



# **Local Development Framework**

## **Core Strategy & Development Policies Submission**

### **Addendum to Self Assessment of Soundness**

June 2008

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Further copies of this document and the Submission Core Strategy and Development Policies consultation documents are available from:

- The Forward Planning and Performance Team (address details below);
- Our website [www.northumberlandnationalpark.org.uk/planning](http://www.northumberlandnationalpark.org.uk/planning)
- A hard copy is available for inspection at the National Park Head Office, Eastburn, South Park, Hexham and at the following libraries during normal opening hours, Bellingham, Haltwhistle, Haydon Bridge, Hexham, Kielder, Wooler and on the Northumberland County Mobile Library Service.

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## **Background**

1.1 This document is an addendum to the 'Self Assessment of Soundness' document that was submitted to the Government for independent examination on the 13 June 2008. The Self Assessment of Soundness (May 2008) examined the Core Strategy against the nine tests of soundness set out in the old PPS12 (2204). However, it is understood that following the publication of the new PPS12 on the 4 June 2008 any Development Plan Documents submitted for examination after this date will be examined against the new tests of soundness.

1.2 As the new tests are in essence a repackaging/ simplification of the original nine tests the National Park Authority considered it may be helpful to extract the relevant information from the submitted Self Assessment of Soundness and align this with the three simplified tests of:

1. Justified;
2. Effective; and
3. Consistent with National Policy.

This document should be read alongside the submitted Self Assessment of Soundness which is available on the National Park website.

## **Test 1: Justified**

### **Self Assessment**

1.3 Northumberland National Park Core Strategy and Development Policies Submission DPD (May 2008) is justifiable. It is founded on a robust and credible evidence base and is the most appropriate strategy for the Northumberland National Park when considered against reasonable alternatives.

### **Evidence**

#### Engagement

1.4 Northumberland National Park Authority has placed significant emphasis on engaging local communities and other stakeholders in the development of the Core Strategy. The National Park community has played a major role in shaping the Core Strategy, particularly through their attendance and participation in consultation events, for example during the consultation on the Further Preferred Options Document over 8% of National Park residents attended the consultation events.

1.5 During the summer of 2005 the Authority consulted on initial issues for the Local Development Framework by holding community consultation workshops throughout the Park. The outcome of these workshops contributed to the preparation of an Issues and Options document, setting out a range of issues along with possible options for the policy approach to be taken. Extensive public consultation took place between June and August 2006. During the consultation period many useful comments were received, these comments helped to shape a Preferred Options document with draft policies which we consulted on between December 2006 and February 2007. As a result of the comments received during this consultation, and the decision to combine the Core Strategy with the Development Control Policies document it was decided to undertake a further round of consultation between October and December 2007 prior to Submission to the government. The responses to the second Preferred Options document have informed the Submission document.

All responses received to previous consultations, and details of how the Authority has responded to the comments raised are set out in the Statement of Consultation [NP011].

#### Research/ Evidence Base

1.6 During the preparation of the Issues and Options Document [NP017] the Sustainability Appraisal Scoping Report [NP026] provided the initial background evidence to set the initial baseline. Further crucial evidence to inform the Core Strategy was gathered as part of the preparation of the first Annual Monitoring Report in 2005 [NP032] and the first annual State of the National Park Report in 2006 [NP014], such as the Business Needs Survey [NP042], Local Facilities Survey (incorporated into the State of the Park Report), Housing Needs Survey [NP027], and Landscape Character Assessment [NP037].

1.7 The relevant evidence base is identified in section 3 and the supporting text to the appropriate policy within the Submission Core Strategy. The State of the National Park Report identifies when the particular elements of the evidence base will be updated, for example the Housing Needs Survey in 2009/10

#### Alternatives

1.8 Northumberland National Park is in a unique situation in that there has not been significant pressure for development. This low demand arises from a combination of the National Park's small population and its remote location. In 2007/08 the National Park Authority determined only 66 planning applications, the majority of which were for extensions to existing buildings, the conversion of buildings or residential dwellings and new agricultural buildings. Since 1996 only 7 new build dwellings and 22 conversions to dwellings have been completed within the National Park.

1.9 As a result of the low demand for development and the statutory purposes and duty of the National Park Authority the range of realistic spatial options and alternatives was considered to be limited. However, a range of alternative options were considered as part of the Issues and Options process (see Issues and Options SA report [NP018]). Alternative options that were put forward as part of the Issues and Options consultation were assessed in the SA report [NP020] on the Preferred Options document. The Core Strategy Preferred Options document [NP019] included details of the alternative options and any issues put forward during the Issues and Options consultation.

