

Supporting Document Statutory Consultation summary

From Monday 3rd October 2016 to Monday 14th October 2016, the National Park Authority consulted on the following documents that will be used in support of the Local Plan review.

- **Draft Statement of Community Involvement (SCI)**
Updated from the previous SCI (2009). Sets out how the Authority will consult and engage its key stakeholders in developing planning documents (including Neighbourhood Plans), making Development Management decisions.
- **Draft Sustainability Appraisal (SA) Scoping Report**
The first stage of the Local Plan Sustainability Appraisal. The scoping procedure helps to ensure that the SA process is proportionate and relevant to the Local Plan being assessed.
- **Draft Housing and Economic Land Availability Assessment (HELAA) Methodology**
Sets out the approach that will be taken by Northumberland National Park Authority to prepare and undertake a HELAA.

Over 1800 letters and emails were sent out, inviting residents (including those in settlements surrounding the Park), businesses and other statutory consultees, to provide their comments on either one or all of the documents. Included in this figure are the emails sent to the statutory SA Consultation Bodies including Natural England, Historic England, Environment Agency and neighbouring local authorities.

A total of 20 representations have been made; 7 in relation to the SCI and HELAA Methodology respectively, and 7 in relation to the SA Scoping Report. This was a response rate of 1.1%.

Date: 07 November 2016
Our ref: 197770
Your ref: Sustainability Appraisal Draft Scoping Report



Mr. Clive. Coyne,
Head of Forward Planning
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BY EMAIL ONLY

Dear Mr. Coyne,

Planning consultation: Sustainability Appraisal Draft Scoping Report
Location: Northumberland National Park Authority

Thank you for your consultation on the above dated 03 October 2016 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Sustainability Scoping Report

Natural England generally welcomes the approach of the Draft SA Scoping Document for Northumberland National Park Local Plan and considers that the methodology used presents a sound framework for meeting the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and associated guidance.

We are pleased to note the comprehensive approach taken in identifying Sustainability Issues that are relevant to the area covered by the National Park. We also recognise and welcome the approach taken by the National Park in incorporating potential future issues (such as climate change) within the context of the Local Plan. Natural England wish to make the following observations:

Is the proposed SA framework appropriate?

Natural England welcome the robust framework set out in the Scoping document which seeks to deliver a comprehensive assessment of Sustainability in line with the SEA directive. The approach taken by the National Park is likely to deliver an appropriate Sustainability Appraisal document in accordance with (SEA) guidance.

Is the scoping and baseline information adequate?

Natural England recognises that the existing data presented is of basic outline in nature and is subject to change and development throughout the evolution of the Sustainability Appraisal, However the comprehensive approach in data collection (shown in Appendix 1 of the draft scoping document) highlights the National Park's thorough approach to assessing sustainability in accordance with the SEA directive.

Have all relevant plans and programmes been identified?

Natural England welcomes the comprehensive approach taken by the National Park in bringing together relevant and appropriate working programmes, documents and initiatives that are relevant to the Local Plan area. As a National Park authority there appears to have been substantial work carried out in collating evidence to inform the scoping report process.

Is any significant environmental, social or economic baseline data missing or inaccurate?

We recognise the draft issue of the scoping document as being the basic framework to the Strategic Environmental Assessment, and therefore data is subject to change as the SEA evolves. However, the comprehensive approach taken in the collection and analysis of data, the setting out of a strong framework and the robustness of the methodology reassures that such an approach will deliver an appropriate assessment document.

We would like to suggest that, in addition to the documents mentioned within the baseline methodology, policy includes reference to Landscape Character Assessments in context and evolving policy references National Character Areas where applicable. NCAs divide England into 159 distinct natural Areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the environment.

Are there any additional sustainability problems or opportunities in the National Park?

It is noted that the draft scoping document identifies a list of potential issues for sustainability and this appears to be an appropriate level of detail in the context of this report.

In addition to what has been set out in the draft report, opportunities for adding value to the natural environment exist in the context of new developments and we would welcome the inclusion of relevant sections into policy for the provision of Green Infrastructure where possible. Whilst such opportunities may be limited in the scale of development expected within the National Park, none-the-less green infrastructure can offer a range of benefits, including the following:

- Space and Habitat for wildlife with access to nature for people
- Places for outdoor relaxation and play
- Climate Change adaptation – for example flood alleviation
- Environmental education
- Local food production- in allotments, gardens and through agriculture
- Improved health and well-being – lowering stress levels and providing opportunities for exercise.

Is the scope of the SA proportionate?

We welcome the detailed sustainability framework approach and consider that it generally covers our interest in the natural environment, especially in an area of high landscape value and protection. We welcome specifically the emphasis on protection of the natural environment and wild fauna and flora as set out in paragraphs 3.4- 3.7 of the draft report. This is in-line with Strategic Environmental Assessment objectives and Appropriate Assessment in the context of the Habitats Directive (92/43/EEC). We note the comprehensive list of documents used to inform the process of the local plan development set out in appendix 4 and welcome the use of International, European, National, Regional and Local Documents to inform the evolution of the Local Plan. .

