

## Representations from Regulation 19 Consultation in Policy Order

Page No	Policy	Organisation	Sound?	Participate in hearing?	Summary of Representation	Authority response	Proposed Action
13	Para 2.15	Campaign for National Parks	No	No	Local plan lacks a policy on climate change. We believe that this makes the plan unsound as without such a policy, it will not be justified or effective. Climate change will be one of the most significant factors influencing the future of the National Park and has the potential to have a significant impact on its special qualities so it is essential that the plan includes a clear policy covering both climate change mitigation and adaption	<p>NNPA consider all the proposed policies cover all aspects of Climate Change (adaptation and mitigation) to a sufficient extent without the need for an additional policy replicating criteria from other policies.</p> <p>The NNPA consider CNP make a valid point and therefore propose to insert additional explanation in Chapter 4 Spatial Strategy setting out the importance of Climate Change. This will also include an illustration that shows which Strategic and Development Management policies cover these issues.</p>	<p>Insert after Para 4.5: <b><u>Climate Change</u></b></p> <p><u>Climate change is one of the biggest challenges facing the environment, society and the economy both at a global and local level. Planning has an important role to play in taking a proactive approach to both mitigating and adapting to climate change. The UK Climate Change Act 2008 established a legally binding target for an 80% reduction in the UK's greenhouse gas emissions by 2050 and National Parks have an important role to play in meeting this challenge and responding to the effects of climate change. Local planning authorities are also bound by the legal duty in Section 19 of the 2004 Planning and Compulsory Purchase Act (as amended) to ensure that, taken as a whole, local plan policies contribute to the mitigation of, and adaptation to, climate change.</u></p> <p><u>Climate change is at the heart of the strategic policies within this plan, specifically in the Sustainable Development criteria:</u></p> <p><b><u>Climate change adaptation</u></b> <u>Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities (NPPF glossary).</u></p>

							<p><u>In the General Design principles we have sought to address:</u>  <b><u>Climate change mitigation</u></b>  <u>Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions (NPPF glossary).</u></p> <p><u>These strategic policies will be applied to all development and as such it is intended this will embed the importance of climate change consideration within all developments rather than as an add-on, such as with the previous Core Strategy Policies 2 and 25. The table below shows where climate change is a consideration in the Local Plan policies.</u></p>
15	3.1 – 3.5	Northumberland County Council	Yes	No	<p>We have no issues of soundness to raise however we wish to make the following comments, as set out below, and would welcome further discussion under the Duty to Cooperate on matters such as affordable housing. The Council considers that the overall strategy fits well with the strategy set out in our own Submission Local Plan. The strategic priorities, spatial objectives, sustainability and general development principles reflect the key role that the National Park plays within the County as a whole, in terms of the rural economy, tourism, ecology, landscape and the historic environment.</p>	Support noted.	No modification required.
16	3.4	House Builders Federation	Yes	No	<p>The HBF are supportive of Strategic Priority 4 which looks to <i>‘support the provision of a range of housing that encourages more working age people and families to live in the National Park or one of its gateway settlements’</i>.</p>	Support noted.	No modification required.

					<p>The HBF are also generally supportive of Spatial Objective 5 which looks <i>'to make the National Park (and its gateway settlements) a more attractive option for young adults and people of working age to live and work in'</i>.</p> <p>The HBF consider that it is important that the Vision, Strategic Priorities and Spatial Objectives are aligned to ensure that the full housing needs of the current and future residents are met.</p>		
16	3.5	National Farmers Union	Yes	No	<p>We welcome the Plans ambition to allow support sustainable rural growth, attract more families and workers to live in the National Park and help retain young people.</p> <p>Reviewing the Proposed Strategic Spatial Objectives for the Local Plan, we note that objective 7 aims to encourage the location of development, but lacks details on how such an objective would avoid disadvantaging communities who have faced cuts to services and facilities.</p>	<p>Support noted for ambition for sustainable growth.</p> <p>Policy DM1 seeks to ensure services and facilities serving existing communities are protected as far as possible through the planning system.</p>	No modification required.
19	ST1	Environment Agency	Yes	No	<p>It is good to see reference to the Water Framework Directive with regard to water quality.</p>	Support noted.	No modification required.
19	ST1	Highways England	Yes	No	<p>The policy reference has been amended from "Policy 1" to "Policy ST1". It is noted that the policy has been amended primarily with two additional points k and l. These additional requirements are not considered to be of any particular relevance to Highways England and do not represent a material change in</p>	Support noted.	No modification required.

					terms of influence at the SRN. Therefore, support can be maintained for this policy and no further comment or representation is considered necessary.		
21	4.19	Mineral Products Association		No	<p>Para 4.19 of preferred options. The use of Local stone. We support the use of local stone and vernacular to help maintain local characteristics. We supported this approach but it has now been deleted. We are disappointed that this paragraph has been deleted. It was a useful statement of fact and suggest the wording is reinstated.</p> <p>This narrative was extremely helpful as it indicated that the authority was seeking to avoid repetition in policies through the use of strategic policies such as ST1, ST2 and ST3. However the deletion of the narrative and the insertion of specific policies is notable and unnecessary (see comments for DM16 below).</p>	<p>The supporting text of Policy ST2 was deleted in error during formatting of the Publication Draft.</p> <p>The wording from the preferred options version will be re-introduced and is considered appropriate for explaining about the need for good design and includes reference to local stone, vernacular and character.</p> <p>There were no previous objections to the supporting text to Policy ST2 and therefore this is considered to be a minor modification.</p>	<p>The wording from the preferred options version will be re-introduced before Policy ST2:</p> <p><b><u>General Development Principles</u></b></p> <p><b><u>4.20</u></b> <u>It is important that new development is to a high standard of design and quality, so that it can serve many generations to come. Most development has a visual impact but some forms of development also have a long-term impact on the intensity of use in an area, for example in terms of vehicle movements or use of services such as shops, waste collection or water supply. If new development is of a high quality it will add to the high quality of the National Park environment and will tend to encourage spending, create employment and maintain quality of life for residents.</u></p> <p><b><u>4.21</u></b> <u>Design is a key aspect of sustainable development. It goes to the heart of most planning proposals. Attitudes to design, especially in an area with such a strong vernacular built tradition, are shaped by what has gone before but will also need to adapt to suit changing technologies, materials, climate, building styles and expectations.</u></p> <p><b><u>4.22</u></b> <u>Northumberland National Park has a distinctive built heritage that is recognised as one of its most cherished qualities. The use of local</u></p>

