothetical boundaries and so some more distant European Sites have been included. This more closely follows the RSPB's preferred ecosystem method of following through each LSE in terms of 'source, pathway and receptor'. That is, LSE is 'development (source) and any adverse consequence (pathway) on a European Site (receptor)'. Local Plan policies must control these consequences to remove LSE'. The 'screening within a screening' has been retained within version 2, though made much clearer. This is because the screening has been done in two steps (A and B). The aim of the first is to quickly screen out policies which clearly have no LSE, in order to be able to concentrate on the ones that are less clear cut. Step B looks at the policies which flagged up possible LSE. By examining these in more detail, some are screened out. Those that cannot be screened out go on to HRA Stage 2 Appropriate Assessment. HBC has taken RSPB advice and inserted the section 'Hartlepool's relationship to the European Site' within each of the European Designated Sites tables showing interest features and vulnerabilities. The way Version 1 was set out, it appeared to have screened each policy on its own merit, rather than thinking how each might impact spatially and in combination with others. Version 2 has considered spatial and in-combination effects and has presented this in a clearer way. Regarding too much reliance on Policy LS1 – the Locational Policy: The original statement was: 'Each of the issues or types of development outlined in LS1 is covered by its own, more detailed, policy within the Local Plan and effects on site integrity are therefore considered for each of those policies where this has been flagged up in the screening exercise. The

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
			that there would not be harm. Amber: It is considered likely that the scheme may be deliverable, depending on the provision of satisfactory mitigation measures. The proportion of the Plan that is represented by schemes in this category should be clearly understood. The Council should be prepared to bring forward evidence clearly demonstrating that any mitigation measures will work for that type of development at that location being relied upon and are deliverable in a manner which will permit the developments to go ahead. Green: It is considered that the scheme will not harm any internationally designated sites. Our detailed comments are provided in Annex 1 with reference to page and section number. We hope that you find our comments/suggestions helpful and we are very happy to further discuss these with you. NB. Appendices is on file and should be consulted when considering comments.	Locational Strategy itself contains the guiding principle that: 'New development will be located or designed so as not to have either directly or indirectly an adverse impact on the integrity of internationally designated nature conservation sites. The impact of a development must be considered both alone as well as in combination with other plans and programmes. Where impacts would otherwise have an adverse effect, mitigation measures will be required in advance of the development that meet the Habitats Regulations'. Given the inclusion of the above statement, the policy of itself is assessed as not having an adverse effect on the integrity of any internationally designated sites'. HBC accepts that in version 1 there was a general presumption that mitigation would be sought via the HRA process at the detailed development control planning application stage. Hartlepool BC has taken advice from the RSPB and has taken the emphasis off of this policy for mitigating LSE and has embedded mitigation within the appropriate policies. Version 2 of the HRA better demonstrates how allocations are deliverable, particularly with regard to mitigation written in to the policies. The adding of a visual traffic light approach was considered but would have made the tables over-complicated; particularly as it was felt that it was better to retain the Natural England guidance on screening using A, B, C and D coding (which was simplified by doing away with the sub-categories). Each of the comments in Annex 1 was considered and in most cases these were helpful and the HRA was consequently improved.

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
				Version 2 includes the following in the summary and this demonstrates how advice and a more rigorous approach has made the HRA a more robust process: 'In line with neighbouring local authority areas, the likelihood of increased disturbance as a direct result of new housing is identified. Mitigation is required for indirect recreational disturbance and the report discusses that these will be delivered through three pathways: • Strategic policy guidance from Hartlepool BC • Hartlepool BC day to day Foreshore Services provision • Developer contributions Changes to policy wording has ensured that developers are given clear guidance which steers them away from potential adverse impacts. Policies are much stronger regarding how mitigation (should it be necessary) must be mitigated. Mitigation is required through Planning Obligations and this will be addressed in greater detail through a SPD. Developers will be expected to provide mitigation and this will mainly be in the form of maximum provision of Suitable Alternative Natural Greenspace (SANGS) for the application site and/ or a financial developer contribution. The financial developer contribution will be made to the Council and spent through Foreshore Services (the current mechanism by which Hartlepool BC manages issues on the coast) or one of the existing coastal management plans (eg: Durham Heritage Coast; T&CC European Marine Site)'. Therefore, this version has put a much stronger emphasis on mitigating LSE and brings it into line with neighbouring assessments.
TM Darling & Son	LP0245	DP0214	Habitat Regulations	The changes noted above equally apply to this response.

Company	Unique Ref	DP Ref	Comments on Appendices	Planning Policy Response
			Our interpretation of the HRA regulations suggests you may need further consultation with Natural England. There would appear to be a circular argument whereby the HRA screens out any impacts for the proposed development based on the fact that the policies will require mitigation if there is an impact. We would question whether this approach is compliant with the Habitats Regulations and leads to issues of delivery.	

