



David English  
Cramlington Neighbourhood Plan  
Neighbourhood Planning and Infrastructure Team  
Planning Services  
County Hall  
Northumberland  
NE61 2EF  
19/07/2010

Dear Mr English,

Homes England wishes to submit comments in relation to the Submission Draft Cramlington Neighbourhood Plan with specific reference to a site referred to as West Hartford. The West Hartford site is:

- Located within the Cramlington Neighbourhood Plan area;
- Located within the existing settlement boundary as defined by the adopted Local Plan, and;
- Allocated for development within both the adopted and emerging Local Plans.

However, the submitted Neighbourhood Plan fails to acknowledge the strategic context of this site and proposes its removal from the established Cramlington settlement boundary without appropriate justification. Homes England is of the view that this decision results from a failure to appropriately consider the West Hartford site in the emerging Local Plan and Neighbourhood Plan. As such, Homes England has significant concerns in relation to:

- The robustness of evidence used to support the choices made and the approach taken in the Neighbourhood Plan;
- The meaningfulness of consultation and engagement activities which have not considered available options;
- The appropriateness of strategies proposed in the Submitted Neighbourhood Plan;
- Conformance of the Neighbourhood Plan with strategic policies of the adopted (and emerging) Local Plan, and ultimately;
- The Submitted Neighbourhood Plan's compliance with the Basic Conditions required in order to be put forward for local referendum.

It is also of significant concern that despite the legal obligations set out in the Neighbourhood Planning (General) Regulations 2012, representations made by Homes England to the pre-submission draft of

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the Cramlington Neighbourhood Plan have not been acknowledged or taken into account in the Consultation Statement published alongside the Submission Draft Neighbourhood Plan. The regulations state that the consultation statement must contain a summary of the main issues and concerns raised by the persons consulted and a description of how those issues and concerns have been considered and where relevant, addressed in the proposed neighbourhood development plan. As no reference is given to our previous representations or any consideration given to the points a copy is enclosed for reference.

### **Planning Context**

The West Hartford site has long been considered an appropriate location for development. Consent for industrial use of the West Hartford site was first granted on 10th October 1997 (Ref: C/97/C/259) and the site was subsequently allocated for employment use under Policy WP2 (i) a – Individual users and WP4 – West Hartford in the Blyth Valley District Local Plan (May 1999). The site was also identified as an employment site under Policy SS1 in the Blyth Valley Core Strategy (July 2007) with these documents comprising the current adopted development plan for the Neighbourhood Plan area.

Despite various planning applications having been submitted for employment uses in the period since, no tangible interest has ever emerged for employment uses at the site. Consequently, the site was recognised as no longer holding a reasonable prospect of coming forward for the allocated use and identified for deallocation in the Northumberland Core Strategy (2015). The Core Strategy was submitted for examination but subsequently withdrawn by Northumberland County Council on 5th July 2017.

More recently, the Northumberland Local Plan - Publication Draft (January 2019) was submitted for examination 29 May 2019 and is being examined in parallel with the Cramlington Neighbourhood Plan. This iteration of the plan now proposes that the West Hartford site be retained as an employment allocation under Draft Local Plan Policy ECN 3.

Despite Cramlington being identified as a Main Town under the settlement hierarchy provided in Policy STP 1 of the Publication Draft Local Plan, unlike other Main Towns the extent of the settlement boundary is not established in the Draft Local Plan with this decision being delegated to the Cramlington Neighbourhood Plan.

Consequently, the Submitted Cramlington Neighbourhood Plan proposes a settlement boundary which excludes the West Hartford site with the proposed Settlement Boundary following the route of the A192. As a result, the two plans combine to allocate a site immediately adjacent to, but outwith, the proposed settlement boundary without any explanation or justification for this atypical approach.

The only reference given to West Hartford in the Submission Draft Neighbourhood Plan is at Paragraph 7.5 which states that *"The Plan does not allocate West Hartford as this is a strategic matter to be addressed through the new Northumberland Local Plan"*. However, this approach fails to consider the interplay between local and strategic policy matters giving rise to an uncertain policy situation in which neither plan takes full account of all of the relevant considerations.

## Neighbourhood Plan and Evidence Base

To illustrate the concerns outlined above and their implications for the Cramlington Neighbourhood Plan, a brief description of Homes England's concerns in relation to the Neighbourhood Plan and its evidence base are provided below. Separate representations will be made in relation to the Examination of the Northumberland Local Plan where these concerns touch on matters of soundness of the Submitted Local Plan.

### Housing Background Paper (January 2019)

Section 5 of the Housing Background Paper describes the methodological approach to the identification and assessment of housing sites. The first stage of the assessment is described as being the identification of sites and broad locations for development irrespective of policy constraints and the quantity of development needed across the town.

With regards to the first stage of work Paragraph 5.4 of the Housing Background Paper states that:

*"The assessment examined all sites contained within the Northumberland SHLAA, which were capable of delivering five or more dwellings [emphasis added]"*.