						<p><u>stone and vernacular design with little architectural detail is characteristic of the area. The challenge lies in managing change in a sympathetic way to ensure that new buildings respond to modern needs yet sit in harmony with the historic structures in the surrounding area. This needs to start with a clear appreciation of context, so that proposals can be designed to 'fit in', without slavishly reproducing designs from the past. With larger scale development it will require an understanding of how the site relates to the wider landscape.</u></p> <p><u><b>4.23</b> The rural nature of the National Park clearly requires different solutions from an urban environment. National Park designation also brings with it a requirement for planning decisions to conserve and enhance the cultural heritage, wildlife and natural beauty of the area. The consequence is that development solutions will tend to be more restrictive and require greater sensitivity to their context. The National Park Authority nevertheless encourages innovation in architecture, materials and technology for new buildings but will normally require more traditional methods for changes to historic buildings.</u></p> <p><u><b>4.24</b> To help designers and developers respond to these challenges the Authority has an extant Design Guide SPD that provides advice about, and examples of, the quality expected. The Authority uses it to influence proposals and to negotiate on schemes during pre-application discussion and to support decisions on planning applications. The Design</u></p>
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							<a href="#">Guide SPD will be updated as part of the Local Plan review.</a>
22	ST2	Coal Authority	No	No	<p>We previously supported this policy as it included consideration of unstable land, we are disappointed to note that the wording has now been amended and reference to unstable removed.</p> <p>Suggest insert into ST2</p> <p><b><u>I) The proposal, is located near to land known or suspected of being contaminated or unstable, a full assessment demonstrates that it will not give rise to unacceptable risks and is suitable for the proposed use. This may require suitable remedial works to be carried out in advance of development.</u></b></p>	<p>NNPA agree that it is important to consider unstable land in relation to development. At present there is no policy within the Core Strategy and the Development Management team considered that the NPPF (para 170) was sufficient to determine applications.</p> <p>Nevertheless, given the extent of coal works that the Coal Authority outlined in their representation, the NNPA propose to add an additional criteria slightly amended from that proposed by the Coal Authority to ST2.</p>	<p>Insertion of part m into ST2:  <a href="#">m) The proposal is located near to land known or suspected of being contaminated or unstable, an assessment shall accompany an application and demonstrate that the proposal will not give rise to unacceptable risks. Such an assessment shall include suitable remedial measures including timeframes for when such measures will be undertaken.</a></p>
22	ST2	Highways England	Yes	No	<p>The policy reference has been amended from “Policy 2” to “Policy ST2”, with the policy provisions having been significantly amended and expanded upon. In particular, Highways England was supportive of the previous policy provision which sought to ensure that new development, <i>“does not prejudice highway safety or cause unacceptable levels of traffic that would harm the environment or capacity of the local road network”</i>. It is noted that, whilst criteria i) maintains the provision relating to highway safety, reference to unacceptable levels of traffic and detriment to capacity on the road network is no longer incorporated within the policy.</p> <p>Whilst we can generally maintain support for the policy, we consider that the removal of these provisions makes</p>	<p>Support noted. The comments from Highways England need to be considered in proportion to the level of development that NNP is subject to. It receives just 90 planning applications per year . The majority of proposals fall as small scale minor development with just one major application being received every two to four years. This level of small scale development would not affect the strategic road network. The Policy was adapted to take local circumstances and known levels of development into account. Policy DM9 would be relevant in those circumstances.</p> <p>If a large scale development comes forward, then Strategic Policy ST3 for Major development would come into play. The presumption against major development would enable the Authority to consider the impact upon</p>	<p>No modification required.</p>

					the policy less robust from a transport and infrastructure perspective. Whilst the implications are more pertinent to the local road network, this could potentially have implications for the SRN and as such we would recommend that this wording is reinstated.	the Strategic road network.	
24	ST3	Highways England	Yes	No	<p>The policy reference has been amended from “Policy 3” to “Policy ST3” and the policy text has been significantly amended; this includes the removal of the requirement for development to not have any detrimental effects on the transport network and the extent to which such impacts could be mitigated, which was previously supported by Highways England.</p> <p>Whilst we can generally maintain support for the policy, we consider that the removal of these provisions makes the policy less robust from a transport and infrastructure perspective. Whilst the implications are more pertinent to the local road network, given the proximity of the SRN, there is still the potential for major development to have implications for the SRN, either individually or cumulatively, such as when taking into consideration development in neighbouring authorities. As such, we would therefore recommend that this wording is reinstated</p>	The NNPA agree that reference to the transport network should be included within the Strategic Major development policy.	<p>It is therefore proposed to insert reference d)</p> <p><del>e) Whether all possible measures have been taken to minimise adverse effects on the special qualities of the National Park, the landscape and recreational opportunities and the extent to which these could be mitigated.</del></p> <p><u>e) Whether all possible measures have been taken to minimise any adverse effects on the special qualities of the National Park; the ability for the public to understand and enjoy the special qualities; the setting of historic assets; natural resources; and the transport network and the extent to which these could be mitigated;</u></p>
24	ST4	Highways England	Yes	No	This policy was previously titled “Policy 4: Settlement Hierarchy” and has been re-worded and expanded upon as “Policy ST4: Spatial Strategy”. In particular, support can be provided for the rewording of part 2 which clarifies that development will be supported in Local Centres and Smaller Villages where it	Support noted.	No modification required.

