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07/08/2019

**Subject: Cramlington Neighbourhood Plan Neighbourhood Planning (General)
Regulations 2012: Regulation 16 Consultation.**

Dear Mr English,

Further to your letter dated 30 July 2019, I note that an addendum to the Cramlington Neighbourhood Plan Consultation Statement has now been issued in response to my previously expressed concerns in relation to Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

Despite your letter allowing a period of 10 working days (i.e. until 13 August 2019) for Homes England to amend or supplement the previous representation made under Regulation 16, I note that at the time of writing the Northumberland County Council webpage for the Cramlington Neighbourhood Plan has already been updated to state "*The County Council is satisfied that the submission is complete and complies with legal requirements. The Plan will now proceed to independent examination*". This is again disappointing and reinforces the viewpoint that Homes England's comments in relation to the West Hartford site have not been given full and proper consideration during the plan making process to date, nor have the most appropriate policy responses been properly considered to ensure policy alignment between strategic and local issues.

Homes England maintain the points made more generally in my previous letter dated 19 July 2019, this being that the West Hartford site has not been appropriately considered in the development of the Cramlington Neighbourhood Plan and as a result, the Neighbourhood Plan fails to meet its legal obligations and Basic Conditions. In summary:

- Failure to consider the West Hartford site as part of the 'policy-off' site assessment process represents a deviation from the stated site assessment methodology and raises questions over the consideration of reasonable alternatives for the purposes of the Strategic Environmental Assessment.
- Failure to comply with the basic condition of having regard to national policy with respect to paragraph 120 of NPPF (February 2019). The exclusion of the West Hartford site from the

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settlement boundary of Cramlington, despite its clear relationship with the settlement and proposed allocation in the emerging local plan, would prevent a site which is considered suitable for development being considered for alternative uses to address unmet needs in the area should it become apparent to the LPA that there is no reasonable prospect of the allocated use coming forward.

- Similarly, with regards to the basic condition of contributing to the achievement of sustainable development, should the requirement for a site to address an unmet need emerge, the Settlement Boundary as currently drafted would result in the West Hartford site being considered to be within the open countryside, this despite Local Plan acknowledgement that the site is a sustainable location for development. This could conceivably result in other less sustainable sites on the edge of Cramlington or other nearby settlements coming forward to address that unmet need.
- Finally, with regards to the basic condition of neighbourhood plans being in general conformity with the strategic policies in the development plan for the local area, the exclusion of the West Hartford site from the settlement boundary despite its location within the established settlement, and despite the proposed rolling forward of its existing allocation in the emerging Local Plan, conflicts with both the settlement boundary as defined by the adopted plan and the Spatial Strategy of safeguarding the countryside from encroachment in the emerging Local Plan due to clear uncertainties as to the status of the West Hartford site.

Notwithstanding the sustained view that the West Hartford site is appropriate for housing development, Homes England are of the view that the redrawing of the settlement boundary of Cramlington to include the West Hartford site and aligning site specific policies with those of the emerging local plan would overcome these issues for the purposes of the Neighbourhood Plan. This would provide a clear and robust policy framework for the site which is well aligned with national policy guidance.

Homes England requests that such amendments are considered to ensure that Local Plan and Neighbourhood Plan policies for West Hartford, and Cramlington more generally, can be considered robust yet flexible enough to respond to changing land use needs over the lifetime of both plans.

Yours sincerely

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Homes England