

## **EXAMINATION OF THE CRAMLINGTON NEIGHBOURHOOD PLAN**

### **Submission Draft - March 2019**

#### Examiner's questions for clarification

Q1. CTC questioned the need to include the identical policy reference to financial contributions to the coastal mitigation service within policies CNP1, CNP3 and CNP4. However, CTC was advised by NCC that the policies should include the same wording as a result of the comments from Natural England dated 8 February 2019 (attached). It remains the view of CTC that the wording should be included within only one policy and CTC consider this could be in a separate policy with supporting text. The following is suggested as supporting text:

*'The NPPF states that the presumption in favour of sustainable development does not apply where a plan or project is likely to have significant effect on a habitats site, unless an appropriate assessment has concluded that it will not adversely affect the integrity of the habitats site. The appropriate assessment undertaken as part of the preparation of the neighbourhood plan identified increasing levels of recreational disturbance in the Northumberland Coast Special Protection Area and Ramsar site. It highlighted that adverse effects could be avoided where developers agree to contribute to the Northumberland Coastal Mitigation Service and that mitigation for impacts on coastal designations should be required for development that will cause a net increase in housing numbers or tourism accommodation within 10km of the coast.'*

*The Northumberland Coastal Mitigation Service is a developer-funded wardening service that will provide a presence within the designated sites to educate and advise recreational users such as dog walkers, joggers, horse riders and sea anglers as to how they can enjoy the coast without causing excessive disturbance to important bird populations.'*

Q2. This was a recommendation contained within the appropriate assessment; therefore, the neighbourhood plan was amended to reflect it. Whilst the Northumberland Local Plan (NLP) has reached examination stage, there remains the potential that the plan could not be adopted, even if this is remote. As NCC prepared the appropriate assessment, they may wish to comment further on this matter and the question regarding the mapping which supports the submission NLP. CTC do however note that the zones do appear to be clear on the interactive policy map that supports the submission NLP

<http://northumberland.maps.arcgis.com/apps/webappviewer/index.html?id=2ddf0360755b401e99a333432d132cec>

Q3. The policies reflect the wording suggested for inclusion within the plan that was identified through the appropriate assessment process through discussions with NCC. As NCC prepared the appropriate assessment, they may wish to comment on this matter further. CTC would agree with amendments to the policy and policies to ensure it accurately reflects where it will be applied, including that it relates to tourism development. CTC suggest that in the interests of clarity, it may be appropriate to illustrate the 10km zone on the neighbourhood plan policy map.

Q4. Tourism accommodation could be included within the provisions of policy CNP3; therefore, CTC agree that it should be referenced in any policy dealing within financial contributions.

Q5. The reference within policy CNP1 that 'development will be supported' does advocate that planning permission will be granted where the criteria are met and where it accords with other relevant policies within the plan. The need to accord with other relevant policies is not specifically stated as the plan should be read as a whole.

Q6. CTC consider criterions 'a', 'b' and 'c' relate to Cramlington's important role and that future development should not impact on the ability for this role to be fulfilled. CTC submit that these matters could be addressed as part of a planning statement which would accompany a planning application. For example, an economic development proposal on an allocated site within the settlement boundary would help to ensure that the town remains a strategic location for growth however, housing proposals on an employment site has the potential to impact on this role. Similarly, a proposal for a large mixed-use development should provide a mix of land uses to minimise the need to travel. With regard to criterion 'c', CTC consider it would be possible for an applicant to demonstrate how green spaces will be protected and enhanced. CTC submit that the first sentence of the policy is clear that these criteria will be considered where appropriate.

Q7. It is correct that each criterion only applies where it is relevant to the particular development proposal. The use of the word 'and' is there to explain that they should all at least be considered. However, CTC would not have any concerns if 'and' was amended to 'or'.

Q8. CTC would not have any concerns if criterion 'a' was removed.

Q9. During the preparation of the neighbourhood plan there was significant uncertainty over the future of the land at West Hartford and whether this was to remain allocated as employment land, whether it was to change to a housing allocation, or indeed have any allocation for development. Through discussions with representatives from NCC it was concluded that the future of West Hartford was a strategic matter. To include the site within the settlement boundary, even as white land, would suggest that it could be acceptable for development. Whilst the NLP has been submitted for examination this does not guarantee the future allocation of the site as a prestige employment area.

