



# Northumberland

## County Council

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Date: 24 January 2019

### **By e-mail only**

Dear Sue,

### **Redevelopment of site to provide new Middle and High School education provision - Queen Elizabeth High School, Whetstone Bridge Road, Hexham, NE46 3JB**

I write further to previous discussions in respect of the redevelopment of the above site in order to accommodate middle school provision alongside the existing high school.

I understand from the most recent plans that were discussed at our last meeting with my colleague Val Robson (Building Conservation Officer) and Matthew Payne (Consultant Engineer – Highways Development Management) on 7 November 2018 that the proposals would result in the demolition of the existing school buildings to the eastern part of the site. There would also be some elements of demolition to the existing Grade II listed Hydropathic building along with the conversion of this and new build school buildings to the rear. Vehicular access would be taken from Whetstone Bridge Road to the east of the site.

The purpose of this letter is to provide some initial and general advice on the principle of development, key constraints and main issues following the discussions on the plans that have been tabled. A formal pre-application enquiry has not been submitted and as such this response does not provide a detailed assessment of the proposed development of the site.

I would also refer to the document previously shared with you titled “Hexham Schools Project – Planning Issues”, which highlights constraints and key issues for the site, and also includes some initial comments from the Council’s ecologists. I have attached a copy of this for reference.

### **Site Constraints**

Grade II listed former Hexham Hydropathic  
Conservation Area  
Archaeological Area  
Public right of way to northern boundary  
Areas of High Landscape Value  
Green Belt  
Coal Working Standing Advice Area  
Impact Risk Zone SSSI  
Neighbourhood Planning Area  
Flood Zones 2 and 3

## **Relevant Planning Policy**

### National Planning Policy

National Planning Policy Framework (NPPF) (2018)  
National Planning Practice Guidance (NPPG) (2014, as updated)

### Development Plan Policy

Tynedale District Local Plan (2000)

GD2 Design criteria for new development  
GD3 Provision of suitable access for people with impaired mobility  
GD4 Range of transport provision  
GD7 Car parking standards  
NE27 Protected Species  
NE33 Tree protection  
NE34 Tree felling  
NE37 Landscaping in developments  
BE22 Setting of listed buildings  
BE27 Archaeology  
BE28 Archaeological assessment  
BE29 Development and preservation  
CS21 Location of noise sensitive uses  
CS23 Location of noise generating uses  
CS23 Development on contaminated land  
CS24 Development adjacent to or in the vicinity of contaminated land  
CS27 Sewerage

Tynedale Core Strategy (2007)

GD1 Location of development  
GD2 Prioritising sites for development  
GD4 Transport and accessibility  
GD5 Flood risk  
NE1 Natural environment  
BE1 Built environment  
CS1 Principles for community services and facilities  
EN1 Principles for energy  
EN3 Energy conservation and production

## Emerging Planning Policy

Northumberland Local Plan – Draft Plan (Regulation 19 Consultation – January 2019)

Hexham Neighbourhood Plan 2016-2036 (Additional Regulation 14 Pre-submission Consultation: 5 October to 16 November 2018)

### **Main Considerations**

In assessing the acceptability of any proposal regard must be given to policies contained within the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a material consideration and states that the starting point for determining applications remains with the development plan, which in this case contains policies from the Tynedale Local Plan and Tynedale Core Strategy as identified above.

Paragraph 48 of the NPPF states that weight can be given to policies contained in emerging plans dependent upon the stage of preparation of the plan, level of unresolved objections to policies within the plan and its degree of consistency with the NPPF. Consultation has taken place on the emerging Northumberland Local Plan, with the next stage due for consultation later in January 2019, although limited weight can be given to this at this stage. However, the weight to be afforded to the Plan and relevant policies in respect of the proposal will increase as the process goes on, and depending on when any new application is submitted. In addition I would draw your attention to the draft Hexham Neighbourhood Plan, which has recently undergone further consultation at Regulation 14 stage.

The main issues for consideration as part of any application are likely to include:

- Principle of development
  - location
  - Green Belt
- Design and visual impact
- Impact on heritage assets
- Residential amenity
- Highway safety
- Ecology
- Flood risk and drainage
- Public Protection matters

### Principle of Development

#### *Location*

The site lies within Hexham, which is identified in the Tynedale Core Strategy as one of the main towns that will be the main focus for development and also where any large scale individual developments would be located.

There is no allocation within the existing Tynedale Local Plan or Tynedale Core Strategy documents on the site currently occupied by the main school buildings or the Hydropathic building. The land to the west of the buildings falls within the Green

Belt. In addition, the land to the west of the existing playing fields are identified within Tynedale Local Plan (Policy LR8.1) allocated for specified recreational use - playing fields.

The part of the site occupied by the buildings does not feature any allocation within the emerging Northumberland Local Plan or the Hexham Neighbourhood Plan. However, the land to the west of this area, including the playing fields and land beyond, remains within the Green Belt.

