

## Northumberland National Park Local Plan Examination

### Northumberland National Park Authority's response to the Matters, Issues and Questions identified by the Inspector

<b>Matter 2 – The Duty to Co-operate</b>	<b>EXMIQ02</b>
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#### Issue

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

**1) Who has the Authority engaged with in terms of housing needs and housing provision and what form has this taken?**

2.1.1 The Authority has prepared a Duty to Co-operate Statement (NNPA-012) which sets out how it has and continues to comply with the duty to co-operate. Northumberland County Council (NCC) is the only constituent authority which covers the National Park and therefore this is an important relationship to the National Park. As NNPA is a small local planning authority (receiving approximately 90 planning applications each year), a proportionate approach has been taken which accords with guidance that “*all parties should approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans.*” The details of the duty to co-operate with NCC are set out in Part 4 of the Duty to Co-operate Statement (NNPA-012) and the signed Statement of Common Ground is appended to that document.

2.1.2 Northumberland County Council is the Housing Authority for the whole County and their Draft Local Plan (Table 7.1 of NNPA-056) set out four Housing Delivery Areas in Northumberland: North Delivery area; Central Delivery area; West Delivery area and South East Delivery area. The National Park includes areas within the North and West Delivery areas. In assessing housing need, both NCC and NNPA have used a consistent set of consultants (Arc4) to provide their own Strategic Housing Market Assessments (SHMA; NNPA-025).

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2.1.3 The NNPA 2017 SHMA (NNPA-025) calculated a housing need of up to 8 homes per year equating to 160 homes in the 20 year period within the National Park. This is an extremely minor level in comparison to the need of Northumberland County which is looking at an average of 885 per annum and 17,700 in the 20 year period (Para 7.13 of Northumberland Local Plan NNPA-056). The Northumberland Local Plan, currently under examination, states that their housing in gateway settlements will in practice meet some of our need (Paras 7.14-7.15):

*'Working closely with neighbouring authorities through the Duty to Cooperate, the Council will continue to ensure that planned housing growth across the wider region is complementary and strategically co-ordinated. Northumberland County Council has not considered it necessary to ask for any of its neighbouring authorities to help provide for any of the County's identified needs. While a proportion of Northumberland's overall housing need falls within the protected Northumberland National Park (an independent local planning authority), given its lower levels of need and much slower rate of new house building, **the Northumberland Local Plan does not make any specific reduction to take into account housebuilding within the National Park**.'*

2.1.4 This approach is confirmed in the Statement of Common Ground (appendices of NNPA-012) dated 23<sup>rd</sup> September 2019:

*NCC 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. The NCC Submission Local Plan does not make any specific reduction to take into account house building within the National Park.*

2.1.5 Along with the Duty to Cooperate Statement (NNPA-012), there has also been a number of face-to-face duty to co-operate meetings, email correspondence and meetings between senior planning staff of both authorities. The Statement of Common Ground was agreed between the two authorities in September 2019 to provide an up to date situation. One of the National Park Authority Members is County Councillor John Riddle OBE, who is the NCC Portfolio Holder for Planning, Resilience and Housing. The Chair of the National Park Authority, Glen Sanderson is also a senior County Councillor with a portfolio for the Environment and Local Services. On occasions National Park officers have spoken with these senior county councillors regarding matters with Northumberland County Council, however this has not been necessary about the Local Plan.

2.1.6 The National Park has not sought to address housing need or provision with the other neighbouring authorities, such as Carlisle City or Scottish Borders Councils due to the distance of the Park boundary with their main settlements.

**2) What are the inter-relationships with other authorities in terms of migration, commuting, housing markets and service provision?**

2.2.1 As outlined above, the main relationship is with Northumberland County Council. As identified in the Duty to Cooperate Statement (page 15, NNPA-012) the relevant adjoining authorities are Cumbria County Council and Carlisle City Council (District Council) to the west, and the Scottish Borders (Scottish Authority) to the north. However, for the other authorities the boundaries are very rural in nature, usually comprising isolated or small rural communities. As such the levels of migration, commuting, housing markets and service provision are minimal. The nature and level of development in these border areas are such that there are no cross-strategic boundary issues with respect to migration, commuting, housing markets or service provision.

