

Morpeth Neighbourhood Plan – Summary of representations received and submitted to the independent examiner		
Name	Organisation (if applicable)	Summary of representation
General representations on the Morpeth Neighbourhood Plan		
Susan Davidson	Marine Management Organisation	The Marine Management Organisation had no comments to make as they considered that this was outside their remit.
Alastair Welch	Natural England	<p>Natural England’s response highlighted designated sites within the neighbourhood area. The representation also highlighted the importance of fully understanding the impact of the Neighbourhood Plan on Local Wildlife Sites.</p> <p>The representation also identified that there is BAP (Biodiversity Action Plan) Priority Habitat within the Neighbourhood Area and highlighted the importance of encouraging the preservation, enhancement and creation of priority habitats where these opportunities exist.</p> <p>Natural England considered that the Neighbourhood Area could benefit from enhance green infrastructure provision.</p> <p>Natural England considered that Morpeth Town Council should consider whether the Neighbourhood Plan has any impacts on protected species and provided information on Natural England’s Standing Advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species, should they be identified as an issue.</p> <p>Natural England stated that appropriate weight should be given to the roles performed by the area’s soils. In addition the representation suggested the consideration of opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes.</p> <p>Natural England agreed with the conclusions of the Habitats Regulations Assessment that the plan would be unlikely to have a significant effect on European sites and was satisfied that the SEA and SA Environmental Report considered relevant environmental issues.</p>
Paul Liversidge	North East Ambulance Service	The North East Ambulance Service had no detailed comments on the Neighbourhood Plan, other than to draw attention to the fact that, as an Emergency Service, they may be required to use roads within the Neighbourhood Area for access and egress in the event of being activated to attend an emergency call, or to convey patients to

		hospital for out-patient appointments.
Rachael Bust	Coal Authority	<p>According to the Coal Authority Development High Risk Area Plans, there are numerous recorded risks from past coal mining activity. If the Neighbourhood Plan allocates sites for future development in these areas then consideration as to the development will need to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the emerging Northumberland Development Plan. In addition any allocations on the surface coal resource will need to consider the impacts of mineral sterilisation in accordance with the National Planning Policy Framework and emerging Northumberland Local Plan.</p> <p>Hebron The NDP does not allocate any sites in Hebron, however it should be noted that the eastern section of the settlement boundary is affected by recorded mining legacy in the form of past surface mining. The eastern edge of Hebron lies on the surface coal resource and new development will therefore also need to consider the issue of mineral sterilisation.</p> <p>Mitford Mitford is not on the surface coal resource and is not affected by any recorded mining legacy features.</p> <p>Hepscott The Neighbourhood Plan does not allocate any sites in Hepscott, however it should be noted that the area within the settlement boundary is affected by recorded mining legacy in the form of mine entries, thick coal outcrops and probable underground coal workings at shallow depth. The entire village of Hepscott lies on the surface coal resource and any new development will therefore also need to consider the issue of mineral sterilisation.</p> <p>Pegswood</p> <ul style="list-style-type: none"> ○ Site Hou1 AP1 – This site is affected by recorded past shallow coal workings; ○ Site Hou1 AP2 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth; ○ Site Emp6 – This site is affected by recorded past shallow coal workings; ○ Site Emp3 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth; ○ Site Tra4 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth; ○ Pegswood Community Park – This site is affected by 6 recorded mine entries, past surface mining, recorded past shallow coal workings and probable underground coal workings at shallow depth.

The area within the settlement boundary is affected by recorded mining legacy features including recorded mine entries, past surface mining, recorded past shallow coal workings and probable underground coal workings at shallow depth. In addition the entire village lies on the surface coal resource and all new development will therefore also need to consider the issue of mineral sterilisation.

Morpeth

- Site Hou1 AM1 – This site is affected by a thick coal outcrop and probable underground coal workings at shallow depth;
- Site Emp6 (Eastern Morpeth) – This site is affected by a recorded mine entry, thick coal outcrops and probable underground coal workings at shallow depth;
- Site Emp6 (County Hall) – This site is affected by a thick coal outcrop.

Most of the Town boundary lies on the surface coal resource and any new development will therefore also need to consider the issue of mineral sterilisation. All of the allocated sites (except those adjacent to the A1) lie on the surface coal resource and all new development will therefore also need to consider the issue of mineral sterilisation.

Morpeth Town Centre

None of the allocated sites are affected by mining legacy features; the eastern edge of the town centre boundary contains thick coal outcrops and probable underground coal workings at shallow depth

The entire Town Centre boundary lies on the surface coal resource and all new development will therefore also need to consider the issue of mineral sterilisation.

The Coal Authority raised concerns that the Neighbourhood Plan did not properly address the issues of unstable land and mineral safeguarding. Given the Morpeth Neighbourhood Plan is progressing ahead of the emerging Northumberland Local Plan it cannot rely upon that part of the Development Plan to address those issues.

There has been significant historic coal mining activity within the plan area. This is an important locally distinctive issue which needs to be afforded due consideration in the location and then subsequent design, layout and eventual construction of new development. Historic coal mining features have the potential to be disturbed during new development activity and consequently can affect land stability and public safety.

These factors can impact upon the deliverability of sites and their economic viability. As we have clearly indicated

		<p>previously, whilst Neighbourhood Plans are prevented from dealing with minerals issues, mineral sterilisation and safeguarding is not just a 'County Matter' it is also clearly spelt out in National Policy as a matter for plans which allocate new development. The NDP therefore needs to address the issue in order to be in conformity with National Planning Policy.</p> <p>The Coal Authority objected to the Morpeth Neighbourhood Plan on the grounds that it does not meet the necessary basic conditions of conforming to National Policy and the adopted parts of the Development Plan.</p> <p>The Strategic Environmental Assessment was also considered deficient in that the Housing Location Assessment: Site Assessment Criteria set out in Appendix B fails to respond to the comments made by The Coal Authority previously on the draft NDP that unstable land and mineral sterilisation need to be considered.</p>
Julian Austin	Amec Foster Wheeler (on behalf of client National Grid).	<p>National Grid identified the following High Pressure Gas Transmission pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> ○ FM10 – Thrunton to Saltwick; ○ FM13 – Simprim to Corbridge <p>From the consultation information provided, the above gas transmission pipelines do not interact with any of the proposed development sites.</p>
Laura Kennedy	Northumbrian Water	<p>Upon reviewing the submission draft of the Neighbourhood Plan, Northumbrian Water were pleased to note the incorporation of a number of suggested revisions and additions and considered that the submission draft of the Neighbourhood Plan provides guidance and policies that will contribute towards sustainable development in the neighbourhood plan area.</p>
Naomi Cunningham	Holder Planning (on behalf of client, CWP)	<p>A representation was submitted regarding a site controlled by CWP at Stobhill East, Morpeth. The site is located on the south eastern edge of Morpeth and has a capacity for approximately 113 homes.</p> <p>At the time of the Neighbourhood Plan submission, the site was identified in the emerging Core Strategy as safeguarded land, excluded from the Green Belt. The representation stated that the Neighbourhood Plan does not include the site within the settlement boundary, which was considered inconsistent with the emerging Core Strategy. The representation also considered that the Neighbourhood Plan's housing requirement of at least 1700 homes to be inconsistent with the 2100 identified in the emerging Core Strategy. The representation requested that the settlement boundary be revised to include the Stobhill East site and allocated for housing; or, if not allocated, safeguarded.</p> <p>Issues were also raised regarding the lack of a 5-year supply of housing land in the City Region Commuter Area and</p>

		that this shortfall was not being addressed through the Neighbourhood Plan.
Naomi Cunningham	Holder Planning (on behalf of client, CWP)	<p>A representation was submitted regarding a site controlled by CWP at Stobhill South, Morpeth. The site is located on the southern edge of Morpeth and has a capacity for approximately 550 homes.</p> <p>The site is identified in the Northumberland Local Plan Core Strategy Full Draft Plan as Green Belt and is located immediately to the south of the site known as Stobhill, which received planning permission for residential development in December 2014 (on appeal) and has been identified in the MNDP as Stobhill South Hou1, CM4 and its allocation is supported. The respondent stated that the site which is the subject of their representation should also be allocated for housing as they considered that the site is suitable for that use and will be required in the medium to long term if housing needs for the area are to be met and a 5-year housing land supply to be maintained.</p> <p>The representation also considered that the Neighbourhood Plan's housing requirement of at least 1700 homes to be inconsistent with the 2100 identified in the emerging Core Strategy. The representation requested that the settlement boundary be revised to include the Stobhill East site and allocated for housing; or, if not allocated, safeguarded.</p>
Denise Byrom	Morpeth North Residents Action Group	<p>The representation expressed strong support for the Neighbourhood Plan and emphasised that the Plan should be in place as soon as possible in order to prevent the development of more housing than is needed in Morpeth at this time. The representation sets out the Group's views that development of Morpeth should be in the form of a democratically and competently planned expansion, together with necessary infrastructure to ensure that future development is sustainable.</p>
John and Wyn Cook	N/A	<p>The respondent objected to the Neighbourhood Plan on the following grounds:</p> <ul style="list-style-type: none"> ○ It was considered that the Neighbourhood Plan had already been submitted to the County Council before the expiry of the consultation period. Issues regarding prematurity were raised due to the submission taking place before the consultation period; ○ The Northumberland Local Plan Core Strategy has not yet been adopted. The respondent considered that the Neighbourhood Plan could not be in compliance with a document which does not yet exist; ○ The respondent considered that the settlement boundary for Morpeth, as set out in the Neighbourhood Plan, is outdated and based on historic growth rather than the needs of Morpeth as a modern settlement; ○ The area of the Wansbeck valley from "The Stanners" in the east towards Mitford and from the river in the North to "Springhill Estate in the south should not be designated as Green Belt; ○ The area from the river bank on the north up to the hanging woodland on the south and between "The Stanners" to the east and the housing to the west forms part of Springfield House and is garden area. In no way can this be classified as "open countryside"; the respondent believed that this is a prerequisite to a Green Belt definition being applied; ○ The settlement boundaries relate generally to pre-Victorian Morpeth. Taking account of the pattern and

		<p>location of existing developments, the old Morpeth settlement boundaries are no longer valid or applicable to modern Morpeth; and</p> <ul style="list-style-type: none"> ○ The old local urban and parish councils have no jurisdiction in planning terms and should carry no more weight than residents.
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	The representation is sought to promote the allocation of Land North of Barmoor Farm & South of High Stobhill Farm on the southern fringe of the Morpeth urban area for housing development in the Neighbourhood Plan; the representation was also made in relation to the consultation on the County Council's Local Plan Core Strategy: Full Draft Plan.
P Snowdon	N/A	<p>The respondent stated that they had attended meetings regarding the Neighbourhood Plan and feel that the involvement of a large number of committed residents with knowledge and expertise demonstrates the strength of the local community and how it values the area.</p> <p>Concern was expressed regarding piecemeal development in the area and the respondent stated that it is important that the Neighbourhood Plan is in place as soon as possible in order to encourage sustainable growth within a sustainable environment.</p>
Alastair Willis	Signet Planning (on behalf of client, Till Services Ltd)	<p>At the time of the Submission Neighbourhood Plan, the respondent had submitted an outline planning application seeking consent for 10 affordable homes. The Neighbourhood Plan listed the application site as an area of Protected Open Space under Policy Env3. The respondent considered that there was a failing of the Neighbourhood Plan to identify the area of land in question, as well as a number of other sites, on the Proposals Map.</p> <p>The respondent also considered that the Neighbourhood Plan is unlawful both in regard to legal procedure and the ability for it to meet the condition tests. The representation sets out the respondent's view that the Plan is unable to meet the condition tests (a), (d), (e), (f) and (g) as set out in Schedule 4B of the Town and Country Planning Act 1990 in relation to the process for making Neighbourhood Development Orders.</p> <p>The respondent considered that the Neighbourhood Plan failed to meet the objectively assessed needs for market and affordable housing as its housing requirement of at least 1,700 units is contrary to the minimum requirement of 2,100 units identified in the Northumberland Local Plan Core Strategy. In addition, the respondent also considered that the Neighbourhood Plan failed to identify sufficient employment land and, as a result, it does not accord with the strategic policies due to being advanced ahead of the Local Plan Core Strategy which the respondent considered to be a fundamentally flawed approach.</p> <p>Overall, the respondent considered that the Neighbourhood Plan failed to satisfy a number of the basic conditions tests. Many of the issues were considered to overlap between the various tests but link fundamentally to the</p>

		<p>Neighbourhood Plan not planning positively for the correct, evidenced quantum of development for Morpeth. With regard to employment land requirements it was not considered possible for the Neighbourhood Plan to plan for a quantum of development led by Strategic policy since that work is not complete and not published. In relation to housing requirement the respondent considered that the Neighbourhood Plan disregards the latest OAN and uses a quantum that does not accord with the strategic policy approach and is limiting the ability to boost housing supply. Further to this, the respondent considered it premature to attempt to do so in advance of the Core Strategy preparation. It was also considered that the Neighbourhood Plan does not recognise the strategic role and function of Morpeth within the County and it was contended strongly that the Plan failed to meet condition tests a), d), and e).</p>
Anonymous Respondent #1	N/A	<p>The respondent stated that the draft plan does not have a sound legal basis or an adopted Core Strategy upon which to derive any legitimacy for the purposes of determining planning applications.</p> <p>The respondent considered that the plan vision failed to recognise the potential for gardens to be subdivided and developed for market, affordable and self-build housing and similarly failed to recognise the opportunity for existing plots to be subdivided and in so doing meet the housing demand and diversify the choice. The respondent considered that there are number of sites/ gardens of existing houses outside of the settlement boundary that fall into this category; the plan therefore excludes sites that can be developed in a sustainable way. The basis for the "Housing Site Allocation – Outline Methodology and Potential Sites" was considered by the respondent to be incomplete and unsound and that the scenarios listed and used to assess the options for development fail to adequately consider the potential for windfall sites and subdivision of gardens.</p>
Lee Crawford	Persimmon Homes	<p>The respondent commended the significant time and effort that has clearly been invested by the Steering Group and the quality of plan which has been produced as a result. The respondent also welcomed the significant consultation that has been undertaken and looked forward to further partnership working with key stakeholders in the town.</p> <p>The respondent stated that the submission of the Neighbourhood Plan came as a surprise as it had been stated throughout the process to date that the Neighbourhood Plan would be twin tracked with the emerging Core Strategy. This approach had been supported by the respondent. In previous representations, the respondent highlighted that there were clearly some outstanding issues in terms of conformity with the emerging Core Strategy but state that they did not raise significant objections as we felt that the disparities on housing numbers could be resolved as the Neighbourhood Plan evolved along with the emerging Core Strategy. The decision to proceed to submit the plan based on lower housing numbers changes the context. The respondent highlights that they are aware that Neighbourhood Plans can be made ahead of a new Local Plan; however, they also considered that they must still meet</p>

		<p>the basic conditions.</p> <p>The respondent has landholdings at Peacock Gap, Morpeth, and they expressed disappointment that this site was no longer allocated for housing development in the Submission Draft, whereas it had appeared as an allocation in a previous consultation document.</p> <p>The respondent refers to the Northumberland Local Plan Core Strategy: Full Draft Plan consultation, undertaken in early 2015. The emerging Core Strategy seeks to meet Objectively Assessed Housing Needs in accordance with the NPPF; it also seeks to distribute 2,100 new dwellings to Morpeth as a Main Town. The respondent accepts that, while there may be outstanding issues with the emerging Core Strategy, it does provide the most up to date emerging plan and the direction of travel which the emerging Neighbourhood Plan must seek to be in general conformity with. The respondent highlighted key sections of the Neighbourhood Plan and came to the conclusion that the Neighbourhood Plan should contain a requirement for at least 2,100 homes. The respondent considered that the Neighbourhood Plan should be planning to accommodate at least 2,100 dwellings and this would show general conformity with the latest targets in the Core Strategy along with genuine efforts to meet objectively assessed needs.</p> <p>The Neighbourhood Plan recognises that progressing the Plan ahead of the emerging Core Strategy means that certain parts of the Neighbourhood Plan will be superseded by the Core Strategy in due course. The respondent requested that further detail is added to the Neighbourhood Plan to explicitly set out that this includes housing policies and targets. In order to progress ahead of the Core Strategy, the Neighbourhood Plan must explain that housing needs assessments may raise the figure and that additional sites will have to be identified and that this will have to occur through the Core Strategy process. The respondent had been keen for this process to happen through the Neighbourhood Plan so that local residents would have the greatest opportunity to shape the future of the area. The respondent states that they have a number of concerns in relation to the Neighbourhood Plan and it is their view that it fails the Basic Conditions in terms of having regard to national policy being in general conformity with the emerging development plan.</p>
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	<p>Mitford Estate is a major land owner with numerous interests within the Morpeth Neighbourhood Plan Area and strongly objects to the current proposals in the Neighbourhood Plan for the following reasons:</p> <ul style="list-style-type: none"> • The approach of the local planning authority and the Neighbourhood Planning Forum to the Morpeth Plan is completely wrong. The intention of legislation and policy was that the Morpeth Neighbourhood Plan should follow and take into account the strategic policies of the Core Strategy. It is completely wrong for both Northumberland County Council and the Morpeth Neighbourhood Forum to seek to adopt the

