



Local Plan 2017-2037

Publication Draft

Consultation Feedback Report

August 2019

Contents

1. Introduction.....	3
2. Level of Response	5
3. Publication Draft Feedback.....	6
Campaign for National Parks	6
Coal Authority	6
Environment Agency.....	7
Highways England	7
Historic England	7
Home Builders Federation	7
Mineral Products Association	8
National Farmers Union	8
National Grid	9
Natural England.....	9
Northumberland County Council.....	9
Northumbria Water.....	9
Public Comments	10

1. Introduction

Background

- 1.1. Northumberland National Park Authority (NNPA) is in the process of reviewing its Local Plan. Representations have been made for the Publication Draft of the Local Plan which NNPA proposes to submit to the Secretary of State. As part of the process the Authority has analysed the responses received and prepared this feedback report.
- 1.2. Local planning authorities are required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to undertake effective discussion and consultation with local communities, businesses and other interested parties to inform key stages of the Local Plan preparation.

Previous Consultation

- 1.3. In the spring of 2017 an **Issues Paper** was consulted on in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, hereinafter Regulation 18. This represented the first formal consultation stage in the development of the Local Plan. A Feedback Report (May 2017) was prepared to summarise the level of response to the Issues Paper consultation and the comments received.
- 1.4. Responses to the Issues Paper consultation together with emerging evidence, such as the Infrastructure Plan and Strategic Housing Market Assessment (May 2017), informed the production of a **Policy Options Paper**. NNPA consulted on this document for an eight week period from 16th October 2017 until 11th December 2017. This was also a formal consultation stage that met the requirements of Regulation 18. The Policy Options Consultation Feedback Report was published in Autumn 2017 providing analysis of the responses to the Policy Options consultation.
- 1.5. In 2018, NNPA consulted on the **Preferred Options Draft Plan** document from 30th July 2018 to 24th September 2018 (8 weeks) in accordance with Regulation 18. This document set out the preferred policy direction in the form of a draft local plan. A Feedback Report (May 2019) was prepared which informed changes for the next consultation document.
- 1.6. The next document for public consultation was the **Publication Draft Plan** which NNPA intends to submit to the Secretary of State for inspection. A consultation period for six weeks was held between 31st May 2019 and 12th July 2019, in accordance with Regulation 18. NNPA asked for comments on whether the Publication Draft Plan was considered sound and legally compliant. This Feedback Report analyses the representations received.

Purpose

- 1.7. The purpose of the Publication Draft Plan consultation was to set out in the form of a draft Local Plan the policies, proposals and supporting text for the types of development that would potentially be acceptable or otherwise in the National Park. The Publication Draft also sets out the vision, strategic priorities and spatial objectives for planning for the future of the National Park over the plan period up to the year 2037. Feedback and responses to this draft document was then sought from local residents, businesses, visitors, statutory consultees and other relevant stakeholders on

whether the document was sound and legally compliant prior to submission to Secretary of State.

Preferred Options Consultation Methodology

- 1.8. A total of four drop-in consultation events were held during the eight week consultation period (31st May 2019 to 12th July 2019). These were held at locations inside or bordering the National Park; at The Sill (National Landscape Discovery Centre) on the 4th June 2019, Wooler on the 11th June 2019, Bellingham on the 19th June 2019 and Elsdon on the 25th June 2019.
- 1.9. In order to engage a wide audience at the public consultations, two shorter guidance documents were produced in addition to the Draft Local Plan:
 - A leaflet entitled “What is the Local Plan?” setting out a brief overview of the Local Plan and the process of reviewing it.
 - A frequently asked questions (FAQs) on the Publication Draft consultation.
- 1.10. NNPA also provided at the consultation events, for reference, a Duty to Cooperate document, an Equalities Impact Assessment, a SHLAA, a Viability Assessment, an Interim Sustainability Appraisal Statement and a Habitats Regulations Assessment. A policies map was also displayed at the consultation events.
- 1.11. Consultees were encouraged to make a written representation during the consultation period. An open letter asking for representations to be made was published on the 30th May 2019 and sent to known stakeholders and statutory bodies on the consultee register. Those wishing to make a representation were asked to submit this via e-mail or post before the end of the consultation period. Comments were also noted at the public consultation events.