Any other comments

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
Fens Residents Association	LP0011	DP0010	We have been careful to ensure that the comments and opinions in this response are representative of the majority of people on the estate, even if they do not respond individually. Many look to us to put forward their concerns, or indeed approvals, when consultations such as this arise. Having examined the whole document we find that the chapters covering Climate Change, Quality of Place and the Natural Environment include aspirations and aims which deserve support and endorsement from residents and their representatives. Indeed, if they are ultimately to influence development for the better, these chapters are supportive of the additional measures and amendments needed and which we set our below. We consider them absolutely essential for the best outcomes, not only for residents of the Fens Estate and future residents of the South West Extension (SWE), but for all of Hartlepool. We hope that these comments will be fully taken on board and that action and amendments result from them. Please contact our Chair, Robert Smith if any clarification is needed.	Noted.
Park Residents Association	LP0014	DP0187	The above comments are a précis of Park Residents' Association Members views and opinions, further detail is available should you need clarification on any points.	Noted.
Elwick Parish Council	LP0016	DP0222	Elwick Parish Council, along with other rural parishes, has invested considerable time and effort in the development of the Rural Neighbourhood Plan. We are therefore delighted to see that our Plan is broadly in agreement with the proposed Local Plan.	Noted.
Hartlepool Rural Plan Working Group	LP0017	DP0210	Map of site provided - please see hard copy of submitted information.	Noted.
Greatham Parish Council	LP0018	DP0167	Please note - throughout this submission where Greatham is used it should be assumed that this refers to the entire Parish including South Fens unless village is clearly stated.	Noted.
EDF energy	LP0019	DP0227	The West Somerset Local Plan Appendix B is attached to this letter for	Noted.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			reference - please consult this for reference. It is saved under this response reference electronically and in hard copy.	
Stockton Borough Council	LP0022	DP0032	Thank you for consulting Stockton-On-Tees Borough Council on the Preferred Options Local Plan for Hartlepool. In general, the Council support of the contents of the Local Plan. However, the following comments are highlighted at this stage for further consideration and discussion under the Duty to Cooperate. Stockton-on-Tees Local Plan As you will be aware the Council have begun the process of preparing a new Local Plan following a review of the evidence base. The evidence base review includes a Strategic Housing Market Assessment (incorporating objectively assessed housing needs), Employment Land Review and Town Centre Uses study. The Council have engaged adjoining authorities throughout the preparation of the evidence base. Whilst the Strategic Housing Market Assessments for both Stockton and Hartlepool identify that they are not within the same housing market area it is evident that Wynyard is a strategic cross boundary issue. I hope these comments assist Hartlepool in progressing the Local Plan and we look forward to working in collaboration with you at Wynyard to ensure the area is successfully delivered. Notwithstanding any future meetings we would be obliged if you would keep the Council informed of progress on the Local Plan.	Noted – the Council will continue to work closely with Stockton Borough Council on all relevant cross boundary issues as part of the duty to cooperate.
Wynyard Park	LP0027	DP0223	To conclude, Wynyard Park welcome the quantum of development that has been included within the plan to-date, however, it has been necessary to object to the current strategy outlined within the Local Plan Preferred Options as there are concerns that this is the wrong approach in the context of the positive discussions held to date, the oversupply of employment land and the need to significantly boost the supply of housing within the Borough. As such, it is requested that the amount of land to be allocated for residential development be significantly increased and that the employment allocation EMP1 be removed. We welcome the opportunity to continue to hold positive discussions with Hartlepool Borough Council in the future in order to review the evidence base and ensure that the Local Plan facilitates the creation of an aspirational and deliverable future for Wynyard Park.	The Council notes the response of GVA/Wynyard Park requesting that policy EMP1 (Wynyard Business Park) be removed from the Local Plan. Wynyard Business Park performs an important sub-regional, if not regional, role in providing an attractive, highly accessible site for potential inward investment. The Business Park has so far attracted several significant investment developments and the Tees Valley as whole needs to be in a position of having a portfolio of high quality employment land to meet potential requirements of inward investors over the next 15 years. To remove the Wynyard Business Park allocation at this stage would be short-sighted and place Hartlepool and the rest of the Tees Valley at a significant disadvantage in attracting new

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			We look forward to discussing the representations to the Local Plan with Officers in due course. However, should you have any queries in the meantime, please do not hesitate to contact me. Wynyard Park have also submitted a Highway and Transportation Considerations Technical Note for consideration as part of their representation. This is saved electronically and in hard copy on the PO consultation file.	inward investment.
Highways Agency	LP0029	DP0196	Covering letter and evidence base document also submitted - these should be viewed in conjunction with the comments on the policies.	Noted.
Environment Agency	LP0031	DP0190	Groundwater and Land Contamination We are very pleased to see that our previous comments in relation to aquifer protection and the use and clean up of contaminated land have been incorporated into the Local Plan. We particularly welcome the inclusion of sections 11.40 (Underground Storage), 16.30 and 16.31 (Aquifers) and those stating that future developments should target brownfield land.	Support welcomed.
Coal Authority	LP0042	DP0172	Thank you for consulting The Coal Authority on the above document. Although a Coalfield Authority Hartlepool has no coal mining legacy issues and no surface coal resource. On this basis the Coal Authority has no comments to make on the Local Plan Preferred Options Document.	Noted.
Persimmon Homes (Teesside)	LP0045	DP0209	Conclusion Persimmon Homes recognise that the Plan seeks to focus development in those areas most likely to deliver homes and jobs however we do not consider the sites selected to be the most sustainable or deliverable, or in the quantity necessary to ensure the borough can meets its full objectively assessed housing needs. Therefore whilst we are supportive of the need for a new local plan in accordance with the principles of the NPPF, we believe there are still a number of key areas which require focus and re-examination before it can be considered sound. These areas are as follows: • Greater emphasis should be placed upon growth and the need and demand for new housing within the Council's vision, themes and objectives	These issues are dealt with under the appropriate sections. Please refer to relevant section for comment.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			to align the plan with the core principles of the NPPF; • The current designation of Strategic Gaps upon the Proposals Map is unclear, unnecessary and unjustified. Any such designation should be clearly defined and supported by the appropriate Policy detailing how the designation should be interpreted. • Policies CC1 and QP7 cannot be justified in light of the Written Statement to Parliament on 25th March 2015 by Eric Pickles MP Secretary of State for Communities and Local Government which made clear that Local Planning Authorities should not seek to set energy requirements from developments which go beyond the Building Regulations. • Greater emphasis should be placed upon the need not only to improve local transport links 'in Hartlepool' but also those at the strategic level affecting cross boundary issues in order to maximise the opportunities for growth within the borough. • It is imperative that Viability Testing is undertaken as part of the plan-making process to support and inform the progression of the Local Plan and demonstrate that sites are not subject to such a scale of obligations and policy burdens that their ability to be developed viable is threatened. • Given the available information the housing requirement cannot be fully justified. It may also be necessary for the housing requirement to be uplifted in response to the need to meet the full affordable housing needs of the borough. In light of deliverability concerns with High Tunstall and question marks over the sustainability of sites at Wynyard, it is essential that the plan identifies further housing. In this respect Phase 2 of the Hartlepool South West Extension should be allocated for a further 1000 dwellings over the plan period (2300 in total across the whole HSWE) to maximise the potential social, economic and environmental benefits of the development, ensure the delivery of the outstanding infrastructure (link road) and to make a significant contribution to the delivery of new homes within the borough.	

