

**Northumberland National Park Local Plan Examination  
Matters, Issues and Questions identified by the Inspector**

**Matter 1 – Procedural/legal requirements**

**Issue**

Whether the Authority has complied with relevant procedural and legal requirements.

**Questions**

*Plan preparation*

- 1) Has the preparation of the Local Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
- 2) Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?
- 3) Has the preparation of the Local Plan complied with the Statement of Community Involvement?

*Sustainability Appraisal*

- 4) How has the Sustainability Appraisal (SA) informed the preparation of the Local Plan at each stage and how were options considered?
- 5) How has the SA been reported?
- 6) Has the methodology for the SA been appropriate? What concerns have been raised and what is the Authority's response to these? Have the requirements for Strategic Environmental Assessment been met?

*Habitats Regulations Assessment*

- 7) How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?
- 8) What are the relevant designated sites considered?
- 9) What potential impacts of the Local Plan were considered? What were the conclusions of the HRA and how has it informed the preparation of the Local Plan?
- 10) Have any concerns been raised regarding the HRA and if so, what is the Authority's response to these? How has Natural England been involved?

*Other matters*

- 11) Has the Authority had regard to the specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
- 12) Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? Which?
- 13) How have issues of equality been addressed in the Local Plan?

## **Matter 2 – The duty to co-operate**

### **Issue**

Whether the Authority has complied with the duty to co-operate in the preparation of the Local Plan.

### **Questions**

- 1) Who has the Authority engaged with in terms of housing needs and housing provision and what form has this taken?
- 2) What are the inter-relationships with other authorities in terms of migration, commuting, housing markets and service provision?
- 3) How have these been taken into account in preparing the Local Plan?
- 4) How have the issues of housing needs and housing provision been addressed through co-operation and what are the specific outcomes for example in terms of statements of common ground and housing provision within other Local Plans?
- 5) What is the position of other authorities in terms of the approach to identifying and meeting housing needs? Have specific concerns been raised through duty to co-operate discussions or representations?
- 6) Are there any other strategic matters which require co-operation and if so, how have issues been addressed? For example in relation to minerals and waste issues.
- 7) In overall terms has the Authority engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

## **Matter 3 – Strategic Policies ST1-ST4**

### **Issue**

Whether Strategic Policies ST1-ST4 are positively prepared, justified, effective and consistent with national policy.

### **Questions**

#### *Policy ST1: Sustainable Development*

- 1) What is the background and justification for the policy?
- 2) How is it intended to implement the policy in practice in relation to specific development proposals and how would it relate to other policies?
- 3) Does the policy adequately and effectively deal with the range of issues relating to sustainable development for example climate change?
- 4) How is the policy consistent with national policy?
- 5) What are the issues that the suggested modification SoM21 seeks to address and is it necessary for soundness? Are other modifications necessary?

#### *Policy ST2: General Development Principles*

- 6) What is the background and justification for the policy?
- 7) Does the policy adequately and effectively deal with the full range of relevant issues?
- 8) How is the policy consistent with national policy?
- 9) What are the issues that the suggested modification SoM26 seeks to address and is it necessary for soundness? Are other modifications necessary?

#### *Policy ST3: Major Development*

- 10) What is the background and justification for the policy?
- 11) Is the policy fully consistent with national policy (particularly Para 172 of the NPPF)?
- 12) Should criterion a) refer more generally to the local economy?
- 13) Is criterion e) consistent with Para 172c) of the NPPF in referring to minimising adverse effects and the extent to which these could be mitigated rather than moderated?
- 14) Is part 2 of the policy justified and consistent with the NPPF?
- 15) What are the issues that the suggested modification SoM31 seeks to address and is it necessary for soundness? Would the suggested modification itself be consistent with national policy? Are other modifications necessary?

#### *Policy ST4: Spatial Strategy*

- 16) What is the basis for identifying particular settlements as either Local Centres or Smaller Villages and is the approach justified?
- 17) How would development proposals be considered in practice and how would judgements be made as to the appropriateness of the site and the scale of development proposed?
- 18) Is the approach to development in the open countryside consistent with national policy?

## **Matter 4 – Housing**

### **Issue**

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing.

### **Questions**

#### *Overall housing needs*

- 1) Was the methodology used to identify a housing need figure appropriate?
- 2) Is the figure of up to 160 dwellings (8 per year) justified?
- 3) What is the specific basis for the uplift for market signals of 1 dwelling per year and how was this quantified?
- 4) Is there any basis for further uplifts?
- 5) What is the relationship with the Northumberland Local Plan in terms of identifying housing needs?