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Michael Miller on

[REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Michael Miller
Sustainable Development Advisor



Historic England

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Our ref: PL00041114
PL00040965
PL00040982

Telephone
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Date 11 November 2016

Sent by email to: localplan@nnpa.org.uk

Dear Sir/Madam

Consultation on Northumberland National Park Local Plan:

- a) Draft Statement of Community Involvement;
- b) Sustainability Appraisal Scoping Report;
- c) Housing and Economic Land Availability Assessment

Thank you for consulting Historic England on three of the Northumberland National Park Authority Local Plan evidence base documents: the draft Statement of Community Involvement; the Sustainability Appraisal Scoping Report; and the Housing and Economic Land Availability Assessment. As the Government's statutory adviser on all matters relating to the historic environment in England, we are pleased to be given the opportunity to input into these documents. However, we do not have the resources to be able to comment in detail at this stage in the Local Plan process, and we are therefore offering more general comments, along with links to our national advice. These are set out below for each document.

a) *Draft Statement of Community Involvement*

We support the principles set out in the draft Statement of Community Involvement, and have no comments to make on specific details.

b) *Sustainability Appraisal Scoping Report*

Protecting and enhancing the historic environment is integral to the achievement of sustainable development, as noted within the National Planning Policy Framework (NPPF). The Sustainability Appraisal (SA) process should therefore ensure that any potential impacts upon the historic environment have been properly considered. This will also need to encompass the requirements for the historic environment as set out in the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), which identifies that particular regard should be had for cultural heritage when undertaking an SEA.

While we do not have the capacity for detailed comments, we have noted in the document that the SWOT analysis on page 11, while identifying impacts upon the historic environment as a



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Correspondence or information which you send us may therefore become publicly available.



strength, weakness and threat, has not included it as a potential opportunity. This is surprising, given the enormous value of heritage assets to the Park, and the opportunities that these provide. Historic England produces an annual audit of England's heritage on behalf of the Historic Environment Forum, which includes a wide range of research, including the value of heritage to the society and the economy. The Heritage Counts web pages can be viewed at <https://historicengland.org.uk/research/heritage-counts/>, and the most recent report for 2016 concentrated on the value of heritage to the economy <https://content.historicengland.org.uk/images-books/publications/heritage-and-the-economy/heritage-and-the-economy-2016.pdf/>.

The draft Local Plan Sustainability Appraisal Objective 15 for the historic environment in Table 1 (page 15) refers to 'cultural heritage and settings, and their diversity'. A setting does not exist in isolation (as may possibly be inferred from this objective), but refers to the surroundings in which a heritage asset is experienced. Objective 15 would therefore read better if it were slightly amended to read, for example: '*To protect and enhance the Park's historic environment, heritage assets and their settings*'.

There appear to be some typos within the description of sustainability issues relating to important archaeological and historic resources, as set out in Appendix 1, section 9 (page 20). For information, the 2016 figures for Heritage at Risk have just been released, and can be viewed at <https://historicengland.org.uk/advice/heritage-at-risk/findings/>.

Appendix 4, listing relevant plans, policies and programmes, would benefit from referencing a number of the European conventions, in particular the Florence, Granada and Valetta Conventions. These are listed, along with other relevant plans, programmes and policies, in the Historic England guidance on SEA/SA, <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>. This includes helpful advice on carrying out a SEA/SA, including testing baseline information; key sustainability issues which might affect the historic environment; indicators and monitoring; and the assessment process.

In addition to the conventions noted above, Appendix 4 should also refer to: the UK Culture White Paper (DCMS 2016); Historic England Good Practice Advice Notes in Planning and Advice Notes (available from our web site); the regional document *Case for Culture* <http://www.case4culture.org.uk/> which sets out the ambition for the arts and heritage up to 2030; and any up to date Conservation Area strategies.

We would strongly recommend that the relevant conservation staff and archaeological advisers are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on aspects such as: local historic environment issues and priorities, including access to data held in the Historic Environment Record; how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

c) *Housing and Economic Land Availability Assessment*

The NPPF requires local planning authorities to set out a positive strategy for the historic environment. This should ensure that site allocations avoid harming the significance of both designated and non-designated assets, including effects upon their setting. At the same time, site



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allocations may present opportunities for enhancing and better revealing the significance of heritage assets, or may provide an opportunity to address heritage at risk.

The methodology for assessing site allocations should therefore ensure that there is an understanding of the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 2.29 might therefore be better worded to include significance, for example *'It will be important to consider the character and significance of the surrounding built form and landscape...'*

Similarly, Appendix B, in the section on the Rich Cultural Heritage and Historic Environment, should refer in the text to identifying the impact upon the significance of the assets, including any contribution made by their setting.

Historic England has produced guidance on Site Allocations in Local Plans, which provides more detailed advice on the process. This can be found at <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

We hope that this information is helpful, but please do not hesitate to contact us should you require any further information.

Yours sincerely



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Our ref: DN/2006/000018/SE-
01/SP1-L01
Your ref:
Date: 24 November 2016

Dear Sir/Madam

Northumberland National Park Sustainability Appraisal (SA) Draft Scoping Report, Draft Statement of Community Involvement (SCI) and Draft Housing and Economic Land Availability Assessment Methodology (HELAA)

Thank you for providing us with the opportunity to comment on the Northumberland National Park SA Scoping Report, SCI and HELAA. We have assessed the consultation documents and have the following comments to make.