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			• The proposed housing supply does not include any buffer to account for any under-delivery whilst the plan also identifies a shortfall of housing in the final 5 years of the plan period. To create flexibility and choice as required by the NPPF land at Hart Farm should be allocated for up to 170 units. • Any affordable housing target should clearly define the burden that will be placed upon the development industry and should be informed by an appropriate viability assessment. Any reference to 'minimum' should therefore be removed Policy HS9 and replaced with a maximum 'cap'. Further investigative works are therefore required to establish a robust evidence base which will ensure that the aspirations and policies of the plan are fair, achievable and soundly justified to enable the delivery of homes within the borough. Persimmon Homes will therefore endeavour to work with the council to resolve these matters and look forward to continuing engagement in the evolution of the Local Plan to a point that is beneficial to all. On this note, both Persimmon Homes and the Leebell Consortium are happy to discuss further any of the comments made within this representation and would request to be kept informed of future consultations upon the Hartlepool Local Plan and any of the supporting documentation. NB - APPENDIX SUBMITTED OF LAND AT HART FARM - PLEASE SEE SUBMISSION.	
Resident	LP0046	DP0001	From my own experience, I know how difficult it is to produce documents of this type. I feel that you have done an excellent job and produced a good framework that will help define the Hartlepool of the future.	Thank you. Support noted.
Resident	LP0048	DP0004	Developments seem to be focussed on the outer parts of the region with insufficient development in the town centres particularly with respect to housing and commercial development. Road infrastructure developments that are proposed do not address the	Whilst brownfield town centre development does help regenerate central areas, there are limited sites, and very few are viable to develop. In order to develop a deliverable plan it has been necessary to propose greenfield sites to meet the

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			major pinch point of the A19 Tees crossing and hence will not alleviate the issues identified.	housing need over the plan period. It is agreed that there is an issue at the Tees flyover and this causes queuing on the A19. The Tees Valley Combined Authority and local authorities are actively looking at ways to address this which may include a new Tees Crossing. In the shorter term Highways England have secured funding to increase the A19 between Wynyard and Norton from two lanes to three to help capacity issues. Highways England and the Local Highway Authority will have to be happy with mitigation/improvement measures to both the Strategic and Local Road Networks proposed by the development but it would be unrealistic to say that no new development could occur in Hartlepool until the Tees Crossing Issue was addressed.
High Tunstall Homes	LP0060	DP0017	In conclusion, we confirm our strong support for Policies HSG5 and NE3(5) but our objection to Policy LS1 insofar as it proposes a Strategic Gap be allocated to the immediate west of the proposed High Tunstall development site. Please keep me informed as to the further progress of the Local Plan.	Noted – issues addressed above under specific policies.
Homes and Communities Agency	LP0063	DP0020	Additional information submitted, please see paper file.	Noted.
Sport England	LP0079	DP0037	While the National Planning Policy Framework has radically simplified the Planning system in England, a central tenet of Plan-making remains that the plan must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The NPPF explains that Local Planning Authorities should set out the strategic priorities for the area, including strategic policies to deliver ….(inter alia) • the provision of health, security, community and cultural infrastructure	Noted – the Council will undertake updates to the playing pitch strategy and built sports strategy when appropriate to keep the evidence base up to date.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			and other local facilities Paragraph 171 falls within the section of the NPPF that sets out advice on the evidence base that Plans need, and deals with Health and Well-Being. It advises; "Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation, and places of worship), including expected future changes and any information about relevant barriers to improving health and well-being." This advice is amplified in the section of the NPPF that deals with promoting healthy communities. Paragraph 73 states; "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required." In light of the above, it is Sport England's policy to challenge the soundness of Local Plan and Local Development Framework documents which are not justified by; - An up to date playing pitch strategy (carried out in accordance with a methodology approved by Sport England) - An up to date built sports facilities strategy (carried out in accordance with a methodology approved by Sport England). By 'up-to-date' Sport England means prepared within the last 3 years for Playing Pitch Strategies, and 5 years for Built Sports Facilities Strategies	

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			Our understanding is that Hartlepool's Playing Pitch Strategy dates from 2012, whilst the Built Facilities Strategy dates from 2013. The Council's Leisure Services team have recognised the need to undertake a new PPS, but this has yet to commence. It will be imperative that work on the new PPS reaches the assessment output stage as a minimum before the Plan's policies, and allocations / designations become fixed.	
Resident	LP0080	DP0038	One of the arguments for building further housing estates in Hartlepool is for a population expected to commute either north or south via the A19. Already the A689 and the A179 struggle to cope with the current volume of traffic to the A19. The A19 is regularly at a standstill at peak times due to accidents or broken down vehicles. The network of roads around Hartlepool is totally inadequate, especially in the Park and Hart Lane areas. Before any further building is considered the access roads must be improved to cope with the increased volume of traffic. A prime example is the Bellway site on the Elwick Road , large wagons, in particular those belonging to Tewards, are accessing the A19 using the narrow Elwick road and also the Dalton road. Both of these roads are used for leisure by cyclists, walkers and horse riders, this is an accident waiting to happen . A fairer representation of the volume of traffic would be an assessment, at critical points, over a period of 14 to 28 days and not during holiday periods! (In particular outside of school holidays).	Proposals for development are required to provide new infrastructure if the development is likely to have a negative impact upon the road network. For example the site at High Tunstall and other possible sites are expected to provide a new Elwick bypass and a grade separated junction with the A19, this should assist in reducing the traffic levels on the A179. Furthermore the Council are committed to improving the walking and cycling links along with the promotion of such links within the borough which can help to reduce road traffic.
Resident	LP0082	DP0040	I have recently reviewed the Hartlepool Local Planning Framework, Local Plan Preferred Options and am very concerned about the proposal for 3 additional turbines at High Volts and a 6 wind turbine development to be placed in Brenda Road should the 3 current proposed turbines are rejected by the Planning Inspectorate. The existing meteorological /anemometer mast at Tofts Rd West is 80M high and already prominent on the skyline from several points within Seaton Carew, even as far as Endeavour Close.	The government's National Planning Policy Framework (NPPF) states (paragraph 97) that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. NPPF paragraph 97 goes on to state that local planning authorities should:

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			Six turbines of 99M would represent an unacceptable noise problem and impact on the visual amenity for hundreds of residents of Seaton Carew. I do not believe that wind turbines should be in such close proximity to residential properties regardless of size. This is not a remote rural area any many would experience the impact.	• Have a positive strategy to promote energy from renewable and low carbon sources • Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts • Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources There is a duty therefore, as part of the preparation of the Local Plan, for the local planning authority to positively consider the potential in the Borough for encouraging energy generation for renewable or low carbon sources, and to consider potential locations where such development could be located. The government announced new considerations to be applied to wind energy development in June 2015. Local planning authorities can only grant planning permission for one or more on shore wind turbines if: • The development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan, and • Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing The government's intention for these new considerations is so that "local people have the final say on wind farm

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
				applications". The Local Plan Preferred Options document has identified two areas as potentially suitable for wind turbine developments: • The High Volts area in association with the existing wind turbines • The Brenda Road area in south east Hartlepool Hartlepool Borough Council, in considering its response to the recent planning applications for three 175m wind turbines on land at Graythorp industrial estate, Brenda Road West, and Tofts Farm West concluded that: • The proposed sites are located at the heart of an industrial area of the town characterised by large scale industrial installations including Tata Steelworks, Phillips Tank Farm, the Huntsman plant, and the Nuclear Power Station • The area is crossed by major power lines, and Seaton Port to the south is periodically occupied by large structures such as oil platforms • The turbines would be visible from some residential areas of Seaton Carew. However the visual impact must be viewed in the context of the existing industrial nature of the landscape and balanced against the benefits of the proposal On the basis of the evidence outlined above the Preferred Options document has identified an area centred on the Brenda Road industrial area (to the south and east of the main railway line) as potential suitable for wind turbine development. Consultation on the Local Plan Preferred Option has

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
				demonstrated a considerable amount of concern and opposition to proposals for further wind turbines in Hartlepool. However given the timing (at the end of the Local Plan Preferred Options consultation period) of the Government Inspector's decision not to proceed with a public hearing into planning applications for 3x175m turbines due to lack of adequate consultation by the developer, it has been deemed appropriate to carry forward the wind turbine areas to the next stage of the Local Plan process as there is some concern that supporters of the 3 wind turbines at the application stage may have understood that the applications had been approved by the Council and therefore had not made a representation on the Local Plan.
Resident	LP0083	DP0041	We would like to thank the help given by Nomusa Malinga and Helen Williams.	Noted and thanks you for your positive feedback.
Resident	LP0085	DP0043	A map has also been provided with this response - this is on the hard copy file.	Noted.
HCA	LP0086	DP0044	Full report and maps provided - please refer to.	Noted.
Resident	LP0088	DP0046	Local Plan Consultation We refer to the above consultation and have no specific comments to make. The residents of the Town have given up their valuable time to put forward their views over the last six years and it is clear that Hartlepool Borough Councils Planners were not happy with the previous Local Plan because of the removal of the land at Quarry Farm following the largest response of objections over 1000. Following the May 2013 elections the elected Mayor was replaced with a Committee System within six months the Local Plan was withdrawn, the Council decided to follow the Governments National Policy Framework, this decision was followed quickly by Outline Planning Applications from Developers for hundreds of houses rushed through one after another by this Council, soon after the land at Quarry Farm was back on the agenda and although the Council refused the application it was a weak gesture as	Comments noted.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			their defence for refusing the outline planning permission was pathetic. We have questioned the validity of the National Planning Policy Framework with the Department for Communities and Local Government under the Coalition and Conservative Governments and experienced their reluctance to answer any questions. It has been of concern to many people across the Country the close links with Developers and Government so clearly this Policy is just a Developers Charter to get rich quick by bulldozing over our countryside. In a matter of weeks after the bulldozers vandalised this good agricultural land we are informed the Local Plan is ready for consultation. Now that the land at Quarry Farm has been condemned there are more applications pending, in previous correspondence we put the question is this going to be another development on the scale of Bishop Cuthbert? From what we have seen of this Local Plan it endorses the real reason why the previous Local Plan was withdrawn. It is pointless to put forward any comments as it has been shown that contrary to the first of the 12 Core Planning Principles which is to empower local people to shape their surroundings this Council has allowed Developers to ride rough shod over democracy to local people.	
Landowner	LP0095	DP0053	Additional documentation submitted related to the SHLAA process. This is available in hard copy.	Noted.
Middlesbrough Council	LP0209	DP0168	Given the above Middlesbrough Council does not intend to raise any objections to Hartlepool's Preferred Options Local Plan.	Noted.
Health and Safety Executive	LP0211	DP0170	HARTLEPOOL LOCAL PLAN – PREFERRED OPTIONS CONSULTATION Thank you for your request to provide a representation on the above consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved. HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages	A compatibility assessment will be carried out in accordance with the HSE methodology for consultation distances on major hazard installations and major accident hazard pipelines. This assessment will be included in the next version of the Local Plan.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance: 1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents 2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended1 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III)2. Regulation 10(c)(i) requires that regard also be had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes. At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents3. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: http://www.hse.gov.uk/landuseplanning/padhi.htm Encroachment of Local Plan Allocations on Consultations Zones We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocations that could be effected are as shown in the attached Annexes to this letter. Verification of Advice using the Web App	