Publicity

- 1.12. NNPA has recently reviewed its Customer Relationship Management (CRM) system meaning that the database of consultees was largely relevant and up to date at the time the public consultation went ‘live’. In advance of the public consultation a total over one thousand letters and around five hundred emails were sent out to publicise the consultation using the contact details on the CRM system in compliance with the General Data Protection Regulations 2018.
- 1.13. Furthermore, the public consultation was fully in accordance with the NNPA Statement of Community Involvement adopted in September 2017 and recipients of correspondence included:
 - All of the National Park’s households and those in parishes overlapping the National Park boundary;
 - Businesses (including farmers and land owners);
 - Parish councils;
 - Statutory consultation bodies;
 - General consultation bodies; and
 - Other relevant stakeholders.

1.14. To comply with the Planning and Compulsory Purchase Act 2004, and Regulation 18, public notices were published in local press including The Hexham Courant (30th May 2019) and the Northumberland Gazette (30th May 2019). Publicity was also directed down to a community level through notifications on the relevant village hall websites, the Hexham Courant “Village Notes” section and direct Officer/ Member engagement with communities. Posters listing each event were also put up in prominent public places in settlements across the National Park.

2. Level of Response

2.1. The aggregate number of attendees across the Publication Draft consultation events was 26. This is the same aggregate number as the previous round of Preferred Options events, but still lower than the first two rounds, as shown in Table 1 below.

2.2. The level of written response was lower than the previous Preferred Options consultation, but still considerably lower than the level received for the Issues Paper consultation (see Table 1 below).

<u>Consultation event</u>	Total no. of attendees	Average per event	No. of written representations
Issues Paper	98	8.16	27
Options Paper	44	5.5	18
Preferred Options	26	6.5	17
Publication Draft	26	6.5	12

Table 1 – Total Attendees and Representations

2.3. Although NNPA publicised the consultation as widely as possible, lower levels of response could be due to a number of potential factors, such as individuals/ organisations were:

- involved in the previous consultation events and had no further contributions to make;
- largely satisfied with the Authority’s approach and therefore less inclined to make a contribution;
- unable or unwilling to take the time required to examine the consultation documents;
- unable to make comments specifically on the soundness or legality of the document;
- feeling that the consultation was not relevant to them.

2.4. Nonetheless, NNPA did engage in discussions with event attendees and receive a number of detailed written representations.

3. Publication Draft Feedback

- 3.1. This section of the report presents a summary of the representations received. The Issues Paper and Policy Options feedback reports analysed comments by theme, whereas the Preferred Options feedback report analysed comments by policy. This feedback on the Publication Draft has considered each comment directly by stakeholder in order to best make a response or suggest a modification, particularly where the soundness or legality of the plan is questioned.
- 3.2. The feedback from stakeholders has been summarised/ shortened in this document; for all representations in policy order and NNPA's responses see the 'Representations (Reg. 19) in Policy Order' document.
- 3.3. A Schedule of Modifications will be issued with the submitted version of the Local Plan, which will detail proposed policy changes from the Publication Draft on which the Inspector will decide.
- 3.4. The following paragraphs summarise the feedback received in relation to each policy. They are listed alphabetically by the name of the stakeholder, with resident comments made at the public consultation events following in chronological order of the meetings.

Campaign for National Parks

The Campaign for National Parks (CNP) believes the Local Plan is unsound for several reasons. Firstly the CNP believe a Climate Change policy is needed as it will be one of the biggest influences on the National Park and needs a clear policy covering both climate change mitigation and adaption.

The CNP also state that Policy DM1: Community Facilities and Infrastructure is unsound as it fails to presume against road-building in the National Park.

In Policy DM11: Landscape, Tranquillity and Dark Night Skies it is suggest that the removal of redundant development needs to be reinstated.