		<p>Neighbourhood Plan in the absence of defined and adopted policies in the Core Strategy which set out the development strategy for Morpeth and have a degree of certainty having been subject to consultation and scrutiny prior to adoption;</p> <ul style="list-style-type: none"> • The Neighbourhood Plan is wholly premature in that it cannot be said to be in general conformity with the Northumberland Core Strategy which is still evolving and is yet to be subject to examination; • No-one yet knows what the housing requirements for Northumberland will be. Morpeth has been identified by the local planning authority and the Secretary of State in appeal decisions to be one of the most sustainable settlements in Northumberland. It is therefore key that an appropriate amount of housing is located here in the emerging Core Strategy and the emerging Neighbourhood Plan; • The adoption of a sequential approach to the delivery of housing land is inappropriate when no assessment of whether there is adequate land has been carried out in the absence of the known identified housing requirement; • The Strategic Environmental Assessment (SEA) has simply not complied with the legal or policy requirements when considering and evaluating alternatives; • The Neighbourhood Plan has not properly, or at all, considered the concerns raised throughout this process by Mitford Estates; • There is no evidence that the Neighbourhood Plan Forum has properly, or at all, considered the objections and concerns of Mitford Estates. <p>The respondent states that they have made substantive representations at previous stages in the plan's preparation, raising issues regarding the lawfulness of the plan and its ability to meet the basic condition tests. The respondent also considers that the Neighbourhood Plan fails to meet the emerging objectively assessed need as identified in the Northumberland Core Strategy Full Draft Plan which sets out a minimum requirement of at least 2,100 net additional homes within the Neighbourhood Plan Area over the plan period to 2031. The Neighbourhood Plan sets out a housing requirement in Policy Hou1 for a reduced housing requirement of at least 1,700 units contrary to that in the emerging Core Strategy.</p> <p>It was contended by the respondent that the Neighbourhood Plan does not contribute to the achievement of sustainable development as outlined in the NPPF and that the Neighbourhood Plan is not in a position to accord with strategic priorities of the emerging Core Strategy given the evidence base and spatial distribution strategy has not yet been determined.</p> <p>The respondent considered that the Neighbourhood Plan cannot meet the tests of aligning with the strategic policy</p>
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		<p>and cannot demonstrate that they are responding to the economic dimension element of the Framework for sustainable development. The Neighbourhood Plan policies, including a tight constraining settlement boundary policy, seeks to restrict the delivery of economic opportunities such as those set out in the respondent's planning application for mixed use development on land to the west of Lancaster Park.</p> <p>The respondent considered that notwithstanding the specific policy issues, the overall thrust of the Neighbourhood Plan is not one that aligns with the positive approach to development focus for Morpeth which is intrinsic through the emerging Core Strategy and reflected in recent Secretary of State appeal decisions. The Neighbourhood Plan was considered to be predicated on a protectionist approach which does not reflect the strategic role that the town has in Northumberland and which is specifically referred to in the emerging Core Strategy. Morpeth's role is more than a main market town. It is identified as a key hub to which additional large scale development and growth will be focussed on, as set out in the emerging Core Strategy. The delivery of the Morpeth By-pass is identified as an intrinsic element of the improved connectivity of the County, referred to in the Economic Strategy, with it opening up development opportunities for employment in addition to housing. However, it is considered that the Neighbourhood Plan merely seeks to replicate the remaining elements of employment land allocations that have been allocations for a significant number of years and not been delivered with no significant new employment land opportunities identified.</p>
Jo-Anne Garrick	Northumberland County Council	<p>Interpretation of the Plan and the general day-to-day use of a final version of the Plan could be improved through a consistent use of terminology.</p> <p>Reference is made differently throughout policies and in supporting text to the Northumberland Local Plan which is still under preparation. A common approach should be taken to the name given to this document in the supporting text. However, because this is an emerging document and has not yet been tested through examination, where reference is made to the Local Plan in the Neighbourhood Plan policies it may be more appropriate to use the term 'development plan'.</p> <p>The County Council has been pleased to be able to support the Town Council and associated parish councils and their volunteers in the preparation of the Morpeth Neighbourhood Plan. The suggested revisions provided in response to the Submission Draft Plan are intended to provide greater clarity to the policies in the Plan.</p> <p>However, the County Council wishes to record its objection to those policies identified in this report which potentially adversely impact its assets. In particular, policies that seek to limit the future use of the County Hall and Fire Station sites in Morpeth are a matter of concern. The County Council would support modification to policies in the Plan</p>

		which should allow adequate flexibility for the future use of these sites for appropriate alternative uses.
Katherine Brooker	DTZ (on behalf of client, Northumberland Tyne and Wear NHS Foundation Trust)	<p>DTZ acts for the NTWFT in respect of land in its ownership and control at St George's Hospital. The subject land is located to the north of the operational hospital buildings and is allocated for residential development in both this draft Neighbourhood Plan as AM1 in draft policy Hou1, and in the draft Northumberland County Local Plan (NCLP). The Trust also owns and controls operational land at Northgate Hospital to the north of Morpeth, shown as Committed Development CM2 in draft policy Hou1.</p> <p>The NTWFT is broadly supportive of the Neighbourhood Plan as follows:</p> <p>NTWFT welcomes the acknowledgement in paragraph 7.2.3 that the projected 1,700 unit requirement should be considered a minimum figure to serve housing demand in the Morpeth area within the plan period. This could be said to be broadly in line with the NPPF, which states that the five year land supply figure should be a minimum. The acknowledgement of the importance of Northumberland County Council's emerging evidence base is also welcomed.</p> <p>Reference in paragraph 7.2.4 of the St George's Hospital allocation as the principal location for additional residential development is supported, as is reference to the role of brownfield sites in the area to come forward for development in the event of under-delivery on committed and allocated sites. There are various identified established residential sites and locations around Morpeth that could sustainably deliver against housing demand for Morpeth.</p> <p>However, the following aspects of the Neighbourhood Plan are considered flawed:</p> <ul style="list-style-type: none"> • The reduction in projected housing requirement for Morpeth, compared with that advanced in the NCLP; • The settlement boundary; • The timescales for delivery of a masterplan for St George's Hospital.
John Fleming	Gladman Developments Ltd	<p>The respondent considered that the Neighbourhood Plan, as proposed, contains a series of flaws not only in its application of local and national planning policy, but also lacks clear, robust and up-to-date evidence to justify the inclusion of a number of policies and objectives it seeks to adopt. It was recommended that there is a critical need to undertake a fundamental overhaul to the development strategy as proposed, failure to do so will likely result in the Neighbourhood Plan being found unable to meet basic conditions (a), (d), (e) and (f) if progressed to examination at this time.</p> <p>It was recommended that the examination of the neighbourhood plan be delayed until the emerging Core Strategy</p>

		<p>has been successfully tested at examination and has been subsequently adopted by the County Council. Progression of the Neighbourhood Plan at this time will pre-empt the strategic policies for the wider area rather than support them.</p> <p>The ability to progress the neighbourhood plan before an up-to-date Local Plan is in place was strongly questioned. The respondent stated that work on the Neighbourhood Plan was considered likely to be abortive, representing both a waste of Town Council and local planning authorities' time and resources.</p> <p>It was contended that the Neighbourhood Plan is fundamentally flawed and requires substantial amendment, redrafting and the removal of several policies before progressing any further.</p> <p>It was considered that the plan's vision, aims, objectives and suite of policies throughout are inconsistent with the requirements of the Framework, PPG and the Neighbourhood Plan Basic Conditions. The Neighbourhood Plan was considered inflexible, ineffective and will be unable to respond rapidly to changes in the market. The Plan comprises a number of policies which actively seek to restrict the ability of future sustainable growth being delivered without any regard to delivering housing to meet the full OAN for the wider area.</p>
James Reid	Barratt David Wilson Homes North East	<p>Comments were provided with the aim of supporting the Neighbourhood Plan through to adoption, helping to ensure that it is sound and consistent with national policy. The respondent's representations promoted two sites which they considered capable of facilitating sustainable development within the plan period.</p> <p>The NPPF requires the Neighbourhood Plan to support the strategic development needs set out in Local Plans, including policies for housing and employment development (para 16). The latest draft of the Local Plan (December 2014) identifies a minimum net additional requirement of 5,680 homes across the Central Delivery Area. The Plan endorses the Neighbourhood Plan area as a "critical opportunity to provide a step change in delivery and make a significant contribution to the required levels of housing". Table 6.2 which presents the distribution of new housing development, apportions a minimum of 2,100 dwellings to the Neighbourhood Plan area over the duration of the plan period. BDW therefore maintains its position that this should be the minimum requirement sought by the Neighbourhood Plan rather than the 1,700 currently proposed.</p>
Les Stephenson and Mark Gray	N/A	<p>The essence of the objection is that the Neighbourhood Plan is premature in light of the content of the draft Core Strategy, and until strategic objections to that document are resolved, in particular in relation to housing numbers within the Central Delivery Area, and the contribution the town of Morpeth makes to such any establishment of a settlement boundary that seeks to constrain development, without identifying opportunities for supply will be out of date when seeking to align with the requirement to create a five year housing land supply.</p>

		<p>The Neighbourhood Plan seeks to establish an embargo of development within and surrounding Morpeth, without realistic expectation of deliverability of certain sites both within the Neighbourhood Plan area and without acknowledging the poor and as yet untested delivery of sites adjoining Morpeth.</p> <p>Considering the requirements that need to be met for the Core Strategy to be sound, it was noted by the respondent that it is a lesser test when examining the Neighbourhood Plan. In this regard there is the question of whether the Neighbourhood Plan reasonably complies with the provisions and the emerging policy of the Core Strategy.</p> <p>The respondent objected to the decreased provision in the level of proposed housing development in Morpeth during the Plan period and noted that it sets out a position of a minimum of 1,700 houses, but in turn it seeks to maximise it by referencing only opportunities for 2,100 houses through specific sites, without any reference to how windfall opportunities would be considered in the event of a lack of a 5YHLS.</p> <p>The Neighbourhood Plan should not limit development through the imposition of a settlement boundary the settlement boundary in the absence of a 5YHLS will conflict with this aspiration. The respondent considered that the Neighbourhood Plan and its extent of proposed development is conflict with the overall strategy to grow the County economically.</p> <p>The Neighbourhood Plan has made no positive introductions to the need for executive housing and how such will be provided. There is a growing evidence base for the need for such housing, yet what is being planned for is family and affordable housing with significant opportunities being missed.</p> <p>Whilst the Neighbourhood Plan Group appears to have updated its evidence base to assess whether the Plan will be deliverable over its Plan Period there are now significant concerns that they appear to be ignoring that evidence in the primary component of the SHMA and the draft Viability Study. In essence these documents indicate that development should be directed to where the market wants to deliver. Morpeth is a primary attractive town for developers. Inherently attractive locations such as Morpeth will be more popular and more likely viable that places such as Lynemouth, Widdrington, Pegswood, Hadston, and indeed places such as Ashington and Amble. As such the proposed settlement boundary will be out of date as soon as it is proposed due to the lack of a 5YHLS and the demands placed on the town in the absence of delivery elsewhere including places such as Pegswood (within the Plan boundary- the site allocated for development in Pegswood is unviable and undeliverable).</p>
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		<p>The Neighbourhood Plan needs to consider the OAN and the needs of the County HMA as a whole. Failure to deliver in one town has a knock on effect on the provision in the wider locality and indeed the County. The draft NP should recognise this and not be a slave to prescription in relation to delivery on a town by town basis. Rather it should welcome opportunities from significantly more outlets in locations with market attractiveness. It is necessary for the NP to have sufficient flexibility to respond to shortfalls in delivery in areas within the County and surrounding authorities if and when required. Such can be derived through increasing provision in viable locations.</p>
Mr & Mrs B George	N/A	<p>Limiting future development only to within Morpeth and a very small number of settlements in the neighbourhood as proposed will put severe pressure on the Historic Town. It will become more congested with more people and more traffic. Equally, strictly ring fencing it will lead to considerable pressure being put on the precious countryside. The considerable need for more houses will continue, and the pressures will grow. This is recognised in the NPPF.</p> <p>1) Policies limiting housing development do not carry weight If less land is available in which to consider development, the more difficult it will be to achieve growing housing targets.</p> <p>2) The NPPF says Green Belts should not be extended unless there are special reasons. The existing Green Belt has worked for 30 years, and extending it would only lead to longer journeys on the road for those settling outside, and many will want to.</p> <p>Tranwell Woods has been referred to in writing by the Council as a settlement, contributing much to Morpeth's wellbeing, and yet there is no mention of it in the draft Neighbourhood Plan. It had its own H7 development policy in the previous Local Plan, and it will continue to be an important contributor to Morpeth's wellbeing. Since it is in the parish of Mitford, it could be included in the suggested Mitford boundary if dispensing with the limited few development areas is not taken on board.</p> <p>It is recommended that development proposals in all neighbourhood areas are considered where housing development is reasonable and appropriate. It would seem that the proposed Neighbourhood Plan does not conform with the Government's National Planning Policy Framework for reasons 1) and 2) above.</p>
Sasha White QC	Landmark Chambers (on behalf of client Sandra	<p>A legal opinion was submitted in relation to the weight to be attached to the emerging Morpeth Neighbourhood Plan, in in the context of a planning application by Mitford Estate on land west of Lancaster Park, Morpeth. The opinion relates to:</p> <p>(1) Whether the draft Neighbourhood Plan complies with the basic conditions set out in Schedule 4B of the Town and</p>

