

Haydon Neighbourhood Plan

Summary of representations received and submitted to the Independent Examiner

Northumberland County Council is required, under Regulation 4(3)(b) of The Neighbourhood Planning (Referendums) Regulations 2012, to provide a summary of any representations submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act.

This document provides a summary of those representations which were made in relation to the Submission Draft Haydon Neighbourhood Plan.

Copies of the representations made on the Plan, and which were submitted to the independent examiner, can be made available on request from the County Council by contacting the Neighbourhood Planning and Infrastructure Team on 01670 623619 or by email at: NeighbourhoodPlanning@northumberland.gov.uk

List of Representations

1. Natural England
2. Coal Authority
3. Historic England
4. Northumberland National Park Authority
5. (Avison Young on behalf of) National Grid
6. Haydon Bridge High School
7. Northumberland County Council
8. The Environment Agency

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Cameron Chandler, Northumbria Area Team	Natural England	<i>Natural England do not have any further comments on the Plan.</i>
Melanie Lindsley, Development Team Leader (Planning)	The Coal Authority	<p><i>They comment that within the Haydon Neighbourhood Area there are mining legacy features present at surface and shallow depth including approximately 158 mine entries, shallow coal workings and reported surface hazards, which pose a potential risk to public safety and surface stability.</i></p> <p><i>They are pleased to see the inclusion of Policy H1 Sustainable Development which includes criteria i, which requires development proposals to address contamination or land stability issues.</i></p>
Jules Brown, Historic Places Adviser	Historic England	<p><i>Historic England made a number of comments on the pre-submission draft plan in September 2021 and are pleased that these have been taken into account.</i></p> <p><i>They note the changes made as a result of comments on pre-submission draft Policy H7 and Annexe 4 but suggest this is a retrograde step. They point out that NPPF and Planning Practice Guidance make clear it is possible to identify non-designated heritage assets (NDHAs) in a neighbourhood plan, which had been done here.</i></p>
Susannah Buylla, Interim Head of Planning	Northumberland National Park Authority (NNPA)	<p><i>NNPA comment that the strategic policies of the Northumberland National Park Local Plan (2020) should be added to Table 5 (General Conformity with the strategic policies) and Appendix 2 of the Basic Conditions Statement.</i></p> <p><i>For ease of use, NNPA suggest it would be helpful to use bullet points to identify each paragraph in a given policy.</i></p> <p><i>Relating to the local economy section, (page 45), NNPA point out that reference is only made to the policies of the Northumberland Local Plan. They are satisfied that Policy DM7 of the NNPLP is sufficient to promote home working and promoting and protecting local businesses,</i></p>

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		<p><i>but suggest that reference should be included to these supporting paragraphs for completeness.</i></p> <p><i>NNPA support the design code and particularly highlight the reference in section 2.1.3 on Landscape Character and section 4.5.2 Farmstead conversions.</i></p> <p><i>NNPA comment on a number of policies.</i></p> <p>Policy H1 Sustainable development <i>NNPA consider that the wording of part h) puts a disproportionate burden on applicants and suggest limiting this criterion to the Haydon Design Code only.</i></p> <p>Policy H2: Sustainable location of new development <i>NNPA point out that part g) would not necessarily accord with their adopted spatial strategy policy ST4, which directs business development to named settlements or to re-use existing buildings.</i></p> <p>Policy H3 Embedding energy efficiency and renewable energy <i>NNPA is supportive of this policy and accords with the principles within NNPLP Strategic policies ST1 and ST2. It notes that this policy does not make a requirement for all developments to commit to renewable energy but does support those that do.</i></p> <p>Policy H4 Community energy and renewable energy technologies. <i>NNPA is supportive of this policy and note that it refers mainly to those areas outside of the National Park which is considered appropriate given the NNPLP policy DM13 restricting renewable developments to domestic scale only.</i></p> <p>Policy H5 Flood Prevention and Alleviation <i>NNPA are unsure whether this policy adds anything to existing government policy and guidance set out in the NPPF and NPPG. However, given the flood alleviation schemes are</i></p>

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		<p><i>likely to be outside the national park area officers are satisfied that this is not relevant to the national park area.</i></p> <p>Policy H6 Design <i>NNPA support this design policy.</i></p> <p>Policy H8 Landscape <i>NNPA are supportive of this policy but consider that specific reference to certain areas in the Parish in part c) is unnecessary and suggest deletion of parts of this criteria.</i></p> <p>Policy H9 Biodiversity <i>NNPA are supportive of this policy but are slightly concerned that the reference to sites on the policies map could mean that biodiversity on sites not identified are overlooked. As such they suggest amending the first paragraph to delete this reference. NNPA advise deleting the two 'where appropriates' from the fourth paragraph as neither are needed (as development schemes should be embedding enhancements). They suggest that examples of wildlife habitats could be included within the supporting text rather than included within the policy.</i></p> <p>Policy H10 Green Infrastructure <i>NNPA support the provision of green infrastructure within new development schemes.</i></p> <p>Policy H17 Tourism <i>NNPA advise that the second part of this policy does not reflect the strategic spatial policy of ST4 of the NNPLP (page 30) which requires an essential need to be provided for tourism development to be considered acceptable in an unsustainable location. They say it is also unclear whether tourism facilities and visitor accommodation development should only make use of previously developed land and buildings or whether it allows new buildings. For clarity, NNPA advise re-wording the second paragraph.</i></p> <p>Policy H18 Agriculture</p>

