

WARKWORTH NEIGHBOURHOOD PLAN

Report to Northumberland County Council of the Independent Examination

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1. Executive Summary

1. I was appointed by Northumberland County Council with the support of Warkworth Parish Council to carry out the independent examination of the Warkworth Neighbourhood Plan.

2. I undertook the examination by reviewing the submitted Plan, associated documents and written representations, and by making an unaccompanied visit to the Neighbourhood Area.

3. I consider the Plan to be an adequate expression of the community's views and ambitions for Warkworth. It is based on an effective programme of public consultation which has informed a Vision to 2036. This is to be achieved through a set of six aims delivered through six planning policies dealing with matters distinct to the locality and 18 community actions (which do not form part of this examination). The Plan is supported by a Consultation Statement and Basic Conditions Statement and Strategic Environmental Assessment and Habitats Regulations Assessment screening reports. There is supporting evidence provided and there is evidence of community support and the involvement of the local planning authority.

4. I have considered the 22 separate representations made on the submitted Plan. These are addressed in this report as appropriate.

5. Subject to the recommended modifications set out in this report I conclude that the Warkworth Neighbourhood Plan meets all the necessary legal requirements, including satisfying the Basic Conditions. I make a number of additional optional recommended modifications.

6. I recommend that the modified Plan should proceed to Referendum and that this should be held within the Neighbourhood Area of Warkworth.

2. Introduction

7. This report sets out the findings of my independent examination of the Warkworth Neighbourhood Plan. The Plan was submitted to Northumberland County Council by Warkworth Parish Council as the Qualifying Body.

8. I was appointed as the independent examiner of the Warkworth Neighbourhood Plan by Northumberland County Council with the agreement of Warkworth Parish Council.

9. I am independent of Warkworth Parish Council and Northumberland County Council. I do not have any interest in any land that may be affected by the Plan. I possess the appropriate qualifications and experience to undertake this role.

10. My role is to examine the neighbourhood plan and recommend whether it should proceed to referendum. A recommendation to proceed is predicated on the Plan meeting all legal requirements as submitted or in a modified form, and on the Plan addressing the required modifications recommended in this report.

11. As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). To comply with the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
- contribute to the achievement of sustainable development; and
- be in general conformity with the strategic policies of the development plan in the area; and
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations, including the Conservation of Habitats and Species Regulations 2017.

12. An additional Basic Condition was introduced by Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in 2018 that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. I am also required to make a number of other checks under paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990.

13. In undertaking this examination I have considered the following documents as the most significant in arriving at my recommendations:

- the submitted Warkworth Neighbourhood Plan
- the Basic Conditions Statement
- the Consultation Statement
- the Strategic Environmental and Habitats Regulations Assessment screening reports
- the relevant parts of the existing development plan, comprising the Northumberland Local Plan 2016-2036
- representations made on the submitted neighbourhood plan
- relevant material held on the Warkworth Parish Council and Northumberland County Council websites
- National Planning Policy Framework (September 2023)
- Planning Practice Guidance
- relevant Ministerial Statements

14. The Plan was prepared prior to publication of the revised National Planning Policy Framework (NPPF) in December 2023 and this does not yet apply for the purposes of examining plans (paragraph 230, NPPF December 2023). The Basic Conditions Statement addresses the version of the NPPF published in September 2023 and this is the version used throughout this examination, including where paragraph numbers are referenced.

15. No representations were received requesting a public hearing and having considered the documents provided and the representations on the submitted Plan I was satisfied that

the examination could be undertaken by written representations without the need for a hearing.

16. I carried out an unaccompanied visit to the Neighbourhood Area on a weekday during January. I visited the main locations addressed in the Plan, including the Local Green Spaces, Conservation Area, settlement boundaries and the surrounding countryside.