	<p>Manson, Signet Planning)</p>	<p>Country Planning Act 1990;</p> <p>(2) Whether the environmental report submitted with the Neighbourhood Plan complies with the Environmental Assessment of Plans and Programmes Regulations 2004;</p> <p>(3) The level of weight that can be attributed to the Neighbourhood Plan in decision-making and in particular the determination of the Lancaster Park application by the County Council;</p> <p>(4) The impact of the Council’s failure to achieve a 5 year housing land supply on the determination of planning applications in Northumberland.</p> <p>In summary, it was concluded:</p> <p>(1) The Neighbourhood Plan does not comply with the basic conditions because it effectively sets a cap on development, meaning that it fails to meet the housing needs of the Neighbourhood Plan Area; does not plan positively to support local development; and restricts sustainable development. This is contrary to the key principles of the National Planning Policy Framework (“NPPF”);</p> <p>(2) The environmental report submitted with the Neighbourhood Plan fails to comply with the SEA Regulations, as it fails to assess reasonable alternatives to the housing strategy set out in the plan. This is because It (i) fails to consider an option of delivering a greater quantum of housing across the Neighbourhood Plan Area and (ii) failed to re-assess the plan’s housing distribution strategy in light of increased housing requirements for the Neighbourhood Plan Area set out in the Council’s emerging Local Plan (December 2014 version).</p> <p>(3) The Neighbourhood Plan can only be afforded very limited weight in decision-making at this stage. This is because (i) it has not been subject to independent examination (ii) it is subject to profound objection, including, as set out above, that it fails to comply with the basic conditions or EU law and (iii) it is inconsistent with the key principles of the NPPF.</p> <p>(4) The Council’s lack of a 5YHLS means that the housing supply policies in the Neighbourhood Plan are deemed to be out of date. Accordingly, regardless of the factors set out in sub-paragraphs (1) - (3) above, these policies should be given very limited weight in decision-making by the Council.</p> <p>Policies Hou1 and Hou2 of the Neighbourhood Plan seek to deliver new housing in Morpeth. Policy Hou1 provides that <i>“at least 1700 dwellings shall be developed in the Neighbourhood Plan Area in the Plan period”</i>. So far as Morpeth is concerned, these are to be provided from <i>“existing commitments”</i> and the St. George’s Hospital Site. Policy Hou2 provides that <i>“the St George’s Hospital Site, Morpeth shall be developed as a sustainable urban extension for around 1000 homes.”</i></p> <p>Policy Set1 is the counterpart to Policies Hou1 and Hou2. It defines settlement boundaries for Morpeth (shown on the</p>
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		<p>Proposals Map), and states that <i>“planning permission will be granted for Development within settlement boundaries subject to conformity with other relevant policies in the Local Plan, including the Neighbourhood Plan”</i>. Areas outside the settlement boundaries will be treated as open countryside, and development will only be permitted when it is justified by exceptional circumstances.</p> <p>For the purposes of complying with the basic conditions, the Neighbourhood Plan must demonstrate that it is in general conformity with the strategic policies in the Development Plan. The Development Plan for Northumberland comprises the saved policies in the Local Plans of the six former local planning authorities that made up Northumberland prior to 2009. For the Neighbourhood Plan Area these are the saved policies in the Castle Morpeth District Plan (2003). Clearly, the housing supply policies in this plan are out-of-date, as is recognised by MTC in its Basic Conditions Statement. Therefore, there is no up-to-date strategic housing policy for the NPA.</p> <p>Two matters were highlighted by the respondent:</p> <p>Firstly, the “housing need” for which the Neighbourhood Plan must “meet” over the plan period is not the 1700 dwellings set out in the Neighbourhood Plan (based on out-of-date figures from the Core Strategy consultation document in October 2013) but is instead at least the figure of 2100 dwellings in the emerging Local Plan. That is because the latter figure is the most up-to-date assessment of housing need in the Neighbourhood Plan Area. Further, although it is clear that a Neighbourhood Plan does not need to be in general conformity with the strategic policies in an emerging Local Plan, the Planning Practice Guidance, at paragraph 009 makes clear <i>“the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.”</i> This includes an up-to-date assessment of housing need in an emerging Local Plan.</p> <p>Secondly, a neighbourhood plan which sets a “cap” on development will not satisfy the basic condition requirement to have regard to the NPPF, in particularly the requirement for flexibility and to plan positively for growth. Further, the Planning Practice Guidance states that a neighbourhood plan must not constrain the delivery of important national policy objectives.</p>
Vision and Objectives		
Robert Barnes	PlanningProspects (on behalf of client Dransfield Properties Ltd)	The reference to “a vibrant town centre” in “The Neighbourhood Plan Vision” was welcomed. It was considered that the words “town centre” should be added before “retail sector” at Plan Objective 2 to emphasise that it is the town centre where retail strength should be encouraged.
Mr Andrew	Ward Hadaway	Paragraph 2.2.1: Respondent supported the comment that the current Development Plan does not provide a wholly

Moss	(on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	<p>appropriate strategic context. Reasons include that the current Development Plan, insofar as it exists, does not include a policy setting the objectively assessed need for market and affordable housing in the housing market area.</p> <p>Support expressed for paragraph 2.3.2 bullet point three and its reference to the development of Pegswood as a more sustainable settlement with a vibrant village centre, more housing choice, a better range of services and facilities and increased local employment.</p> <p>Support expressed to the reference to a strong green buffer between Pegswood and Morpeth. As detailed in previous submissions to the emerging Neighbourhood Plan, Welbeck Estates own land to the west and south of Pegswood (SHLAA sites 6796 and 6797). These sites were considered by the respondent to be available in whole or part as alternative or additional sites. They were also considered well related to Pegswood and their development would offer the opportunity to positively contribute towards to the achievement of a strong green buffer between Pegswood and Morpeth including through high levels of tree planting for example.</p> <p>Support expressed for the strategy of developing Pegswood as a more sustainable community, followed through with increased housing allocations to Pegswood in this and future Plan periods. Additionally it was considered by the respondent that this needs to be followed through into Green Belt boundaries such that they can endure.</p>
Anonymous Respondent #2	N/A	<p>The vision fails to recognise the need for both affordable housing and diversification of housing offer by providing plots for self-build housing. It similarly fails to recognise the latent need for both of these housing types and the potential for them to diversify the economic base of the town of Morpeth. In this failing the plan erroneously seeks to limit the settlement boundary and excludes sites that can be developed in a sustainable way for affordable and self-build housing.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	<p>At paragraph 2.2.3 the Plan recognises that by being prepared in advance of the Core Strategy it will <i>‘in some aspects’, be ‘superseded by the Core Strategy in due course’.</i></p> <p>The Plan needs to be sufficiently flexible to react positively and rapidly to change, to provide a plan led approach to meet the objectively assessed needs of the Plan area following the approach of the presumption in favour of sustainable development. To meet these criteria the plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base.</p> <p>The Vision for the area as set out in paragraph 2.3.2 is supported. Also supported is the recognition given to the increased connectivity of Pegswood through the construction of the Morpeth Northern Bypass (the Bypass) (2.3.3),</p>

		<p>and the positive strategy of the Parish Council to seek more housing choice, a better range of local services, more local employment and a more vibrant village centre.</p> <p>Support is given to Plan Objective 4 – Developing Pegswood (PO4) as a more sustainable settlement. The strategy set out at 3.3.3 to develop Pegswood as a more sustainable community and to provide residential development proportionate to the needs of the community and improvements to the village centre is supported.</p> <p>The Plan has been submitted for Independent Examination on 17 June 2015, some six months after the Core Strategy revised housing figures were published, but does not make provision for this revised figure. It does not therefore uphold the general principle of the strategic policy to focus significant growth in the Morpeth Neighbourhood Plan Area. There is some conflict between the Plan and the emerging Core Strategy. The approach put forward by the Plan (section 7) to validate the reduced housing provision is unjustified; this is addressed under section 5 of this submission.</p> <p>The Plan should be amended to be in general conformity with the emerging Core Strategy and supporting evidence base and should make provision for <i>‘at least 2,100 new dwellings’</i>. Alternatively to increase the flexibility of the Plan, the wording could be amended to <i>‘at least meet the housing provision for the Neighbourhood Plan Area, detailed in the adopted Core Strategy’</i>.</p> <p>In only providing for <i>‘at least 1,700 new dwellings’</i> it is submitted that the Plan does not meet the basic conditions (a), (d) and (e).</p> <p>The Plan should be amended to be in general conformity with the emerging Core Strategy and supporting evidence base and should make provision for <i>‘at least 2,100 new dwellings’</i>. Alternatively to increase the flexibility of the Plan, the wording could be amended to <i>‘at least meet the housing provision for the Neighbourhood Plan Area, detailed in the adopted Core Strategy’</i>.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	<p>At paragraph 2.2.3 the Plan recognises that by being prepared in advance of the Core Strategy it will <i>‘in some aspects’</i>, be <i>‘superseded by the Core Strategy in due course’</i>.</p> <p>The Plan needs to be sufficiently flexible to react positively and rapidly to change, to provide a plan led approach to meet the objectively assessed needs of the Plan area following the approach of the presumption in favour of sustainable development. To meet these criteria the plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base.</p>

		<p>Support was given to the recognition that Morpeth has multiple roles (3.1.2) as an employment hub for South East Northumberland and a market town and rural service centre; as well as being a commuter centre serving Tyneside and beyond.</p> <p>Support was also given to the Plan’s strategy set out in 3.3.2 specifically with regard to housing, to ensure new residential areas are developed to meet objectively assessed needs as identified in the emerging Northumberland Local Plan, with a mix of house types and tenures and in a manner that contributes to the attractive character of the town and provides for the expanded community.</p> <p>The Plan does not make provision for the 2100 dwellings identified in the emerging Core Strategy and instead plans for “at least 1,700 new dwellings”. It therefore fails to uphold the general principle of the strategic policy to focus significant growth in the Morpeth Neighbourhood Plan Area. There is therefore some conflict between the Plan and the emerging Core Strategy. In only providing at least 1,700 new dwellings, it is submitted that the Plan does not meet the basic conditions (a), (d) and (e).</p> <p>If the policies and proposals of the plan are to be implemented the Plan needs to be deliverable and must also meet the needs of the wider area. It is inappropriate to plan for residential development simply to meet minimum population projections.</p> <p>The Plan should be amended to be in general conformity with the emerging Core Strategy and supporting evidence base and should make provision for at least 2,100 new dwellings. Alternatively to increase the flexibility of the Plan it should be amended to “<i>at least meet the housing provision for the Neighbourhood Plan Area detailed in the adopted Core Strategy.</i>”</p>
Sustainable Development Principles		
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	Paragraph 4.3.6: Support was expressed for the statement that ‘ <i>Pegswood is the largest village in the Plan area ...</i> ’ Welbeck Estates considered the allocation to Pegswood should be increased in this Plan period acknowledging its inherent sustainability and the opportunity to further support it. Welbeck Estates additionally considered that Pegswood can continue to contribute towards development needs in future Plan periods. This should be taken into account in establishing Green Belt boundaries such that Pegswood can continue to contribute towards development needs in future Plan periods.
Alastair Willis	Signet Planning	The respondent contended that the Neighbourhood Plan does not contribute to the achievement of sustainable

	(on behalf of client, Till Services Ltd)	development as outlined in the NPPF. Paragraph 7 of the NPPF outlines the three dimensions to sustainable development being economic, social and environmental. The respondent considered that the Neighbourhood Plan should demonstrate that, in relation to the economic growth role, it ensures sufficient land of the right type is available in the right places and at the right time to support growth and innovation including the provision of infrastructure.
Policy Sus1: Sustainable Development Principles		
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P Mitford)	An objection was submitted in relation to criterion 2 as it was considered that there are many forms of development that can be accommodated outside settlement boundaries. Respondent considers it is not sound to limit development outside settlement boundaries ' <i>other than in exceptional circumstances</i> '.
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P Hobson)	An objection was submitted in relation to Policy Sus1 criterion 2. The respondent considers that Tranwell is a settlement but is not shown as having a settlement boundary. Planning permissions have and continue to be granted for dwellings in Tranwell. Respondent considers that this is a principle that should continue. A further objection was lodged that there are many forms of development that can be accommodated outside settlement boundaries and that it is not sound to limit development outside settlement boundaries ' <i>other than in exceptional circumstances</i> '. It was also considered that limiting development as proposed is more onerous than Green Belt policy, the erection of new buildings in the Green Belt not being inappropriate for a number of types of development including ' <i>limited infilling in villages</i> ' (NPPF para 89). For the reason set out above an objection was lodged that infill development should in principle be permitted in Tranwell.
Alan Hunter	Historic England	Policy Sus1- Historic England welcomed the requirement for development to respect and maintain the character of Morpeth and the villages, including their settings. Nowhere in this policy, however, is there any overt need for development to safeguard and/or constructively utilise the historic environment and its component heritage assets. The National Planning Policy Framework (NPPF) (paragraph 7) makes clear that in order for development to be sustainable it must seek to conserve the built and historic environment, the corollary being that development which gives rise to unjustified harm to any heritage assets would not be. Heritage protection should be an integral part of this policy dealing with sustainability principles.
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – 'Welbeck	It was suggested that criterion A or the reasoned justification to the policy be amplified to state that meeting the objectively assessed housing need is a minimum, not a maximum. The justification given was the absence of a Development Plan policy setting the objectively assessed need for market and affordable housing in the housing market area. An objection was submitted in relation to Policy Sus1 criterion 2. The respondent considered that there are many forms of development that can be accommodated outside settlement boundaries and that it is not sound to limit

	Estates')	development outside settlement boundaries ' <i>other than in exceptional circumstances</i> '.
Alastair Willis	Signet Planning (on behalf of client, Till Services Ltd)	The respondent considered that, as criterion 4 seeks a prioritisation of reuse of previously development land, this is in conflict with the NPPF which sets out that the effective use of land should be encouraged by re-using land that has been previously developed. The respondent considered that since the NPPF does not set out a sequential approach, the Neighbourhood Plan is therefore in conflict with the NPPF, paragraph 17.
Anonymous Respondent #2	N/A	The respondent supported the principle of sustainable development but objected to the criteria based approach and to the listed criteria.
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	Criterion 4 seeks a prioritisation of reuse of previously developed land. This was considered to be in conflict with the NPPF which sets out the Core Planning Principles that should underpin plan making. This includes the encouragement of the effective use of land by reusing land that has been previously developed. It does not set out a sequential approach as incorporated in Policy Sus1.
Jo-Anne Garrick	Northumberland County Council	Suggested amendment to text as follows: <i>"Can be accommodated within settlement boundaries defined in the Neighbourhood Plan other than in exceptional those circumstances defined in Policy Set1;"</i>
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	The respondent generally supported Policy Sus1 in that it makes provision for new development at a scale and in locations that support the continued sustainability and viability of the communities in the Plan area, and in the exercise of the presumption in favour of sustainable development in accord with the NPPF. The prioritisation of previously developed land at criterion (4) is acknowledged. Previously developed land should be re-used, but that should not prevent the proper identification of an adequate supply of land in sustainable locations with regard to the requirement to maintain a five year supply of deliverable housing sites. The re-use of previously developed land should be set in context and it is suggested that an amendment is made to criterion (4) to include the phrase ' <i>whilst ensuring a five year supply of deliverable housing sites</i> '.
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	The respondent generally supported Policy Sus1 in that it makes provision for new development at a scale and in locations that support the continued sustainability and viability of the communities in the Plan area, and in the exercise of the presumption in favour of sustainable development in accord with the NPPF. The prioritisation of previously developed land at criterion (4) is acknowledged. Previously developed land should be re-used, but that should not prevent the proper identification of an adequate supply of land in sustainable locations with regard to the requirement to maintain a five year supply of deliverable housing sites. The re-use of previously developed land should be set in context and it is suggested that an amendment is made to criterion (4) to include the phrase ' <i>whilst ensuring a five year supply of deliverable housing sites</i> '.