Coal Authority

The Coal Authority declares that Policy ST2: General Development Principles is unsound as it should consider land instability. It is suggested to insert a clause specifying no unacceptable risks from contaminated or unstable land, possibly requiring a full assessment or remedial works.

Both the Mineral Safeguarding Areas and Minerals Development sections of Policy DM17 are supported as being positively prepared, justified, effective, consistent with the NPPF and meeting legal requirements such as Duty to Cooperate. The Coal Authority is particularly pleased with the criteria contained in the policy, against which proposals for mineral extraction will be assessed.

Environment Agency

The Environment Agency overall finds the plan to be sound.

The consultee is particularly pleased to see the ambition for Net Gain (in line with the NPPF) contained in Policy DM10: Habitats, Biodiversity and Geodiversity.

They are also pleased with reference to the Water Framework Directive in Policy ST1: Sustainable Development.

Highways England

Highways England are generally supportive of the overall strategy of the Local Plan. However, several recommendations have been made.

Firstly, in Policy ST2: General Development Principles it is recommended to reinstate a reference to unacceptable levels of traffic as otherwise there could be implications for the Strategic Road Network. For a similar reason, the reinstatement of detrimental effects on the transport network in Policy ST3: Major Development is suggested.

In DM1: Community Facilities and Infrastructure, it is recommended to clarify and detail the scope of infrastructure. Lastly, in DM16: Minerals Development, a suggestion is made to consider cumulative impacts such as traffic and the Strategic Road Network in relation to Minerals Development.

Historic England

Historic England responded to the consultation but had no capacity to provide detailed comments upon the Plan.

Home Builders Federation*

The Home Builders Federation consider three policies are not sound, justified or consistent with national policy.

The first of these is Policy ST4: Spatial Strategy where it is recommended to remove the words 'up to' in relation to the 160 dwellings as not to limit potential. The HBF also has concerns on Principal Residency in terms of effective delivery, infrastructure delivery, future financing and the rights of occupants.

The HBF recommend a more flexible approach in Policy ST5: New Housing regarding housing mix that recognises variances in need and demand in different locations.

Relating to Policy DM3: Affordable Housing, the HBF raise concerns about the viability of some typologies when the 50% affordable housing criteria is applied. They also recommend the profit level used (6%) is raised to 15-20% in line with PPG.

Mineral Products Association

The Mineral Products Association recommends several changes in order to make the Plan sound.

Firstly, to reinstate the wording of Para 4.19 and Para 4.22 of the Preferred Options version as they were useful and helpful to the narrative.

It is recommended to reword Policy DM16: Minerals Development in order to make it positively planned.

Also in Policy DM16, it reads 'the small-scale expansion of existing quarries ... will be permitted'. The MPA suggest the scale of quarrying will be determined by socio-economic factors and therefore recommend removing 'small-scale'.

Further in Policy DM16, it is indicated that there is no definition of small-scale and the NPPF does not restrict such operations to local need. In addition, it is recommended to change 'minimise' to 'manage' environmental and socio-economic impacts to ensure the desired outcome.

Finally on Policy DM16, the MPA believes the policy is repetitive of Policies ST1, ST2 and ST3 and should be reworded.

The MPA are supportive of the text and direction of Policy DM17: Mineral Safeguarding Areas. However they believe the approach is unsound in that it is overly restrictive in the exceedingly small Minerals Safeguarding Areas indicated on the Policies Map and does not reflect the full extent of the known resources in the National Park.

National Farmers Union

The National Farmers Union welcome the ambition and direction of the Local Plan. However, several changes were also suggested.

Firstly, to ensure in Policy DM1: Community Facilities and Infrastructure that 'infrastructure' means mobile and broadband coverage, and is not just focused on high-speed connections.

In the Strategic Spatial Objectives, the NFU ask to consider whether Objective 7, locating development close to services and facilities, will detriment communities that have already lost those services or facilities.

For Policy DM4: Rural Workers Housing, a request to consider changes to the agricultural sector post-Brexit has been made.

The NFU also recommend considering livestock as part of DM5: Accommodation for Gypsies, Roma and Travellers.

