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SENT BY EMAIL
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03/04/2018

Dear Sir / Madam,

HARTLEPOOL LOCAL PLAN: MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Hartlepool Local Plan Main Modifications.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The Council will be aware that the HBF provided comments upon the previous draft of the plan, dated 3rd February 2017.

Policy CC1: Minimising and adapting to climate change

Modification MM012 is an improvement to the policy in terms of clarity, however, the HBF still do not consider that this part of the policy is appropriate and consider that it should be deleted.

Policy CC2: Reducing and Mitigating Flood Risk

Modification MM015 is generally supported. However, the HBF considers that an opportunity has been missed to amend this policy and include a viability clause within part 8 of this policy, in relation to the reductions in run-off rates.

Policy QP6: Technical Matters

The HBF are disappointed that the Council has not taken the opportunity to address their concerns and amend the introduction to this policy. The HBF recommend that it would be more appropriate for the policy to start '*Where appropriate all proposals*

*must ensure that the following matters are **considered, and where appropriate,** investigated and satisfactorily addressed:*' The HBF consider that 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.

QP7: Energy Efficiency

The HBF consider that modification MM028 is an improvement to the policy QP7, and the agreement of the Council that this aspect of the policy should not be a requirement is supported. However, the HBF would still recommend that the entire paragraph in relation to the '10% above what is required by the most up to date Building Regulations' should be deleted, as it is not consistent with national policy.

Policy HSG1: New Housing Provision

The HBF consider that the proposed modification, MM039, is an improvement to policy HSG1, providing clarity to the policy in relation to the minimum net housing requirements.

However, the HBF continues to have concerns in relation to the delivery of homes, with the future potential supply identified now at an even lower level than identified in the publication document. Therefore, the addition of an additional policy in relation to ensuring a sufficient supply of housing land is welcomed.

Policy HSG1a: Ensuring a Sufficient Supply of Housing Land

As identified in relation to Policy HSG1 the HBF has concerns in relation to the delivery of homes and potential supply of housing land. Therefore, the addition of this policy is welcomed. However, the implementation of this policy is key, and at present the HBF have concerns that it will not be sufficient to tackle issues of housing delivery efficiently and effectively. It is still considered that more flexibility should be built into the supply at this stage, rather than putting it off for a later plan review.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the progress of the Inspectors Report and the adoption of this document. Please use the contact details provided below for future correspondence.

Yours sincerely,



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