John Fleming	Gladman Developments Ltd	<p>The policy exercises a presumption in favour of sustainable development where they conform to a number of criteria attached to the policy.</p> <p>It was contended that the policy in its entirety is inconsistent with the positive approach required by the Framework. This policy goes over and above the requirements of the Framework and does not have any regard to the need to significantly boost the supply of housing or the presumption in favour of sustainable development. The policy sets out a restrictive approach to growth through its application of a restrictive settlement boundary to contain the physical growth of the settlement with no regard to the Framework. The policy prioritises the reuse of brownfield land and is inconsistent with the requirements of the Framework which encourages but does not prioritise the use of brownfield land. The policy was considered by the respondent to fail to meet basic conditions (a), (d), (e) and (f); its deletion was suggested.</p>
Les Stephenson and Mark Gray	N/A	<p>This policy recognises what sustainable development in part and yet is has little or no social and economic dimension to its content, preferring to concentrate on matters pertaining to the physical environment with little additional content on how such might be delivered and address such matters as the varying types of houses that are required, how the future occupants of such might contribute to the social well-being of Morpeth and indeed the County, as well as promote economic sustainability.</p> <p>It also fails to recognise that development beyond a settlement boundary in sustainable locations, in the absence of a 5YHLS is sustainable.</p>
Policy Des1: Design Principles		
Rachael Bust	Coal Authority	<p>The Coal Authority suggested alterations to Policy Des1 as follows (amended text shown underlined):</p> <p><i><u>1. Avoiding locations that would put the environment or human health or <u>public safety</u> at unacceptable risk <u>including from contamination and land instability and where necessary incorporate appropriate mitigation, treatment or remediation measures necessary to allow development to proceed without posing adverse impacts on the environment, human health or public safety.</u></u></i></p> <p>An additional criterion (P) was also suggested:</p> <p><i><u>P. Ensuring that development does not unnecessarily sterilise mineral resources and where appropriate ensure that consideration is given to the prior extraction of mineral resources.</u></i></p> <p>To complement the suggested amendments to Policy Des1, the following additional supporting text was also suggested:</p> <p><i><u>4.2.6 Incorporating sustainable designs into new development can contribute to reducing energy and improving water management. Sustainable drainage systems can help to manage the flow of rainwater and reduce flood risk. Much of</u></i></p>

		<u>the plan area is located within the 'Development High Risk Area' identified by The Coal Authority. In these areas planning applications except householder proposals, will need to be accompanied by a Coal Mining Risk Assessment to address the risks from land instability associated with mining. The Assessment will also need to identify what mitigation, treatment or remediation measures are necessary to allow development to proceed. In addition any development proposal that will lead to the sterilisation of mineral resources will need to consider the potential for the prior extraction of the mineral resource ahead of the development as required by the Northumberland Local Plan. These requirements will also apply to the sites allocated in this Neighbourhood Plan.</u>
Alan Hunter	Historic England	Policy Des1- Historic England welcomed principle C which seeks to conserve heritage assets and the historic environment generally. In order to better reflect the language and terminology of the NPPF, reference should be made to avoiding the unjustified harm or loss of the <i>significance</i> of the area's heritage assets.
Anonymous Respondent #1	N/A	The respondent objected to the policy and considered it to be poorly drafted, ambiguous, all embracing, anti-development, unnecessarily repetitive of NPPF and NPPG, and as a criteria based policy it was considered unclear as to the extent to which all or only some of the criteria need to be satisfied. The respondent considered it is therefore unsound.
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered it poorly drafted, ambiguous, all embracing, anti-development, unnecessarily repetitive of NPPF and NPPG, and as a criteria based policy, is unclear as to the extent to which all or only some of the criteria need to be satisfied and was considered unsound.
Jo-Anne Garrick	Northumberland County Council	Change could be made to the introductory paragraph to clarify how the policy should operate in relation to future policy documents which would form part of the statutory development plan. In addition, the policy may be seen as overly restrictive in relation to the presumption in favour of sustainable development which would encourage development other than in locations allocated or designated in the Plan. <i>Proposed revisions:</i> <i>Development will be permitted where it accords with <u>the policies, site allocations and designations in the Neighbourhood Plan and the <u>development plan</u></u> Northumberland Local Plan.</i> <i>....</i> <i>C Ensuring development of and in proximity to designated and local heritage assets and their settings conserves, preserves, reflects and enhances the historic asset and the historic environment <u>in accordance with their significance.</u></i>
Stephanie Linnell	George F White (on behalf of	Policy Des1 – Design Principles indicates in the first sentence that ' <i>Development will be permitted where it accords with site allocations and designations in the Neighbourhood Plan and Northumberland Local Plan</i> '. This proposed

	clients Messrs Laidler)	wording is too constrained and inflexible. The Plan needs to make provision for windfall development, conversions, changes of use, all of which should also make a positive contribution to the Plan area and to which the stated criteria of the policy, where applicable, should be applied. The policy as worded requires amendment. The first sentence should be deleted to ensure the design principles apply to all development.
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	Policy Des1 – Design Principles indicates in the first sentence that <i>‘Development will be permitted where it accords with site allocations and designations in the Neighbourhood Plan and Northumberland Local Plan’</i> . This proposed wording is too constrained and inflexible. The Plan needs to make provision for windfall development, conversions, changes of use, all of which should also make a positive contribution to the Plan area and to which the stated criteria of the policy, where applicable, should be applied. The policy as worded requires amendment. The first sentence should be deleted to ensure the design principles apply to all development.
John Fleming	Gladman Developments Ltd	Whilst recognising the importance of good quality design principles, any design policies proposed in the Plan should be made in strict accordance with the Framework. Placing undue policy burdens may affect the viability and deliverability of future sustainable growth opportunities. The criteria attached to this policy go over and above the requirements set out by the Framework. Policy Des1 is too prescriptive in detail and may have a direct impact on the ability of future sustainable growth opportunities being delivered viably. The policies contained within the Neighbourhood Plan should be properly tested for their effects on development viability and supported by an adequate and robust evidence base. It does not appear that the Town Council has undertaken any up-to-date viability assessment of the Plan’s cumulative obligations. It is of crucial importance that the Neighbourhood Plan be tested for its effects on development viability to ensure that each of the policies contained in the Plan do not place undue policy burdens that may affect the ability of future sustainable growth opportunities being delivered viably.
Policy Set1: Settlement Boundaries		
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P Mitford)	Respondent considers that it is not sound that SHLAA site 3234 (Hepscott Station, land at) is shown as being outside settlement boundaries. Physically the site is within Hepscott. The settlement boundary would be logically drawn along the railway line which runs on the northern side of the site. Respondent also considers that a further reason the policy is not sound is that it limits development outside settlement boundaries <i>‘other than in exceptional circumstances’</i> . Respondent considers that, as drafted, even a small application to extend a house outside settlement boundaries would conflict with the policy.
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P	An objection was lodged that Tranwell should have a settlement boundary and that in the alternative the policy needs to be reworded to allow for infill development in Tranwell. A further objection was lodged that it is not sound to limit development outside settlement boundaries <i>‘other than in exceptional circumstances’</i> . As drafted, even a small

	Hobson)	application to extend a house outside settlement boundaries would conflict with the policy.
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	Following on from their objection to policy Sus1 criterion 2, the respondent considered that it is not sound to limit development outside settlement boundaries ' <i>other than in exceptional circumstances</i> ' and that, as drafted, even a small application to extend a house outside settlement boundaries would conflict with the policy. Additionally it was considered likely that a Green Belt will be established during the Plan period. The policy as drafted was considered more onerous than NPPF para 89 which amongst other things states that limited infilling in villages is not inappropriate development in the Green Belt.
David Marjoram	England and Lyle (on behalf of clients, Taylor Wimpey)	The respondent objected to the settlement boundary for Morpeth and sought amendments which would remove land to the north of St. George’s Hospital and the inclusion within the settlement boundary of land north of Barmoor Farm and south of High Stobhill Farm, which is within the respondents’ ownership. The respondent considered that this would help protect an environmentally sensitive area from unnecessary development. The respondent also considered that the land to the north of St. George’s Hospital should be removed from the settlement boundary plays an important role in protecting the rural setting of Morpeth, due to its protection through the Castle Morpeth Local Plan as an Area of High Landscape Value.
Anonymous Respondent #1	N/A	The respondent objected to the policy and considered that the settlement boundary does not include areas and plots of land for which there is reasoned justification for residential development. Concern was raised as it was considered that the policy includes criteria that are poorly defined, ambiguous, overlapping and irrelevant. Some criteria are unnecessary by virtue of the exceptions already provided by the NPPF.
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that the settlement boundary does not include areas and plots of land for which there is reasoned justification for residential development. Concern was raised as it was considered that the policy includes criteria that are poorly defined, ambiguous, overlapping and irrelevant. Some criteria are unnecessary by virtue of the exceptions already provided by the NPPF.
Jo-Anne Garrick	Northumberland County Council	The County Council supports the creation of settlement boundaries in this Neighbourhood Plan. It is a helpful and relevant approach to providing direction to growth particularly where a minimum amount of growth is defined in policy elsewhere in the Plan, for example in Policy Hou1, and where the Plan demonstrates flexibility alongside direction for growth in relation housing numbers to be delivered through the Plan. Evidence presented in Table 1 (housing supply at March 2015) which sets out the scale of current commitments, and the scale of housing development proposed at the St George’s Hospital site through Policy Hou2 alongside the additional housing sites allocated at Pegswood helps in justifying the creation of appropriate settlement boundaries which should assist

		<p>decision making on development proposals.</p> <p>Change could be made to the introductory paragraph to clarify how the policy should operate in relation to future policy documents which would form part of the statutory development plan. The policy could be more positive towards development in rural areas supported through NPPF, particularly leisure uses, and it could be drafted to better align with paragraph 28 of NPPF. In order to provide clarity in decision making it could also express support for appropriate extensions to existing buildings including dwellings.</p> <p><i>Proposed revisions:</i></p> <p><i>Settlement boundaries are defined on the Proposals Map. Planning permission will be granted for development within settlement boundaries subject to conformity with other relevant policies in the Local Plan <u>including the Neighbourhood Plan and elsewhere in the development plan.</u></i></p> <p><i>Areas outside the settlement boundaries will be treated as open countryside where development will only be permitted <u>where it serves or supports the following purposes or activities</u> when it is justified by the following exceptional circumstances: -</i></p> <ul style="list-style-type: none"> <i>A. <u>farming and other land based rural businesses, or the sustainable diversification of these activities; or,</u></i> <i>B. <u>existing business that requires a rural setting because of the characteristics of its particular enterprise; or,</u></i> <i>C. <u>a sustainable visitor attraction that is related to the experience or interpretation of the countryside; or,</u></i> <i>D. to provide for <u>the development of local services and community facilities to support a rural community; or,</u></i> <i>E. for <u>housing that meets the criteria of section in paragraph 55 of the NPPF; or</u></i> <i>F. <u>sustainable leisure developments that benefit businesses in rural areas where this respects the character of the countryside including the expansion of facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; or,</u></i> <i>G. <u>appropriately designed extensions to existing buildings, including extensions to dwellings, which are subservient to and respect the scale and appearance of the existing building.</u></i>
Katherine Brooker	DTZ (on behalf of	This policy was considered by the respondent to be contrary to the NPPF as it is direct contradiction to policy strategy and Set1's own content. The settlement boundary is conservatively drawn taking account of some development

	client, Northumberland Tyne and Wear NHS Foundation Trust)	<p>allocations but not others. The policy precludes development outside of the settlement boundary except under certain circumstances set out in the policy. The circumstances set out would preclude the developing out of the allocated land to the north of the Morpeth Northern By-pass.</p> <p>It was also considered by the respondent that, taking account of the allocated land and the 225 houses currently under construction at Northgate Hospital, the further planning permission for residential development directly to the north of the by-pass and the employment land allocations at the A1, the settlement boundary should be robustly and justifiably drawn to the north of Northgate Hospital.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	<p>The proposals map, Section 4.3 of the Plan and Policy Set1 set out a settlement boundary for Morpeth. Paragraph 4.3.2 indicates that the settlement boundary is intended to positively direct and shape the spatial distribution of development within the plan period.</p> <p>The Plan in line with the emerging Core Strategy identifies that the most sustainable location to accommodate future growth in Morpeth is to the north of the town. Support was given to the principle of focusing the majority of new development to the north of Morpeth. However, as proposed, the Morpeth settlement boundary is too constrained; it does not allow for a range of sites to come forward to meet the proposed growth rates for the town, concentrating growth on one site, in a single land ownership at the former St. George's Hospital. There are other sites in the north of Morpeth which could also contribute to meeting the objectively assessed need of the town during the plan period and further consideration of these sites is required either as standalone sites or as part of a holistic masterplan for the north of Morpeth. Additional land should be included within the settlement boundary to give greater flexibility to the Plan, to increase certainty that the Plan will be sufficiently flexible to meet the objectively assessed need and to provide for a range and choice of housing sites, rather than constraining development by a tightly drawn settlement boundary raising conflict with the Core Strategy. It was considered that the Bypass is the most easily recognisable and permanent feature to the north of Morpeth and that this should be used to define the settlement boundary, rather than the proposed line based on land ownership.</p>
John Fleming	Gladman Developments Ltd	<p>The use of restrictive settlement boundaries as a mechanism to restrict the ability of future sustainable growth opportunities being delivered does not accord with the positive approach required by the Framework. The use of a settlement boundary to contain the physical growth of Morpeth will result in a plan that fails to deliver sustainable development and the full OAN for the wider area. The use of Policy Set1 is ineffective, inflexible and will be unable to respond rapidly to changes in the market, for example where the Council is unable to demonstrate a 5 year housing land supply (as is currently the case).</p> <p>It was recommended that it is appropriate to delete Policy Set1 in its current form as it is inconsistent with basic conditions (a), (d) and (e) and replace it with the following wording:</p>

		<i>“Development adjacent to the existing settlement will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</i>
Les Stephenson and Mark Gray	N/A	Policy Set1 has little regard to the need to comply with the provisions of para 49 of the NPPF. It does not provide a plan B approach in the eventuality of the lack of a 5YHLS. It is thus not in general conformity with the NPPF. The criteria for only permitting development outside settlement boundaries does not acknowledge this fundamental planning principle.
Policy Set2: Development in Hebron, Hepscott, Mitford and Pegswood		
Jo-Anne Garrick	Northumberland County Council	The final paragraph refers to the need to protect and retain mature trees within or adjacent to the development site. Whilst the desire to protect important trees is supported, the correct mechanism would be through the use of tree preservation orders. The County Council would question whether the protection of trees can reasonably be achieved through the use of planning policy when other powers exist to achieve that aim.
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	<p>The proposals map, Section 4.3 of the Plan, and Policy Set2 set out a settlement boundary for Pegswood. Paragraph 4.3.2 indicates that the settlement boundary is intended to positively direct and shape the spatial distribution of development within the plan period 2011-31. The proposed settlement boundary for Pegswood is drawn tightly and as a result has insufficient flexibility to provide for a range of sites to meet the growth aspirations of the Plan area.</p> <p>In order to deliver the housing requirement for the Plan area, sites with capacity to deliver must be in places that are attractive to the market, financially viable and in a range of locations which provide for a mix of housing and a range of tenures at a scale that the housing market can deliver. There remains strong demand in the settlement of Pegswood for new housing. With amendments the Plan could meet its objectives to accommodate growth and provide for a choice in sustainable sites to deliver this. Development in Pegswood would strengthen and enhance the existing local services on offer maintaining a viable community and supporting services in nearby Morpeth. The Plan identifies that the most sustainable location to accommodate future growth in Pegswood is to the north of the settlement; this assessment is supported.</p> <p>Additional land should be included within the settlement boundary to give greater flexibility to the Plan, to increase certainty that the Plan will be sufficiently flexible to meet OAN and to deliver a range and choice of housing sites, rather than constraining development by a tightly drawn settlement boundary.</p> <p>The inclusion of sites 3018 and 6847 to the west of Pegswood School provides the opportunity to address infrastructure issues, improve footpath connectivity and green networks and develop a strong northern edge to the village. The proposed sites are of a low landscape sensitivity and offer the opportunity to strengthen the northern settlement edge whilst retaining a degree of separation between Pegswood and Longhirst. The development of the</p>

		<p>sites would not create a risk of urban sprawl into the countryside, or an increased risk of coalescence with the village of Longhirst. Indeed the assessment comments indicate that the site is not visually intrusive and is relatively close to the village centre.</p> <p>The proposed amendment to the settlement boundary Policy Set2 and the Proposals Map and inclusion of sites 3018 and 6847 for residential development in Policy Hou1 offers the opportunity for sustainable development, improvements to the footpath network and wildlife environment, as well as meeting the OAN for Pegswood and the Plan area in line with the Plans strategy and broad vision.</p>
John Fleming	Gladman Developments Ltd	The deletion of this policy was recommended by the respondent. It was considered to be restrictive in nature and does not accord with the requirements of national planning policy and guidance. Responses made by the respondent under Policies Sus1 and Set1 were also considered to apply to Policy Sus2.
Rural Setting, Sense of Place and Local Identity (Environment and Heritage)		
Alan Hunter	Historic England	Paragraph 5.1.1- it was observed here that the area possesses a wide range of heritage assets. Historic England noted that these heritage assets also vary significantly in status and condition.
Denise Byrom	Morpeth North Residents Action Group	<p>The representation set out the view that:</p> <ul style="list-style-type: none"> ○ The special character and heritage of Morpeth should not be destroyed by development outside the provisions of the Neighbourhood Plan; ○ Sustainable growth should address public and private transport, education and schools provision, sewage capacity and treatment (including the prevention of treated outflows into watercourses), potable water capacity and pressure on health services; ○ Careful consideration of the impact of additional traffic should be given as part of an integrated planning process; ○ The natural existing environment and special wildlife should be protected from foreseeable damage from unsustainable development.
Policy Env1: Landscape and Wildlife Corridors		
David Marjoram	England and Lyle (on behalf of clients, Taylor Wimpey)	The respondent considered that since Policy Env1 identifies the A192 south of Morpeth as a proposed Landscape Corridor and the Catch Burn as a proposed Wildlife Corridor, any proposals for housing development on Land North of Barmoor Farm, which lies on the western side of the A192, could readily take the opportunity to enhance and extend the network of the landscape corridor in accordance with the policy, with a focus on increasing biodiversity, wildlife value and general amenity value. The respondent also considered that, by including the land mentioned above within the settlement boundary, this would further enhance opportunities to extend the wildlife corridor, again with a focus on increasing biodiversity, wildlife value and general amenity value.
Anonymous	N/A	The respondent objected to the policy and stated that there is no evidential base to substantiate the definition or the