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		<i>NNPA consider this policy too simplistic. They support farm diversification in principle but point out this will depend upon the scale of such development, and also consideration of wider issues such as the special qualities of the National Park including landscape character, tranquillity, biodiversity and cultural heritage which does not come across within the policy.</i>
Matt Verlander, Director	Avison Young, on behalf of National Grid	<i>National Grid have identified that they have no record of electricity and gas transmission assets, including high voltage electricity assets and high-pressure gas pipelines, within the Neighbourhood Area.</i>
David English, Planning Manager, Neighbourhood Planning	Northumberland County Council (NCC)	<p><i>NCC make a number of comments on the Plan.</i></p> <p>General Comments on the Plan from service areas within the County Council</p> <p><i>Environment and Design Team</i></p> <p><i>They advise that the number of non-designated heritage assets on page 25 is incorrect and should be clarified.</i></p> <p><i>They advise referencing the ‘Heritage Gateway’ website as the ‘Keys to the Past’ website is likely to be replaced in the near future.</i></p> <p><i>Strategic Estates</i></p> <p><i>They object to the following proposed designations:</i></p> <ul style="list-style-type: none"> <i>• The Haydon Bridge High School Buildings designation as Community facilities. The buildings are for the use and benefit of the school, and any use by the public should be based on agreement with the school administration to suit school needs and practical considerations.</i> <i>• The Haydon Bridge High School playing field as public open space, (LGS09 and LGS05) opposed for the reason given above.</i> <i>• The Haydon Bridge High School Playing field as protected open space (POS02). The use of the field should not be limited in any way that would impact on the future development of new or alternative facilities for the school.</i>

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		<ul style="list-style-type: none"> • <i>Haydon Lodge as a conservation area asset (CA14). They oppose any designation that would limit the potential redevelopment and use of the building.</i> <p><i>Education and Skills</i></p> <ul style="list-style-type: none"> • <i>Para. 5.71 Policy H11 Local Green Space, ref LGS09 Cricket Pitch at Haydon Bridge High School. Access to cricket pitch in the ownership of the School to be agreed on the terms of the school Governing Body.</i> • <i>Para. 5.74 Policy H12 Protected Open Space, ref POS02 Haydon Bridge High School Rugby pitches. Access to rugby pitches in the ownership of the school to be agreed on the terms of the school Governing Body.</i> • <i>Para. 5.98 Policy H15 Community Services and Facilities, ref CF6 - Haydon Bridge High School; Objective 5 Vibrant and thriving communities. If the school closed, the land and buildings would revert to the local authority.</i> • <i>Annex 1, Objective 5, Vibrant and thriving communities, ref 5a – secure access to the High School facilities outside school hours etc. They advise this is reworded to state increased access would be sought with the Governing Body of Haydon Bridge High School.</i> <p><i>Flooding & Coastal Erosion Risk Management</i></p> <p><i>They advise that the use of SuDS for all developments could be emphasised in paragraph 5.94.</i></p> <p><i>Strategic Transport</i></p> <p><i>They support the inclusion of sustainable transport themes within the plan outlined in Policy H19 'Sustainable Transport and New Developments' and Policy 20 Walking and Cycling.</i></p> <p><i>Public Health</i></p> <p><i>Feedback on Annex 1 (Community Actions):</i></p>

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		<ul style="list-style-type: none"> • <i>Objective 1a and 1b (sustainability and climate change): consider involvement of Northumberland County Council’s climate change team in the delivery of these objectives.</i> • <i>Objective 1b: consider liaising with Northumberland County Council’s Cold Homes Group to support information provision on renewable energy heating and power for domestic homes. This objective also links with Public Health’s Joint Strategic Needs Assessment – which will include a chapter on fuel poverty.</i> • <i>Objective 5 (vibrant and thriving communities): considering high proportion of older people living alone, consider investing in and developing activities for this population.</i> • <i>Objective 7 (accessibility and transport): consider involvement of Northumberland County Council’s climate change team in the delivery of such goals as public electric car charging points in the village.</i> <p>Comments from the Local Planning Authority (LPA)</p> <p>Policies Map</p> <p><i>The Conservation Area is not shown on the conservation area assets map. This should be modified.</i></p> <p><i>It would be helpful to identify the settlement of Langley on the Policies Map by providing a name adjacent to the settlement on the Map. This would aid in navigating the Map for those unfamiliar with the locality.</i></p> <p>Policy H2. Sustainable location of new development</p> <p><i>The LPA suggest that the policy presents some concerns regarding its purpose and the extent to which it would be appropriate having regard to national planning policy and guidance and state that unless appropriate modifications are made to Policy H2 it would fail to meet the basic conditions.</i></p> <p><i>They suggest modification to the policy or supporting text to recognise paragraph 78 of the National Planning Policy Framework (NPPF), which requires consideration to be given to</i></p>

