

## **Northumberland Local Plan Intervention - Technical Appendix**

This Technical Appendix accompanies the Council's response to the Secretary of State's letter of 16 November 2017. It provides more detailed information in relation to the issues raised within the Secretary of State's letter as well additional information to provide further assurance and confidence that the Council will deliver a Local Plan for Northumberland to the timescales set within the published Local Development Scheme and seek to further accelerate the Plan making process where possible.

The Technical Appendix is grouped around the following themes raised within the Secretary of State's letter of 16 November 2017:

1. Exceptional circumstances which justify the failure of the Council to produce a Local Plan;
2. Progress in plan-making - Any measures that the Council has or is taking to accelerate plan publication;
3. Policies in plans not kept up to date;
4. Housing Delivery;
5. Extent to which authorities are working cooperatively to put strategic plans in place; and
6. Potential impact that not having a Plan has on neighbourhood planning activity

### **1. Exceptional circumstances which justify the failure of Council to produce a Local Plan**

The Northumberland Local Plan Draft Core Strategy was submitted for examination to the Secretary of State for Communities and Local Government on 7th April 2017 under the Council's previous Labour Administration. One of the new Conservative Administration's key pledges when coming into office was to immediately revisit the Core Strategy. The Administration considered that there were material changes in respect of population projections subsequent to the submission of the Core Strategy, and that significantly lower levels of residential growth were required to support and sustain economic growth in Northumberland. The Council also considered that the Government's planned consultation on a standardised methodology for calculating housing need would have a material bearing on future housing requirements. Finally, the Council considered that a review of the Northumberland Local Plan Core Strategy would allow it to ensure that the Plan directly supports the economic ambitions in the North of Tyne area as described in the emerging plans for a North of Tyne Combined Authority.

The following motion to consider the withdrawal of the Northumberland Local Plan Core Strategy was tabled by Councillor Peter Jackson, the Leader of the Administration, and considered by the Council at its meeting on 5th July 2017:

*"We call upon the Council to review its decision made on 22 February 2017 to approve the Northumberland Local Plan Core Strategy Pre Submission Draft Plan (as modified) and submit it to Government for independent examination.*

*It is important for Northumberland County Council to support an economic and housing growth agenda aimed at creating sustainable and successful communities across the County. It is equally important that the Council fully commits to the ambitions of the North East LEP Strategic Economic Plan. Ongoing support for, and commitment to, the North of Tyne devolution agenda is also critical.*

*Whilst acknowledging the above, we have serious reservations relating to the level of new housing development proposed in the Core Strategy. The proposed level of new housing in the County, at 24,320 by 2031 plus the inclusion of up to an additional 2,000 houses at Dissington Garden Village over and above objectively assessed need, are significant issues. Recent and anticipated national publications on housing and population projections, together with the recent refresh of the Strategic Economic Plan, present an opportunity to review the housing numbers required for Northumberland to play its part in securing long term sustainable economic and housing growth across the whole of the North East.*

*This would require further work and consultation in relation to the Core Strategy and this should be undertaken in a timely manner in order to minimise the period that Northumberland has without an up-to-date Plan in place. It is therefore proposed that Council:*

- *Rescinds its previous decision to approve the Northumberland Local Plan Core Strategy Pre Submission Draft Plan (as modified) for submission to Government for independent examination;*
- *Formally withdraws the Core Strategy from the independent examination process and advises the Secretary of State of this decision;*
- *Instructs Officers to undertake a full review of the housing and employment numbers, and strategic land use allocations, required during the Plan period to sustain County-wide and regional economic growth; and*
- *Resolves to undertake the work required to carry out the review and progress any necessary associated work and public consultation to enable the Council to reconsider approval of the Core Strategy for submission to Government as soon as practicable”*

Reports with additional background information to assist Members consideration of the proposed motion were submitted to the Council meeting. These reports, under Items 4 and 4.1 on the Council agenda, can be accessed via the following link:

<http://committee.northumberland.gov.uk/Meeting.aspx?MeetID=7720>

At the Council meeting it was resolved to withdraw the Core Strategy from submission with the Council agreeing the following reasoning for withdrawal:

*“The submitted Core Strategy was informed by and developed predominantly on the basis of the 2012 Sub-National Population Projections (SNPP). The SNPP 2014-based population projections are now available and it is clear from the tables presented in the Addendum Report that the levels of residential growth required to support and sustain economic growth in Northumberland are*

*significantly different based on the SNPP 2014 data when compared to the 2012 data.*

*Whilst the SNPP 2014 data suggests an annual jobs loss, and therefore a positive "Policy On" approach would still be required in order to reverse the trend of jobs loss which is predominantly due to a loss of people of working age population from within Northumberland, it is evident from the tables provided in the Addendum Report that it is possible to address the jobs loss issue with less houses being required than are currently proposed in the submitted Core Strategy.*

*At a national level, it is clear from changes to statute and the contents of the Housing White Paper that the national policy context is also currently evolving and, in the near future, Government policy will have changed in certain respects. Government consultation is expected to commence on a standardised methodology to calculating housing need later this month and this will also have a material bearing on future housing requirements.*

*Finally, discussions are currently ongoing between the three North of Tyne authorities and Government regarding the possibility of a devolution deal that will see the creation of a mayoral combined authority in the North of Tyne area. This deal would aim to support economic growth in the North of Tyne area, and wider North East, thereby supporting the North East LEP's Strategic Economic Plan that was refreshed earlier this year. A review of the Northumberland Local Plan Core Strategy would allow the Council to ensure that the plan directly supports the economic ambitions in the North of Tyne area."*

The approved minutes from the Council meeting can be accessed via the following link: [http://committeedocs.northumberland.gov.uk/MeetingDocs/29512\\_M7721.pdf](http://committeedocs.northumberland.gov.uk/MeetingDocs/29512_M7721.pdf)

The Northumberland Local Plan Core Strategy was officially withdrawn in accordance with Regulation 27 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 7th July 2017. As stated in our covering letter, the withdrawn Core Strategy was accompanied by a substantial body of evidence and supporting policies. Whilst the Core Strategy was subsequently withdrawn by the Council for the reasons set out above, the Council is satisfied that a significant proportion of this work remains valid. It is the intention to minimise the number of changes to the Local Plan and supporting documentation whilst ensuring that this is brought up to date and reflects the changed circumstances that led to the withdrawal of the Core Strategy in July 2017.

## **2. Progress in plan-making - any measures that the Council has or is taking to accelerate plan publication**

There is a strong political commitment to deliver a sound Local Plan for Northumberland as soon as reasonably practicable. Following the withdrawal of the Northumberland Local Plan Core Strategy, the Council immediately began work on the preparation of a new Local Plan for Northumberland. Early work on the development of a new Northumberland Local Plan

included a review of the options for preparing a new Local Plan, having regard to the procedural arrangements as set out in the Local Plan Regulations and the reasons for the withdrawal of the previous Core Strategy as well as reviewing the Core Strategy evidence base documents to identify which were still relevant and up to date and which required updating.

The Northumberland Local Plan Local Development Scheme (LDS) for 2017 to 2020, which sets out the timetable for the preparation of the new Local Plan, was approved at Cabinet on 23 November 2017. The approved LDS can be accessed via the following link:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Local%20Plan/Local-Development-Scheme-2017-2020-November-2017.pdf>

The approved minutes from the Cabinet meeting can be accessed via the following link: [http://committeedocs.northumberland.gov.uk/MeetingDocs/32138\\_M7792.pdf](http://committeedocs.northumberland.gov.uk/MeetingDocs/32138_M7792.pdf)

The published timetable for the preparation of the Northumberland Local Plan is as follows:

<b>Stage</b>	<b>Dates</b>
<b>Plan Preparation (Regulation 18)</b>	<b>Summer 2017 - Summer 2018</b>
Evidence base work and informal consultation	Summer 2017 to Summer 2018
Initial consultation	Early Spring 2018
Consultation on draft Local Plan	Summer 2018
<b>Publication of draft Local Plan (Regulation 19)</b>	<b>Winter 2018</b>
<b>Submission of Local Plan (Regulation 22)</b>	<b>Summer 2019</b>
Independent Examination	Winter 2019
<b>Adoption (Regulation 26)</b>	<b>Summer 2020</b>
Post-adoption (monitoring and review)	On-going

A more detailed Local Plan timetable has been prepared which is date-specific for the remainder for the completion of the Regulation 18, 19 and 22 stages. This timetable is included at Appendix 1.

Behind both the published and more detailed timetables is a detailed project plan with a risk register and issues log (see Appendices 2, 3 and 4) and further topic based project plans which are monitored on a weekly basis to ensure that production of the Local Plan remains on track. Measures are put in place immediately to deal with any areas of slippage in the timetable to ensure that the agreed timetable is strictly adhered to, and the Council is currently assessing whether any areas of the timetable can be condensed and accelerated, particularly during the period between the Reg 18 and Reg 19 consultations and formal submission. Planning Advisory Service (PAS) have been engaged to act as a critical friend in this process.

The new Local Plan will be a single Full Local Plan which will include far more detailed planning policies than would have been provided in the withdrawn Core Strategy. It will set strategic planning policies and also include detailed land allocations and designations as well as development management policies.

The Council have also amended the plan period to 2016 to 2036 to bring the Plan up to date and to ensure the requirements in the NPPF to plan for 15 years is met.

Rather than the previous two-phased approach of preparing a Core Strategy followed by a detailed Delivery Document, progressing on the basis of a Full Local Plan negates the need for two separate phases of document preparation and double examinations and cuts the overall plan preparation process by at least 18 months to 2 years when compared to the previous Core Strategy plus Delivery Document approach. This new consolidated method will be completed along a fairly similar timeline to the previous two-staged version of the plan, resulting in an overall delay of approximately 6 months when compared to the timetable for producing the previous Core Strategy and a Delivery Document (see Appendix 5). As explained above, the Council has engaged PAS to further review the timetable for preparing the new Northumberland Local Plan and will seek to condense this and accelerate the preparation process even further where possible.

Once adopted, a single Local Plan would also ensure full plan coverage and replace all of the existing Core Strategy and saved Local Plan policies, allowing for a consistent set of planning policies across Northumberland.

As stated above the Council is committed to delivering a sound Local Plan for Northumberland as soon as reasonably practicable. It is also committed to working with local communities to deliver a Plan which local communities want. To achieve this, the Council will consult on the Plan at the various stages of its preparation. We will also continue to work closely with Parish and Town Councils and Neighbourhood Plan Groups to ensure there is no conflict with adopted and emerging Neighbourhood Plans. The Council is confident that it can deliver a sound Local Plan which meets the needs and aspirations of the communities of Northumberland, quicker than if it was managed by an external source.

The Council has a competent Planning Policy Team in place with experienced members of staff who are capable of delivering the Plan in the timescales set out in the published LDS. However, the Council is mindful of the capacity of the Team and the pressures being placed upon them to accelerate Plan production and has therefore bolstered capacity within the Team with additional fixed term posts including a Principal Planner and three Planning Officers. The Council has also made a commitment to bring in additional external consultancy support, where necessary, to help ensure the delivery of a sound plan. To date this has included external support on strategic transport matters as well as the use of consultants to undertake work on Sustainability Appraisal, Whole Plan Viability, and establishing the housing and economic growth options for Northumberland.