Respondent #1		extent of the corridors as shown on the plan. The respondent also considered there to be no evidential base to indicate that all 'development' would adversely impact on a corridor per se and as such the scope of the policy is inappropriate and unsound. The policy was considered to be poorly drafted and uses terms that are both ambiguous and emotive.
Anonymous Respondent #2	N/A	The respondent objected to the policy and stated that there is no evidential base to substantiate the definition or the extent of the corridors as shown on the plan. The respondent also considered there to be no evidential base to indicate that all 'development' would adversely impact on a corridor per se and as such the scope of the policy is inappropriate and unsound. The policy was considered to be poorly drafted and uses terms that are both ambiguous and emotive.
Lee Crawford	Persimmon Homes	<p>At the previous plan stage, Landscape and Wildlife Corridors were given separate policies. The two issues have now been grouped together in a single policy. The respondent's view is that the two issues should be separated as they had different intentions when allocated as part of the Castle Morpeth Local Plan. Impacts and mitigation associated with landscape and wildlife corridors are very different.</p> <p>The respondent's landholding at Peacock Gap, along with other landholdings to the north of Morpeth have frontage along the A192 Landscape Corridor. Whilst the respondent recognised the value that the Plan puts upon the landscape corridors and entrance routes to the town, as demonstrated at the recent Stobhill planning appeal decision, the landscape corridors are not cordon sanitaires for development. However, a sensitive approach must be taken to the position and design of development and landscape mitigation must be incorporated. It is the respondent's view that the wildlife and landscape corridors have a policy designation which ensures that impact and mitigation are appropriate. While the respondent's landholding at Peacock Gap has not been given a protected designation, Policies Des1 and Env1 are negatively worded using phrasing such as "safeguards" and "protected from development". Such wording can have significant repercussions when in operation through development management. It is therefore recommended that the Landscape Corridors and Wildlife Corridors are given separate policies and that the wording is revisited. Minor alterations would ensure that the designations are in general conformity with the existing policies of the Castle Morpeth Local Plan and that the designations are not misconstrued as prohibitive of development.</p>
Jo-Anne Garrick	Northumberland County Council	<p>The final paragraph of the policy seeks remedial action 'to the satisfaction of the Local Planning Authority'. It would be more appropriate to specify in a development plan policy the mechanism by which impact minimisation and remedial action could be secured. This would give certainty to developers and decision makers.</p> <p><i>Proposed revisions:</i></p> <p><i>Where Landscape or Wildlife Corridors are disrupted as an unavoidable consequence of adjacent or nearby development, developers will be required to minimise the impact and to carry out remedial <u>action in</u></i></p>

		<i>accordance with a scheme that shall be secured by way of planning condition or planning obligation as appropriate to the satisfaction of the Local Planning Authority.</i>
John Fleming	Gladman Developments Ltd	New development often offers the opportunity to enhance biodiversity values and can often be integrated into development proposals through high quality design. This helps maintain their role as part of the local and wider area's biodiversity network. It was considered that the Neighbourhood Plan should be consistent with the requirements of Chapter 11 of the NPPF and that the Plan should not attempt to impose additional requirements in an effort to preclude the delivery of future sustainable growth.
Policy Env2: Local Green Space		
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that it inappropriately conflates NPPF green belt policy with local open space policy and was therefore poorly unsound, poorly drafted and ambiguous.
John Fleming	Gladman Developments Ltd	<p>The allocation of land as Local Green Space should be able to demonstrate robust evidence to meet national policy requirements as set out in the Framework. Local Green Spaces should be consistent with the requirements of the Framework and should complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when the plan is prepared or reviewed and be capable of enduring beyond the end of the plan period. They should not be used as a mechanism to preclude sustainable growth opportunities from being delivered.</p> <p>Local Green Space will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and not an extensive tract of land. <p>The use of this policy tool restricts the supply of housing and does not provide appropriate justification or evidence for the inclusion of these areas and their consistency with the requirements set out above.</p> <p>Policy ENV2 was considered inconsistent with the requirements of the Framework and basic conditions (a), (d) and (e) as it was considered inappropriate at this time to designate land as Local Green Space.</p>
Policy Env3: Protected Open Space		
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that there was no evidential base to substantiate the definition or the extent of the Protected open space as shown on the plan. There is no evidential base to indicate that all 'development' would adversely impact on an area of open space per se and as such the scope of the policy is

		inappropriate and unsound. The use of exceptional circumstances is unsound in this context as policy is poorly drafted and uses terms that are both ambiguous and emotive.
Jo-Anne Garrick	Northumberland County Council	The County Council objects to the inclusion of land around County Hall as Protected Open Space. The County Council is currently conducting a property review and, in reaching a conclusion about the future of County Hall it will have due regard to protecting, where appropriate, the amenity value of land around County Hall in any future development or redevelopment of the site.
John Fleming	Gladman Developments Ltd	It was questioned whether the sites identified under this policy are proposed Local Green Spaces by a different name. It was considered that further evidence is required to justify the inclusion of both Policy Env2 and Env3.
Les Stephenson and Mark Gray	N/A	This policy introduces a dimensional test to the development of open space not advocated anywhere in the NPPF. The test of 'exceptional circumstances' has not been defined. For example lack of housing supply has been seen to be an exceptional circumstance in appeals countrywide, yet the policy does not reference such nor does it seek to work with its community to define appropriate cases when such might be the case.
Policy Env5: Local Wildlife Sites		
John Fleming	Gladman Developments Ltd	It was considered that this policy goes over and above the requirements of Framework; there is no requirement within the Framework that prevents development adjacent to Local Wildlife Sites. Furthermore, future development proposals will often incorporate high quality design measures which will further enhance the biological values of the site. It was recommend Policy Env5 be deleted as it is inconsistent with basic conditions (a), (d) and (e).
Policy Her1: Safeguarding Heritage Assets		
Alan Hunter	Historic England	Policy Her1- as drafted, this policy reads more like a series of Community Actions. Consequently it provides little guidance or clarity for developers and decision-makers as to the tests which should be satisfied in order to make proposals acceptable in planning terms. [See Community Action CAHer1]
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that there is no evidential base to substantiate the list of 'projects'. The policy is enabling in its focus and as such does not provide the necessary guidance for consideration against proposed developments. The scope of the policy is inappropriate and unsound. The promotion of Article 4 directions is unsound in this context as policy is poorly drafted and uses terms that are both ambiguous and emotive.
Jo-Anne Garrick	Northumberland County Council	Having regard to the purpose of planning policies which should provide a clear indication of how a decision maker should react to a development proposal, other than the first sentence of this policy, the County Council considers that this policy does not achieve the intentions set out in paragraph 154 of NPPF. It presents a series of proposals or projects which would be better placed in the Community Actions section of the Plan.
Policy Her2: Locally Important Heritage Assets		
Alan Hunter	Historic England	Policy Her2- the concept of 'net loss' is more readily and commonly applied to change within the natural environment

		where habitats can often be relocated or recreated. For all practical purposes the relocation of a heritage asset is not practicable or desirable. It is not always possible to mitigate or compensate for the loss of significance or value of a heritage asset. Harm should be minimised and shown to be outweighed by public benefit which is necessary and which cannot be met in any other way. Total loss will only rarely be justified in terms described above. Compensation cannot be weighed such that it results in 'no net loss' of a heritage asset.
John Fleming	Gladman Developments Ltd	Significant weight is already attached to both designated and non-designated heritage assets by section 12 Conserving and enhancing the historic environment contained in the Framework. It was recommended that this matter will be more appropriately dealt with by the local planning authority based on robust evidence which the Neighbourhood Plan should seek to support.
Policy Her3: Heritage Assets at Risk of Harm		
Alan Hunter	Historic England	Policy Her3- The following amendment was suggested (shown underlined): <i>'Proposals that contribute positively towards the <u>repair of heritage assets, whether or not they are designated, and where appropriate the long term sustainable use or re-use of heritage assets at risk of harm, including those listed in the HER and any unlisted assets, will be supported</u> '</i>
Local Economy		
Robert Barnes	PlanningProspects (on behalf of client Dransfield Properties Ltd)	The general tone of the text of the Neighbourhood Plan dealing with the local retail market is supported. In particular Dransfield agreed that there will be limited scope for increases in shopping floorspace over the plan period, and the emphasis should be placed on promoting the town centre as a shopping destination. However, it was considered that while the new Morrisons store should “mop up” growth in convenience spending for the short to medium term, the effect of the re- use of the former Morrison’s building on Stanley Terrace in taking up demand is less straightforward. The reuse of this building or its alteration or redevelopment for retail use is certainly to be encouraged but the extent to which this would meet future need will vary considerably depending on the nature of the new occupiers. Equally, there is much uncertainty in forecasting how convenience shopping patterns will change, with low spending growth, an increase in the proportion of spending made online, and significant shifts in the development programmes being implemented by the major grocers.
Denise Byrom	Morpeth North Residents Action Group	The representation expressed support for the aspirations outlined within the Neighbourhood Plan, in particular: <ul style="list-style-type: none"> ○ Continuing support for the development of a vibrant retail sector in the town centre, helping to ensure that Morpeth remains a successful market town; ○ Encouraging a growing, sustainable tourism sector including new visitor attractions; ○ Encouraging developments which enhance the environment; ○ Bringing disused heritage sites back into economic usage; and ○ Developing Morpeth as a desirable centre for the region’s tourism economy.

Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	The Morpeth Neighbourhood Plan outlines an approach to the local economy setting out that Morpeth urgently needs to create additional employment to address the current imbalances and ongoing reduction in public sector jobs. The plan then discusses commissioned Commercial Demand Study which is being prepared to inform the next iteration of the Local Plan Core Strategy. The Neighbourhood Plan advises that the Steering Group were informed by sight of an early draft of the Morpeth section of this Commercial Demand Study but this was not publicly available, has not been subject to scrutiny and cannot be relied upon at this stage to inform a fundamental strand of the Neighbourhood Plan which is crucial to meeting national planning policy obligations in relation to economic considerations.
Policy Emp1: Morpeth Town Centre Strategy		
Katherine Brooker	DTZ (on behalf of client Royal Mail Group)	<p>Royal Mail Group objected in relation to the proposals map and Policy Emp1. The proposals map shows the existing operational Morpeth Delivery Office (18-22 Oldgate) as a 'Key Development Opportunity Site'. Policy Emp1 (e) supports the "reuse or redevelopment of Key Development Opportunity Sites and other vacant buildings and sites within the Town Centre as a town centre use or sports, leisure, hotel, cultural or community use appropriate to its location." Royal Mail Group objected on the grounds that the Morpeth Delivery Office is not a vacant site or building and is an important part of their network of facilities.</p> <p>The representation also stated that Royal Mail Group supported the removal of its property from within the Primary Shopping Area as the principle use of the site is 'delivery office' (B1 or sui generis). Royal Mail Group requested that the part of the policy relating to areas outside the Primary Shopping Area provides some protection to existing commercial uses from inappropriate adjacent development. Royal Mail Group stated in their representation that, in the case of the delivery office, this would relate to conversions of adjacent properties to residential use. Taking account of this, Royal Mail Group requested the addition of wording in order to protect existing commercial operations in the Town Centre where this would impact upon their efficient and effective operation.</p>
Jo-Anne Garrick	Northumberland County Council	<p>The County Council has concerns about the explanation provided at paragraph 6.1.4. There is no evidence presented to support the assertion that 'the serious need for employment means that the County Hall site remains a strategic employment location'. The County Council is currently conducting a property review and a conclusion will be reached about the future of County Hall in due course. It is not appropriate for a neighbourhood plan to define the strategic policies for an area and references to County Hall site being a 'strategic employment location' should be deleted.</p> <p>Having regard to the purpose of planning policies which should provide a clear indication of how a decision maker should react to a development proposal, other than paragraphs M, N and O of this policy, the County Council considers that this policy does not achieve the intentions set out in paragraph 154 of NPPF. Each of the paragraphs</p>

		<p>numbered A to L set out objectives or aims which collectively comprise a strategy for the town centre. The County Council supports the concept of defining a strategy for the Plan and for its component topic areas, but considers that such a strategy should be placed within the supporting text to set the context for land use policies covering this topic. This would reflect the way in which the strategy for the Plan has been articulated elsewhere in the Plan, for example at paragraphs 3.3.2 and 6.1.10. Paragraphs M, N and O could perhaps be redrafted as part of Policy Emp2 – Development within Morpeth Town Centre.</p> <p>Paragraph E of Policy Emp1 deals with ‘Key Development Opportunity Sites’. This is the only reference in policy to those sites defined on the proposals Map. If there is to be a purpose for these designations it would be necessary to retain a specific land use policy that best defines the purpose of their designation.</p>
Policy Emp3: Pegswood Village Centre		
Rachael Bust	Coal Authority	Site Emp3 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth.
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	Support expressed for the policy, it being sound to support development which would add to the vibrancy of Pegswood Village centre. Support expressed for reasoned justification para 6.3.4 which refers to additional housing development in the Pegswood. This additional housing development would support the vibrancy of the Village Centre. As detailed in other representations, Welbeck Estates considered the scale of the allocation to Pegswood should be increased in this Plan period including to take some of the pressure off Morpeth.
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	The aim to help create a vibrant village centre through the redevelopment of the ‘heart of the village’ set out in Policy Emp3 is supported.
Policy Emp4: Economic and Employment Strategy		
Robert Barnes	PlanningProspects (on behalf of client Dransfield Properties Ltd)	The respondent expressed concern about the provisions of Policy Emp4 in that it allows, “other employment generating uses” in locations including Coopies Lane, County Hall, Pegswood Industrial Estate and Fairmoor. The reasoning was that similar provisions in former Local Plan policy for Morpeth were exploited by developers promoting major retail development at employment sites, citing this as explicit policy support for out of centre retail. There was concern that if this was embodied in the Neighbourhood Plan it would be potentially hugely damaging to the town centre.