17. Throughout this report my recommended modifications are bulleted. Where modifications to policies are recommended they are highlighted in **bold** print with new wording in “speech marks”. Existing wording is in “*italics*”. Other modifications, including to the supporting text, are also recommended and these are not in bold. The recommended modifications are numbered from M1 and are necessary for the Plan to meet the Basic Conditions. A number of modifications are not essential for the Plan to meet the Basic Conditions and these are indicated by [square brackets]. These optional modifications are numbered from OM1. Some changes will also be needed to the supporting text and documents consequential to the modifications. These should be agreed between Northumberland County Council and Warkworth Parish Council.

18. Producing the Warkworth Neighbourhood Plan has clearly involved significant effort over many years led by the Steering Group. The process began in 2019 and is informed by significant community involvement. There is evidence of collaboration with Northumberland County Council and continuing this will be important in ensuring implementation of the Plan. The commitment of all those who have worked so hard over such a long period of time to prepare the Plan is to be commended and I would like to thank all those at Warkworth Parish Council and Northumberland County Council who have supported this examination process.

3. Compliance with matters other than the Basic Conditions

19. I am required to check compliance of the Plan with a number of matters.

Qualifying body

20. The neighbourhood plan has been prepared by a suitable Qualifying Body – Warkworth Parish Council – which being a parish council is the only organisation which can prepare a neighbourhood plan for the area.

Neighbourhood Area

21. I am satisfied that the Plan relates to the development and use of land for a designated neighbourhood area which was designated by Northumberland County Council on 21 February 2020.

22. The boundary of the neighbourhood area is shown in Figure 1 and accompanying Policies Map. A detailed map of the boundary is also available on the online Northumberland Development Plan Policies Map.

Land use issues

23. I am satisfied that the Plan's policies relate to relevant land use planning issues

Plan period

24. The period of the neighbourhood plan runs to 2036. The period is shown on the Plan cover and is consistent with the Vision. It aligns with the Northumberland Local Plan.

Excluded development

25. I am satisfied that the neighbourhood plan makes no provisions for excluded development (such as national infrastructure, minerals extraction or waste).

4. Consultation

26. I have reviewed the Consultation Statement and relevant information provided on the Warkworth Neighbourhood Plan website. It provides a clear record of the consultation process that has been undertaken since the prospect of a neighbourhood plan was first developed in 2019. This was guided by a Steering Group once the neighbourhood area had been designated.

27. The preparation of the neighbourhood plan has been open and transparent with good levels of participation. A number of different engagement methods have been used, including a website, public meetings, social media and interactive drop in events. Surveys of both residents and businesses each attracted more than a 40% response rate. Around 100 people participated in a consultation event on the draft policies and community actions. There have been door drops to every household and information has been published in a widely distributed local publication, The Pelican.

28. The process has been informed by surveys of local housing needs and background papers on Local Green Spaces and non-designated heritage assets as well as being supported by a planning consultant. Northumberland County Council has been involved from the genesis of the Plan and engaged with its development before formal consultation on the draft.

29. The Plan was subject to Regulation 14 consultation between 21 November 2022 and 9 January 2023. The consultation included circulation of an information leaflet to every household and the public display of posters as well as promotion online, in local publications and via social media. There is evidence of the consultation including the required statutory and other consultees. Physical copies of the Plan were made available. Multiple channels for making comments were provided and a drop in event was timed to coincide with the Christmas lights switch on. There were responses from 61 residents, 10 consultation bodies and seven other organisations.

30. A detailed report on the issues raised is provided in the Consultation Statement and there is evidence of changes being made to the Plan.

31. 22 separate representations have been made on the submitted Plan, including from residents and statutory bodies. All the representations have been considered as part of the examination and are addressed as appropriate in this report. The general comments from the Marine Management Organisation encourage reference to the North East Marine Plan. This is not necessary in relation to any of the Plan's policies in order to meet the Basic Conditions but it would be appropriate to include a reference in the supporting text.

