

**Northumberland County Council – Northumberland Local Plan Core Strategy Pre-Submission Draft: Proposed Further Major Modifications**

**Background**

1. Northumberland County Council is consulting on proposed further major modifications to the pre-submission draft of the Northumberland Local Plan Core Strategy (NLPCS). This follows consultation on major modifications to the pre-submission draft NLPCS that took in June/July 2016. The current consultation is part of ongoing discussions between Local Authority areas regarding strategic priorities for development, held under the Duty to Cooperate.
2. Once in place, the NLPCS will provide strategic policies on the overall quantity and locations of development in Northumberland, along with more detailed policies that the Council will use to determine planning applications, and potential development sites within the County. The NLPCS also proposes to allocate a number of sites currently in the Green Belt for residential development.
3. Throughout various stages of consultation on the NLPCS Gateshead Council has provided formal consultation responses that highlight issues in a number of areas, the most recent consultation response having been approved by Gateshead Cabinet in September 2016. The most significant issues raised in our consultation responses so far relate to the scale of growth proposed within the NLPCS. The evidence that Gateshead Council has been presented with so far suggests that the level of growth set out within the NLPCS, if delivered, could have a negative impact on Gateshead.
4. As identified in the documents published for consultation, Northumberland County Council has not proposed to address the issues we have raised by modifying the policies relating to the scale of growth set out in the plan. Conversely, the current consultation proposes a modification to the plan which seeks to increase the potential housing delivered in Northumberland from 24,000 new homes, to 26,000 new homes, through the allocation of additional Green Belt land for housing development at Dissington garden village (Ponteland).
5. Officers from Gateshead Council have held discussions with colleagues at Northumberland County Council as part of ongoing activity under the Duty to Cooperate. These discussions have taken place with the intention of

preparing a joint position statement that will explore concerns raised by Gateshead Council and Newcastle City Council through consultation. Evidence prepared to support this work suggests that the scale of housing growth planned for Northumberland will significantly increase the number of residents moving from Gateshead to Northumberland. This approach is not consistent with the Gateshead and Newcastle Core Strategy and Urban Core Plan, which plans to accommodate Gateshead's housing needs within the Borough. As such, there do not appear to be the "exceptional circumstances" required by national planning policy which would justify the allocation of greenfield Green Belt land for housing in Northumberland.

6. Consultation on the further proposed major modifications of the NLPCS must be limited to the proposed further modifications. Our draft consultation response therefore requests that Northumberland County Council removes the proposed allocation of land at Dissington garden village for housing development.
7. Our draft response to this consultation is consistent with responses we have provided to earlier stages of consultation on the emerging NLPCS. Gateshead Council has raised concerns regarding the scale of proposed housing growth in Northumberland, and the impact this may have on Gateshead during each stage of consultation on the emerging NLPCS, from December 2013 onwards.
8. The emerging NLPCS is at an advanced stage; subject to the outcome of consultation on proposed further major modifications to the NLPCS, and subject to approval by Northumberland County Council, the next stage of the plan-making process could be submission of the NLPCS to the Secretary of State for examination in 2017. Accordingly, although our draft consultation response emphasises that we support the principle of sustainable growth within the North East, it also re-states our concerns regarding the potential impact of the NLPCS for Gateshead.
9. The deadline for consultation responses is 23 December 2016. In order to meet this deadline, our comments have been forwarded to Northumberland County Council for information, with an accompanying covering letter stating that our formal consultation response is subject to Cabinet approval in December 2016.

## **Consultation**

10. The Cabinet Members for Economy and Transport have been consulted.

## **Implications of Recommended Option**

### **11. Resources:**

- a) Financial Implications** – The Strategic Director, Corporate Resources confirms that no financial implications directly arise from this report
- b) Human Resources Implications** – None
- c) Property Implications** - None

### **12. Risk Management Implication** - None

### **13. Equality and Diversity Implications** – None

### **14. Crime and Disorder Implications** – None

### **15. Health Implications** – None

### **16. Sustainability Implications** – Sustainability Appraisal and Strategic Environmental Assessments have been published and will be revised as proposals are developed.

### **17. Human Rights Implications** - None

### **18. Area and Ward Implications** – None

## **Appendix 2**

### **Northumberland Local Plan Core Strategy Pre-Submission Draft: Proposed Further Major Modifications**

Thank you for providing us with the opportunity to comment on the proposed further major modifications to the pre-submission draft of the Northumberland Local Plan Core Strategy (NLPCS). This letter is provided to support a completed representation form, enclosed with this letter.

