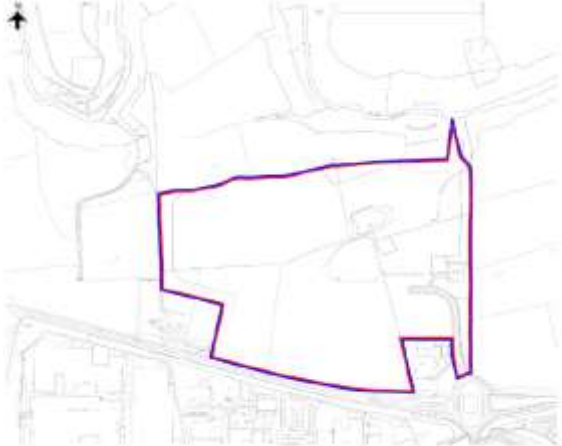


Cramlington Neighbourhood Plan Consultation Statement (May 2019) – Addendum

Appendix 15: Pre-Submission engagement – comments and response

Consultee	Policy/ Para	Comment	Response/ proposed change
Homes England	Para 7.7	<p>Paragraph 7.7 of the Cramlington Neighbourhood Pre-Submission Draft Plan (2018) notes that ‘the plan does not allocate West Hartford as this is a strategic matter to be addressed through the new Northumberland Local Plan.’</p> <p>Whilst this statement does not allocate the site for employment uses, we believe that the Cramlington Neighbourhood Plan should consider West Hartford for residential development.</p> <p>The Site & Planning History The site is a 53.16-hectare area of land which is currently allocated as Employment Land within the currently adopted development plan (additional detailing provided within section 3).</p> <p>A hybrid planning application, reference 16/04741/OUT, was submitted by Homes & Communities Agency (the previous trading name of Homes England), in relation to the site. This application is scheduled to be taken to the Strategic Planning Committee imminently.</p>  <p style="text-align: center;">Figure 1- Red Line Boundary</p>	<p>Noted, no amendments required.</p> <p>The Cramlington Housing Needs Assessment (2018) estimated the quantity of housing needed across the Plan area by considering a number of different growth options:</p> <ul style="list-style-type: none"> • The Northumberland Five Year Supply of Deliverable Sites (2017-2031) – this produces a target of 1,388 dwellings; • National household projections (2014 based) – this produces a target of 1,807 dwellings; and • Past dwelling completion rates (2001 to 2017) – this produces a target of 441 dwellings. <p>The plan will support the delivery of around 3,600 new dwellings which is significant growth.</p>

		<p>The application seeks outline permission for up to 501 dwellings and associated open space with all matters reserved expect for access, and a full application for a wildlife mitigation area. The Red line boundary of application reference 16/04741/OUT is shown in Figure 1.</p> <p>Key Benefits of the scheme</p> <p>The proposed development represents a significant opportunity to deliver the following economic, social and environmental benefits to Cramlington and the wider area:</p> <ul style="list-style-type: none"> • Provision of market housing; • Affordable housing provision thus helping to create mixed and balanced communities; • A range of house sizes including 2, 3, 4 and 5 bed dwellings thus helping to meet an identified need for such properties within the County; • Provision of a primary care facility; • Substantial areas of landscape and open space; • 2.5ha of new open and recreational space for residents and the wider community; • Production of direct and indirect construction jobs during the construction phase; • Residential amenity will be protected within the development; • Provision of a 25ha ‘wildlife area’ designed to enhance the provision for protected and notable species in the area • There will be no unacceptable impact on the surrounding highway network; • The site is well located to promote pedestrian and cycle trips; and • The site is well connected in terms of public transport to a number of larger settlements and their services within the surrounding area. • Whilst our application is undetermined as yet there are clear opportunities to link our application to the housing and social aspirations stated within the Cramlington Neighbourhood Plan Pre-Submission Draft (2018). 	<p>West Hartford is allocated as a sub-regional employment site within the current development plan (Blyth Valley Core Strategy policy REG4).</p> <p>The emerging Northumberland Local Plan identifies West Hartford as a prestige employment area for large scale development.</p> <p>Appendix 2 of the basic conditions statement highlights that NCC consider Blyth Valley Core Strategy policy REG4 to be a strategic policy.</p> <p>Identification of the site for housing would be in clear conflict with both the current and emerging development plan.</p> <p>The planning application referred to within the representation was refused by the strategic planning committee on 8 January 2019.</p> <p>There were two reasons for refusal:</p> <p>The first was that the development would result in the loss of a high quality employment site, significantly diminishing the range of employment land available both</p>