					would be proportionate to the size of the settlement as previously stipulated by Highways England. Given the remaining provisions remain consistent with the previous draft, support can be maintained for this policy and no further comment or representation is considered necessary.		
25	ST4	House Builders Federation	No	Yes	<p><i>The HBF does not consider that Policy ST4 is sound, as it is not justified or consistent with national policy for the following reasons:</i></p> <p>Paragraph 4.41 highlights that that the population of the park is ageing, with a continuing, strong, increase in the proportion of the resident population over 65 years of age. Whilst this is, perhaps, not surprising it does indicate potential difficulties in maintaining economic and social wellbeing with a stagnant population size but ageing demographic. This will inevitably reduce the potential workforce and population vitality in the future. The HBF therefore consider that the NNPA should seek to address this loss of working age population over the period of the plan, including through the provision of an appropriate range and number of homes.</p> <p>Paragraph 4.45 states that the Objectively Assessed Housing Need (OAHN) for Northumberland National Park is for up to approximately 160 units over the plan period (2017 – 2037) with approximately 40 of these being affordable. Paragraph 4.47 goes</p>	<p>The Housing Topic Paper explains the justification for the Authority's approach to Housing.</p> <p>The HBF suggest that amendments to the wording of para 4.45 for the removal of the words 'up to' in relation to the 160 dwellings identified as the OAHN. The NNPA consider this would not be appropriate and this is supported by the 2017 SHMA.</p> <p>NNPA comments that given the local circumstances this is very unlikely to be an issue that would ever arise. The Housing Topic Paper explains that there is very limited interest in building new housing within the National Park. In 2018/19 no applications were submitted to the LPA for new housing. So far in 2019/2020 one new house has been submitted and approved on a site in an established settlement.</p> <p>The NNPA agrees that they do not wish to limit the aspirations of local people or limit the potential for new younger residents to provide or take up economic opportunities within the National Park, however the National Park is not a suitable location for unrestricted growth.</p> <p>The HBF refer to the Authority as a Council. We are special purpose local authority that has no responsibility for</p>	No modification required.

on to state that this plan will not allocate housing sites nor will it contain a housing delivery target. In terms of the scale of housing provision the HBF is mindful of the status of the area as a National Park and therefore does not consider unrestricted housing growth should occur. It is, however, important that the National Park retains its vitality and places due weight upon its duty to; 'seek to foster the economic and social wellbeing of local communities'.

Therefore, the HBF would recommend the removal of the words 'up to' in paragraph 4.45 in relation to the 160 dwellings identified as the OAHN. The NNPA will need to ensure that the housing provision does not limit the aspirations of local people or limit the potential for new younger residents to provide or take up economic opportunities within the National Park, particularly in relation to appropriately sized family homes.

Policy ST4 provides a settlement hierarchy and states that *'development should support the service function of Local Centre and the sustainability of Smaller Village by providing additional small scale housing (principal residence or affordable) . . . that would be proportionate to the size of each settlement'*. Paragraph 4.53 defines 'principal residence housing' as a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The HBF seek

Housing provision but it is Northumberland County Council who is the Housing Authority. The suggestion that we are a council with all their powers is misleading.

The HBF seek assurances that the need for dwellings to be either a principal residence or affordable housing will not be an impediment to the effective delivery of homes. The Authority considers that the Principal residence restriction is a significant change from the local needs criteria set out in the current Core strategy. Due to the limitations of the planning use classes order, the Authority wish to ensure that any new housing is not used for second homes or holiday homes. The Authority has 20% of its housing stock not in full time occupation and therefore consider the HBF should be supporting such a move, to ensure that any new housing is used for housing for the needs of the population.

The Authority has not placed a size limitation on new dwellings as other National Park Authorities limited the size and therefore family homes are being supported by the NNPA.

The HBF raise concerns regarding the occupancy restrictions. The NNPA propose to review the Local Plan within 5 years from adoption, and from monitoring reports which will be carried out on an annual basis, and will reassess the housing provision to ensure that the housing needs of current and future residents are being met.

					assurances from the Council that the need for dwellings to be either a principal residence or affordable housing will not be an impediment to the effective delivery of homes. The HBF have concerns in relation to these restrictions and the potential implications they could have on the delivery of homes, including the potential to deliver infrastructure and other policy requirements set out in the plan. The HBF also have concerns in relation to the principal residence requirements and the impacts this could have on future financing and the rights of occupants.		
30	ST5	Highways England	Yes	No	This policy was previously titled "Policy 10: Providing a range and choice of housing". It has been re-worded and expanded upon as "Policy ST5: New Housing". The amendments to the Policy do not represent a material change in terms of impact at the SRN. As such, support can be maintained for this policy and no further comment or representation is considered necessary.	Support noted.	No modification required.
30	ST5	House Builders Federation	No	Yes	<i>The HBF does not consider that Policy ST5 is sound, as it is not justified or consistent with national policy for the following reasons:</i>  Parts 1 and 2 of this policy require development to provide a mix of dwellings in terms of size, type and tenure and states that this will be assessed against information in the most recent SHMA. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however,	The NNPA consider the Policy is worded to be flexible and allow a mix of dwellings in terms of size, type and tenure depending upon the local circumstances of the site and the current evidence at the time of making the decision. The Authority has not prescribed this in any detail in the Policy. Para 4.51 considers the reasonable alternatives and explains how it has discounted having specific house size, tenure and type requirements. The policy will enable any up to date evidence being taken into account rather than the SHMA.	No modification required.