This is a different position to the land at south-west sector. This land has been considered suitable for long term development through both the preparation of the withdrawn core strategy and evidence base associated with the new NLP. For example, within the Northumberland Strategic Housing Land Availability Assessment (SHLAA) (site 6886) it states:

- *Part of Cramlington South West Sector strategic development site. Phase 3 of the proposed SWS master plan. Highways network cannot be developed until phases 1 and 2 of the SWS are developed. Impact on adjacent SSSI and protected species requires further assessment. Watercourse crosses east of site, for which a buffer zone may be required.*
- *Land available for development but will follow once phases 1 and 2 have been developed*
- *Low-market price levels. Third phase of SWS masterplan, achievable once phases 1 and 2 are developed.*
- *Time period 15+ years*
- *Deliverable following the development of phases 1 and 2 of the SWS masterplan. Phase 3 is proposed beyond the 15-year timeframe. Yield reflects visioning of phase 3 South West Sector masterplan. No permission in place for this particular parcel at the current time*

The SHLAA assessment schedule is available online <https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and->

Q10. CTC agree that it would be clearer if the policy referred to the specific sites for allocation.

Q11. CTC agree that reference should be included within policy CNP4 for the need to provide replacement green space of equal or better value, where, in accordance with the NPPF it has been identified that the open space is surplus to requirements. NCC may have specific comments on the proposed allocation within the emerging NLP.

Q12. It is the purpose of the second sentence to explain the range and what the mix could include. CTC suggest that in light of the comments and to aid clarity, the second part of sentence two could be deleted and the first reordered to read:

*'To ensure that a range and choice of housing is available to meet identified need across the Cramlington Neighbourhood Plan Area, a mix of house sizes, types and tenures will be required to be provided.'*

With regard to how this is to be interpreted, the second part of the policy explains what the housing mix should be informed by. A developer would be expected to consider the two documents referred to and explain how they have informed the mix.

Q13. Paragraph 6.22 explains that starter homes are included within the definition of affordable housing. Starter homes were considered in the Cramlington Housing Needs Assessment, as described in the supporting text.

Q14. The final paragraph of policy CNP5 could relate to specialist housing provision. CTC agree that there is a requirement for a need to be identified through the SHMA or HNA updates. The paragraph was seeking to acknowledge that other, more up to date, studies/ evidence could be provided by a developer to identify a specific need or provide greater detail to that identified within the SHMA or HNA. However, CTC would not have significant concerns if the paragraph was deleted.

Q15. The reference to mix in policy CNP5 also relates to house sizes, therefore criterion 'b' is a relevant consideration, however CTC accept that this would be addressed by policy CNP2. With regard to viability, in order to provide consistency with policy CNP6, a similar reference could be included within the supporting text, for example:

*'Applicants seeking to justify a mix of housing which does not reflect identified housing needs will be required, at their own expense, to support their position by providing an independent viability assessment of the scheme costs and end values and pay for this to be checked by the Local Planning Authority.'*

Q16. CTC accept the amendment; it is agreed that it should state ten or more; this was a drafting error.

Q17. CTC are mindful that whilst the NLP has been submitted for examination, it has not yet been adopted. It is envisaged that there will be a lot of debate through the examination process of the way in which the NLP approaches affordable housing provision. CTC consider that the approach set out within policy CNP6 is appropriate and acknowledge that some policies within the neighbourhood plan could be superseded by the NLP once it is adopted.

Q18. CTC consider that the provision of affordable housing to meet identified needs within the neighbourhood plan area should be delivered within the plan area, where there is the ability to

provide it. Where there no such opportunities, policy CNP6 would support provision outside the plan area.

Q19. In response to the comments on starter homes and affordable home ownership, which is not funded by public grant, rather than amending criterion 'e' in paragraph 5 of policy CNP6, it may be better to amend the wording of paragraph 5, to state:

*'The affordable housing provided in pursuit of this policy for rent, discount market sales housing, or where public grant funding is provided towards other affordable routes to home ownership, will be made available to people in housing need at an affordable sale or rental cost for the life of the property. Any...'*

Q20. In light of paragraph 127 (c) of the NPPF, CTC consider that 'prevailing density and' could be removed from policy CNP7.

Q21. CTC agree with NCCs comments and would be content with the deletion of bullet point 'g'. It is also accepted that the text could be replaced with reference to renewable energy generation, as this is was identified as an important consideration when identifying the design principles for the plan area.

Q22. Criterion 'i' of policy CNP7 refers to the creation of safe and accessible places. It is assumed that the question relates to criterion 'g' and this matter will be resolved with its deletion?

Q23. The purpose of CNP8 is to encourage the reuse of vacant residential properties or those that are underused or require improvements. It does not relate to the conversion of other buildings to residential accommodation. In order to clarify this, it is recommended that paragraph 6.36 is amended to state *'Policy CNP8 seeks to reduce the number of vacant residential properties...'* CTC consider that the use of the word adaptation is appropriate as permission may be required to make internal and external alterations to properties to make them suitable for a specific housing need, for example work to flats or where permitted development rights have been removed. CTC do not consider that there is a need for a separate policy concerning extensions to existing dwellings as such development would fall to be considered against policies CNP2, CNP7 and CNP 8. CTC does however submit that it is important to retain the policy as a result of concern over vacant dwellings and ensuring the best use is made of existing housing, in accordance with the principles of sustainable development.