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website: http://www.hse.gov.uk/landuseplanning/padhi.htm . When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility. Identifying Consultation Zones in Local Plans HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence. Identifying Compatible Development in Local Plans The guidance in HSE's Land Use Planning Methodology, available at http://www.hse.gov.uk/landuseplanning/methodology.pdf will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the	

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on Development Type Tables and the Decision Matrix are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones. There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of the Web App. Provision of Information to Interested Parties – Pipeline Operators The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter. If you have any questions about the content of this letter, please contact me at the address given in the letterhead. Please also see supplementary information provided.	
Resident	LP0217	DP0179	1) The document is somewhat long on narrative, but it serves as a useful starting point. It is recognised that it represents the Preferred Options (subsequent to the Issues and Options published in May 2014) but it is still more a series of aspirational goals than a structured plan.. Once all consultation comments have been received and consolidated it is assumed that the next Revision of the document will include a basic bar chart, or similar, showing the key deliverables in chronological sequence with their proposed start dates, key milestone dates, interactive dependencies, and completion dates, for the initial 5 year period. All subject to change, pending Secretary of State comments etc, but absolutely necessary, nonetheless. The timescale to reach adoption of the Local Plan by February 2018 beggars belief, and is hardly symptomatic of a dynamic approach by either HBC or central Government. It is assumed fast-tracking is not an option as preparation, assessment and revision times need to comply with	Disagree, whilst the plan is aspirational, it also provides policies which help to guide future development within the town to appropriate, sustainable locations. There is no requirement on the plan to go into such detail as much of that is dictated by the market so can only be assumptions – putting too much detail could lead to the plan becoming out of date. The Council aim to submit the plan to the Inspectorate by the end of March 2017 – once submitted the timescales are out of the Council's hands and are dictated by issues such as the availability of inspectors etc.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			mandatory durations laid down by the powers that be? 5) More emphasis should be placed on the importance of public acceptance and engagement - residents must be actively encouraged to take pride in their town by being less parochial and projecting a more positive, enlightened image to the outside world. This should be a top down initiative. Prospective businesses quickly pick up on such nuances when they carry out their scouting missions and it can be a deciding factor in their choice of location. A panel of well-qualified, motivated members of the public (eg Chairs of Residents' Associations) should be appointed by HBC to assist in the on-going consultation process and preparation of the Publication Document in September 2016. 6) A significant proportion of the initiatives contained in the Local Plan should already be up and running and should have been for some considerable time, as part of HBC's fundamental obligations of responsibility and diligence. It should not be necessary to wait until September 2018 before their "implementation". This is particularly relevant to strengthening the local economy. Prioritisation, focus and timing have to be addressed in the next revision of the plan, and must reflect what is deemed necessary as opposed to "nice to have".	Whilst it is agreed that public acceptance is important, that is why we try and consult extensively. With due respect, it is not considered necessary to appoint a panel of members of the public. Residents group etc are all consulted and have chance to have an input into the process to guide the development of the plan. From the Publication of the plan, policies within it will hold weight and therefore it is not necessary to wait until adoption to start using these policies, particularly where there a few or no objections to policies.
Resident	LP0218	DP0180	REFERENCES TO EUROPEAN UNION DIRECTIVES AND POLICIES not necessarily relevant after Britain leaves EU. A lot of them worth incorporating in UK policies and many already exceeded by HBC policies. 1.10, Habitats Regulations Assessment – valid in any event. 7.4 - Carbon Dioxide emissions. Council's written commitment to go beyond EU's targets/Sustainable Energy Action Plan to be commended. 9.52, 9.57, 9.62, Energy Performance for Buildings - Council's intention to go beyond EU targets to be commended. 11.2, European Structural & Investment Funds Strategy - no refererences to actual sources of EU funding in whole document but presumably such funding filters through via other funding channels (such as European	Noted, The UK is still part of the EU and is likely to be at the date of adoption, furthermore many EU Directives are transposed into British law so until the UK leaves Europe and British law is revoked then HBC are bound to apply all the relevant statute, which currently includes ED Directives.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			Regional Development Fund). 11.30, 11.35, 11.39, protection of nature conservation from development. UK legislation also exists so situation should not change. 12.12, Business development in rural area - European Agricultural Fund for Rural Development will no longer exist, a major setback. LT1, Leisure & Tourism table, page 179/180 - EU designated bathing waters. Standard should be maintained in any case. Recreational disturbance impacting on European directives – unclear what directives are. Table 15, Hierarchy of International, national and locally designated sites - EU Birds Directive. Should be upheld. Also listed in page 236, Appendix 1, Glossary. Appendix 1, page 237, Glossary - Strategic Environmental Impact Assessment. No mention of this in main document. Appendix 3, List of Regional Plans, Policies, Guidance and Strategies, page 243 - Tees Valley European Structural and Investment Funds Strategy 2014-2020. No mention of this in main document. Sources of Funding for Development - given the reference to the Tees Valley European Structural and Investment Funds Strategy 2014-2020 in Appendix 3 it is reasonable to assume that a proportion of the funding for the proposals in the Preferred Options document would come from that source – which will no longer exist after Britain leaves the EU. Where will alternative funding come from? GOOD POINTS Intention to maintain green wedge/Urban Fence between town and surrounding villages. Policies relating to promoting health and tackling obesity, eg restricting numbers and monitoring locations/opening hours of fast food outlets.	Strategic Environmental Assessments are referred to in the Natural Environment Chapter of the plans and therefore the reference in the glossary is relevant. Not all plans and policies that have been taken into account are cited within the policy, but it is prudent to list the key policies and plans that inform the plan. Support welcomed Support welcomed (policy RC18)