					important that any policy is workable and ensures that housing delivery is appropriate, for example any SHMA will provide a snapshot in time and may be superseded by more up to date alternate sources of information. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand may vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.	As outlined above, the Local Plan is proposed to be reviewed within five years and therefore the monitoring of this policy will be carried out and reassessed.	
33	DM1	Campaign for National Parks	No	No	<p>The plan is unsound as this policy is not consistent with national policy since it fails to make reference to the policy presumption against road building in National Parks.</p> <p>There is nothing in the wording of the policy or the supporting text to suggest that this policy covers only certainly types of infrastructure and on the basis that is intended to cover all types of infrastructure, there is a need for it to include reference to relevant national policy on road-building.</p>	<p>New road building is not identified as a risk or a threat for Northumberland National Park. Across the whole of the National Park there is not a single trunk road, let alone motorway. There are two A roads (A68 and A696) that go through the Park and a few A roads that are close to the edge of the Park (such as the A696). All other roads are either B and C classified or unclassified roads. There is no pressure for road building.</p> <p>Given the local circumstances of Northumberland National Park it is considered that although an application is extremely unlikely to be submitted within the life of the plan, the proposed Major Development policy (ST3) would be sufficient to enable such a proposal to be assessed.</p>	<p>No modification required to policy but propose to include definition of Infrastructure in supporting text after para 5.3:</p> <p><a href="#">The 2017 NNPA Infrastructure Plan recognises infrastructure as a wide-ranging term comprising the physical network of services and facilities that are required for an area to function properly. Infrastructure is considered to include, but is not limited to, the following:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Public transport &amp; roads;</a></li> <li>• <a href="#">Flood defences;</a></li> <li>• <a href="#">Schools and other education/childcare provision;</a></li> <li>• <a href="#">GP surgeries and other healthcare facilities;</a></li> <li>• <a href="#">Community meeting places and facilities;</a></li> <li>• <a href="#">Social care facilities;</a></li> <li>• <a href="#">Energy supply and distribution;</a></li> <li>• <a href="#">Telecommunications,</a></li> <li>• <a href="#">Water and wastewater supply/disposal;</a></li> <li>• <a href="#">Key retail outlets;</a></li> <li>• <a href="#">Emergency services;</a></li> <li>• <a href="#">Sports and recreational</a></li> </ul>

							<ul style="list-style-type: none"> <li><a href="#">facilities;</a></li> <li><a href="#">Cultural institutions like libraries and museums;</a></li> <li><a href="#">Waste processing &amp; disposal facilities.</a></li> </ul>
33	DM1	Highways England	Yes	No	<p>This policy was previously titled: “Policy 6: Community Facilities”. It; has been re-worded and expanded upon as “Policy DM1: Community Facilities and Infrastructure” to include provisions relating to infrastructure delivery and protection. The policy provisions relating to community facilities remains consistent with the previous draft and as such Highways England’s previous comments remain applicable and support can therefore be maintained.</p> <p>With regards to the provisions relating to infrastructure, the policy and supporting text is worded as such that it is not clear as to the types of infrastructure to which it relates. It has therefore been assumed that it is all encompassing and as such includes transport infrastructure. On this premise, Highways England has no particular concerns with the requirements identified in the supporting criteria for new and improved infrastructure but as noted, would recommend that the policy clarifies the scope of infrastructure to which it relates.</p>	<p>Maintenance of support noted.</p> <p>Similar to comments made above by CNP, it is proposed to provide more detail regarding what types of Infrastructure are included within this policy.</p>	See above.
33	DM1	National Farmers Union	Yes	No	<p>Whilst the Plan clearly acknowledges the challenges of mobile and broadband coverage across the Park and the need to support new infrastructure. We seek the assurance that the Park will support all spectrums of coverage and not just focus upon high-speed. Policy DM1: Community</p>	<p>The NFU seek reassurance that this relates to all spectrums of mobile and broadband coverage. NNPA can confirm this and explain that the policy does not mention high speed. Only considering high speed connections would not reflect the local circumstances where still some 5% of</p>	No modification required.

					Facilities and Infrastructure could be bolstered to further specifically support mobile and broadband coverage.	the park's residents do not have electricity let alone mobile and broadband coverage.  Para 5.5 clearly states that this policy relates to broadband and mobile telecommunications and the NPAs recognition of the important role this is to the residents and business of the National Park.	
37	DM3	House Builders Federation	No	Yes	<p><i>The HBF does not consider that Policy DM3 is sound, as it is not justified or consistent with national policy for the following reasons:</i></p> <p>This policy requires developments of more than 5 dwellings within a Local Centre to provide 50% affordable dwellings. However, the Residential Appraisals from the Viability Assessment Report, do indicate that there are viability issues for some of the site typologies when the 50% policy is applied, for example Scheme O (7 units, brownfield), Scheme P (10 units, brownfield), Scheme W (7 units, brownfield site) and Scheme X (10 units, brownfield site).</p> <p>The HBF also note that the Viability Assessment assumes a profit of 6% on market dwellings, this does not appear to be in conformity with PPG which states that <i>'for the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies'</i> (PPG ID: 10-018).</p>	<p>The Viability Addendum report has been amended with the profit on market units adjusted to 15% to reflect these comments and PPG. Profit on affordable units has been retained at 6% following discussions with Registered Providers.</p> <p>Policy DM3 (4) ensures that proposed schemes can proceed if viability issues are presented. Although the direction of this policy has not been changed, NNPA proposes modifying the wording as shown to make the criteria clearer.</p>	<p>Viability report market unit profit to 15% of GDV.</p> <p>Modifications to Policy DM3 (4) which states that: 'where a scheme is proposed within a Local Centre and there are exceptional circumstances which demonstrate that the delivery of the required <u>proportion of</u> affordable housing would not be financially viable, the Authority will consider <b>an element of a larger proportion of</b> principal residence housing as part of a <b>revised</b> proposal'.</p>