		As such, it was suggested that all uses of the phrase, “employment generating uses” in Policy Emp4 are followed by the inserted text, “(other than main town centre uses)”. It is considered that this would help to control development in employment locations and protect the town centre whilst also confirming that the provisions of national policy in this regard continue to apply.
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	Support expressed for Emp4 criterion D, it was considered sound that Pegswood Industrial Estate be safeguarded and developed with small scale businesses.
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	The respondent considered that the scale and scope of employment sites detailed in Policies Emp4 and Emp5 will not deliver the quantum of new economic growth and employment opportunities necessary to strengthen the economic role of Morpeth and provide strategic employment sites to attract inward investment, as referred to Neighbourhood Plan paragraph 6.1.6. The respondent considered that the only employment land allocations in the Neighbourhood Plan were existing Local Plan allocations and that these are not sufficient to deliver the Plan’s objectives in respect of employment. It was therefore considered that the Plan should make further employment site provision, particularly if the County Hall site is disposed of for non-employment uses. The representation also stated the Neighbourhood Plan should make provision for an additional 20 hectares of employment land distributed around the edge of the town in order to achieve the Vision and Objectives and to harness Morpeth’s growth potential.
Alastair Willis	Signet Planning (on behalf of client, Till Services Ltd)	The respondent considered that the approach to employment land provision and policy within Policy Emp4 and Emp5 cannot be aligned to the emerging Core Strategy’s strategic policies as the evidence base has not been completed and is not publicly available for scrutiny and thus could not be utilised to inform the Neighbourhood Plan. The respondent also considered that there was no evidence of the Neighbourhood Plan Group having formulated their own robust NPPF compliant analysis of employment land requirements as outlined in NPPF paragraphs 160 and 161 in relation to proportionate evidence base.
Sandra Manson	Signet Planning (on behalf of client, Mitford	The approach to employment land provision and policy within Policy Emp4 and Emp5 cannot be aligned to the emerging Core Strategy policies as the evidence base has not been completed and is not publicly available for scrutiny and therefore cannot be used to inform the Neighbourhood Plan. There is no evidence that the Neighbourhood Plan is

	Estates)	supported by its own robust NPPF compliant analysis of employment land requirements as outlined in paragraphs 160 and 161 of the NPPF in relation to proportionate evidence base.
Jo-Anne Garrick	Northumberland County Council	<p>In a similar manner to the County Council's comments on Policy Emp1, Policy Emp4 describes a strategy rather than providing precise support to decision makers in deciding how to respond to any development proposal. It is repetitive and confusing in the context of Policy Emp5 which specifically covers the matters described in general terms in Policy Emp4. This strategy should be placed within the supporting text to set the context for land use policies covering this topic.</p> <p>The County Council objects to the reference in paragraph B of the policy which seeks to safeguard County Hall and the Fire Station for 'employment generating purposes'. There is no evidence that alternative uses would not be appropriate on those sites, including housing. If this policy is not deleted it should be modified to ensure that the uses preferred by the policies in the Plan cannot be determined to be the only acceptable uses on these sites.</p>
Policy Emp5: Allocation of Employment Sites		
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	<p>The respondent considered that the scale and scope of employment sites detailed in Policies Emp4 and Emp5 will not deliver the quantum of new economic growth and employment opportunities necessary to strengthen the economic role of Morpeth and provide strategic employment sites to attract inward investment, as referred to Neighbourhood Plan paragraph 6.1.6.</p> <p>The respondent considered that the only employment land allocations in the Neighbourhood Plan were existing Local Plan allocations and that these are not sufficient to deliver the Plan's objectives in respect of employment. It was therefore considered that the Plan should make further employment site provision, particularly if the County Hall site is disposed of for non-employment uses. The representation also stated the Neighbourhood Plan should make provision for an additional 20 hectares of employment land distributed around the edge of the town in order to achieve the Vision and Objectives and to harness Morpeth's growth potential.</p>
Alastair Willis	Signet Planning (on behalf of client, Till Services Ltd)	<p>The respondent considered that the approach to employment land provision and policy within Policy Emp4 and Emp5 cannot be aligned to the emerging Core Strategy's strategic policies as the evidence base has not been completed and is not publicly available for scrutiny and thus could not be utilised to inform the Neighbourhood Plan.</p> <p>The respondent also considered that there was no evidence of the Neighbourhood Plan Group having formulated their own robust NPPF compliant analysis of employment land requirements as outlined in NPPF paragraphs 160 and 161 in relation to proportionate evidence base.</p>
Sandra Manson	Signet Planning (on behalf of	The approach to employment land provision and policy within Policy Emp4 and Emp5 cannot be aligned to the emerging Core Strategy policies as the evidence base has not been completed and is not publicly available for scrutiny

	client, Mitford Estates)	and therefore cannot be used to inform the Neighbourhood Plan. There is no evidence that the Neighbourhood Plan is supported by its own robust NPPF compliant analysis of employment land requirements as outlined in paragraphs 160 and 161 of the NPPF in relation to proportionate evidence base.
Policy Emp6: Safeguarding of Employment Sites		
Rachael Bust	Coal Authority	Site Emp6 – This site is affected by recorded past shallow coal workings;
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck Estates’)	Support expressed for criterion D, it was considered sound that Pegswood Industrial Estate be safeguarded for B1, B2 and B8 uses.
Jo-Anne Garrick	Northumberland County Council	<p>The County Council notes that this policy seeks to ‘safeguard’ certain sites for employment purposes. The County Council objects to the limitations sought to be imposed through paragraph B of the policy in relation to County Hall and the Fire Station. Whilst it is noted that the policy states that certain uses ‘may’ be acceptable, it must be made clear through modification that, whilst these uses may be preferred by the Town Council, the policy should not seek to preclude other appropriate uses.</p> <p>It would be helpful if paragraph C (Whalton Road pharmaceutical factory) was identified on the proposals Map. It would also help if the Proposals Map were amended to more clearly define the Emp6 sites by reference to the relevant paragraph in the policy, for example: Emp6A (Coopies Lane); Emp6B (County Hall and Fire Station) etc.</p> <p><i>Proposed revisions:</i></p> <p>7. <i>The development does not conflict with <u>policies in the Neighbourhood other Plan or policies elsewhere in the development plan. policies or proposals.</u></i></p>
Housing		
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – ‘Welbeck	<p>Paragraph 7.2.3: It was noted that the Plan is based on meeting a minimum requirement of 1,700 dwellings in the Neighbourhood Plan area, a figure 400 dwellings below the 2,100 figure in the latest version of the emerging Northumberland Local Plan. As a general comment Welbeck Estates noted that in case of conflict between policies in Plans, the Act requires that the conflict be resolved in favour of the last document to be adopted. The Plan therefore needs to be sufficiently flexible to be able to deliver this.</p> <p>The Neighbourhood Plan suggests that if there is need for additional dwellings, this can be met by bringing forward</p>

	Estates')	development phased for construction beyond the current Plan period on the St George's Hospital site. Welbeck Estates questioned if such increased numbers are deliverable on the St George's Hospital site in this Plan period.
Mr Andrew Moss	Ward Hadaway (on behalf of client The Welbeck Estates Company Limited – 'Welbeck Estates')	Paragraph 7.3.4: According to the Housing Site Allocation and Assessment Paper 2015, SHLAA site 6796 (land to the west of Pegswood) was assessed on the basis of it delivering 219 dwellings, therefore considerably more dwellings than the sites proposed for allocation in Hou1C and Hou1D. Welbeck Estates stated that they would welcome discussions in relation to their sites accommodating comparable numbers of dwellings to those proposed in Hou1C and Hou1D. SHLAA site 6797 (land to the south of Pegswood) does not appear to have been assessed in the Housing Site Allocation and Assessment Paper 2015.
Denise Byrom	Morpeth North Residents Action Group	The representation set out that: <ul style="list-style-type: none"> ○ Any future housing development should be within the settlement boundaries to preserve the character of Morpeth as an historic rural market town surrounded by open countryside; ○ That brownfield sites such as that at St. George's Hospital, should be developed in preference to greenfield sites; and ○ Settlements should not be permitted to coalesce.
Anonymous Respondent #2	N/A	The respondent considered that Section 7 of the plan is unsound in that it fails to consider the need for self-build sites and the extent to which this can extend the choice to residents. As such the basis for the document "Housing Site Allocation – Outline Methodology and Potential Sites" is unsound and the document is incomplete and inconclusive. The scenarios tested fail to adequately consider the need for full range of choice of tenures and the need for affordable housing – The scenarios also fail to consider the potential for westward expansion of the urban area of Morpeth.
Lee Crawford	Persimmon Homes	The Neighbourhood Plan plans for "at least 1700 dwellings" within the plan period, consisting of St. George's Hospital, existing planning permissions and 2 new sites at Pegswood. The respondent states that new household projections and subsequent ambiguity surrounding the County housing targets has resulted in the Neighbourhood Plan's housing target of 1700 dwellings, which was fixed early in the plan process and fails to meet the objectively assessed housing needs of the area. The respondent was fully supportive of the delivery of the St. George's Hospital site. However, they considered that the central plank of the Castle Morpeth Local Plan (2003) has yet to deliver any housing on the ground, and that based on the previous issues with delivery, the current trajectory is already optimistic and the St. George's Hospital site could not simply accelerate housing delivery in the way suggested unless other builders were involved providing additional outlets.

		<p>The respondent considered that, since the housing targets within the emerging Core Strategy do not include Pegswood, the gap between the Neighbourhood Plan housing target and the objectively assessed housing need is actually wider and if Pegswood were to be included, the 2100 figure in the emerging Core Strategy would automatically rise.</p> <p>The respondent was concerned that the Neighbourhood Plan suggests that it will establish a 5 year housing supply for Morpeth. Regardless of the debate around the housing target for Morpeth, the respondent considered that the 5 year housing land supply would not be considered at a Neighbourhood Plan level and, based on the significant shortfall, it is unlikely that the numbers currently planned would establish a favourable supply of sites for Housing Market Area or Authority Area.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	<p>The Plan acknowledges that <i>one of the most important aspects of the Plan is to consider the amount, type and location of new housing in the Plan area for the next 15-20 years</i>. Greater clarity could be provided by amending this to clearly state the Plan period 2011-2031.</p> <p>Section 7.2.3 suggests that there are uncertainties surrounding the aggregate figure for the neighbourhood plan area, likely to arise from the emerging Core Strategy. The figure indicated in the Core Strategy FDP December 2014, for the Plan area is an increase on the previously published figures based on more up to date evidence and clarity regarding the Plan area.</p> <p>The Plan indicates (7.2.3) that if there is a demonstrated need for additional dwellings during the plan period (this has already been demonstrated above) then this can be met by bringing forward development phased for construction beyond the current plan period on the St Georges Hospital Site at Morpeth. The Plan provides no indication of how this could be achieved. An amendment to the Pegswood settlement boundary and the allocation of additional land for residential development will bring greater flexibility to the Plan, increase certainty that the Plan will be sufficiently flexible to meet OAN, and that the Plan can deliver a range and choice of housing sites.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	<p>The Plan acknowledges that <i>one of the most important aspects of the Plan is to consider the amount, type and location of new housing in the Plan area for the next 15-20 years</i>. Greater clarity could be provided by amending this to clearly state the Plan period 2011-2031.</p> <p>Section 7.2.3 suggests that there are uncertainties surrounding the aggregate figure for the neighbourhood plan area, likely to arise from the emerging Core Strategy. The figure indicated in the Core Strategy FDP December 2014, for the Plan area is an increase on the previously published figures based on more up to date evidence and clarity regarding the Plan area.</p>

		The Plan indicates (7.2.3) that if there is a demonstrated need for additional dwellings during the plan period (this has already been demonstrated above) then this can be met by bringing forward development phased for construction beyond the current plan period on the St Georges Hospital Site at Morpeth. The Plan provides no indication of how this could be achieved. An amendment to the Pegswood settlement boundary and the allocation of additional land for residential development will bring greater flexibility to the Plan, increase certainty that the Plan will be sufficiently flexible to meet OAN, and that the Plan can deliver a range and choice of housing sites.
Les Stephenson and Mark Gray	N/A	The respondent considers that two sites within Table 1 will not come forward for development as envisaged, that being the allocation in Pegswood, and the former Davison's Garage. The former has been identified in evidence to the Council as being unviable for development. The former Davison's garage is a detailed permission for a high density proposal that the market doesn't want to deliver. It is a form of development that is not attractive to the market and has all but ceased. This consent will not be implemented in its current form.
Policy Hou1: Housing Development		
Rachael Bust	Coal Authority	Site Hou1 AP1 – This site is affected by recorded past shallow coal workings; Site Hou1 AP2 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth;
Matt Verlander	Arup (on behalf of client, Homes and Communities Agency)	The HCA welcomed the amendments to the text for policy Hou1 which states “at least 1700 dwellings” shall be developed from existing commitments and allocations which include HCA’s land at the St George’s Hospital site. In particular the HCA were supportive of the reference in paragraph 7.2.3 that the figure in the Neighbourhood Plan is set at a minimum, and should there be a demonstrated need for additional dwellings during the Plan period, this can be met by bringing forward development phased for construction beyond the current Plan period on the St George’s Hospital site. The policy was therefore considered to be more closely aligned to the emerging Local Plan for Northumberland proposing 2,100 new dwellings between 2011 and 2031 in Morpeth. The HCA considered that this flexibility would allow further sites to be brought forward including specific phases of the St George’s Hospital Site without conflicting with the Local Plan.
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	The respondent considered that the “at least 1,700 dwellings” in the Neighbourhood Area remains some way below the 2,100 identified in the Northumberland Local Plan Core Strategy Full Draft Plan. The respondent considers that the overall housing requirement for the county should be increased and that, therefore, the housing requirement set out in the Neighbourhood Plan is not sufficient; a much higher figure of 2,675 is suggested by the respondent although it is recognised that the Local Plan Core Strategy will determine the final minimum requirement figure.

		<p>The respondent considered that the approach to determining the housing requirement for the Neighbourhood Area is not robust, reasoned justification due to the discrepancy between the housing requirements set in the Neighbourhood Plan and those set in the emerging Core Strategy.</p> <p>The respondent acknowledged the site allocation (Policy Hou2 – Land north of St. George’s Hospital) but noted that further development beyond the 375 dwellings holding permission will depend on the provision of an access road from the Northern Bypass, together with uncertainty about both the suitability and achievability of the site in the SHLAA. The respondent used this justification to recommend the allocation of land north of Barmoor Farm and South of High Stobhill Farm, within their ownership, in the Neighbourhood Plan. The respondent requested that the Neighbourhood Plan give consideration to the following sites:</p> <ul style="list-style-type: none"> ○ Land north of Barmoor Farm; and ○ Land south of High Stobhill Farm. <p>The respondent considered it would be inappropriate to exclude this land from the settlement boundary, given:</p> <ul style="list-style-type: none"> ● The sites have been identified as being suitable, available and achievable in the SHLAA; ● The uncertainty over the delivery of the only housing allocation in Morpeth; and ● Recent history, whereby housing has come forward on sites that the County Council had allocated for employment development in the town. <p>The respondent had commissioned site-specific reports for the land in their ownership. The results of these were summarised within their representation.</p>
Anonymous Respondent #1	N/A	The respondent objected to the policy and stated that there is no evidential base to substantiate the numbers identified and as such the policy is unsound.
Anonymous Respondent #2	N/A	The respondent objected to the policy and stated that there is no evidential base to substantiate the numbers identified and as such the policy is unsound.
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	The Neighbourhood Plan specifically allows for less development than is proposed in the emerging Local Plan. Throughout the consultation on the plan, its development has been explicit in disregarding the OAN requirement that has informed the emerging Core Strategy. In addition, the final OAN is not yet known, with the County Council undertaking a refresh of the SHMA work and evidence base to inform the next consultation stage of the plan. The respondent therefore considers that the plan has not been prepared positively and does not accord with national policy.
Jo-Anne	Northumberland	The County Council supports this policy. Whilst the minimum number of new dwellings differs from the numbers

Garrick	County Council	indicated in the emerging Core Strategy, the evidence presented to support the Plan clearly allows for sufficient flexibility to deliver sufficient housing during the Plan period when read in conjunction with information on current completions and commitments and the intention to support a sustainable urban extension at St George's Hospital through Policy Hou2.
Katherine Brooker	DTZ (on behalf of client, Northumberland Tyne and Wear NHS Foundation Trust)	<p>Paragraph 3.3.9 makes reference to the emerging Core Strategy projected requirement for 2,100 houses in the Morpeth area in the plan period. The Neighbourhood Plan proposes a lesser requirement of 1,700, which is at odds with Northumberland County Council's figures. The Neighbourhood Plan states that the lesser figure can be served by existing commitments and draft allocations, which it sets out in Table 1. Paragraph 7.2.2 states that 'It is recognised that this figure is subject to revision in light of the Department for Communities and Local Government (DCLG) 2012 Household projections (Feb 2015) and will not be finalised until the Local Plan is adopted.'</p> <p>Paragraph 7.2.3 suggests a justification for planning for a reduced figure of 1,700 in the interim, due to 'uncertainties around the county housing requirement, apportionment for the Neighbourhood Plan Area, and build-out rates in a locally oversupplied market...'</p> <p>Morpeth is one of the most sustainable and desirable market town locations in the County as a whole and is within the commuter area of the Tyne and Wear conurbation. As a result, Northumberland County Council is correctly focusing significant development for the area in Morpeth.</p> <p>It was considered that to advance a reduced projected need figure is to ignore Northumberland County Council's desired economic growth, the evidence of local market advanced by the house builders (that figures should exceed the 2,100 figure) and government agencies through the recent consultation events, and the recent investment in infrastructure to support significant growth for Morpeth (e.g. Northern By-pass and Sewerage facility), and is contrary to the NPPF by seeking to fetter delivery of sustainable development.</p> <p>Neighbourhood Plan draft policy Hou1 should include sufficient flexibility to respond to market conditions and rises in local demand and should not seek to undermine Northumberland County Council's growth strategy.</p>

Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	<p>The suggested amendment to the settlement boundary Policy Set2 and the Proposals Map and inclusion of SHLAA sites 3018 and 6847 for residential development in Policy Hou1 offers the opportunity for: sustainable development, improvements to the footpath network and wildlife environment, as well as meeting the OAN for Pegswood and the Plan area in line with the Plans strategy and broad vision.</p> <p>Support was expressed for Policy Hou1 in the allocation of land at North of Longhirst Road site 3019.</p> <p>However the policy should be amended to provide for <i>'at least 2,100 dwellings'</i>, or to <i>'at least meet the housing provision detailed in the adopted Core Strategy'</i>. Guidance for Neighbourhood plans clearly states that Neighbourhood plans should not promote less development than set out in the local plan or undermine its strategic policies.</p>
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	<p>Support was given to the identification of SHLAA site 3497 as a potential site for development in the Housing Site Allocation document. However, this should be translated into the plan through a housing site allocation included in Policy Hou1 and on the proposals map. The northern part of the site is within the ownership of the client.</p> <p>An objection was made against Policy Hou1 in that it should be amended to provide for <i>"at least 2,100 dwellings"</i> or to <i>"at least meet the housing provision detailed in the adopted Core Strategy"</i>. It was also considered that insufficient sites were identified to meet the objectively assessed needs for the plan area.</p>
John Fleming	Gladman Developments Ltd	<p>This policy states that at least 1,700 dwellings shall be developed in the Neighbourhood Plan area over the plan period. This comprises of existing commitments in Morpeth & Pegswood and the three allocations contained in the plan.</p> <p>Whilst it was acknowledged that the Neighbourhood Plan allocates land for residential development in accordance with the emerging Core Strategy, this figure has yet to be successfully tested at independent examination by an Inspector. It cannot be certain that the level of growth proposed at this time will meet the full OAN for the district. Therefore, the ability to progress the Neighbourhood Plan at this time was questioned.</p>
James Reid	Barratt David Wilson Homes North East	<p>Policy Hou1 and the proposals map of the Neighbourhood Plan identify the locations for new housing in Morpeth and Pegswood. BDW would request the Neighbourhood Plan assess the potential of the following sites as contributors to the area's housing supply during the emerging plan period:</p> <p>Land at West Lane End Farm, Morpeth</p> <p>The respondent states that the site extends to approximately 75 acres and provides the logical extension of the settlement to the north. The site was previously assessed by the Castle Morpeth Local Plan Inspector in 19981 who concluded it was suitable and should be allocated for residential development. Paragraph 30.16.6 of the adopted</p>

2003 Castle Morpeth Local Plan states the principle of development was established at the local public inquiry and its allocation accepted by the Inspector. However, due to national policy prevailing which at the time required a strict sequential brown before green approach, the allocation was not taken forward. Notwithstanding this the Plan recognised the-then longer term potential to accommodate the residential development needs of the town. In addition, the Local Plan Inspector concluded that the whole of the St George's Hospital (now identified by the Neighbourhood Plan) should **not** be allocated for housing. Given that the plan period ended in 2006, BDW considers the long term potential of the site to be now.

At present the land at West Lane End Farm is considered Safeguarded Land under Policy 21 of the draft Northumberland Local Plan. Given the need to significantly boost Central Northumberland's housing supply and the fact that the land is not considered within the Green Belt, BDW feels it inappropriate to restrict the site's delivery beyond 2031.

The Morpeth Northern Bypass is planned to dissect the site. The northern half was proposed for employment land within the PO2 which supported by Policy Emp5 of the Neighbourhood Plan. The implementation of the bypass will be of great benefit to the town and will provide a new defensible boundary for development at West Lane End Farm and the town of Morpeth. Furthermore, the delivery of the site could contribute significantly toward the provision of infrastructure in North Morpeth.

Land north of the A192, Hescott

The respondent states that the site extends to approximately 11.76 hectares (29.06 acres) and offers the logical extension of Hescott village.

The Council has recognised the site's potential for residential development by finding it suitable for approximately 89 dwellings within years 6-10 (SHLAA 2014).

At present the site is identified within the 'general extent of the Green Belt' which is yet to be defined. The site does not meet any of the five principles set by paragraph 80 of the NPPF and has already been considered suitable for development. Should the Neighbourhood Plan proceed with a similar strategy for Hescott as the previous plan, it is likely that Hescott village will continue to lose its working age population, particularly with increased levels of development proposed in Morpeth. The housing requirement is a minimum target and the allocation of this sustainable site will complement the vitality of this attractive settlement, thus supporting the objectives set by the draft Core Strategy and NPPF.

Sasha White QC	Landmark Chambers (on behalf of client Sandra Manson, Signet Planning)	<p>Policy Hou1 states that “at least 1,700 houses will be built during the plan period”. It could be argued that this sets a minimum requirement because of the word “at least”. However, the delivery of this housing requirement is constrained within a tightly drawn settlement boundary as set out by Policy Set1. Given this, in order to demonstrate conformity with the NPPF, it is essential that the Neighbourhood Plan demonstrates that it can meet the housing need for Morpeth over the plan period within this settlement boundary. The only evidence for this is the document “Housing Site Allocation – Outline Methodology and Potential Sites”. This demonstrates that:</p> <ul style="list-style-type: none"> • Existing commitments provide for approximately 1,620 dwellings in Morpeth which is below the 2,100 dwellings required by the Core Strategy Full Draft Plan and relies on all permitted development coming forward as planned; • Outside of existing commitments, the Neighbourhood Plan only has one preferred site for the delivery of additional dwellings, which is the St. George’s Hospital site; • The Plan identifies other possible sites within the settlement boundary that can deliver a maximum of 224 dwellings but it was also recognised that a number of sites have significant constraints to delivery; <p>The respondent therefore considered that this shows that the settlement boundary is unlikely to have the capacity to deliver more than 2,100 dwellings over the plan period.</p>
Policy Hou2: St. George’s Hospital, Morpeth		
Matt Verlander	Arup (on behalf of client, Homes and Communities Agency)	<p>Policy Hou2 refers to the St George’s Hospital site specifically, with the site identified as being developed as a sustainable urban extension for around 1,000 homes. The HCA were supportive of this level of development. The policy also states that a detailed masterplan shall be prepared for the site and shall be “agreed by the Local Planning Authority”. The HCA and County Council as local planning authority are working closely to progress this strategic site.</p> <p>The HCA stated that the policy does not give the flexibility to respond to market conditions (as stated in the NPPF paragraph 14) as it requests a masterplan be prepared including phasing details, detailed information including a mix of house types, recreational facilities and detailed infrastructure. Any masterplan should be indicative only, setting out broad principles of development form.</p> <p>The respondent considered that it is for the planning application process to agree on specific details over time and to suit market conditions at that time. An amendment to the policy was suggested, taking account of the above points.</p>
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	<p>The respondent considered that the “at least 1,700 dwellings” in the Neighbourhood Area remains some way below the 2,100 identified in the Northumberland Local Plan Core Strategy Full Draft Plan. The respondent considered that the overall housing requirement for the county should be increased and that, therefore, the housing requirement set out in the Neighbourhood Plan is not sufficient; a much higher figure of 2,675 is suggested by the respondent</p>

		<p>although it is recognised that the Local Plan Core Strategy will determine the final minimum requirement figure.</p> <p>The respondent considered that the approach to determining the housing requirement for the Neighbourhood Area is not robust, reasoned justification due to the discrepancy between the housing requirements set in the Neighbourhood Plan and those set in the emerging Core Strategy.</p> <p>The respondent acknowledged the site allocation (Policy Hou2 – Land north of St. George’s Hospital) but noted that further development beyond the 375 dwellings holding permission will depend on the provision of an access road from the Northern Bypass, together with uncertainty about both the suitability and achievability of the site in the SHLAA. The respondent used this justification to recommend the allocation of land north of Barmoor Farm and South of High Stobhill Farm, within their ownership, in the Neighbourhood Plan. The respondent requested that the Neighbourhood Plan give consideration to the following sites:</p> <ul style="list-style-type: none"> ○ Land north of Barmoor Farm; and ○ Land south of High Stobhill Farm. <p>The respondent considered it would be inappropriate to exclude this land from the settlement boundary, given:</p> <ul style="list-style-type: none"> ● The sites have been identified as being suitable, available and achievable in the SHLAA; ● The uncertainty over the delivery of the only housing allocation in Morpeth; and ● Recent history, whereby housing has come forward on sites that the County Council had allocated for employment development in the town. <p>The respondent had commissioned site-specific reports for the land in their ownership, including a Landscape and Visual Review, SUDS/Drainage Strategy, Access – Site Appraisals, and Preliminary Ecology Appraisal. The results of these were summarised within their representation.</p>
Katherine Brooker	DTZ (on behalf of client, Northumberland Tyne and Wear NHS Foundation Trust)	<p>NTWFT supports the policy and the proposed masterplanning process and intends to fully participate in this process. Further to the proposal for the masterplan to be agreed before development on site, it is advanced that this should be achieved prior to determination of any planning application in respect of any part of the allocated land.</p> <p>The aims of the masterplan as drafted in the policy are supported. However, care must be taken to give developers sufficient flexibility to agree their own, acceptable layouts and detailed proposals. The masterplan should be indicative, but set out principles of phasing, housing numbers and development form. All else should be held as part of the decision making process at planning application stage so that matters such as detailed site issues and viability can be properly assessed. The planning application process is sufficient and appropriate control over such</p>

		development matters.
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	<p>An objection was made against the area allocated for development at St. George's Hospital as identified on the proposals map. It was considered that the identified site should be amended and extended to include additional land beyond that in a single ownership to provide for a more holistic development to the north of Morpeth.</p> <p>The construction of the Bypass now creates a recognisable and permanent feature to the north of Morpeth, clearly defining the edge of the settlement and the opportunity to facilitate the delivery of the Morpeth Strategic Site. The land area contained by the bypass, Fulbeck Lane to the west and Howden Wood to the east, offers the opportunity to deliver housing, services and facilities, as well as open space, recreation and sports facilities to meet the Plan's objectives and needs of existing and future residents of the settlement.</p> <p>Detailed master planning is required for the whole of this land area rather than the simplistic proposal of constraining this to the land formerly part of St. George's Hospital. It was strongly believed that the settlement boundary, as currently identified within the Plan and Proposals Map should be amended to include SHLAA site 3174. The housing allocation Hou1, Am1 should be amended to include SHLAA sites 3174 and 3055.</p>
Policy Hou3: Housing Mix		
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P Hobson)	<p>The respondent considered that Tranwell has and continues to make a positive contribution to the supply of executive housing in the County and that executive housing has and continues to be needed in the County and in the Region. An objection was lodged that the policy / its reasoned justification needs to be amplified to reflect this and to support the provision of executive housing in appropriate locations which include Tranwell.</p>
Matt Verlander	Arup (on behalf of client, Homes and Communities Agency)	<p>Policy Hou3 states that the promotion of 'Lifetime Neighbourhoods' will be supported in Morpeth town centre and the St George's urban extension. The HCA confirmed that as part of the master planning process, issues associated with Lifetime Neighbourhoods would be explored, including:</p> <ul style="list-style-type: none"> • The availability of shops, community facilities and transport connections; • The accessibility of the neighbourhood for people who may have restricted mobility; • The current and potential attractiveness of the area to older people; and • The safety and sociability of public spaces.
Anonymous Respondent #1	N/A	<p>The respondent objected to the policy and considered that it failed to adequately provide for a range of choice of tenures for housing.</p>

Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that it failed to adequately provide for a range of choice of tenures for housing.
John Fleming	Gladman Developments Ltd	Policies Hou3 and Hou4 relate to providing a range of housing types and tenures. Whilst recognising the importance of delivering Morpeth's housing needs, this matter will be appropriately dealt with by the local planning authority at the strategic level. The deletion of this policy was recommended.
Les Stephenson and Mark Gray	N/A	This policy fails to address the attractiveness of Morpeth to the entrepreneur and businessman and notably ignores evidence of a need for larger executive housing in the North East, as well as that proposed.
Policy Hou4: Delivering Affordable Housing		
Matt Verlander	Arup (on behalf of client, Homes and Communities Agency)	The HCA were supportive of this policy but reiterated previous representations made that affordable housing on the site should be in accordance with the Development Plan or an up-to-date housing needs assessment. Developers should not be required to undertake housing need surveys as part of development proposals as this is a very substantial piece of work and should be part of the evidence base to be produced and maintained by the Local Planning Authority as part of the Development Plan system.
Anonymous Respondent #1	N/A	The respondent objected to the policy and considered that there is no evidential base to substantiate the selection of 10 houses as a cut off. It was also considered that the policy is poorly drafted and does not take account of the economic viability of the development of the site, tenure being provided and other material considerations.
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that there is no evidential base to substantiate the selection of 10 houses as a cut off. It was also considered that the policy is poorly drafted and does not take account of the economic viability of the development of the site, tenure being provided and other material considerations.
Lee Crawford	Persimmon Homes	The respondent fully understands the reasons for the Neighbourhood Plan to seek to secure all affordable housing on site and also understands concerns regarding the availability of sites locally to spend contributions on delivering affordable housing. Policy Hou4 and its supporting text should be made slightly more flexible so that some affordable housing can be provided through off-site contributions. This would enable innovative proposals to meet needs which are all too often neglected, such as those of the ageing population.
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	Support was expressed for the provision of affordable housing, however it was considered that Policy Hou4 as worded is at odds with the subsequent justification at paragraph 7.5.8 where it clearly identifies, in accordance with national guidance, that off-site financial contributions may be justified. Policy Hou4 should be amended to include for this provision.