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			Policies relating to conservation and protection of major leisure and natural environment assets such as Saltholme and Summerhill.	Support welcomed
			Policies relating to climate change, eg energy management and CO2 emissions, energy efficient building regulations which go over and above EU regulations and targets.	Support welcomed (policies CC1 and QP6)
			Recycling facilities - very good ones already in place, both in terms of household refuse collections and Burn Road site.	Noted.
			Intended improvements to public transport, particularly in view of the new housing developments on edges of town which will result in much larger volumes of cars accessing town centre unless alternative transport is easily available. However, not convinced that bus services will be extended to these new areas given that West Park has a very poor bus service at present, based on the notion that most people living in the area have at least one car.	The Council works closely with all the Main public transport providers to ensure that new housing developments are served by buses as soon as practical. Discussion shave already taken place regarding the provision of services to the SW Extension and similar discussions will take place for High Tunstall.
			Vicarage Gardens proposals (café culture/improved connectivity to Burn Valley).	Support welcomed (policy RC5)
			Proposals re improved landscaping at Navigation Point to screen car parking area - however screening will still impede view of waterfront from patrons of restaurants etc. Pity car parking can't be moved to other side of buildings – not well thought out originally.	Comments noted and will be borne in mind in any future design solutions.
Story Homes	LP0219	DP0181	Excessive Use of SPDs Story Homes also raise significant concerns with the repetitive reference to SPDs through the emerging Plan consultation documents. According to the LDS, 8 SPDs are to be provided to support the Local Plan; however, many of these have already been produced. The Council must ensure that it effectively reviews existing SPDs following Local Plan adoption to ensure that they are still in conformity and assist in the interpretation of Local Plan policies. Paragraph 153 of the NPPF stresses that SPDs should be used where they can help make '...successful applications or aid infrastructure delivery...'. The Council should therefore take this into consideration and should avoid	The Council uses SPD`s to provide further guidance on polices within the plan. The Council continually reviews the SPDs and updates them as and when necessary and where resources allow.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			utilising SPDs to introduce policy requirements and unnecessary burdens outwith the formal plan making process. Plan Period Timescales Story Homes have noted that the end date of the emerging plan period is identified as 2031 which would only provide a maximum of a 13 year timescale following successful adoption when considering the dates set out in the LDS. We consider that this is inconsistent with national policy. Paragraph 157 of the NPPF clearly sets out that Local Plans should be drawn up over a '...preferably a 15 year time horizon'. In order to ensure consistency with the NPPF we consider that the Council should consider extending the plan period. Summary Story Homes would be happy to discuss any of the comments made above prior to the next stage of consultation. We would also be pleased to be kept informed of the progress of the plan and any future opportunities to be involved in its preparation.	The plan period is from April 2016 for 15 years until 2031. Noted. Story Homes will be consulted on any future LDF documents.
Resident	LP0221	DP0183	I hope these few comments are helpful in your deliberations and I wish you success in taking this venture forward.	Noted. Response welcomed.
HBC Housing Services	LP0228	DP0192	Housing Services has welcomed the opportunity to be involved in the development of the local plan and support the document in its draft form.	Noted. Response welcomed.
Darlington Borough Council	LP0232	DP0197	I have reviewed the document to identify any strategic or cross boundary issues that may affect this Council, and have concluded that there are no matters of concern which warrant submission of objections or representations.	Noted. Response welcomed.
Home Builders Federation	LP0234	DP0200	Use of Supplementary Planning Documents (SPDs) 10. There is significant reference to the use of SPD in various policies throughout the consultation document (e.g. QP4, QP5, QP7, RUR1, etc). The LDS identifies that 8 SPDs are to be provided, a number of which have already been produced. The Council will have to review any existing SPDs post Local Plan adoption to ensure they are still in conformity and assist in the interpretation of Local Plan policies. 11. The Council should also resist utilising SPDs as a vehicle for introducing	Noted, the Council update SPD`s as and when necessary and when resources allow. The Council seeks to have a full suite of up to date SPD`s referenced within the LP prior to adoption of the LP. Noted. The Council uses SPD`s to provide further guidance on polices within the plan.  Noted. The Council uses SPD`s to provide further guidance on