37	DM3	Northumberland County Council	Yes	No	<p>Policy DM3 seeks to secure affordable housing in the national park for those in need of affordable housing who also have a local connection. We welcome this policy and the local connection criteria, which will enable residents to remain in their local area and help sustain local communities.</p> <p>The Council recognises that the larger settlements close to the National Park, including Bellingham, Haltwhistle, Rothbury and Wooler, with a greater range of services, facilities and transport links, may provide for some of the housing needs of the National Park, including affordable housing. While it is noted that the requirements of Policy DM3 part 3 differ from the requirement in neighbouring areas as set out in the emerging Northumberland Local Plan, the level of need in the National Park is very small. The Council looks forward to working closely with the NNPA to ensure that both policies are complementary, and that affordable homes of the appropriate tenure are delivered where they are required.</p>	<p>The close working relationship with Northumberland County Council is confirmed and NNPA confirm that NCC as Housing Authority would provide evidence and support in ensuring that the affordable housing in any NNPA areas would be suitable in terms of appropriate tenure for the local requirements. This has happened in the past and will continue to happen in the future.</p>	No modification required.
39	DM4	National Farmers Union	Yes	No	<p>Paragraph 5.24 summarises the provision of conditions that restrict the occupancy of existing houses on the same agricultural unit, but only briefly outlines relaxing such conditions. Due to fundamental changes to the agricultural sector post Brexit and CAP, acknowledgement of such challenges and further details on this would be beneficial.</p> <p>Furthermore, <b>paragraph 5.29</b> would also benefit from acknowledging the</p>	<p>In relation to restricted occupancies for existing houses, part 2 of Policy DM4 allows for restrictions to be relaxed. However it does not prescribe exact details. At present the authority cannot predict the implications for Brexit on farmers but NNPA consider the policy is flexible enough for applicants to demonstrate the circumstances at the time. The present Core Strategy does not have any mention of agricultural workers housing and the NNPA rely solely on National Policy.</p>	No modification required.

					fundamental changes to the agricultural sector post Brexit and CAP (5.29 (b) and tenancy reform) and (5.29 (c) and economic viability without support) as outlined in the Economic Futures and Employment Demand Study (May 2018).	<p>This policy is considered appropriate to allow local circumstances to be taken into account and set out the circumstances when new housing and lifting of conditions would be permitted.</p> <p>It is proposed to review the Local Plan within 5 years and therefore there will be more certainty with respect to Brexit. This policy would be reviewed as part of the Review.</p>	
41	DM5	National Farmers Union	Yes	No	We note that Policy DM5: Accommodation for Gypsies, Roma and Travellers section 1 (e) covers essential infrastructure and services, but does not mention any provision of space for any associated livestock (horses, etc.) that the community may have. We would welcome details on how the authority would treat such livestock within the plan to avoid any adverse issues associated (highways, trespass, etc.).	NNPA is a special purpose local authority rather than a housing authority with responsibilities for providing sites and housing for gypsies. It is considered that should the Housing authority or individual applicants wish to include land for livestock along with permanent sites the proposed policy would be able to be consider the impact upon the surrounding area.	No modification required.
48	DM7	Highways England	Yes	No	This policy was previously titled "Policy 18: A sustainable local economy". It has been re-worded and expanded upon as "Policy DM7: Rural Economy and Diversification". These amendments include more robust provisions relating to access and traffic generated by new economic development, including new provisions which state that proposals should have safe site access for development by the existing road network, and should not lead to unacceptable harm resulting from traffic impacts. Consequently, support can be maintained for this policy and no further comment or representation is considered necessary.	Support noted.	No modification required.

50	DM9	Highways England	Yes	No	<p>This policy was previously titled: "Policy 20: Accessibility and Connectivity". and incorporates some minor re-wording as "Policy DM9: Transport and Accessibility". The amendments to the policy do not represent a material change and as such Highways England's previous support can be maintained. Therefore, no further comment or representation is considered necessary.</p>	Support noted.	No modification required.
50	DM9	Northumberland County Council	Yes	No	<p>Policy DM9 refers, amongst other things, to ensuring that proportionate transport and accessibility needs are incorporated into new development proposals. However, it is questionable whether "proportionate" is sufficiently precise and defensible to ensure that, in particular, the safe operation of the highway network is protected from indiscriminate car parking arising from insufficient car parking space being incorporated into developments.</p> <p>In this context it is noted that the policy also refers to minimising the overall need for journeys and maximising the proportion of journeys by public transport, cycling and walking. Nevertheless, this does not necessarily address the potential requirement, for example, for vehicles to be suitably contained within residential development while owners undertake non-private vehicle trips.</p> <p>In view of the above it is recommended that car parking standards, based on the Submission Northumberland Local Plan Annex, are included in the Northumberland National Park Authority Plan.</p>	<p>NNPA consult with NCC as the Highway Authority, who provide advice on safe access and Highways. The policy has been drafted having regard to the small scale nature of the majority of the developments proposed within Northumberland National Park.</p> <p>NNPA agree that reference to "appropriate" car parking provision in this Policy would clarify the wording of the policy and by adding further supporting text, cross reference the car parking standards set out in the Northumberland Local Plan, which are used by the same Highways Authority.</p>	<p>Policy DM9 part e) NNPA propose to amend the word 'proportionate' with 'appropriate':</p> <p>Ensure that <del>proportionate</del> <u>appropriate</u> transport and accessibility needs are incorporated into new development proposals <del>(including the provision of cycling facilities</del> <u>car and cycle parking and supporting infrastructure;</u></p> <p>Propose an additional paragraph in the supporting text, after 5.62:</p> <p><u>The National Park Authority consults with the Highway Authority (Northumberland County Council) on all developments where access and transport is a relevant planning consideration. Where planning for car parking to serve residential development, it is recognised that car ownership varies most directly in relation to dwelling size. This is reflected in the parking standards for residential development which require variable provision based on the number of bedrooms in the dwelling. The Authority will refer to the parking standards in the Northumberland</u></p>