John Fleming	Gladman Developments Ltd	Policies Hou3 and Hou4 relate to providing a range of housing types and tenures. Whilst recognising the importance of delivering Morpeth's housing needs, this matter will be appropriately dealt with by the local planning authority at the strategic level. The deletion of this policy was recommended.
Policy Hou5: Infrastructure to serve new Housing Development		
Anonymous Respondent #1	N/A	The respondent objected to the policy and considered that there is no evidential base to substantiate the need for development to contribute to the listed infrastructure. The policy was considered to be poorly drafted and did not take account of the economic viability of the development of the site and other material considerations.
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that there is no evidential base to substantiate the need for development to contribute to the listed infrastructure. The policy was considered to be poorly drafted and did not take account of the economic viability of the development of the site and other material considerations.
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	Support was given to the provision of affordable housing, however Policy Hou4 as worded was considered to be at odds with the subsequent justification at paragraph 7.5.8 where it clearly identifies, in accordance with national guidance, that off-site financial contributions may be justified. Policy Hou4 should be amended to include for this provision.
John Fleming	Gladman Developments Ltd	<p>Policies which seek developer contributions should be properly tested for their effects on development viability and supported by adequate and robust evidence. In this regard it does not appear that the Town Council have undertaken any up-to-date viability assessment of the Neighbourhood Plan's cumulative obligations.</p> <p>It was considered that the Town Council should therefore test all the policies contained in the Neighbourhood Plan for the effects on development viability. Contributions must be based on up-to-date, robust evidence of needs and cannot be used to make up the funding for desirable infrastructure, or to support the provision of unrelated items.</p>
Getting Around (Transport)		
Policy Tra1: Loansdean Link Road protection		
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	The respondent stated that they would support the continued protection of a preferred alignment for the proposed Loansdean to Stobhill Link road.
Jo-Anne Garrick	Northumberland County Council	<p>The County Council is in the process of reviewing routes protected for future highway schemes. This work will support the preparation of the Local Plan in due course. There is no evidence presented with the Neighbourhood Plan to demonstrate the need for this link road. Accordingly, the County Council objects to the inclusion of this policy which has no basis in evidence.</p> <p>If the policy is retained it should be identified more clearly on the Proposals Map through amendment to the Key or</p>

		<p>by inserting the Policy number next to the graphic on the Proposals Map. Furthermore, the policy should be modified to allow the need for the link road to be established if development proposals come forward that may impact this route.</p> <p><i>Proposed revisions:</i> <i>The preferred alignment for the Stobhill – Loansdean Link Road (shown on the Proposals Map) will be safeguarded unless it can be demonstrated that the route is no longer required. from development.</i></p>
Policy Tra2: Traffic Congestion		
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	<p>The respondent expressed support for Policy Tra2(A) and agreed that the traffic impacts of new development should be appropriately controlled and mitigated. The respondent also considered that the new Northern Bypass will have a substantial impact on the levels and patterns of traffic movement within Morpeth, especially through traffic, providing a real alternative to having to use Telford Bridge.</p> <p>In addition to the above, the representation also provided the respondent’s view that land in their ownership, north of Barmoor Farm and south of High Stobhill Farm, would be both accessible and sustainable, subject to appropriate highway mitigation measures and a small number of public transport improvements and would facilitate use of alternatives to the private car in accessing nearby local facilities and services, including schools and employment opportunities etc.</p>
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	<p>This policy sets out a policy criterion approach that is not aligned with the transport strategic policies in the emerging Core Strategy nor is aligned with the NPPF in that it sets out that development will not adversely impact on traffic congestion or key junctions within the town or wider plan area. NPPF paragraph 32 sets out that this test is one that needs to be considered in relation to the overall impact not being severe as more accurately reflected in Policy Tra3.</p>
Jo-Anne Garrick	Northumberland County Council	<p>Minor modifications are suggested for clarity as follows:</p> <p><i>Proposed revisions:</i> <i>Subject to compliance with other policies <u>in the Neighbourhood Plan and elsewhere in the development plan proposals for development or change of use</u> will be supported where it can be demonstrated that: -</i></p> <ul style="list-style-type: none"> A. <i>they will not adversely impact on traffic congestion in Morpeth town centre or at key junctions within the town or wider plan area, achieved through appropriate mitigation as necessary;</i> <i>and</i> B. <i>additional opportunities to alleviate traffic congestion on the strategie highway network and through improvements to pedestrian and cycling routes have been identified, considered, assessed and will be implemented.</i>

Policy Tra3: Transport Requirements for New Developments		
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	<p>The respondent expressed support for Policy Tra3(A) and (C) and agreed that the traffic impacts of new development should be appropriately controlled and mitigated. The respondent also considered that the new Northern Bypass will have a substantial impact on the levels and patterns of traffic movement within Morpeth, especially through traffic, providing a real alternative to having to use Telford Bridge.</p> <p>In addition to the above, the representation also provided the respondent's view that land in their ownership, north of Barmoor Farm and south of High Stobhill Farm, would be both accessible and sustainable, subject to appropriate highway mitigation measures and a small number of public transport improvements and would facilitate use of alternatives to the private car in accessing nearby local facilities and services, including schools and employment opportunities etc.</p>
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered it to be poorly worded as a supportive policy with an unhelpful negative orientation. It was considered that there is no evidential base to substantiate the appropriateness or necessity for Criteria A, B or C to be applied. It was considered that that the policy is poorly drafted and does not take account of the economic viability of the development of the site and other material considerations.
Jo-Anne Garrick	Northumberland County Council	<p>Minor modifications are suggested for clarity as follows:</p> <p><i>Proposed revisions:</i></p> <p><i>Subject to compliance with other policies <u>in the Neighbourhood Plan and elsewhere in the development plan proposals for development or change of use</u> will be supported where it can be demonstrated that: -</i></p> <p><i>A. The cumulative impact on traffic flows on the strategic and local highway network, including the roads within and leading to the town centre, will not be severe, unless appropriate mitigation measures are undertaken.</i></p>
Stephanie Linnell	George F White (on behalf of clients Messrs Laidler)	Policy Tra3 criterion (b) indicates <i>that proposals for new development will be supported where it can be demonstrated that: (b) It makes provision for accessible and efficient public transport routes within the development site or the improvement of public transport facilities to serve the development.</i> This requirement is too onerous to be applied to all new development; clearly a small scale development or a conversion scheme would not be able to comply with this requirement. The criterion should be amended.
Stephanie Linnell	George F White (on behalf of clients Messrs Michie)	Policy Tra3 criterion (b) indicates <i>that proposals for new development will be supported where it can be demonstrated that: (b) It makes provision for accessible and efficient public transport routes within the development site or the improvement of public transport facilities to serve the development.</i> This requirement is too onerous to be applied to all new development; clearly a small scale development or a conversion scheme would not be able to comply with this requirement. The criterion should be amended.

John Fleming	Gladman Developments Ltd	It was considered that the application of national standards will appropriately implement the above policy and will be dealt with by the County Council. It was therefore recommend that Policy Tra3 should be deleted as it will simply repeat these requirements.
Policy Tra4: Development of Footpath and Cycleway Networks		
Rachael Bust	Coal Authority	Site Tra4 – This site is affected by recorded past shallow coal workings and probable underground coal workings at shallow depth;
Jo-Anne Garrick	Northumberland County Council	It is suggested that modification to the policy could make reference to improving cycle and footpath links to employment sites including those designated or protected through policies in the Neighbourhood Plan.
Leisure and Culture		
Flooding and Sustainable Drainage		
Denise Byrom	Morpeth North Residents Action Group	Support was given to the approach set out in the Neighbourhood Plan. The representation provided agreement that: <ul style="list-style-type: none"> ○ Growth of the town through piecemeal housing and development will inevitably have a serious impact on land and hard surface drainage; ○ Integrated planning of critical improvements in drainage infrastructure, both natural in streams/rivers and by piped systems, is essential to reduce the risks of future flooding in the town; and ○ With respect to watercourse management, the conservation of healthy wildlife corridors is essential to eliminate local pollution issues.
Policy Inf1: Flooding and Sustainable Drainage		
Laura Kennedy	Northumbrian Water	Northumbrian Water strongly supported the inclusion of Policy Inf1 – ‘Flooding and Sustainable Drainage’, and considered that the inclusion of a single, comprehensive policy relating to flood risk and sustainable drainage will provide important guidance for developers and residents. Northumbrian Water also considered that such thorough guidance will ensure that new development in the neighbourhood plan area can be facilitated whilst ensuring no detrimental impact upon flood risk and drainage.
David Marjoram	England and Lyle (on behalf of client, Taylor Wimpey)	The respondent accepted that any development it undertakes should not be at risk of flooding and should not give rise to an increased risk of flooding elsewhere. The representation also provided details regarding land in their ownership, north of Barmoor Farm and south of High Stobhill Farm, explaining how issues regarding flooding and drainage would be considered through the development of the site.
Anonymous Respondent #2	N/A	The respondent objected to the policy and considered that there was no evidential base to substantiate the criteria based policy or the selection of the criteria. It was considered that that the policy is poorly drafted and does not take account of the economic viability of the development of the site, the extent to which the local planning authority will adopt SuDs and other material considerations.
Sandra	Signet Planning	The Neighbourhood Plan is contrary to the strategic policy set out in the emerging Core Strategy and NPPF in relation

Manson	(on behalf of client, Mitford Estates)	to Policy Inf1 which sets out criterion C2 that greenfield sites to be developed should reduce the existing run-off rates by a minimum of 50% of the existing site run-off rates. This is considered wholly contrary to any national legislation and policy approach in relation to addressing sustainable urban drainage and flooding and is not in accordance with the emerging Core Strategy. Such a policy approach has inherent financial implications for developability of sites contrary to the NPPF which requires sustainable development to pay careful attention to viability and cost making and plan marking and decision taking. This outlines that the policy burdens should not be at such a scale to threaten viability of development and is wholly beyond any requirement in the NPPF or other legislation relating to such considerations.
Jo-Anne Garrick	Northumberland County Council	<p>Comments on the drafting of this policy have been provided previously to the Town Council by the County Council's Flood and Coastal Erosion Risk Management Team. The County Council suggests that modification should be made to the policy to better reflect the intention of NPPF as follows:</p> <p><i>Proposed revisions:</i></p> <p><i>B. Ensuring that the development will <u>not increase the risk of flooding</u> reduce flood risk in vulnerable locations elsewhere and wherever possible look to reduce the risk of flooding in particular areas known to have experienced flooding. flood risk overall.</i></p> <p><i>C. Ensuring that development proposals separate, minimise and control surface water runoff, with sustainable drainage systems being the preferred approach.</i></p> <p><i>i. Surface water should be disposed of in accordance with the hierarchy of preference, which states that surface water should be directed to:</i></p> <ul style="list-style-type: none"> <i>• <u>Infiltration (i.e. a soakaway), or if that is not feasible due to underlying ground conditions or site constraints,</u></i> <i>• A watercourse, unless there is no alternative or suitable receiving watercourse available;</i> <i>• A surface water sewer;</i> <i>• A combined sewer should be the last resort once all other methods have been explored.</i> <p><i>ii. Where greenfield sites are to be developed, the surface water runoff rates <u>must match the equivalent greenfield run-off rate for the same rainfall event and wherever possible should aim to reduce the existing greenfield run-off rate</u> should reduce the existing runoff rates. Where previously developed (brownfield) sites are to be developed surface water runoff rates should <u>aim to discharge surface water at the equivalent greenfield run-off rate.</u> Where this is impractical, discharge rates shall be reduced by a minimum of 50% of the existing site run-off rate.</i></p>
John Fleming	Gladman Developments Ltd	The deletion of Policy Inf1 was suggested as significant weight is already afforded to flood mitigation measures by national planning policy and the application of national standards is more appropriate for the implementation of this policy.

Proposals Map		
Mr Andrew Moss	Ward Hadaway (on behalf of client Mr P Mitford)	An objection was lodged that SHLAA site 3245 (Hepscott Station, land at) is shown as being outside settlement boundaries. The respondent considered that the settlement boundary should be revised to include the site within the settlement boundaries of Hepscott and that the settlement boundary would be logically drawn along the railway line which runs on the northern side of the site.
Cllr Nic Best	Morpeth Town Council (Qualifying Body)	A request was made to vary the Proposals Map to show all sites as designated as 'protected open space under Plan Policy Env3 and also listed in Appendix A of the Plan, as these were omitted from the Proposals Map as submitted. This request did not include new or additional sites not previously proposed for designation in the Plan.
Strategic Environmental Assessment		
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	<p>The respondent raises concerns regarding the compatibility of the 'Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) Environmental Report' submitted with the Neighbourhood Plan and considered that there are issues regarding its compliance with the relevant SEA regulations. The issues highlighted were as follows:</p> <ul style="list-style-type: none"> • It was considered that the reasonable alternatives considered through the SEA and Neighbourhood Plan process used a report from 2011 produced by David Locke Associates entitled 'Sustainable Growth Scenarios for Morpeth. There was concern that this report was produced pre-NPPF and that the 'growth areas' contained within the Report and used as a starting point for developing the reasonable alternatives were developed using policy designations which are not supported or carried forward through the NPPF or the emerging Core Strategy; • It was considered that the alternative scenarios considered in the SEA do not assess or incorporate the client's land interest in any of the alternative scenarios, despite the scheme and site being promoted as a reasonable alternative by the respondent; • It was considered that the SEA was fundamentally flawed in relation to its approach to considering reasonable alternatives with no robust rationale on the housing and employment sites/locations considered. The approach to the SEA in relation to potential alternatives is based on a highly restrictive scope utilising an outdated plan policy approach for the former Castle Morpeth Borough Council in relation to settlement boundaries and housing requirement and overly influenced by remaining housing and employment land allocations within that Borough Plan which has limited the Neighbourhood Plan Group from proactively and transparently considering alternative scenarios to meet both housing and employment requirements. It was strongly contended that the plan failed to meet this basic condition text and if progressed through to adoption could be the subject of fundamental legal issues and potential legal challenges.
John Fleming	Gladman Developments Ltd	The requirement to produce a Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) goes to the core compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental

		<p>Assessment Directive and implementing UK Regulations. Where an adequate SEA/SA has not been undertaken a Neighbourhood Plan is unlikely to meet this basic condition.</p> <p>Whilst it was acknowledged that the Neighbourhood Plan was supported by an SEA, this document was not considered to be a robust piece of evidence nor was it considered to comply with the requirements set out above.</p> <p>In a number of instances the SEA work undertaken was considered overly-simplistic and contains flawed or un-evidenced judgements that have been made in the assessment of the Neighbourhood Plan’s proposals. It was also considered that the SEA failed to consider the implications of the Neighbourhood Plan’s housing proposals on meeting, or more critically failing to meet, housing needs.</p> <p>Given that the Neighbourhood Plan is restrictive throughout, the SEA should have assessed all reasonable alternatives on individual policies.</p> <p>The SEA has not been prepared in accordance with paragraphs 2) and 3) of regulation 12 of the Environmental Assessment of Plans and Programmes 2004. The SEA cannot meet these requirements when it has fundamentally failed to assess the development potential of individual sites only providing for broad locations. Failure to identify and then assess alternatives is unlawful and would provide grounds for legal challenge and quashing of the policy. There is no attempt to assess individual policies which may restrict growth, this has likely impacted on the plans preferred options. The SEA provides a flawed assessment.</p> <p>The respondent submitted that the SEA/SA needs to be completely revised and updated, with active consideration of the removal of the settlement boundary and other restrictive policies as reasonable alternatives. Given that this will likely alter the spatial strategy, it was suggested that the Council will be need to re-consult under Regulation 16.</p>
Les Stephenson and Mark Gray	N/A	<p>There is currently no evidence that the NP is the most appropriate strategy when considered against reasonable alternatives. For example it has not taken account of the above evidence and information in its ES process, and has made no provision for addressing the need to provide for different types of housing contrary to the provisions of the NPPF.</p> <p>The accompanying ES does not present suitable alternatives and has been absent in consideration of meeting the wider needs of the Town in terms of its position as a Commuter Town and in terms of its status as a quality location to</p>

		locate for middle and high end managers. Whilst the Neighbourhood Plan Group has considered a few development scenarios in supporting evidence base documentation it is considered that there are key flaws in the methodology used and the level of evidence available.
Sasha White QC	Landmark Chambers (on behalf of client Sandra Manson, Signet Planning)	The respondent considered that the SEA Environmental Report failed to consider “reasonable alternatives” to the amount of housing that the Neighbourhood Plan seeks to deliver across the plan period therefore failed to consider a higher number of dwellings.
Rachael Bust	Coal Authority	The Strategic Environmental Assessment was considered deficient in that the Housing Location Assessment: Site Assessment Criteria set out in Appendix B fails to respond to the comments made by The Coal Authority previously on the draft NDP that unstable land and mineral sterilisation need to be considered.
Alastair Willis	Signet Planning (on behalf of client, Till Services Ltd)	The approach to the SEA and assessing site alternatives was considered to have no robust rationale to support the options considered, and was not in accordance with the SEA regulations and did not meet condition test f). The respondent requested the examiner to find that the Plan has failed against the neighbourhood planning legislative requirements and cease progression of the Morpeth Neighbourhood Plan.
Consultation Statement		
Sandra Manson	Signet Planning (on behalf of client, Mitford Estates)	Part 5 of the Neighbourhood Planning (General) Regulations 2012, Part 5, Section 15 (2) relates to the consultation statement that must be submitted alongside the submission plan. It was considered by the respondent that this statement fails to meet the requirements of the act due to: <ul style="list-style-type: none"> • Failure to summarise the main issues and concerns raised by those consulted, including the Mitford Estates; • Failure to describe how the issues and concerns raised have been considered through the plan making process. It was therefore considered that the consultation statement disregards fundamental objections raised by numerous parties through the development of the plan and specifically those submitted by Mitford Estates. It was also considered that there was no clear reasoning for discounting the issues/comments raised or how they were considered.