As you are aware, Gateshead Council has submitted formal written responses to consultation on the emerging NLPCS on several occasions throughout the plan's preparation. The most important issues raised in our comments relate to the scale of housing growth set out in the plan and the impact this could have on Gateshead. The proposed further major modifications to the NLPCS do not seek to address the issues we have raised through consultation. Therefore, rather than re-stating the comments we have provided previously, we advise that this consultation response is considered in addition to our previous submissions to consultation on the NLPCS. In particular, this letter should be considered alongside our response to consultation on the proposed modifications to the pre-submission draft NLPCS, contained within our letter to you dated 27 July 2016.

Over recent months officers from Gateshead Council, Newcastle City Council and Northumberland County Council have met with the aim of preparing a joint position statement. The joint position statement is being developed with the aim of supporting an understanding of the issues raised to date through consultation on the NLPCS, including understanding the significance of any impact of the NLPCS for Gateshead and Newcastle. Work on the joint position statement is ongoing, and we hope to reach a stage where areas of mutual agreement are identified within the statement, and where opportunities for mitigating anticipated impacts are explored, if appropriate.

An analysis of recent migration trends between Northumberland, Gateshead and Newcastle has been carried out by the Councils to support preparation of the joint position statement. This analysis suggests that if the level of housing provision identified within the NLPCS is delivered, it could result in around 2,000 additional residents moving from Gateshead to Northumberland over the plan period. This level of out-migration is over and above the current trend of net migration of residents from Gateshead to Northumberland.

There are many factors influencing migration patterns which are hard to quantify, making an accurate estimate of future trends difficult. However, the analysis of migration trends prepared for the emerging joint position statement has provided a useful indication of the potential implications for Gateshead. Although quantifying the exact impact of Northumberland's growth for surrounding areas is difficult, the evidence available to us makes clear that if the scale of housing growth proposed within the NLPCS is delivered, it will significantly increase the number of residents moving from Gateshead to Northumberland. Our previous consultation responses have highlighted our concerns regarding the potential implications of this for the delivery of

objectives aimed at supporting sustainable economic and housing growth in Gateshead. The proposed development of around 2,000 homes on Green Belt land at Dissington has the effect of increasing the plan's housing provision to around 26,000 new homes over the plan period. In our view, this proposed increase in the supply of allocated housing land in Northumberland is likely to exacerbate the potential negative impacts of the NLPCS for Gateshead.

The Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP) plans to accommodate the full objectively assessed need for housing in Gateshead and Newcastle. However, through its implicit assumption that net migration into Northumberland will increase, it appears that the NLPCS aims to accommodate a portion of housing growth that has already been attributed to Gateshead within the adopted CSUCP. We therefore question whether there are exceptional circumstances which justify the allocation of greenfield land currently within Northumberland's Green Belt to accommodate housing development.

For the reasons set out above, we respectfully request that Northumberland County Council removes the proposed housing allocation at Dissington Garden Village from the further major modifications of the NLPCS.

We regret that our request for modifications to the NLPCS comes at a late stage in the plan's preparation. However, our request is in keeping with the issues we have identified within our past responses to consultation on the emerging NLPCS: Gateshead Council has consistently raised concerns regarding the implications of the quantity of housing provision proposed within the NLPCS at each stage of consultation on the emerging plan, from December 2013 onwards. Our response also results from an objective assessment of migration trends recently prepared in collaboration with Northumberland County Council to support our emerging joint position statement.

Over the coming months we hope to continue to work with Northumberland County Council and Newcastle City Council to progress our joint position statement. This work will involve discussion regarding the potential implications of Northumberland's proposed housing growth for Gateshead's road network. Gateshead Council is currently awaiting further information regarding anticipated transport impacts of development in Northumberland. We hope to provide a response on this issue once we have been able to develop a detailed understanding of the specific mitigation measures that may be required in Gateshead to address any identified issues associated with new developments in Northumberland.

We support ambitions to grow the economy of the North East to deliver increased prosperity for the region. Unfortunately, the evidence that is available to us suggests the delivery of housing growth in Northumberland, as set out in the pre-submission draft NLPCS could have negative impacts on Gateshead. We are keen to work with Northumberland County Council to

support the County in preparing a plan capable of supporting sustainable growth in the region.