							<a href="#">County Council Local Plan Annex which sets out the level of off-street car parking in new development. As with Northumberland County Council standards, in relation to non-residential development, the standards are not expressed as either a maximum or a minimum. Instead, they provide an indication of the appropriate level of parking for different uses. With regard to residential development, parking requirements are expressed as the minimum level that would normally be required. Cycle parking will be required at new and extended Community Facilities, Leisure facilities, visitor facilities and tourist accommodation.</a>
52	DM10	Environment Agency	Yes	No	We are pleased to see mention of an ambition for Net Gain as per the revised NPPF. Ideally this is strategic to ensure enhancements of existing habitats and species.	Support noted. In relation to the comment on this being part of the Strategic policies, the NNPA agree that Net Gain is important. It wasn't included within the strategic policies due to the scale of developments that are received by NNPA, however on further consideration a more transparent approach could be achieved through the addition of reference to net gain in biodiversity.	<p>NNPA propose to add additional words to part h) of ST2. Although the Environment Agency commented on DM10, as per their comment 'ideally this is strategic...', the change has been made to ST2:</p> <p>h) Opportunities are taken to enhance local wildlife and biodiversity, <a href="#">including providing net gain</a>, that are proportionate to the development proposed.</p>
56	DM11	Campaign for National Parks	No	No	The Local Plan is unsound as this policy is not justified or effective. The wording has been amended since the preferred options consultation and the requirement to remove redundant development has been removed. This was something that we particularly welcomed and which would help deliver the first National Park purpose.	This requirement to remove redundant development was deleted from DM11 on the basis that it was already covered in Strategic Policy ST1 d).	No modification required.
56	DM11	National Farmers Union	Yes	No	Whilst we note the ambition of Policy DM11: Landscape, Tranquillity and	We note the comments regarding security lighting but confirm that this	No modification required.

					Dark Skies, we are also aware that such policies can occasionally be at odds with the safe management of livestock or movement of vehicles during the hours of dusk or darkness.	policy protecting the designated dark sky park does not preclude any lighting for security and safety purposes. There are a number of lights that can be used to ensure security in rural areas which are also dark sky compliant. The authority has produced an information sheet and is looking to create a SPD providing such information for all types of location. The NNPA are in discussions with the NFU to produce a useful information sheet for farmers and rural businesses.	
60	DM13	National Farmers Union	Yes	No	<p>This policy could benefit from further clarity to ensure that those wishing to adopt such technology are supported. Section 1 gives no clear remit for what is meant by 'small-scale' and so would be supported.</p> <p>Furthermore, section 1 (g) "<i>Any planning impacts identified by the affected local community have been sufficiently addressed</i>" is extremely wide in scope "any" and as such, we would welcome further clarity.</p>	<p>NNPA considers the flexibility of Policy DM13 allows the local circumstances to be considered. Small scale will depend upon the circumstances. This is outlined in para 5.93 which refers to equipment that allows energy demands for a single property or local community rather than large scale developments that provide energy for the national level.</p> <p>Part g) of the Policy referring to "any affects" on local community reflects the wording in the Written Ministerial Statement from 2015 which likewise is wide in scope. The NNPA do not propose to identify all the issues that would be raised by local communities.</p>	No modification required.
60	DM13	Northumberland County Council	Yes	No	The policy approach for renewable and low carbon energy in the Northumberland National Park Local Plan is supported. It is considered that the policy will support development that is of a scale that is appropriate to the context of the Northumberland National Park.	Support noted.	No modification required.
68	DM16	Highways England	Yes	No	Highways England can generally be supportive of this policy and the requirement for minerals related	Whilst the comments are noted by NNPA, the local circumstances are such that most minerals development	No modification required.

					<p>development to appropriately assess its effects on the road network, as part of a planning application, to ensure that it will not have an unacceptable impact on traffic.</p> <p>Notwithstanding this, it is recommended that the policy includes provisions requiring proposals to consider the cumulative impacts arising from minerals development and other forms of development, which is a particularly pertinent consideration for traffic impacts on the operation of the SRN.</p>	<p>would be considered as Major Development. If they are not major development it would be extremely unlikely to affect the strategic road network.</p> <p>Given any scale of minerals development that would affect the Strategic road network would be considered to be major development the above proposed changes (in HE003) will allow NNPA to consider the impact on the road network under Policy ST3.</p>	
68	DM16 (1)	Mineral Products Association	No	No	<p>The policy is much changed from the proposed Preferred Options policy and the previous comments are therefore of limited value. Unfortunately, we do not believe the revised policy is planned positively. We believe subsection 1) should be amended.</p> <p>Amend subsection 1) accordingly to read:-  <i>"1) In exceptional circumstances major minerals development will not be permitted other than in exceptional circumstances and where it can be demonstrated that the proposal is in the public interest of assessing ....</i></p>	<p>NNPA consider that given national planning policy provides a presumption against major development in national parks, it is considered that this policy needs to be worded in the negative rather than the Minerals Association's positive approach suggested. The NNPA consider this policy meets with National Policy and the wording should remain as proposed.</p>	No modification required.
68	DM16 (2)	Mineral Products Association	No	No	<p>The "scale" of the quarry extension will be determined by the socio-economic considerations, through sustainable considerations, and through addressing the criteria specified in Policies ST1, ST2 &amp; where appropriate ST3. Also, the policy does not consider new quarry development. The wording of the policy should be amended</p> <p>Amend subsection 2) accordingly to read:-</p>	<p>NNPA comment that the scale of the development needs to reflect national policy and large scale expansion or new quarry developments need to relate to the national policy presumption against major development.</p> <p>The NNPA consider this draft policy accords with National Policy and should be retained. Taking local circumstances into account, NNP has</p>	No modification required.