## **Test 2: Effective**

### **Self Assessment**

1.10 Northumberland National Park Core Strategy and Development Policies Submission DPD (May 2008) is effective. It is considered to be deliverable, flexible, and able to be monitored.

### **Evidence**

#### Deliverability

1.11 The Core Strategy sets out a spatial strategy for the National Park up to 2021, going beyond traditional land use planning. It provides a spatial portrait of the Park and by presenting key statistical information it provides a picture of the state of the National Park. It sets out a clear and detailed spatial vision for sustainable development and the future of the National Park, with a clear set of spatial objectives

flowing from the vision.

1.12 The Core Strategy contains policies which provide a clear framework to guide the scale and location of development, which are the spatial interpretation of the National Park Management Plan. The policies have been fully informed by a sustainability appraisal process which is based on the achievement of a wide range of social, economic, and environmental objectives. The Appropriate Assessment process [NP009] has assessed the impact of the policies on nature conservation sites of European importance and has therefore informed the Submission Core Strategy.

1.13 Consultation has taken place with service providers including utility companies during the preparation of the Core Strategy and Development Policies document. However, as there are no significant levels of new development planned or anticipated in the Park, there are no significant infrastructure requirements. A wide range of organisations have been consulted throughout the process of developing the Core Strategy and comments received have been taken into account – set out in the Statement of Consultation [NP011].

1.14 Paragraph 1.3-1.6 of the Core Strategy highlights that the LDF has taken account of other key strategies such as the Regional Economic Strategy [NE006], Integrated Regional Framework [NE007], Regional Housing Strategy [NE006], sub regional strategies and the emerging LDFs and community Strategies of the 3 Districts within the Park and the Northumberland County Community Strategy. The strategies and policies of the 3 District Councils covering the Park have been particularly relevant in informing the Core Strategy. For example, when developing the settlement hierarchy the emerging hierarchies of Alnwick, Berwick and Tynedale LDFs were considered – see Settlement Topic Paper [NP022]. Appendix 1 of the Submission document [NP007] sets out a list of strategies and plans which have influenced its preparation.

1.15 The Implementation and Monitoring framework (section 13 of the Submission document [NP007]) sets out how and by whom each policy will be implemented. It highlights key areas where policy implementation will be related to other strategies and organisations. Much of the implementation of policy will be done directly by the Authority through decisions on planning applications or other activities of the Authority. A draft Implementation and Monitoring Framework was consulted on at the Further Preferred Options stage [NP021]; comments on the framework have been reflected in the Submission document.

#### Flexibility

1.16 The circumstances within Northumberland National Park are unique, with a very low rate of development in comparison to other parts of the country and even the North East region. Many changes in national or regional policy will not impact on the policies contained within the Core Strategy. Section 1 of the Core Strategy explains the context within which it has been prepared; specifically section 1.9 highlights that unlike the old system of Local Plans and Structure Plans the LDF process is one of continuous updating and monitoring – identifying areas where new or revised policies may be required through the Annual Monitoring Report (AMR) process.

#### Monitoring

1.17 The Core Strategy includes a monitoring and implementation framework for each policy which identifies organisations (or teams within the National Park Authority) who will implement policies and includes specific targets and timescales where appropriate. Sections 1.9 and 13.1-13.3 identifies the purpose of the

framework, explaining that performance will be monitored annually through the AMR/ State of the Park Report. The annual State of the Park report will be reported to the National Park Authority in June each year and the key findings will be circulated widely to all residents and stakeholders.

### **Test 3: Consistent with National Policy**

#### **Self Assessment**

1.18 Northumberland National Park Core Strategy and Development Policies Submission DPD (May 2008) is considered to be consistent with National Policy.

#### **Evidence**

1.19 Government Office North East (GONE) has been consulted throughout the process of preparing the Core Strategy and their views have been taken into account. GONE objected to a number of Further Preferred Options policies on the basis that they were not consistent with national planning policy and the Authority has addressed these objections through amending, deleting, or adding policies. GONE were sent a draft copy of the submission document in February 2008 and only expressed concern over Policy 17 which they considered merely repeated national policy. The submission document was amended to explain the local justification for the retention of such a policy. Copies of GONEs comments on the evolving Core Strategy are included in the Statement of Consultation [NP011].