As explained above the Council has engaged with, and welcomes the support of, the Planning Advisory Service (PAS) and officials from MHCLG in assisting the Council in moving forward with a new Local Plan for Northumberland. On 5th January 2018 both officials from PAS and DCLG attended a critical friend meeting with the Council. The Council found this meeting very useful and will continue to work positively with PAS and MHCLG in plan-making in Northumberland. One key outcome from this meeting was the offer of support from PAS to undertake a review of the the Council's evidence base. This review has since been undertaken jointly by PAS/IPe and a copy of their recommendations report is included at Appendix 6. The key recommendations presented in that report will inform the key actions that will be given greatest priority in the next few months and which will ensure

that the overall review and refresh of the evidence base is a proportionate response. This work has also informed a review of the Local Plan timetable by PAS/IPe to identify areas of the timetable which have the potential to be condensed. A copy of their recommendation report is included at Appendix 7 and, whilst their review states that “there is nothing to suggest that it should be further revised in response to the Secretary of State’s letter”, they have made a number of helpful recommendations which are expected to lead to a shortening of the overall timetable.

The Council has also commissioned additional plan-making support from Planning Officer Society Enterprise (POSE) to assist with specific policy issues such as Green Belt, settlement boundaries and site selection methodology within the emerging Plan. We are also arranging additional project management and critical friend support from outwith the organisation to ensure that the plan-making process is challenged in the correct way and the timetable that we are working towards is strictly adhered to.

In addition to the support from officials at PAS, MHCLG and POSE, following the approval of the LDS officers of the Council made contact with PINS on 24th November 2018 to discuss arrangements for a Senior Inspector Advisory visit. PINS have advised that such a visit would normally take place just before the Local Plan enters the committee cycle at Regulation 19 Stage. To date it has been agreed that contact would be made in May 2018 in order to check progress on plan preparation and to discuss possible dates for an Inspector’s visit (see Appendix 8).

### 3. Policies in plans not kept up to date

Following the withdrawal of the Core Strategy, as an interim measure, the Council approved and immediately put in place a Position Statement on 27th July 2017 to assist those interested in development proposals in Northumberland. This Statement has subsequently been updated and was approved at Cabinet on 23rd November 2017. The Statement clarifies the general approach to be taken to planning applications following the Core Strategy withdrawal, with particular regard to proposals for housing as well as covering the status of adopted Core Strategies and Local Plans as well as Neighbourhood Plans; the Five Year Housing Land Supply Position in Northumberland; policies for the protection of the open countryside and the Green Belt; as well as infrastructure requirements and the use of planning obligations.

The approved Position Statement can be accessed via the following link:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Local%20Plan/Position-Statement-Following-Withdrawal-November-2017.pdf>

The approved minutes from the Cabinet meeting can be accessed via the following link: [http://committeedocs.northumberland.gov.uk/MeetingDocs/32138\\_M7792.pdf](http://committeedocs.northumberland.gov.uk/MeetingDocs/32138_M7792.pdf)

#### 4. Housing Delivery

Over the last few years the Council has experienced a significant increase in the net additional homes delivered across the County. Recent years have seen markedly more homes being delivered than was the case in the early years of the decade. Data indicates that this uplift in delivery is continuing with 1,447 net additional homes being delivered in 2014/15, 991 in 2015/16, and 1,531 in 2016/17. This trend has continued throughout 2017/18 with approximately 930 dwellings delivered between 1 April and 31 December 2017. Further information on the net additional homes delivered in Northumberland up to 31 March 2017 is available via the following link:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Housing%20Studies/8.%20Net%20additional%20homes/Net-Additional-Homes-Provided-2016-17-Final.pdf>

The Council is committed to preparing a new Local Plan as quickly as possible, however in the intervening period, and in order to ensure housing takes place in a sustainable manner and to defend appeals to the best of its ability, the Council at its Cabinet meeting on 23rd November 2017 agreed a five year housing land supply position - the Northumberland Five Year Housing Land Supply of Deliverable Sites 2017-2022 report. The report sets out that the Council has an identified housing land supply equivalent to a 6.5 year supply. In preparing the five year housing land supply position a rigorous assessment of sites has been undertaken.