However, West Hartford (SHLAA ref:9069) is not included in the list of assessed sites at the table beneath Paragraph 5.13. This omission represents a failure to accord with the stated site assessment methodology and a failure to fully consider;

- The site's current location within the established settlement boundary;
- The site's development potential;
- The contribution that the site could make towards achieving wider policy objectives, and ;
- Its suitability for consideration as a reasonable alternative to the preferred approach put forward in the neighbourhood plan for Strategic Environmental Assessment purposes.

### Settlement Background Paper (January 2019)

Chapter 3 of the Settlement Background Paper sets out the methodology used to identify the Cramlington settlement boundary, the first stage of this methodology comprises a desktop review of existing evidence documents, including the Blyth Valley Local Plan Proposals Map and the findings of the Northumberland Strategic Housing Land Availability Assessment.

With regards to the adopted proposals map, Paragraph 2.4 of the Settlement Background Paper states that:

*"The Cramlington Neighbourhood Plan proposes a general presumption in favour of sustainable development within settlement boundaries of the two settlements in the Plan area: Cramlington and East Hartford"*

However, an excerpt from the associated Proposals Map included at Page 9 of the Settlement Background Paper does not include the entirety of the West Hartford site. No further reference is given to the decision to deviate from the adopted settlement boundary or the strategic context of proposed allocations in the emerging Northumberland Local Plan.

Paragraph 4.8 of the Settlement Background Paper also describes the consideration given to SHLAA sites in establishing the Settlement Boundary for the Cramlington in the Neighbourhood Plan, this echoes the Housing Background Paper in again stating that:

*"All of the sites included within the Northumberland Strategic Housing Land Availability Assessment (SHLAA) have been considered by the Steering Group – the results of the assessment are included within the Housing Background Paper [emphasis added]"*.

As discussed above in relation to the Housing Background Paper, the West Hartford Site (SHLAA ref:9069) was not considered in this review of identified SHLAA sites. As shown below, this omission is visually illustrated quite clearly at Page 12 of the Settlement Background Paper which purports to show all SHLAA sites in the northern part of Cramlington. An accurate excerpt of the Northumberland Council SHLAA showing site ref:9069 is presented alongside for comparison.



Figure 1: SHLAA Map as shown at page 12 of the Settlement Background Paper.



Figure 2: SHLAA map as shown on NCC online mapping system.

As a result of the failure to fully consider the adopted settlement boundary; the strategic context of the emerging local plan and the selective assessment of sites, the settlement boundary is proposed to be drawn to exclude a site which is within the settlement of Cramlington as defined in the adopted Local Plan and which is identified for continued allocation in the Submitted Northumberland Local Plan. No consideration appears to have been given to the implications of this alteration to the settlement boundary or rationale for it being excluded.

#### Employment Background Paper (January 2019)

At Paragraph 5.9 the Employment Background Paper suggests that the evidence base for the emerging local plan has recommend the de-allocation of almost 6oha of land with deallocations including the current sub regional employment site at West Hartford. Paragraph 5.9 goes on to state that the Neighbourhood Plan supports the conclusions and recommendations of the Local Plan evidence base.

This reference to the emerging Local Plan clearly relates to the withdrawn Northumberland Core Strategy (2015) which had proposed the deallocation of the West Hartford site rather than the current Northumberland Local Plan as the site is now proposed to be retained as a strategic allocation. This demonstrates a fundamental lack of understanding of the strategic policy context of the Development Plan for the local area from which to develop policy approaches resulting in a failure of the Neighbourhood Plan to comply with its basic conditions.

## Conclusions

Homes England has significant concerns in relation to the consideration given to the West Hartford in the emerging Neighbourhood Plan with particular reference to:

- Failure of the Submitted Draft Neighbourhood Plan to comply with adopted and emerging strategic policies in the local area resulting from a demonstrable lack of understanding of the West Hartford site and its strategic context.
- The failure of key evidence base documents to follow the stated methodology to ensure that all available sites were assessed, this resulting in a failure to consider the development potential of the West Hartford site and appropriate policy responses to the local implications of strategic policies.
- Failure to consider the West Hartford site as a reasonable alternative despite its strategic allocation and location within the existing settlement boundary. Particularly with reference to the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- The failure to acknowledge or consider representations made by Homes England to the Pre-submission Draft of the Cramlington Neighbourhood Plan despite the legal obligations set out in Section 15(2) of the Neighbourhood Planning (General) Regulations 2012.

As a result of these concerns Homes England are of the view that remedial work is required in relation to the treatment of the West Hartford site in the Cramlington Neighbourhood Plan to ensure that the plan can be considered capable of meeting the required basic conditions. Concerns in relation to the policy responses to the West Hartford site and the approach of delegating the establishment of the Cramlington Settlement boundary will be raised separately through the Local Plan examination process.

Homes England wishes to reiterate the view that West Hartford as an allocated site should, as a minimum, be fully considered as part of the Neighbourhood Planning process to assess its potential contribution to the wider policy aspirations of the Cramlington Neighbourhood Plan. Regardless of the outcome of this assessment, the site should be included within the Cramlington settlement boundary to ensure that the Neighbourhood Plan can be considered to be in conformance with the adopted and emerging strategic policies for the area.

Yours sincerely

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