Q24. In response to the comment from NCC regarding qualification of 'harmful impact', it is suggested that policy CNP8, criterion 'b' is amended to read:

*'The extension or alteration is sympathetic to the character and appearance of the street scene'.*

In addition, criterion 'c' is amended to read:

*'A high standard of amenity can be provided for existing and future residents.'*

Q25. In response to the comments, CTC suggest criterion 'b' of policy CNP9 could be reworded to:

*'Any significant impacts from the development on the transport network, or highway safety can be cost effectively mitigated to an acceptable degree'.*

Q26. In accordance with the approach that is being taken within the emerging NLP (paragraph 5.49), employment generating uses could include: uses that fall within D1 of the use classes order (non-residential institutions) such as creches that serve people working in the employment areas, or health clinics that provide for specialist needs; sui generis uses such as taxi companies, trade counter

retail operations; or ancillary retail. It would not include residential development. CTC would be content for the bullet points 'j', 'k' and 'l' to be renumbered in a more appropriate way.

Q27. There is no specific local justification for the application of the 1000m<sup>2</sup> threshold, CTC have relied upon the evidence work which has informed the preparation of the NLP, including that for office development.

Q28. The purpose of criterion 'a' was to provide flexibility to highlight that there may be circumstances where there were significant benefits arising from the development which outweigh that of the active travel network.

Q29. The list within policy CNP14 is not exhaustive, it is seeking to highlight important elements of the plan area where connections by modes other than the private car are important. There is no specific evidence base document that has been prepared. However, they are areas which have been identified during the preparation of the plan through steering group meetings and discussions with NCC in particular.

Q30. CTC would be happy for the amendments to be made as NCC prepared the policies map. CTC consider that the policy as worded will provide flexibility and acknowledge that the position could change in the future with regard to the provision of the link roads.

Q31. In response to the comments, CTC suggests the wording of the policy CNP16 is amended to read:

*'Development that will result in improved passenger services and rail infrastructure, including the creation of a transport hub will be supported.'*

At the time of preparing the neighbourhood plan no specific site had been identified for the creation of a transport hub. CTC has no objection to the additional supporting text suggested by NCC in relation to car parking. NCC should be able to provide guidance on the status of the proposals and timescales for delivery.

Q32. Through the preparation of the neighbourhood plan there has been no discussions concerning the definition of smaller scale development which may not be inappropriate development on an area designated as local green space. The discussion was always very clearly related to the requirements of national policy. It is not clear where in the NPPF or NPPG there is a requirement for a neighbourhood plan to include this level of detail. The local green space and protected open space background paper provides details of the importance of each space that is proposed for designation.

Q33. Policy CNP22 has been prepared to reflect the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. In order to reflect the provisions of the NPPF the criteria within the policy seek to provide guidance on the assessment of significance of development on the conservation area. If it is considered that the policy requires amendment to better accord with the provisions of the NPPF, the following could be added as an additional paragraph:

*'Development that would lead to substantial harm to, or total loss of significance or any aspect of the Cramlington Village Conservation Area that contributes to its significance will not be supported unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to less than substantial harm to the significance of the Cramlington Village Conservation Area, this harm should be weighed against the public benefits of the proposal.'*

Q34. Given the importance the NPPF places on the provision of community facilities CTC submits that criterion 'a' has an important role and that there should be consideration of the other benefits offered by the proposal which would come about as a result of the loss of the facility. CTC suggest that in order to better relate to the requirements of the NPPF, the word 'significant' could be removed from criterion 'a'.

Q35. CTC would have no objection to the removal of the words before 'development' on the first line of the policy as this is included within the supporting text.

Q36. Paragraph 11.10 of the submission NP explains that there are higher recorded percentage levels of obesity, depression, type 2 diabetes and asthma in Cramlington than the rest of Northumberland.

In addition:

- 1 in 10 children aged 4-5 in Cramlington Village are obese;
- 1 in 5 children aged 10-11 in Cramlington Village are obese;
- 1 in 3 adults in Cramlington Village are obese; and
- 1 in 4 adults in Cramlington North are obese.

The policy requirement included at criterion 'b' has been informed by the evidence prepared by NCC for the NLP - the NLP Public Health Technical Paper on Planning for Hot Food Takeaways (July 2018) <https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Economy%20Retail%20Studies/Technical%20Papers%20for%20Economy%20and%20Retail/NCC-TBG-Paper-Hot-Food-Takeaways.pdf>.

This highlights that across the plan area:

- 33.5% of year 6 children are overweight or very overweight:
  - 46.5% in Cramlington West;
  - 42.9% in Cramlington East;
  - 40% in Cramlington Village;
  - 36.4% in Cramlington South East;
  - 25.7% in Cramlington North;
  - 19.8% in Cramlington Eastfield;
- There are 21 takeaways, equating to 0.72 per 1,000 people.