					<p><i>“2) The <del>small-scale</del> expansion of existing quarries, <b>new quarry developments</b>, or <b>the</b> extension of time for minerals operations will be permitted where it can be demonstrated .....”</i></p> <p><i>This is consistent with subsection 5</i></p>	<p>one working quarry at Harden Quarry. The Authority has permitted the expansion of the Quarry and an extension of time for this quarry with a much more restrictive Core Strategy policy (Core Strategy Policy 23).</p>	
68	DM16 (3)	Mineral Products Association	No	No	<p>The subsection as worded, does not accord the NPPF.</p> <p>The NPPF states at Para 205 – <i>“When determining planning applications, great weight should be given to the benefits of mineral extraction including to the economy. In considering proposals for mineral extraction, mineral planning authorities should</i></p> <p><i>a) <u>as far as is practical</u>, (Our underlining) provide for the maintenance of landbanks of non-energy minerals from outside National Parks.....”</i></p> <p><i>f) Consider how to meet any demand for small-scale extraction of building stone at, or close to, relic quarries for the repair of heritage assets, taking account of the need to protect designated sites; and</i></p> <p><i>g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of permissions reflecting the intermittent or low rate of working at many sites.</i></p> <p>It is notable that there is no definition of “small-scale” and the NPPF does not restrict such operations to addressing a “local need”.</p> <p>Amend subsection 3) accordingly to read:-</p>	<p>Whilst national policy relating to mineral extraction is relevant, it is essential to ensure that Local Plan policies are effective at serving the purposes of the National Park. These purposes are set out in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act, 1995.</p> <p>These place conservation and enhancement of the natural beauty of the National Park effectively above the social and economic statutory duty as legislation is clear that the duty (which focusses on local communities only) must be delivered within National Park purposes. It is then important to note that national legislation sits above all local and national policies including the NPPF. As such this policy has been written to support the statutory purposes of conserving or enhancing the special qualities.</p>	No modification required.

					<p><i>“Small Scale quarrying of traditional building stone will be permitted where it <b>accords with subsection above</b> can be demonstrated that there is an identified local need for the stone which will conserve, maintain or enhance the fabric or character of the National Park.”</i></p>		
68	DM16 (4a)	Mineral Products Association	No	No	<p>Minimising environmental and in particular socio-economic impacts may not be the desired outcome of either the policy or any development proposed. Indeed, there is a likelihood that the socio-economic impacts of a development should be maximised. The second half of the proposed sentence seeks to control unacceptable adverse effects.</p> <p>We would therefore suggest the first part of subsection 4.a) is amended Amend subsection a) accordingly to read:-</p> <p>4. <i>“In all cases:</i>  <i>a) all reasonable mitigation measures must be provided for in the proposal, in order to <del>minimise</del> <b>manage</b> environmental and socio-economic impacts ...</i></p>	<p>In the National Park which is designated for its special qualities the environmental impacts must be more than managed, but should be minimised. It is accepted that some impacts can be positive and therefore a minor change is proposed.</p>	<p>DM16 (4): In all <del>cases</del> <b>minerals development applications, a) all</b> reasonable mitigation measures must be provided for in the proposal, in order to minimise <del>negative</del> environmental and socioeconomic impacts and ensure the proposed operations do not have unacceptable adverse effects on the natural and historic environment or human health. <del>;</del> <b>and b) the proposal must be consistent with other relevant policies in this Local Plan.</b></p>
68	DM16 (4b)	Mineral Products Association	No	No	<p>This subsection is too vague and it would benefit the reader if the relevant policies were identified. We assume the relevant policies are ST1, ST2 &amp; ST3.</p>	<p>In considering all applications whether minerals or not, all other policies within the plan must be considered. In effect this part is superfluous as Para 1.13 of the publication draft explains. It is important the plan is read as a whole.</p>	<p>Given Para 1.12 NNPA are satisfied with deleting Part b) as above.</p>

						The reason all policies are not specifically named because not only are the strategic policies ST1, ST2, ST3 relevant but all DM policies relating to the special qualities (DM10, DM11, DM12, DM14 and DM15) and transport (DM9) are likely to be relevant.	
68	DM16 (6)	Mineral Products Association	No	No	As per the comments above in relation to the now deleted paragraph 4.22 and former policy 2, we suggest the wording of subsection 5.e) is deleted as it repeats the requirements of Policies ST1, ST2 & ST3. This could be addressed under a re-worded DM16. Subsection 4b as suggested above	<p>NNPA consider this is essential wording for the proposed restoration and after care of a site.</p> <p>The policies referenced by MPA just require consideration of these issues, whereas this policy signposts the importance of submission of appraisals to support the evidence.</p>	No modification required.
68	DM16	Northumberland County Council	Yes	No	<p>This policy is supported and it is considered that this will provide a suitable basis for the consideration of any future proposals for minerals extraction in the Northumberland National Park.</p> <p>The key cross boundary issues concerning minerals between Northumberland County Council and the Northumberland National Park Authority relate to aggregate minerals. Both authorities have worked collaboratively on a Joint Local Aggregates Assessment that covers both areas as well as to County Durham and Tyne and Wear. The Joint Local Aggregates Assessment recognises that there are no major supply issues across Northumberland for crushed rock in terms of overall quantum of permitted reserves and that the quantum of future provision can be met from sites outside of the Northumberland National Park.</p>	Support noted.	No modification required.