The NFU believes that Policy DM11: Dark Skies is at odds with the safe management of livestock or movement of vehicles during the hours of dusk or darkness.

Finally, further clarity in Policy DM13: Renewable Energy is suggested, to support those wishing to adopt such technology.

National Grid

The National Grid responded to the consultation but had no comments to make in response.

Natural England

Natural England have assessed the document and consider that the Plan is sound.

Northumberland County Council

Northumberland County Council considers the overall strategy fits well their own.

NCC welcomes Policy DM3: Affordable Housing and agree that larger settlement close to the National Park including Bellingham, Haltwhistle, Rothbury and Wooler are best placed to provide for housing needs of the National Park, including Affordable Housing. NCC are looking forward to working closely on this issue and delivery.

In Policy DM9: Transport and Accessibility, NCC state there is a need to be more precise than 'proportionate' and ensure sufficient parking space incorporated into developments to protect from indiscriminate car parking. It is recommended to adopt NCC car parking standards.

Policies DM13: Renewable Energy and DM16: Minerals are supported. Policy DM17: Mineral Safeguarding is supported, but Mineral Safeguarding Areas (referred to in Para 5.124) are not shown on the Policies Map.

For Policy DM18: Waste Prevention, a title change is suggested to reflect storage and segregation (which also form part of the process - not just prevention).

Lastly, Policy DM19: Waste Disposal and Recycling is supported.

Northumbria Water

Northumbria Water believe that the vision, objectives and policies contained within the Plan will guide sustainable development in the National Park moving into the future. NW are supportive of the approach taken to sustainable water management.

***wishes to participate at the oral examination**

Public Comments

4th June 2019 - The Sill (National Landscape Discovery Centre)

Five attendees were at this consultation event. The parents of a resident of a gateway settlement believes there is a need for a mix of ages in the area and that infrastructure and facilities should be delivered alongside new housing.

A National Park volunteer was wary of an ageing population and losing facilities like shops. Two regular visitors to the National Park feel it is underpopulated with no work. They would like to know how we can encourage employment and residents in isolated places.

11th June 2019 - Wooler

Nine attendees were present at the consultation event in Wooler.

One was not familiar with the Local Plan process but was glad to have been able to convert farm buildings in the past.

Another resident wants better protection for trees and is unhappy that they can be removed so easily unless a TPO is in place.

A further resident likes the Local Connection to Principal Resident direction and conversions policy to get more people and families into the Park.

One resident had several views, firstly a disappointment that more people do not engage with the Local or Neighbourhood Plans despite the devolved opportunity. They also wanted us to look for European examples for successful rural planning, feel that VAT levels are stifling business with many traders happy to sit just below the threshold. Overall they are supportive of the Authority's work and approve of the Local Plan.

19th June 2019 - Bellingham (Bellingham is a settlement outside the National Park)

Eight people attended the consultation event in Bellingham.

An Ovingham Resident (not within the National Park) stated that they rejected the recent Northumberland County Council submitted plan as it does not go far enough on renewable energy, but understands the Park is different and the setting needs protecting.

Two Bellingham residents were interested in footpaths in the Park and the impacts on them, believing overall they are not maintained well enough. They feel there needs to be more bus services and provisions. They also alerted officers to potential agricultural structures being built without planning permission.

Another Bellingham resident believes it is the most beautiful part of England and are happy so long as the environment is protected. They like the tranquillity and is against wind farms in line with the Local Plan policy.

25th June 2019 - Elsdon (Elsdon is a settlement within the National Park)

Two Elsdon residents, who read the entire document, like that there is no zoning or allocations and that planning is done on a case-by-case basis. They agree with the gateway settlements direction as families need to be close to facilities. No buses operating to Elsdon is an issue.

Residents from Holystone (settlement within the National Park) believe there is an ageing population, would like to see more bus services, are keen on support of new businesses and want to see the poor technology and communications for businesses improved (especially for home-workers). They are keen to know how we meet the objective of getting people to the National Park for enjoyment. Finally, they would like to see the NNPA offices in the National Park.