- OM1 – [Consider including a reference to the relevance of the North East Marine Plan in an appropriate location in the supporting text]

32. I am satisfied with the evidence of the public consultation undertaken in preparing the Plan. The Plan has been subject to appropriate public consultation at different stages in its development. Participation rates have been good and appropriate opportunities to shape the Plan as it has developed have been provided. Local businesses, landowners, other stakeholders and the local planning authority have been engaged through the process.

5. General comments on the Plan's presentation

Vision and Objectives

33. The Plan includes a Vision for Warkworth in 2036. This presents a positive ambition and reflects the feedback received through consultation. It is consistent with the aims and policies in the Plan. The overall approach is based on future needs and an environmentally responsible approach to new development. The Vision is consistent with sustainable development and this is complemented by the Plan's aims.

Other issues

34. The Plan is clearly structured and has a consistent format. The general approach is to focus on issues where the Plan can add value to existing Local Plan and national planning policy. This is commendable. It addresses the expectation in national Planning Practice Guidance that neighbourhood plans should "*be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared*" (Paragraph: 041 Reference ID: 41-041-20140306,NPPG). The Policies are clearly identified by tinted boxes and generally supported by evidence although there are issues which I address in relation to individual policies. The evidence base is brought together in a Bibliography which is also available online. There are instances where the headings in the Contents are not the same as those used in the body of the Plan. It is for Warkworth Parish Council to consider whether amending the alignment of the text to improve accessibility as highlighted by Northumberland County Council should be done.

- OM2 – [Be consistent in the headings used in the Plan]

35. The Plan includes many references to a "*Policies Map*". This is available as a separate document, including with an inset to show the detail in and around Warkworth village. It would be helpful to include a copy of the inset map in the body of the Plan and to provide a direct link to the map online wherever it is mentioned. The Policies Map includes boundaries which are not established in the Plan but which are relevant to its policies. The Conservation Area boundary is relevant to Policy W1 as well as Policy W4 and I recommend this is shown in the Legend. The settlement boundary for Amble should be included where

it relates to the neighbourhood area. Northumberland County Council has committed to including all relevant neighbourhood plan policies on its Development Plan Policies Map once they have been made.

- OM3 – [Include the inset version of the Policies Map in the Plan and provide a hyperlink wherever it is mentioned. Add “W1 &” before “W4” in the Legend and include the settlement boundary for Amble]

6. Compliance with the Basic Conditions

National planning policy

36. The Plan is required to “*have regard*” to national planning policies and advice. This is addressed in the Basic Conditions Statement which relates each of the Plan’s policies and objectives to the National Planning Policy Framework (NPPF). The Basic Conditions Statement relates the Plan to the September 2023 version of the NPPF.

37. The Basic Conditions Statement includes a table that relates each of the Plan’s policies to relevant paragraphs of the NPPF and provides a short commentary. No instances of conflict are identified and the assessment concludes that “*the Submission Draft WNP has been prepared having regard to the NPPF*”.

38. I address some issues with regard to national planning policy in my consideration of individual policies and recommend some modifications. These include areas where the drafting of the Plan’s policies needs to be amended in order to meet the NPPF’s principles regarding the clarity of policies, the need for policies to be positively worded, to serve a clear purpose and to avoid duplication. I also address the requirement expressed in national planning policy and Planning Practice Guidance that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*” (NPPG Paragraph: 041 Reference ID: 41-041-20140306). The Plan’s policies do not always meet these requirements and a number of recommended modifications are made as a result.

39. I agree with the Basic Conditions Statement and conclude that the Plan has regard to national planning policy and guidance but there are exceptions as set out in my comments below. These include the need for some policies to be more clearly expressed and/or evidenced, for policies to be positively worded and avoid being overly restrictive, for policies

to serve a clear purpose and for duplication with other planning policies or the NPPF to be avoided.

40. I am satisfied that the Plan meets this Basic Condition other than where identified in my detailed comments and recommended modifications to the Plan policies.