Having regard to the existing development plan and emerging policy context, it is considered that the redevelopment of the existing site for middle and high school provision would be acceptable in principle in terms of location and sustainability.

### *Green Belt*

As stated earlier part of the site is located within the Green Belt, and it would appear from the latest plans that there would be some development extending into this area in order to accommodate the new school buildings to the rear of the Hydro building and around the walled garden.

Policy NE7 of the Tynedale Local Plan sets out circumstances when new development in the Green Belt may be permitted, and the proposal would not fall within any of these.

The most up-to-date Green Belt policy guidance is set out within the NPPF. Paragraph 133 states *“the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*.

Paragraph 143 states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*. Paragraph 144 goes on to state that *“when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*.

Paragraph 145 of the NPPF states that *“a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:*

*a) buildings for agriculture and forestry;*

*b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

*c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

*d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

*e) limited infilling in villages;*

*f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*

*g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*

*– not have a greater impact on the openness of the Green Belt than the existing development; or*

*– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”.*

Having regard to the above, the construction of new school buildings in this location would in effect amount to inappropriate development within the Green Belt that does not meet any of the exceptions identified within paragraph 145 of the NPPF. On this basis there would need to be very special circumstances demonstrated to outweigh the harm to the Green Belt, which will need to be included with any submission.

It should also be noted that at this point it appears the development would encroach slightly into the adjacent playing field, and you should ensure that this does not impact upon the playing field provision. We will likely need to consult with Sport England on any subsequent application.

### Design and Visual Impact

Policy GD2 of the Tynedale Local Plan seeks to ensure that development is appropriate for its location in terms of matters such as layout, scale, design and impact upon the amenity of residents. Policy BE1 of the Core Strategy seeks to conserve and enhance Tynedale’s built environment and conservation areas, whilst Policy NE1 sets out principles for the natural environment. The NPPF also supports good design in new development that is appropriate for its location.

The principle of the redevelopment of the site is considered to be acceptable and the scheme should be of a high quality design and take into account its location and adjacent development and constraints in respect of matters of layout of the buildings and associated playing fields and infrastructure; scale and massing; means of access and associated works; and landscaping of the site.

There will be a change in the overall character and appearance of the site, although there may be an opportunity to enhance its appearance. There are a number of existing trees within and to the boundaries of the site and we would advise that consideration should be given to retaining and protecting these as far as possible.

### Impact on Heritage Assets

As discussed previously with you the site includes the Grade II listed Hydro building and is located outside of, but immediately adjacent to the boundary of the Hexham Conservation Area. There is a duty on the Local Planning Authority to have special regard to the desirability of preserving the listed building, its setting and any features of special architectural or historic interest which it possesses, as well as to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

The application will need to be accompanied by sufficient supporting information in a Heritage Statement and Design and Access Statement to demonstrate the need for demolition of existing sections of the listed building and also the effects of the new development upon the significance of the listed building and the Conservation Area. Where harm has been identified then there will be a requirement to demonstrate that there are public benefits that outweigh the harm (see paragraphs 195 and 196 of the NPPF)

I have attached a copy of the report previously prepared by and shared with you by our Conservation Team in respect of the Hydro building.

The development will also require assessment in relation to potential archaeological impacts, which will be assessed by the archaeologists in the Conservation team.

### Residential Amenity

I would draw your attention to Policy GD2 of the Local Plan, which provides advice on scale, design and layout of development, and also refer to impacts on the amenity of existing residents and future occupiers of the development. Any application should demonstrate how the layout, scale and design of the development has taken into account impacts on adjacent residents.

As discussed with you in our most recent meeting the development has the potential to impact upon the amenity of residents in the locality to a greater degree than the existing school due to the increase in scale of development and use associated with additional pupil numbers, traffic movements etc. In addition, there will be potential impacts arising from the new buildings and increased scale of development to the rear of the Hydro building, particularly in relation to the properties to the north on Leazes Park and Beech Avenue, as well as the floodlit all weather pitch adjacent to Whetstone Bridge Road. These elements could potentially result in issues of loss of privacy, daylight and sunlight; impacts on outlook; visual intrusion; and overbearing impact that will need to be considered as part of the final design work.

### Highway Safety

With regard to matters of access, parking and highway safety, any proposal would be assessed having regard to Policies GD4 and GD7 of the Local Plan, Policy GD4 of the Core Strategy and the NPPF. Policy GD4 of the Local Plan states that development proposals will be required to conform to criteria including that safe access to the site and to the classified road system should be secured; and the development should not create levels of traffic which would exceed the capacity of the local road network or create a road safety hazard.