2.2.2 The Economic Futures Report (NNPA-029) which, among other things, analysed travel-to-work patterns demonstrates that the strongest linkages were with Northumberland, in particular, the larger settlements of Rothbury, Bellingham, Hexham and Alnwick. This also supported by the travel-to-work catchments defined by ONS, which show the majority of the NNP as being located within the wider Hexham and Blyth/ Ashington areas. The 'gateway settlements' very close to the National Park provide inter-relationships with services to the National Park.

**3) How have these been taken into account in preparing the Local Plan?**

2.3.1 The inter-relationships have been considered with each adjoining authority and is evidenced by the Statements of Common Ground (see Duty to Co-operate Statement NNPA-012). The SoCGs cover Governance/Working arrangements, Engagement, Strategy and Objectives, Housing, Environment, Transport, Renewable Energy, Minerals and Waste. Several outcomes and the basis for future working is agreed in the SoCGs.

2.3.2 There are minimal inter-relationships with Cumbria/Carlisle and the Scottish Borders which is acknowledged in the SoCG. Most of the cross-boundary considerations to account for in preparing the Local Plan are with Northumberland:

**Migration/Commuting**

2.3.3 As stated in response 2.2.1 above, the levels of migration and commuting are minimal. However, population ageing and decline is a challenge in the National Park (see Para 2.6 of the Publication Draft Local Plan NNPA-001) along with the increased centralisation of health services, education, jobs and retail provision (para 2.11). In order to address these challenges, the Local Plan includes Strategic Spatial Objective 5 to encourage development that will support a growing, sustainable, diverse and resilient local economy, to help 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.

2.3.4 The Strategic Spatial Objectives Matrix (NNPA-033) then shows how this (and other) strategic spatial objectives have been taken into account in preparation of the Local Plan. SSO5, for example, is considered to be compatible with ST1, ST2, ST4, ST5, DM1, DM3, DM4, DM6, DM7, DM8 and DM9 of the Publication Draft Local Plan (NNPA-001).

### **Housing**

2.3.5 The response to Question 1 above specifically covers how the inter-relationship in the housing market between Northumberland County and the National Park has been addressed in the Local Plan.

### **Transport**

2.3.6 The inter-relationship with NCC has been important on the topic of Transport. As NCC is the Highway Authority for the whole county, NNPA already consults NCC on all developments where access and transport is a relevant planning consideration (see Duty to Co-operate Statement NNPA-012). In consultation of the Local Plan, NCC provided comments specifically on Policy DM9: Transport and Accessibility during the Publication Draft stage (see page 58 of the Publication Draft Original Representations NNPA-008). Proposed modifications SoM54 and SoM55 (see Schedule of Modifications NNPA-002) are suggested in light of NCC's comments and show direct co-operation in preparation of the Local Plan.

### **Minerals**

2.3.7 During consultation of the Publication Draft Local Plan (NNPA-001), NCC gave comments on Policy DM16: Minerals Development and DM17: Mineral Safeguarding Areas (see pages 58/59 of the Publication Draft Original Representations NNPA-008). Proposed modification SoM66 (see Schedule of Modifications NNPA-002) is suggested due to NCC's comments and again shows direct co-operation in preparation of the Local Plan.

### **Waste**

2.3.8 NCC also provided comments on Policy DM18: Waste Prevention and DM19: Waste Disposal and Recycling Facilities (see page 59 of the Publication Draft Original Representations NNPA-008). Proposed modification SoM67 (see Schedule of Modifications NNPA-002) follows NCC's suggestion to change the title of Policy DM18 from Waste Prevention to Waste Management.

**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?**

2.4.1 This is outlined above in response to Question 1 and more thoroughly in Matter 4. However to summarise, NCC have identified need of the whole county and have not excluded the National Park from these figures.

2.4.2 Despite such small housing delivery in the past few years in the National Park, it is hoped that the proposed relaxation of the housing policies, including removing the local needs criteria, will re-invigorate small-scale house building.

2.4.3 Should the housing requirement of 8 not be forthcoming, NCC have also agreed through the SoCG (NNPA-012) that they will not discount the National Park's need figure from their countywide target and address our need in the gateway settlements (see para 40 of the Housing Topic Paper NNPA-031). This is further addressed in response to Q5 and Q8 of Matter 4.