Sustainability Appraisal (SA) Draft Scoping Report

We have the following suggestions to make in response to your consultation questions:

1. Is the proposed SA framework appropriate?

The Environment Agency support the range of sustainability issues that are proposed to be addressed within the future Local Plan. We support the inclusion of biodiversity, flood risk, water quality, and waste production as important environmental indicators.

2. Is the scoping and baseline information adequate?

We consider that the scoping and baseline information is adequate. However, we do suggest that the following additional information is referenced within the SA.

In respect of the sustainability objectives in Table 1 of the SA, we recommend that the following documents and mapping information are referenced to help support SA objective 6 'To avoid or reduce flood risk to people or property':

- You can obtain the Environment Agency flood zone maps via the Partner Data Catalogue by logging in/signing up at the following link:
<http://environment.data.gov.uk/ds/partners/#/partners/login>

Environment Agency
Tyneside House Skinnerburn Road, Newcastle Business Park, Newcastle upon Tyne, NE4 7AR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

- If you require more in-depth data, we also hold flood modelling information for certain areas in Northumberland. This modelling information can be requested by contacting our Customer and Environment Team at: northeast-newcastle@environment-agency.gov.uk

In relation to the Water Framework Directive (WFD), we have identified that SA objective 14 considers the protection and enhancement of ground and river water quality. We suggest that references to relevant documents and datasets are included to support this objective. This should include reference to the Northumbria River Basin Management Plan 2015.

The WFD aims, where possible, to achieve good ecological status or potential for all waterbodies by 2027 and prevent deterioration of any element of the WFD classification. For information, and as a potential data source reference, we also provide the following links to WFD information:

For general waterbody classifications and objectives, please see following link: <http://environment.data.gov.uk/catchment-planning/>

For reasons for not achieving good ecological status, please see following link: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/3>

3. Have all relevant plans and programmes been identified?

We consider that, in general, the relevant plans and programmes have been identified and we welcome reference to the updated Northumbria River Basin Management Plan (cycle 2) 2016 – 2021 in Appendix 4 of the SA. However, we do recommend that the following documents are referenced within the SA:

- Guidance on flood risk assessments: climate change allowances was published on 19 February 2016 and last updated on 12 April 2016. This guidance should be referenced within Appendix 4. New climate change allowance figures will impact sites located within flood zones 2 and 3. The guidance is accessible by the following link: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
- We recommend that the Environment Agency Medium Term Plan is referenced with Appendix 4, as this sets out our investment programme from 2015 to 2021. This can be accessed by the following link: <https://www.gov.uk/government/publications/programme-of-flood-and-coastal-erosion-risk-management-schemes>
- Environment Agency (2011) Runoff Attenuation Features: A guide for all those working in Catchment Management. This is available at: [https://research.ncl.ac.uk/proactive/belford/papers/Runoff Attenuation Features Handbook final.pdf](https://research.ncl.ac.uk/proactive/belford/papers/Runoff_Attenuation_Features_Handbook_final.pdf)
- Environment Agency (2012) Rural Sustainable Drainage Systems (RSuDS). This is available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291508/scho0612buwh-e-e.pdf

- The Northumberland Strategic Flood Risk Assessment (SFRA) 2008 has not been included in Appendix 4. We recommend that this document is mentioned within Appendix 4 and any subsequent updates are also referenced as the Local Plan Review progresses.

4. Is any significant environmental, social or economic baseline data missing or inaccurate?

Based on the information submitted, we consider that there is no significant missing or inaccurate baseline data within the SA.

5. Are there any additional sustainability problems or opportunities in the National Park?

Given the comprehensive scope of the SA, we did not consider that there were any further sustainability problems or opportunities in the National Park.

6. Is the scope of the SA proportionate?

We consider that the SA is proportionate to the remit that is required under the National Planning Policy Framework (NPPF). We would also recommend that the principles of the NPPF are considered in the upcoming Local Plan Review.

Draft Statement of Community Involvement

We support the general principles of the Draft Statement of Community Involvement and references made to the Duty to Cooperate.

Draft Housing and Economic Land Availability Assessment (HELAA) Methodology

In general, we are in support of the HELAA methodology that has been prepared.

We consider that the criterion of suitability, availability and achievability, which has been used to determine whether a site is deliverable, developable or uncertain is acceptable.

We recommend that the word 'protection' should be included in paragraph 2.57 when referencing environmental improvement so that the text reads 'environmental protection and improvement'.

It is noted, that any future new sites that are identified for housing and employment use and subsequently brought forward in the upcoming Local Plan review will need to be considered in line with the Sequential Test and, where necessary, the Exception Test as set out in Planning Practice Guidance and any supporting SFRA. The inclusion of any new development sites will require the council's SFRA (2008) to be updated.

If you have any questions or wish to discuss any of the points raised, please do not hesitate to contact me.

Yours faithfully

Louise Tait
Senior Planning Advisor

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