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		<p>Adopted Policy</p> <p><u>Local Policy</u> The following table provides an understanding of the currently adopted allocations on site. The table demonstrates that the site has continually been allocated for employment uses with no success. The site continues to remain undeveloped.</p> <p>Table 1- Current and Adopted Development Policy Relating to the Site</p> <table border="1" data-bbox="622 564 1505 903"> <thead> <tr> <th>Plan</th> <th>Allocation</th> </tr> </thead> <tbody> <tr> <td>Blyth Valley District Local Plan (1999)</td> <td>Identified for large individual sites in 'non-estate locations' for large scale B1&B2 development.</td> </tr> <tr> <td>Blyth Valley Core Strategy (2007)</td> <td>Identified as a prestige employment site.</td> </tr> <tr> <td>Blyth Valley Development Control Policies DPD (2007)</td> <td>Strategic and sub-regional employment development.</td> </tr> </tbody> </table> <p>Emerging Policy</p> <p><u>Northumberland Core Strategy Proposed Modifications Pre- Submission Draft (2017)</u> The Northumberland Core Strategy - Proposed Modification Pre-Submission Draft (2017) was published in July 2017. This document withdrew the allocation of the site for employment uses due to concerns over deliverability.</p> <p>This document has since been withdrawn from the Local Plan process.</p>	Plan	Allocation	Blyth Valley District Local Plan (1999)	Identified for large individual sites in 'non-estate locations' for large scale B1&B2 development.	Blyth Valley Core Strategy (2007)	Identified as a prestige employment site.	Blyth Valley Development Control Policies DPD (2007)	Strategic and sub-regional employment development.	<p>locally and county wide for employment development and undermine regional and local strategies. NCC considered that there is a reasonable prospect that the site could be brought forward for employment development. The application was considered to be contrary to Policy W2 of the Blyth Valley District Local Plan, Policies SS1, REG2 and REG4 of the Blyth Valley Core Strategy, Policy DC6 of the Blyth Valley Development Control Policies DPD, Policies ECN3 and ECN10 of the Northumberland Local Plan - Regulation 18 Draft Plan and the NPPF.</p> <p>The second refusal reason was that insufficient detail has been provided regarding bird strike risk matters in respect of the on-site wildlife mitigation area resulting in uncertainty regarding the delivery of appropriate mitigation for Great Crested Newts and wetland birds within the site. In addition, it was highlighted that granting permission would not be compatible with the council's legal obligations under Regulation 9 of the Conservation of Habitats and Species Regulations</p>
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		<p><u>Northumberland Draft Local Plan Emerging Allocation (2018)</u> The Northumberland Draft Local Plan (2018) has proposed a strategic employment allocation for the site. Based on the information provided within this representation (dated 15.08.2018) we have argued that the site should be deallocated (employment) and reallocated as a site for residential development.</p> <p><u>Northumberland Employment Land and Premises Demand Study (2015)</u> The Northumberland Employment Land and Premises Study (2015) suggested an oversupply in employment land due to existing vacancy rates across the county. This report suggested there is sufficient employment land for the next 60 years.</p> <p>This document identifies multiple constraints that would limit deliverability of West Hartford as an employment site and suggested the development of a masterplan to demonstrate how a prestige operator could be attracted.</p> <p><u>Market Demand and Analysis and Development Viability Report (Cushman and Wakefield, 2018)</u> In support of the live planning application on the site, an assessment was requested by Northumberland County Council and a Report was produced by Cushman and Wakefield. This document establishes the viability and demand for employment uses on site. The study concluded that under current market conditions, development for employment would be difficult to make viable for a number of reasons and that opportunities for employment growth are of a markedly different scale to that envisaged by Northumberland County Council.</p> <p>This report also suggested that Cramlington has an existing stock of employment land that provides a range of size and quality to sustain current enquires and take up levels. In light of the above we would invite you to assess the site in terms of its likelihood to come forward for employment use within the foreseeable future.</p>	<p>2017 because the relevant tests for licensing the destruction of habitat used by a European protected species have not been met.</p> <p>The core strategy that was submitted for examination in April 2017 was subsequently withdrawn from examination in July 2017, therefore what was contained within it is not a relevant consideration.</p> <p>The future development of the West Hartford site has been considered through the plan preparation process. It was concluded that as a strategic matter it would not be appropriate for the site to be given a specific allocation within the neighbourhood plan and that any allocation should be addressed through the new Northumberland Local Plan.</p>