The agreed Five Year Housing Land Supply of Deliverable Sites 2017-2022 report can be accessed via the following link:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Housing%20Studies/3.%205YHLS/5-YHLS-2017-2022-November-2017.pdf>

The approved minutes from the Cabinet meeting can be accessed via the following link: [http://committeedocs.northumberland.gov.uk/MeetingDocs/32138\\_M7792.pdf](http://committeedocs.northumberland.gov.uk/MeetingDocs/32138_M7792.pdf)

Over recent years, the Council has adopted a positive approach to its decision making processes, adopting an “open for business” approach from the early stages of pre-application discussions through to the issuing of planning consent and the delivery of schemes on the ground. Developer confidence has increased in Northumberland significantly during this time and this is reflected over the period 2014-17 where both the number of large planning applications (5 or more units) with permission, and the number of units related to these applications, has increased markedly. The increased levels of developer confidence and supply, across a wider range of sites, provides additional flexibility in the market thus enhancing further the prospects of future delivery.

In the Council’s Five Year Housing Land Supply of Deliverable Sites 2014-2019 report, the supply was identified from 154 sites with an overall capacity of 6410 dwellings. In the latest

report, the five year supply position is identified from a much larger pot of 230 sites with a total capacity of 11,981 dwellings. In addition, the latest report identifies circa 7200 units granted permission since the report's base date or on applications minded to approve<sup>1</sup>. While a number of these dwellings will have been completed since 31 March 2017<sup>2</sup>, there remains sufficient supply to provide a level of confidence that the rate of housing delivery experienced in recent years will continue.

Whilst the level of housing delivery has accelerated significantly in recent years, the Council also has a firm commitment to ensuring new development delivers the highest quality design standards. The Council is currently developing an ambitious design initiative, working closely with consultants Gensler and Design Council Cabe, which will provide a strong platform and policy framework from which to challenge the design agenda in Northumberland and ensure the highest possible standards of place-making and place-shaping. To assist in accelerating our design initiative, the Council has recently submitted a bid for support from the Government's Design Quality Fund and a decision on this is awaited. A copy of the Council's bid for funding is included at Appendix 9 for background information purposes and to demonstrate the firm commitment we have to working with Government in raising the profile of design in all of our planning activities.

##### 5. Extent to which authorities are working cooperatively to put strategic plans in place

Devolution Deal: On 22 November 2017 the Chancellor of the Exchequer announced to Parliament in his budget statement that the Government was minded to enter into a devolution deal with the North of Tyne Authorities (Northumberland County Council, Newcastle City Council and North Tyneside Council) under which they will benefit from £600million of new Government investment to spend on local priorities to boost growth together with a range of devolved powers. The proposed devolution deal was officially launched on 24 November 2017.

The North of Tyne 'minded-to' Devolution Deal sets out the headline terms of the proposed deal which will support the North of Tyne in delivering its ambitious vision for the social and economic prosperity and wellbeing of its communities. The minded-to Deal will continue to support strong working between the three Local Authorities as well as with the North East Local Enterprise Partnership, and beyond, in the shared pursuit of greater productivity and economic growth. As part of the minded-to Deal, the North of Tyne Combined Authority will accelerate the delivery of an ambitious target for new homes, informed by Local Housing Needs figures, and has made a commitment that the three North of Tyne authorities will develop a joint Infrastructure Delivery Statement and explore closer strategic planning alignment at the next review of Local Plans. Further details of the North of Tyne 'minded-to' Devolution Deal can be found via the following link and the new Local Plan for Northumberland will complement and support the North of Tyne Devolution Deal:

<https://northoftynedevolution.com/wp-content/uploads/2017/11/North-of-Tyne-minded-to-devolution-deal.pdf>

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<sup>1</sup> This figure does not include 2,443 units on applications minded to approve in the Green Belt.