Paragraph 108 of the NPPF looks to ensure that safe and suitable access to a site can be achieved by all users. Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

My colleague, Matthew Payne, provided advice on highway safety and transport matters at our meeting in November 2018, and Highways Development Management (HDM) would need to fully assess any information provided within any Transport Assessment in due course in respect of impacts, access requirements and the need for off-site mitigation and improvements. It was identified that there will be impacts arising from relocating middle school pupils to the site, including effects of younger children and increased parent drop-offs. A Travel Plan will also be required with any application.

It is essential that highway and transport issues are identified and resolved at the appropriate time relative to development progress and school opening. For the avoidance of doubt the costs of all works and mitigation measures will need to be met through Education funding mechanisms.

### Ecology

The Tynedale Local Plan, Core Strategy and NPPF highlight the importance of considering potential effects upon the biodiversity and geodiversity of an area, as well as impacts upon trees and hedgerows. Section 15 of the NPPF relates specifically to the conservation and enhancement of the natural environment, including impacts on habitats and biodiversity.

The ecologists in our Conservation Team have provided some initial comments on developing the existing site as set out within the attached summary of planning issues on the site, although this was prior to more detailed proposals proposing conversion, demolition and new buildings around the Hydro. Any application will need to be provided with appropriate ecological survey work with suitable mitigation measures where necessary. As well as supporting the retention and protection of existing trees and hedgerows within and to the boundaries of the site, officers would also encourage appropriate new landscaping proposals as part of the scheme.

The emerging Neighbourhood Plan identifies a wildlife corridor along the northern boundary of the site. It is proposed that these will be protected and enhanced, and opportunities will be taken in any new development proposals, to create and improve links between these corridors. Proposals for development must ensure that there is no negative impact on the integrity of the wildlife corridor or on the water quality of riverine systems and they should take opportunities to enhance the biodiversity value. New exterior lighting must be avoided where it would be adjacent to, or have an impact on a wildlife corridor. Proposals that would result in the further fragmentation of existing wildlife corridors shown on the Policies Map will not be permitted.

### Flood Risk and Drainage

The site is located within Flood Zone 1, although there is an area around the junction of Whetstone Bridge Road and Allendale Road that lies within Flood Zones 2 and 3.

On the basis that the site would exceed 1 hectare in area then a Flood Risk Assessment and Drainage Strategy would be required with any application. Consultation will take place with Northumbrian Water and the Lead Local Flood Authority on the application, and sustainable drainage measures should be incorporated within the scheme where possible.

### Public Protection Matters

The northern part of the site falls within the Coal Authority Standing Advice Area and given the nature of the site there may be a requirement for contaminated land assessments. This will be assessed in more detail as part of any application with the Council's Public Protection Team, who will also assess potential impacts arising from pollution such as noise, odour and lighting.

Further advice on these matters can be obtained from the link below from our Public Protection team:

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Public-Protection/Pollution/preapplicationguidance.pdf>

### **Conclusion**

On the basis of the latest plans and discussions to date it is considered that the principle of the redevelopment of the site for middle and high school provision would be generally acceptable and in broad accordance with the local and national planning policy context. It is acknowledged that the proposal would deliver a scheme that would provide improved and enhanced education provision and facilities within Hexham.

There will be a requirement to clearly demonstrate very special circumstances for new development within the Green Belt part of the site, as well as clear and convincing justification for demolition of sections of the listed Hydro building and consideration of impacts upon its setting.

There will clearly be some additional impacts arising from a larger scale of development on the site as identified in this letter that will need to be assessed in more detail following the submission of any application with relevant supporting information, as well as subsequent consultation.

I must stress that the above advice is not a formal pre-application response as this has not had the benefit of more formal consultation through the pre-application enquiry process, and without the benefit of the full consultation process which will be carried out should you submit a planning application. The advice given above therefore is without prejudice to any recommendation made by officers or any subsequent decision made on a planning application.

### **Validation Requirements**

If you wish to apply for planning permission based on the above advice, you can start your application online by using the Planning Portal website. The following plans and documents will be required as a minimum to accompany your application:



- Fee
- Completed application form
- Site Location Plan (1:1250)
- Existing and Proposed Site (Block) Plans showing details of access, parking and refuse storage
- Existing and Proposed Floor Plans
- Existing and Proposed Elevation Plans
- Existing and Proposed Section Plans / Levels
- Design and Access Statement
- Heritage Statement
- Archaeological Assessment
- Ecology Report (as identified by the Council ecologists)
- Transport Assessment
- Travel Plan
- Contaminated land assessment
- Tree Survey / Arboricultural Statement
- Noise assessment
- Odour assessment

Please ensure that you read the Council's Validation Checklist before you submit an application. Additional documents may be requested over and above those listed above as this response has not been subject to wider consultation as part of the pre-application process.

I trust the information within this response is clear. If you have any comments or wish to discuss this with me any further please do not hesitate to contact me using the details provided at the top of the page.

Yours sincerely,



Mr Neil Armstrong  
**Senior Planning Officer**  
**Development Management Team**