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		<p>The Cramlington Neighbourhood Plan Pre-Submission Draft (2018)</p> <p><u>Understanding Employment Requirements for Cramlington</u> As identified within the Draft Neighbourhood Plan, speculative industrial development is not currently seen to be viable. Likewise, paragraph 7.9 identifies that funding would likely be better placed to provide facilities for indigenous local businesses. This would suggest that likely employment growth is of a different scale than previously envisaged by Northumberland County Council and as currently envisaged through the Northumberland Draft Local Plan (2018) which proposes the site as a Prestige Employment Area.</p> <p>Indeed, as outlined above, the 1999 Blyth Valley District Local Plan allocated West Hartford as a ‘Prestige Employment Site’ for a limited number of operators and this was carried forward in the Blyth Valley Core Strategy (2007) and Blyth Valley Development Management DPD (2007), totalling 19 years of continuous employment allocation and promotion.</p> <p>In addition to this the Market Appraisal undertaken by Cushman and Wakefield in support of current planning application 16/04741/OUT demonstrates that the Site is not likely to be required, or come forward for employment uses, across the Plan period.</p> <p>On this basis we submit that it is reasonable to explore other land use possibilities for the site.</p>	
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		<p>Compliance with Emerging Neighbourhood Plan Policy</p> <p>The Draft Neighbourhood Plan paragraph 3.3 identifies ‘Key Issues’ to be tackled by the plan, including ‘2. Delivery of housing to support local communities and the economy’. The following table provides detailing of the sites compliance with proposed sustainable development and housing policies within the Draft Neighbourhood Plan. The table shows numerous points of compliance with the aspirations of the emerging neighbourhood plan and will support in addressing the stated key issue of delivering housing to support local communities and the economy.</p> <table border="1" data-bbox="584 523 1464 1260"> <thead> <tr> <th data-bbox="584 523 757 611">Draft Policy/ Principles</th> <th data-bbox="757 523 1464 611">Sites Compliance</th> </tr> </thead> <tbody> <tr> <td data-bbox="584 611 757 1010">CNP1- The sustainable development of Cramlington</td> <td data-bbox="757 611 1464 1010"> <ul style="list-style-type: none"> • West Hartford will provide regeneration of a currently disused site. • West Hartford will promote economic growth and provide housing for the local population. • The site has capacity to accommodate residential development • An effective use of previously developed land including site remediation. • The proposed development will provide the additional remediation needed to develop the plot. • Extensive engagement with Northumberland County Council on the appropriate ecological mitigation. • Extensive engagement with Northumberland County Council on sustainable transport methods. </td> </tr> <tr> <td data-bbox="584 1010 757 1142">Policy CNP2- Promoting Good Quality Design in New Development</td> <td data-bbox="757 1010 1464 1142"> <ul style="list-style-type: none"> • The proposal would create an attractive space through hard and soft landscaping • The proposal will ensure that buildings and spaces are easily identifiable and safe </td> </tr> <tr> <td data-bbox="584 1142 757 1260">CNP5- Extending choice in housing</td> <td data-bbox="757 1142 1464 1260"> <ul style="list-style-type: none"> • The site has proposed an extensive mixture of housing types (2,3,4 and 5 beds) • Provides two bed dwellings in line with the aspirations of the Northumberland SHMA Update (2018) </td> </tr> </tbody> </table>	Draft Policy/ Principles	Sites Compliance	CNP1- The sustainable development of Cramlington	<ul style="list-style-type: none"> • West Hartford will provide regeneration of a currently disused site. • West Hartford will promote economic growth and provide housing for the local population. • The site has capacity to accommodate residential development • An effective use of previously developed land including site remediation. • The proposed development will provide the additional remediation needed to develop the plot. • Extensive engagement with Northumberland County Council on the appropriate ecological mitigation. • Extensive engagement with Northumberland County Council on sustainable transport methods. 	