Sustainable development

41. The Plan must *“contribute to the achievement of sustainable development”*. This is addressed in the Basic Conditions Statement by relating relevant Plan policies and aims to each of the economic, social and environmental objectives of the planning system which contribute to sustainable development. It concludes that this *“illustrates the alignment of aims and policies of the WNP with the three objectives of sustainable development”*. I am satisfied that the overall contribution of the Plan to sustainable development is positive and that the Plan meets this Basic Condition.

Development plan

42. The Plan must be *“in general conformity with the strategic policies of the development plan”*. The Basic Conditions Statement addresses this by relating each of the Plan’s policies to relevant strategic policies in the Northumberland Local Plan and providing a brief commentary. It concludes that this *“sets out how the WNP policies are in general conformity with the relevant strategic development plan policies”*.

43. Northumberland County Council has raised no questions about the Plan’s general conformity with the strategic policies of the development plan.

44. I am satisfied the Plan meets this Basic Condition.

Strategic Environmental Assessment

45. The Plan must be informed by a Strategic Environmental Assessment if it is likely to have significant environmental effects. A screening assessment of the policies in the submitted Plan was undertaken by Northumberland County Council (October 2023) which concluded that *“Warkworth Neighbourhood Plan is unlikely to have any significant positive*

or negative effects on the environment. Therefore, Strategic Environmental Assessment is NOT required for the Warkworth Neighbourhood Plan". Natural England's view is that significant effects are *"unlikely"* and Historic England agreed with this conclusion. Environment Agency made no response and has expressed no objections to the Plan.

46. I am satisfied by the screening assessment and conclude that the Plan meets this Basic Condition.

Habitats Regulations Assessment

47. The Plan must be informed by a Habitats Regulations Assessment if it is likely to lead to significant negative effects on protected European sites. A screening assessment of the policies in the submitted plan was undertaken by Northumberland County Council (November 2023). The assessment concludes that while there are protected European sites within and near to the neighbourhood area *"No policies in the plan have a credible risk of a likely significant effect on European sites, and Appropriate Assessment is not required"*. Natural England agreed with this conclusion.

48. I am satisfied with the screening assessment and conclude that the Plan meets this Basic Condition.

Other European obligations

49. The Plan must be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations. The Basic Conditions Statement asserts compliance and no contrary evidence to the Plan meeting this Basic Condition has been presented. There is good evidence of changes being made to the Plan during its preparation. I consider that there has been adequate opportunity for those with an interest in the Plan to make their views known and representations have been handled in an appropriate manner with changes made to the Plan.

50. I conclude that the Plan meets this Basic Condition.

7. Detailed comments on the Plan policies

51. This section of the report reviews and makes recommendations on each of the Plan's policies to ensure that they meet the Basic Conditions. I make comments on all policies in order to provide clarity on whether each meets the Basic Conditions. Some of the supporting text will need to be amended to take account of the recommended modifications.

Sustainable Development and Climate Change

Design

52. **Policy W1** – This provides a range of design criteria to be addressed by development proposals.

53. The Policy is supported by references to the importance of good design in national planning policy and the Good Design Guide. It is informed by work undertaken by the Steering Group to identify what good design means in the local context and has been consulted on through the preparation of the Plan. The criteria raised are generally distinct to the area.

54. The Policy drafting is positive and supportive. The reference to parking meeting the requirements of Local Plan Policy TRA4 fails to *“serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”* (paragraph 16, NPPF). Policies also need to be *“clearly written and unambiguous”* (paragraph 16, NPPF) and it is unclear whether all the criteria apply to all relevant development proposals.