#### *Housing requirement/provision*

- 6) What is the basis for not identifying a housing requirement figure in the Local Plan? Is this justified and consistent with national policy?
- 7) What would be the implications of including a housing requirement figure?
- 8) What role will the Northumberland Local Plan have in meeting housing needs from the National Park? Is this clear and to what extent is this agreed?
- 9) Is the reliance on windfall sites justified?
- 10) What is the basis for not allocating housing sites and is this justified?
- 11) Taking all of the above factors into account, is the overall approach to housing provision and meeting housing needs justified and consistent with national policy?
- 12) Is the lack of a housing trajectory justified?

#### *Policy ST5: New Housing*

- 13) Is the approach to housing mix and the reference to the most recent Strategic Housing Market Assessment sufficiently flexible?
- 14) What is the basis for the requirement that new housing is for principal residence occupancy and is this justified?
- 15) How would this affect the viability and funding of new housing and how has this been taken into account?
- 16) How would this be applied and enforced in practice?
- 17) Is it intended to apply this requirement to all new housing including all of the circumstances set out in parts 3.b and 3.c?
- 18) What is the basis for the approach towards custom and self-build housing and is it justified and consistent with national policy?
- 19) Is suggested modification SoM41 necessary for soundness? Are other modifications necessary?

#### *Policy DM3: Affordable Housing*

- 20) What is the evidence in relation to affordable housing needs, what is the past record in delivery and what are the likely mechanisms for future delivery?
- 21) What is the basis for the requirement for 50% affordable housing and the threshold of more than five dwellings? Is this justified and what is the evidence regarding viability?
- 22) Is the policy sufficiently flexible in terms of taking account of viability on particular schemes?

- 23) Why do parts 3-5 of the policy only apply to Local Centres? Should they also apply to Smaller Villages?
- 24) Is suggested modification SoM44 necessary for soundness? Are other modifications necessary?

*Policy DM4: Rural Workers' Housing*

- 25) Is it intended that the principal residence occupancy requirement applies in such cases and if so, is this clear and is it justified?
- 26) Is the policy sufficiently flexible to take account of changing circumstances?

*Policy DM5: Accommodation for Gypsies, Roma and Travellers*

- 27) What is the evidence in relation to the need for such accommodation?
- 28) Is the approach to this issue justified and consistent with national policy in the light of this evidence?
- 29) Are the criteria in the policy justified and consistent with national policy? What is the basis for criterion b)?
- 30) Is suggested modification SoM49 necessary for soundness? Are other modifications necessary?

## **Matter 5 – Other Development Management Policies**

### **Issue**

Whether the other Development Management Policies are justified, effective and consistent with national policy.

### **Questions**

#### *Policy DM1: Community Facilities and Infrastructure*

- 1) Is Part 7 justified and consistent with national policy?

#### *Policy DM6: Conversion of Buildings*

- 2) Is the approach consistent with national policy, particularly in relation to residential use in light of Para 79 of the NPPF?

#### *Policy DM9: Transport and Accessibility*

- 3) Is the policy sufficiently clear and effective in terms of the specific requirements?
- 4) Are suggested modifications SoM54 and SoM55 necessary for soundness? Are other modifications necessary?

#### *Policy DM10: Habitats, Biodiversity and Geodiversity*

- 5) Is the policy consistent with national policy?
- 6) Is suggested modification SoM58 necessary for soundness? Are other modifications necessary?

#### *Policy DM13: Renewable Energy*

- 7) Is the policy consistent with national policy in relation to wind energy taking account of Para 154 and footnote 49 of the NPPF?

#### *Policy DM16: Minerals Development*

- 8) What is the situation regarding the supply and demand for minerals in the region/sub-region and how does this affect the National Park and the policy approach?
- 9) Is the approach to major minerals development consistent with that set out in Policy ST3 and national policy?
- 10) Is the approach to new quarries or the expansion of existing quarries justified and consistent with national policy?

#### *Policy DM17: Minerals Safeguarding Areas*

- 11) Is the approach to Minerals Safeguarding Areas justified and consistent with national policy?
- 12) Are the Minerals Safeguarding Areas shown on the Policies Map appropriately defined or should they cover wider areas?

#### *Policies DM18 and DM19: Waste Management, Waste Disposal and Recycling Facilities*

- 13) What is the relationship between the National Park Authority and Northumberland County Council in terms of waste issues and waste planning and how has this been taken into account in this Local Plan?
- 14) Are Policies DM18 and DM19 justified and consistent with national policy?