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			policy requirements and burdens outside of the formal plan making process. The NPPF (paragraph153) clearly states; "…Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development…" Information The HBF would be happy to discuss any of the comments made within this response with the Council prior to the next stage of consultation. I would also be pleased to be kept informed of the progress of the plan and any future opportunities to comment or be involved in the preparation of the plan or other planning documents.	polices within the plan. Noted and welcomed. The HBF will be consulted on further stages of the LP an don new SPDs/SPD updates.
Northumbrian Water	LP0241	DP0207	Concluding Comments To summarise, we are broadly supportive of the overall content and vision of the emerging Hartlepool Local Plan. We commend the Council on a number of the proposed policies and the supporting justification where efforts have been made to holistically support sustainable development and growth. We believe that there are specific elements within Policy CC2 Reducing and Mitigating Flood Risk that need to be reconsidered and reviewed in order to make it more directional and comprehensive. We have already provided the Council with information regarding specific sites and our infrastructure provision and so based on the proposed housing and economic development coming forward we have no additional concerns to raise. We hope the commentary and information provided here is of use to Hartlepool Borough Council in taking forward the Local Plan Preferred Options draft to submission and thereafter examination. We are happy to provide continued input as required or further elaborate on our responses here.	Support welcomed Comments noted and response set out above in Policy CC2 response.
Landowner - Junction of Belle Vue & Brenda	LP0242	DP0208	Please also see covering email, location plans and the copy of informal planning response from HBC (January 2014), these are available in hard copy on the representations file.	Noted.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
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Land interest - Tunstall Farm 2	LP0243	DP0211	A vision document has also been submitted, this is filed electronically and a hard copy is on the consultation representations file.	Noted.
Brenda Road Holdings Ltd	LP0244	DP0212	AAD Limited has been acting as agent for Brenda Road Holdings Ltd in the preparation and submission of an outline planning application (H/2014/0177) and subsequent successful planning appeal (APP/H0724/W/15/3005751) regarding land at Brenda Road, TS25 2BJ. As a result of the above appeal, outline planning permission has been granted for 580 residential units on site which comprises of 210 C3 Units and 370 C2 units, along with associated A1, B1 and D1 uses. The objective for the redevelopment of the SECAAH site is to cater for housing needs of some of the most vulnerable members of society including the elderly, ex-armed forces personnel and those on low income. The development will provide a mix of affordable, assisted and family housing and all homes will be low cost. The development is based around the concept of close care, that is that a resident owns their home and care and assistance is provided to them in their home. This can range from weekly domestic support to personal and care services provided day or night. A 70 unit care home on site will act as a hub for the delivery of care. The A1, B1 and D1 uses are envisaged to be towards the west of the site and will include small business units/offices, local retail and a community centre and crèche. It is estimated that approximately 120 full time jobs will be created within the SECAAH development. This figure excludes jobs created by businesses in the A1 and B1 units. We hope that by revitalising the west of Seaton Carew this will help attract further investment to the area and tie in with the existing plans for the wider regeneration Seaton Carew and Hartlepool. SUMMARY RESPONSE: • We contend that the SECAAH site should be designated as housing land and that the development site be acknowledged in the local plan. • Opportunities to develop existing brownfield and fill in sites with the urban area should be supported.	The SECAAH was not included on the Proposals Map accompanying the Preferred Option as it already had outline planning consent and therefore was not an 'allocation'. All housing sites with a valid consent in Hartlepool are not allocations and therefore not shown on the Proposals Map. Should the situation change prior to the next version of the Plan the Proposals Map/policy will be amended to reflect the latest situation. Other issues such a wind turbines, flood risk and de-allocation of employment land have been dealt with under the relevant topic section of this report. Other issues noted here are addressed under the relevant policy sections.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			• The wider benefits of individual developments to the town should be considered when setting the requirement for affordable housing. • Greater care should be taken in the analysis of flood risk in the borough to prevent the sterilisation of potential development land. • Wind turbines should not be allowed close to homes to the south of Seaton Carew. • The changing needs of an aging population should be considered when making housing plan decisions. • Residential Design guides should be carefully considered so as not to discourage innovative design proposals. • The council should consider de-allocating further employment land for other uses in the borough.	
Stovell & Millwater Ltd	LP0247	DP0216	This is a Supplementary Statement to our submission to the Local Plan Preferred Options – Consultation Document (LPPO) as it relates to proposed housing sites at Hart Reservoir, Hartlepool and Glebe Farm, Hart. It needs to be read within the context of our LPPO submission. Both sites have previously been subject to submissions under the SHLAA. Hart Reservoir is site 25 and Glebe Farm is site 2. In our LPPO submission the site for Glebe Farm covers the farmstead and land immediately to the south of the farm as well as the site to the west of the farm. Hart Reservoir is the subject of an extant planning application. The purpose of our LPPO submission was to comment generally on the document, with particular regard to policy LS1 and the strategic gap, in the light of advocating the merits of the above two sites for housing. We can confirm that Mr Wilkinson is the owner of both sites and we are instructed by him as planning consultants on them.	Comments noted, and the sites with are discussed within the relevant areas of the consultation statement. It should be noted that the Hart Reservoirs site does not currently have a planning permission – there is an application in but this has not yet been determined.
Resident	LP0249	DP0219	Having looked at the draft Local Plan I immediately spotted several contentious issues. I have précised some, but clearly not all, of these issues below. What I find inexcusable is that the council is that whilst it is charged with gathering information from the public in its consultation Local Plan, the council will not accept a statement from residents stating that they object to certain things in the Plan for exactly the same reasons that they objected to them in the previous version of The Plan. The council insists that these details should be submitted in full yet again, even though it	Noted, however is this is a new Local Plan process new representations have to be submitted. The Council cannot assume that just because people commented in the past that they have the same points to raise. The issues and sites relating to this plan are different to the issues and sites put forward in the withdrawn 2013 plan

