

Ref: NNPA Local Plan
Contact: Susannah Buylla
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Date: 15th November 2019

Mr Ward,
Inspector
The Planning Inspectorate
3J Kite Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir,

Initial Queries into the Northumberland National Park Local Plan

Thank you for your letter dated 7th November 2019 raising some initial queries.

Taking each of your points in turn:

- 1) We have now received your Matters, Issues and Questions, draft hearings timetable and Guidance Notes thank you.
- 3) The HRA report was prepared by our consultant DTA Ecology on behalf of the Authority. They wish to assure the Authority and yourself that they had full regard to the implications of People Over Wind. Indeed they advise that DTA Ecology produced the first (and currently only) methodological guidance for how the judgment informs decision making under the Habitats Regulations which was published in September 2018 through updates to the Habitats Regulations Assessment Handbook (of which she is a co-author). The Planning Inspectorate and Natural England are both subscribers to the Handbook. You will note from the HRA as submitted that figures 1.1 and 1.2 are both clear that no account is taken of 'mitigation measures' at the stage 1 screening step. I can now provide an amended HRA v2 (Document NNPA-006A) which clearly shows that Policy DM10 *avoids* the risk rather than provides mitigation for the risk.

As such it is considered that as mitigation measures have *not* been used to screen out policies, it would be inappropriate to undertake an Appropriate Assessment. I have sent a copy of the revised HRA to Natural England for their comment,

however you may note that they did not have any objections to the previous HRA Assessment.

- 4) The reference to Policy 22 in the HRA (Document NNPA-006) was an oversight. This relates to Policy 22 which was contained within the Preferred Options document. This has now been amended and is superseded by Document NNPA-006A.
- 5) The proposed Schedule of Modifications has been re-drafted to produce two schedules. Document NNPA-002A only contains Main Modifications as outlined in your letter and Document NNPA-002B contains the proposed minor modifications. These amended documents are attached to this letter. They have also been uploaded to the Authority's Examination website
<https://www.northumberlandnationalpark.org.uk/planning/planning-policy/local-plan/local-plan-examination/>

Should you have any additional questions regarding the Authority's response or require any further information, please do not hesitate to contact me via the Programme Officer. The Authority looks forward to working with you during the course of the Local Plan Examination.

Yours sincerely

S. Buylla

Susannah Buylla

Interim Head of Planning