Policy CNP2- Promoting Good Quality Design in New Development	<ul style="list-style-type: none"> • The proposal would create an attractive space through hard and soft landscaping • The proposal will ensure that buildings and spaces are easily identifiable and safe 	CNP5- Extending choice in housing	<ul style="list-style-type: none"> • The site has proposed an extensive mixture of housing types (2,3,4 and 5 beds) • Provides two bed dwellings in line with the aspirations of the Northumberland SHMA Update (2018) 	
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		<p>CNP6- Providing lifetime affordable housing</p>	<ul style="list-style-type: none"> • The site proposes 15% affordable housing in line with the since withdrawn Northumberland Local Plan Core Strategy Pre-Submission Draft (2017) • Affordable dwellings would be provided on site 		
		<p>CNP7- Creating high quality new places through good quality housing design and layout</p>	<ul style="list-style-type: none"> • The proposed site layout is an example of high quality design providing areas of public open space and could provide additional community facilities such as the provision of a GP surgery • The site will provide an attractive and safe environment to live within; • The site will enhance the quality of surrounding suburban environments; • The site will ensure an environment where crime and disorder is minimised • The proposed masterplan illustrates external garden space and garages, both aiding the delivery of a high-quality streetscape 		
		<p>Policy CNP17: Green Infrastructure Networks</p>	<ul style="list-style-type: none"> • The site will provide public open space, sports provision and green corridors forming approximately 26% of the Development Area; • Public open spaces will be connected by 'green streets' (tree-lined corridors with planted beds) which run along the sustainable drainage swales and which are linked by a network of footpaths which create a leisure 'circuit'; • The site will incorporate the retention of habitat linkages between the Wildlife Area and off site areas; specifically to the east 		
		<p>Policy CNP24 - Infrastructure</p>	<p>In line with policy CNP24 the proposed development will provide community facilities such as:</p> <ul style="list-style-type: none"> • 2.5ha of open and recreational space • Substantial areas of landscape and open space • Potential to provide recreational playing pitches • Potential to provide a children's playpark and a primary health care facility on site. 		

		<p>Future Site Assessment</p> <p>Based on the information provided above, it is evident that there are significant benefits associated with this site being allocated for residential development. As such we invite the Cramlington Neighbourhood Plan to further assess the site with a view to residential development. This assessment could be provided in the form of a site assessment process as provided by the Planning Advisory Service.</p> <p>The Draft Neighbourhood Plan is supported by a Strategic Environmental Assessment (SEA) that will have had regard to reasonable alternatives. Under Article 6(3) of the Habitats Directive, an Appropriate Assessment is required where a plan (or project) is likely to have a significant effect upon a European designated site, either individually or in combination with other plans (or projects). It may be prudent to check that the Draft Neighbourhood Plan has been subject to such a screening exercise for completeness.</p> <p>Summary of Position</p> <p>It would appear, from the Draft Neighbourhood Plan, that the West Hartford Site has not been appraised as a potential housing site within the Cramlington Neighbourhood Plan area. We submit that;</p> <ul style="list-style-type: none"> • The site is inappropriate for ‘prestige’ employment development; and • The suitability for residential use is compliant with the draft Neighbourhood Plans housing policies. <p>We believe that there is merit in inviting the Cramlington Neighbourhood Plan Group to re-assess the site with a view to residential development.</p>	
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