					However, it does recognise that Harden Quarry produces a red-coloured stone that cannot be supplied from other quarries within the area.		
70	DM17	Coal Authority	Yes	No	The Coal Authority supports the notification that Mineral Safeguarding Areas are identified on the Policies Map.	Support noted.	No modification required.
70	DM17	Coal Authority	Yes	No	The Coal Authority is pleased to see the inclusion of this policy which sets out criteria against which proposals for mineral extraction will be assessed.	Support noted.	No modification required.
70	DM17	Mineral Products Association	No	No	<p>We are generally supportive of the text in both Policy DM17 and the plan narrative (excluding the final sentence of para 5.124). However, the approach is unsound in that it is overly restrictive in the exceedingly small Minerals Safeguarding Areas indicated on the Policies Map. The Policies Map and the MSAs do not appear to reflect the full extent of the known minerals resources within the National Park. These are clearly indicated on the BGS Minerals Resource Map and Report for Northumberland, which includes the area of the National Park.</p> <p>The Government's Planning Practice Guidance is clear in that designated areas are not exempt from MSAs Whilst reference to the two quarries in 5.124 is acknowledged and the safeguarding of resources adjacent to these sites critical, the MSAs identified do not identify areas of known mineral resources.</p> <p>Amend the policies map to reflect the known mineral resources of economic importance, together with any known minerals infrastructure.</p>	<p>As these minerals are available in large quantities elsewhere outside the National Park the NNPA consider only those existing quarries should be safeguarded.</p> <p>There is no evidence that there would be a shortage of those other minerals if the areas were not safeguarded.</p> <p>See comments from NCC.</p>	No modification required.

70	DM17	Northumberland County Council	Yes	No	<p>The inclusion of a policy dealing with mineral safeguarding and the proposed definition of mineral safeguarding areas is supported and is considered to be consistent with Paragraph 204 (c) in the NPPF (February 2019). Specifically identifying the existing quarries in the approach is considered to have merit. This should ensure that in determining proposals for new non-mineral development around these sites appropriate consideration is given to whether the new development would be adversely affected by the operations at these quarries or whether the existing permitted operations would adversely impact on the proposed new non-mineral development.</p> <p>Notwithstanding this, it is suggested that a minor amendment is made to Paragraph 5.125 in order to provide some clarity on the approach that is being taken. The Policies Map shows and Paragraph 5.124 refers to Mineral Safeguarding Areas around the existing Harden Quarry and Cop Crag Quarry. However, Paragraph 5.125 additionally refers to Mineral Safeguarding Areas based on the BGS mineral resources information but these are not shown on the Policies Map. In this context it is also unclear what is meant by the final sentence which states that "The MSAs identified on the Policies Map will be taken from the Mineral Resources information produced by the British Geological Survey (BGS)."</p>	Support noted. NCC agree with NNPA approach to only refer to existing mineral sources and there is no need for other minerals to be shown as safeguarded.	<p>NNPA consider to remove the last sentence of para 5.125 as it misrepresents the situation:</p> <p><del>The MSAs identified on the Policies Map will be taken from the Mineral Resources information produced by the British Geological Survey (BGS).</del></p>
71	DM18	Northumberland County Council	Yes	No	This policy is supported and is considered to be consistent with	Support noted, suggestion acknowledged.	NNPA propose the title of DM18 is changed to from <a href="#">Waste Prevention</a> to

					National Planning Policy for Waste. It is suggested that a minor amendment to the title of the policy should be given some consideration to be clearer that this policy also deals with the provision of appropriate storage and segregation facilities to allow the collection of different waste streams for reuse and recycling and not just waste prevention in development.		<del>Waste Management.</del>
71	DM19	Highways England	Yes	No	This policy was previously titled "Policy 32: Waste Management"; It incorporates some minor amendments from the previous draft, but none that are considered to be material or of significant concern to Highways England. As such, it is considered that the previous comments remain pertinent and therefore no further comment or representation is considered necessary.	Support noted.	No modification required.
71	DM19	Northumberland County Council	Yes	No	The approach to waste management development proposals set out in Policy DM19 is supported. In earlier consultation responses on the National Park Local Plan and in discussions between Northumberland County Council and the Northumberland National Park Authority it has been recognised that the sparse rural nature of the Northumberland National Park means that there is not necessarily the critical mass of waste arising to support some types of facility and that the facilities in the main towns and service centres in the rest of Northumberland will have a role in terms of additionally serving communities in Northumberland National Park.	Support noted.	No modification required.

-	-	Historic England		No	Had no comments to make on the Local Plan.	Response acknowledged.	No modification required.
-	-	National Grid		No	Had no comments to make on the Local Plan.	Response acknowledged.	No modification required.
-	-	Natural England	Yes	No	Natural England have assessed the Publication draft of the Northumberland National Park and consider that the plan is sound.	Support noted.	No modification required.
-	-	Northumbria Water	Yes	No	We can confirm that we have reviewed the consultation document in detail and are supportive of the approach taken to sustainable water management. We have not repeated here details of comments provided in previous consultation responses, however would like to reiterate that we believe that the vision, objectives and policies contained within the Plan will guide sustainable development in the National Park moving into the future.	Support noted.	No modification required.