<sup>2</sup> As indicated above, circa 930 dwellings were delivered from 1 April to 31 December 2017.

North of Tyne Housing Infrastructure Fund: Linked to the devolution programme and the North of Tyne Housing Deal, Northumberland has worked collaboratively with the HCA and the other North of Tyne authorities on the prioritisation of Housing Infrastructure Fund (HIF) submissions. This culminated in the submission of a single North of Tyne (HIF) Forward Funding bid for the North Tyneside Murton Gap site and a Northumberland Marginal Viability Bid. This was seeking £4.5m funding to unlock a total of 1,268 units forming part of the wider former St Georges Hospital site in Morpeth. Delivery of a link road and utility infrastructure are key to unlocking and delivering the final element of this strategic urban extension to the north of Morpeth. Further details on the HIF Bid can be found at Appendix 10.

Strategic Working: Northumberland will continue to work effectively with North Tyneside Council, Newcastle City Council, Newcastle International Airport and Highways England in order to overcome shared concerns relating to the Strategic Road Network and linkages to the adjoining local networks, particularly key routes into the regional capital and to Newcastle International Airport. In addition to this, discussions related to the scale of development and understanding potential market impacts linked to the scale of proposed development whilst ensuring the delivery of strategic sites across the North of Tyne area will continue to take place as preparation of the Local Plan for Northumberland evolves.

Strategic working and the delivery of shared priorities: The promotion of the reopening of the Ashington Blyth Tyne (ABT) line for rail passengers is a shared sub-regional priority with Northumberland County Council as lead partner and with support from Newcastle City Council, North Tyneside Council, Nexus and Rail North. Northumberland County Council is currently working through the GRIP process with GRIP2 (Feasibility) recently completed. GRIP 3 (Option Selection) commenced in late 2017 with Planning Services already playing a key role in ensuring delivery of the project. The LEP acknowledges that '*In order to achieve the vision set out in our Strategic Economic Plan, it will be necessary for people to travel and for goods to be transported within, into and out of the area. Without this, the economy cannot function effectively and commercial competitiveness and social inclusion both suffer*'. The ABT scheme will improve local, regional and national connectivity. In addition, by linking into the Tyne & Wear Metro system at Northumberland Park the scheme will also be compatible with the ambitions of Nexus in its emerging 'Metro and Local Rail Strategy' which articulates a vision of existing and disused local rail corridors combining with the Metro network to create a single Metro and local rail network.

Borderlands Growth Deal - Northumberland County Council is in partnership with four other local authorities (Cumbria County Council and Carlisle City Council in the north of England and Dumfries and Galloway Council and South of Scotland Council in Scotland) to deliver a unique cross-border economic growth initiative. The totality of each local authority area forms the Borderlands area and as such some thematic activity will be delivered across the whole Borderlands area. However, the place-based elements of the Deal will focus on those areas closest to the Scotland/England Border. The Deal will therefore act as a catalyst for a transformation in rural growth through sectoral and place-based programmes of activity.

As a new initiative, the detail of the Deal is not fully formed yet but will be produced by September 2018, as requested by the Secretary of State for Scotland, to inform the 2018

Autumn Statement. It is essential that our Local Plan fully reflects the economic and housing needs associated with the Deal and this can be accommodated within the LDS timetable.

#### **6. Potential impact that not having a plan has on neighbourhood planning activity**

Within Northumberland there has been significant neighbourhood planning activity and it is considered that this will continue during the preparation of the new Local Plan. To date in Northumberland there are four Made Neighbourhood Plans; three Plans at Regulation 16 Publicity (Submission); two Plans at Regulation 14 (Pre-Submission); and seventeen other plans currently in preparation (see Appendix 11).

A map showing neighbourhood plan coverage across Northumberland at the present time can be accessed via the following link:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Neighbourhood%20Planning/Neighbourhood-Plans-Map-As-at-18-January-2018.pdf>