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			would repeat everything that the council already has on file. This hardly makes sense, given that the council is fully aware that town residents are far less likely to submit complaints if it entails them having to spend time and effort to do this. I think that, as the resident has already made that effort before, the council should be willing to duplicate the complaint providing they receive acknowledgement from that resident that their complaint still stands. Failure to provide this facility merely makes residents assume that the council don't want to receive complaints (especially when that complaint appeared valid enough to have that section withdrawn from the previous Local Plan). Please add these to the comments on the Local Plan. Time restrictions limit the number of comments I am able to make regarding the rest of these plans.	
Cecil M Yuill Ltd (Quarry Farm)	LP0252	DP0224	Summary and Conclusions In summary, Cecil M Yuill Ltd generally welcomes the Local Plan's overall vision for the Borough up to 2031 and, in particular, the desire to: "Maximise quality housing choices and health opportunities to meet, in full, the current and future needs of our residents". Also welcomed is the Council's promotion of a sustainable growth strategy which comprises: "Balanced urban growth with most expansion being concentrated in areas adjoining the existing built up area with growth delivered alongside infrastructure improvements which allow Hartlepool to grow in a sustainable matter with this comprising controlled western expansion of the town into greenfield land adjacent to the existing boundary of the built up area". However, whilst this overarching locational strategy for future development is broadly supported the following changes need to be made to the Plan if it is to be found sound: • Remove the reference to 'prioritising' brownfield land within the existing urban area; • Incorporate a buffer of 10% to allow for both flexibility and choice, via additional allocations, to allow for any under delivery through the non-	Note summary. Issues dealt with under relevant policy areas.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			delivery of sites in their entirety or a reduced quantum of development on such sites. This would generate the need for an additional 600 units based upon the Council's present overall requirement of 6,000 dwellings over the Plan period or 680 based on Regeneris' recommended uplift to 6,750 with both approaches being consistent with the NPPF requirements for the Plan to be positively prepared and flexible and seeking to ensure that the Plan meets the clear aim of paragraph 47 of the NPPF or they need to significantly boost housing supply; • It should be emphasised within the Plan that the overall housing land requirement settled upon is a minimum over the Plan period in order to meet the aims and objectives of paragraph 47 of the NPPF in seeking to significantly boost housing supply; • The Plan needs to make a firm commitment to meet their full objectively assessed needs for both market and affordable housing over the Plan period. The local planning authority acknowledged that at 36% the threshold required for affordable housing per site is unviable with the Council seeking a minimum of 18% on a site by site basis. This will result in a significant shortfall in the 144 affordable units per annum required across the Plan period. Cecil M Yuill in particular consider that the local planning authority must address this clear deficiency as part of the Plan by allocating additional sites for housing which reduces the percentage requirement to allow a greater proportion of affordable housing to be delivered; • The overall housing strategy within the Plan is reliant on the delivery of a grade separated junction on the A19 to the north of Elwick Village. It is proposed that this is funded by a £80m loan from the Local Growth Fund which will need to be paid back over the Plan period via financial contributions from new development. However, the proposed allocations at High Tunstall, Elwick Village and Hart Village relies on a quantum of 1,285 units which would equate to a pro-rata contribution of just over £14,000 per dwelling. This will raise significant viability issues with a knock on effect of a reduction in the delivery of affordable housing across each site. In light of this, additional sites need to be allocated to the west of the existing built up area in order to assist in delivering the major infrastructure works required. 7.4 In order to address the issues listed above, and ensure that the Plan is	Believe this is a typo – it is an £18m LGF bid which has been made. As noted in the housing chapter above it is proposed to include the Quarry Farm 2 site for 220 to assist with the deliverability of the bypass.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			made sound, the following revisions are required: 1. Reference to prioritising brownfield land within the existing urban areas to be removed from paragraph 6.3; 2. Table 6 needs to be revised to account for an uplift in the housing requirement over the Plan period to 7425 (allow for Regeneris' uplift to 6750 and a 10% buffer to allow for flexibility and under delivery) with an uplift in the annual requirement to 495; 3. Reference to the overall housing land requirement settled upon to be a minimum of the Plan period; 4. Inclusion of Quarry Farm in Table 8 with an additional approximate dwelling capacity of 670; 5. Inclusion of Quarry Farm with approximate dwelling provision of 670 within Policy HSG1 (New Housing Provision); 6. Inclusion of Quarry Farm in Policy HSG2 (Overall Housing Mix) to provide a full range of house types; and 7. New Policy HSG8: Quarry Farm Housing Development which relates specifically to the Quarry Farm site, with the wording relating appropriate latest site specific requirements to be agreed with the Local Planning Authority. Also see additional following additional information submitted: - Review of Hartlepool Borough Council's Housing Policy and Evidence Base (Regeneris Consulting) - Site plans of Quarry Farm 2 and Quarry Farm West - Masterplans of Quarry Farm 2 and Quarry Farm West. Saved electronically and in hard copy on the Preferred Options Representations files.	
Landowner (Southbrooke Farm)	LP0254	DP0228	Site location plan and a report 'Review of Hartlepool Borough Council's Housing Policy and Evidence Base' by Regeneris Consulting also submitted as part of the representation - saved with representation refence electronically and in hard copy.	Noted.
Resident	LP0256	DP0230	The local plan does seem to be comprehensive and quite straightforward. Is there no other priority bus route earmarked for the western side of Hartlepool....maybe the one shown on the map could be extended to cover	The identified priority bus route does serve a significant part of the urban population. However the Council holds regular discussions with all the main bus operators and additional bus priority routes will be considered where these can be

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			other large housing estates, to encourage use of public transport and lessen the high dependency of the private car.	practically implemented and where sufficient resources are available.
Resident	LP0258	DP0233	Please be aware all local traffic, even from this new development will travel down the main street towards the Raby Arms roundabout to gain access to the A19. No locals travel up the Main street to join the Hart Bypass (A179) as this is a very dangerous road to join as it is a death trap if you wish to join the A179 to join the A19	Should the housing allocations proposed at Hart proceed to planning application stage the developer will be expected to submit a traffic assessment looking at the impact of the development on the existing road network. On the basis of this assessment the Council will determine whether any mitigation measures will be required to increase capacity at certain points.
Sovereign Park	LP0260	DP0235	Hansteen is concerned that the latest Employment Land Review is out of date, in that it does not give a true picture of how poor the land at Soveriegn Park is for employment related development. Hansteen made submissions in relation to the ELR when it was published for comment/consultation. There appear to have been no changes made to the final document. Since December 2014, discussions have taken place involving a number of council departments and Hansteen to bring forward a joint housing proposal for the development of the site. As part of these discussions, further details has been provided concerning the flood and environmental risks. It is clear that officers were satisfied that the site could not viably be developed for employment related use. This is not reflected anywhere in the plan or the supporting evidence (in the case the ELR or Sustainability Appraisal).	These comments by Hansteen Holdings are also included in the Economy/Employment Land section of the report and the Council's response is included within that section.
Redcar & Cleveland Borough Council	LP0261	DP0236	Thank you for consulting Redcar & Cleveland Borough Council on the above document. We have reviewed the Preferred Options document, within the context of our own emerging Local Plan, and consider that there are no additional issues that need to be addressed. As such, we support the approach that you have taken. Redcar & Cleveland Borough Council recognises the importance of working together to ensure that any cross boundary issues are dealt with in a satisfactory manner and that that we have satisfied the duty to cooperate. As such, we welcome any opportunities to have further engagement with	Support welcomed. Liaison with Redcar & Cleveland Borough Council will continue.

Company	Unique Ref	DP Ref	Any Other Comments	Planning Policy Response
			you during the preparation of the Local Plan if this deemed necessary	