**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?**

2.5.1 Northumberland County Council are satisfied they can meet their need within their area. Their Submitted Local Plan (NNPA-047), currently in examination, states that NCC '*has not considered it necessary to ask for any of its neighbouring authorities to help provide for any of the County's identified needs*' (para 7.14). They also suggest they will meet the need for the whole of Northumberland which includes the National Park (para 7.15). No other neighbouring authorities have requested NNPA take their need, because they understand that National Parks are not suitable locations for unrestricted housing.

**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.**

2.6.1 As outlined in the Duty to Cooperate Statement (NNPA-012) the main issues that require co-operation include Minerals and Waste. NNPA policy officers are part of the North East Minerals and Waste Policy officers group and the North East Aggregates Working Party (see Part 4 of NNPA-012).

**Minerals**

2.6.2 In terms of minerals, as well as the wider North East working groups, there has been a continued close working relationship between the National Park and NCC. A service level agreement (SLA) between the two authorities means that NCC provides consultancy and knowledge for mineral sites. There is one quarry within the National Park, Harden Quarry, which is monitored by NCC officers (under the SLA) and has recently been agreed to extended extraction of the unique Harden Redstone. However, in line with the Statement of Common Ground (NNPA-012), NCC confirms they will seek to ensure the provision of aggregates extraction for Northumberland is provided outside of the National Park. The Council also agrees to seek to maintain land banks of aggregate minerals for the Northumberland sub-region outside of the National Park.

2.6.3 In addition to the points of co-operation mentioned in Para 2.6.2 above, NNPA also sits on the regional North East Aggregates Working Party which works jointly to prepare an annual Local Aggregates Assessment – which informs Local Plan policy preparation.

**Waste**

2.6.4 As outlined in the Statement of Common Ground (NNPA-012), NCC continues to acknowledge that the National Park is reliant on waste management facilities outside the NP to meet its needs, due to its rural nature. Local authority collected waste, for example, is managed through sites in main towns and service centres outside of the National Park. This raises an important cross-boundary issue, but the volumes of wastes are relatively small. There is general agreement that NCC need to take account of this when planning for waste management and they are happy to do so, as outlined in the Statement of Common Ground.

2.6.5 Along with the co-operation with NCC in Local Plan preparation (para 2.6.4 above), NNPA also attends the North East Minerals and Waster Policy Officers Group which helps resolve strategic cross-boundary issues, share information and support joint working on the

evidence base relating to waste arisings, cross-boundary movement and waste management capacity.

**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?**

2.7.1 As outlined in the Duty to Cooperate Statement (NNPA-012), NNPA has engaged constructively and on an ongoing basis with the main constituent local authority, Northumberland County Council. They are the Highway Authority, the Housing Authority, the Lead Local Flood Authority and provide Public Protection services, waste and many other services to the National Park. Due to the small population and levels of development in the National Park, a proportionate approach is taken. NCC provided responses to Regulation 18 and 19 consultations (NNPA-011), which have been incorporated into the Schedule of Modifications (NNPA-002), including the Main Modifications SoM54 and SoM55 relating to Highways matters and those in Para 2.3.2 above relating to Minerals and Waste.

2.7.2 The Duty to Co-operate also includes involvement with other prescribed bodies, and the Authority appreciates that this should not just be through the statutory consultation methods. The Authority notes that on many occasion attempts have been made to engage with different partners, however the level of development experienced by the National Park means these often stretched organisations take a proportionate and risk-based approach when engaging with the Authority on Local Plan preparation. Feedback is that they are aware of our statutory purposes, the low levels of development and our high Development Management standards and on that basis feel that wider engagement beyond the consultations has not been necessary. For example, the Head of Development Management (now Interim Head of Planning) met with the Environment Agency officers in November 2018 but no issues were raised due to the reasons outlined above. Likewise, Historic England did not provide a response to the Regulation 19 consultation. Nevertheless the authority considers that they have engaged constructively, actively and on an ongoing basis, meeting all the requirements of the Duty to Co-operate, to maximise the effectiveness of the preparation of the Local Plan.