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		<p><i>allowing some market housing on rural exception sites if this helps to facilitate delivery of affordable housing to meet local needs.</i></p> <p><i>They advise that parts b. to f. largely repeat paragraph 80 of NPPF, which relates specifically to an intention to avoid isolated homes in the countryside other than in defined circumstances. They say that given that Policy H2 expressly supports those forms of housing development anywhere in the countryside, Policy H2 presents conflict with paragraph 80 of NPPF, which only concerns isolated homes; and with paragraph 174 b of NPPF which requires that planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. They say that this requirement is reflected in part in the second paragraph of Policy H2, which then presents some inherent contradiction in terms of whether the policy offers specific support to development or whether it seeks to provide for protection of the countryside. The LPA suggest that modification could be made to ensure that the policy better reflects the national policy expectation that isolated homes in the countryside are avoided and are allowed only in those express circumstances set out in NPPF.</i></p> <p><i>The LPA advises that parts g. to j. generally repeat the expectations set out in paragraph 84 of NPPF which seek to enable support for a prosperous rural economy through appropriate planning policies. They say the way Policy H2 is currently expressed fails to recognise the limitations and controls provided at paragraph 85 of NPPF in regard to business, community, leisure and tourism development in the countryside beyond settlements. They advise modification to the policy to address this matter.</i></p> <p><i>They advise that it may be helpful to modify the policy more generally to make reference only to the exceptions, conditions and limitations presented in NPPF.</i></p> <p><i>The LPA also question whether Policy H2 provides any policy control or additional local detail that would not be present in the Northumberland Local Plan (at the time of examination, the plan was not yet adopted but achieved this status soon after).</i></p> <p>Policy H5. Flood prevention and alleviation</p>

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		<p><i>They suggest making a grammatical change in first paragraph: insert ‘...the...’ after ‘...by...’ to read ‘...any adverse impacts caused by the new structure(s) including...etc’. This allows proper use of ‘...structure(s)...’ in the singular and plural.</i></p> <p>Policy H6. Design <i>They suggest part k. could be better phrased to remove repetition of the term ‘to the satisfaction of the local planning authority which appears earlier in the policy, and allows for circumstances where off-site provision may be acceptable.</i></p> <p>Policy H10. Green infrastructure <i>They recommend making several changes to the wording of the policy for clarity, including to demonstrate when the requirements of the policy would be engaged.</i></p> <p>Policy H14. Land west of Langley Gardens and north of Ratcliffe Road <i>The LPA advise that the requirement for ‘at least 15% affordable housing’ is contrary to Policy HOU 6 of the Northumberland Local Plan, which does not set the affordable housing requirements as minimum values. They state the policy does not therefore have regard to paragraph 34 of NPPF and recommend the deletion of ‘at least’ from the wording. They also advise that the supporting text and the Housing Background Paper are updated to reflect more recent changes regarding housing supply and delivery in the Parish.</i></p> <p>Policy H15. Community services and facilities <i>The LPA question whether the first paragraph and parts a. to c. are necessary since they would generally repeat matters covered elsewhere in the Plan. They say that where development is proposed to be located in the countryside beyond existing settlements then the controls provided in Policy H2 would be sufficient to manage development when read in conjunction with Policies H1 and H6, provided Policy H2 is modified to address their concerns referred to above. The LPA suggest that in the 3rd paragraph of the policy, it would be more appropriate to directly reference those shops, services and facilities to which the policy would apply. They also note the recent changes to the Use Classes Order, and say this should be reflected in the</i></p>

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		<p><i>drafting of the policy by, for example, modifying the policy to confirm that it would apply to those proposals where planning permission is required.</i></p> <p>Policy H20. Walking and cycling network <i>The LPA supports the intention to provide planning policy support for a dedicated cycle route and footpath between Haydon Bridge and Hexham but remain concerned about the identification of a route on the Policies Map, even as a general extent as indicated in the policy. They advise that Policy H20 should be modified to provide support for a dedicated segregated cycle and pedestrian route between Haydon Bridge and Hexham and reference to any general extent being defined should be deleted. The Policies Map should be modified accordingly.</i></p>
Louise Tait, Planning Advisor	Environment Agency	<i>The Environment Agency is satisfied that their previous comments, set out in a letter dated 24 September 2021, have been included in the submission draft plan.</i>