55. I am content with Warkworth Parish Council's response to representations from Northumberland County Council that the approach to *“incremental and phased development”* is appropriate and could be applied to the development of exceptions sites as well as development within the settlement boundary. I share Historic England's view that it is more appropriate and consistent with national planning policy and the Planning (Listed Buildings and Conservation Areas) Act 1990 to refer to the *“special interest”* of the Conservation Area instead of its *“integrity”*

56. Policy W1 does not meet the Basic Conditions.

- **M1 – Amend Policy W1 to:**

- **Replace *integrity* with “special interest” in criterion c.**
- **Delete the second sentence of criterion h.**
- **Insert “and” at the end of criterion o.**

Meeting housing needs

Affordable housing and housing mix

57. **Policy W2** - This addresses the development of affordable housing outside the Warkworth settlement boundary as an exception and subject to relevant planning criteria.

58. The Policy is based on evidence, supported by Northumberland County Council, that overall housing requirements are being more than met in the neighbourhood area. I agree with this analysis and do not agree with representations from JT Planning that further site allocations are needed. Tim Cronin has made representations to be more precise in the description of “new market dwellings” when referencing Local Plan Policy HOU 10 in paragraphs 5.10 and 5.11. I support the extra clarity although it is not needed for the purposes of meeting the Basic Conditions.

59. Given this context the Plan focuses on the opportunity to improve the way the need for different types of home is met. Policy W2 addresses the role of rural exception sites within the context provided by Local Plan Policy HOU 7 and the settlement boundary defined by Local Plan Policy STP 1. The Plan considers that Local Plan Policy HOU 5 already effectively addresses issues of housing need within settlements. The Policy is informed by an independently prepared Warkworth Housing Needs Assessment.

60. The neighbourhood area also includes a settlement boundary for Amble and there is no evidence provided for why Policy W2 relates only to exception sites outside the Warkworth settlement boundary. The Amble settlement boundary should be included on the Policies Map and Warkworth Parish Council has confirmed this was the intention.

61. The drafting of Policy W2 is restrictive in stating what *“will only be permitted”* and what *“must”* be provided. This is not consistent with the need for plan policies to be *“prepared positively”* (paragraph 16, NPPF). The drafting can also be improved to re-enforce the need for all the criteria to be addressed. I share Northumberland County Council’s view that the second part serves no clear purpose. Any application for development of a rural exception site would be considered in accordance with Policy W2 and all other development plan policies.

62. Rural exception sites *“can come forward in any rural location”* (Paragraph: 011 Reference ID: 67-011-20210524, NPPG) and contrary to criterion b. are not limited to locations that *“adjoin”* the settlement boundary. Notwithstanding the approach in Local Plan Policy HOU 7 this only applies to entry level and not rural exception sites (paragraph 72, NPPF). It is, however, consistent with national planning policy that rural *“housing should be located where it will enhance or maintain the vitality of rural communities”* (paragraph 79, NPPF) that there is a process demonstrating that the proposal is for the most suitable site as proposed in criterion a.

63. Policy W2 is inconsistent in stating that development proposals on rural exception sites *“must comprise 100% affordable housing”* and then recognising there may be instances where an element of cross-subsidy from market housing is required. National planning policy requires that those bringing forward rural exception sites to *“consider whether allowing some market housing on these sites would help to facilitate”* the provision of affordable homes (paragraph 78, NPPF) and Local Plan Policy HOU 7 establishes criteria to be met where market housing is provided. In this respect I also agree with Northumberland County Council that there is some duplication between Policy W2 and Local Plan Policy HOU 7.

64. The Policy both requires homes to meet the needs identified in the most recent evidence in criterion d. and specifies a preference for one, two and three bedroom in criterion f. This carries the risk of creating ambiguity as the evidence for the size of affordable homes may change and I recommend the assessment of need is simply based on

the most recent evidence. A summary of the most recent evidence at the time of the Plan's preparation can be provided in the supporting text.

65. Policy W2 does not meet the Basic Conditions.

- **M2 – Amend Policy W2 to:**
 - **Insert “or Amble” after “Warkworth” in the first line and criterion a.**
 - **Delete “only” in the first line**
 - **Delete criterion b.**
 - **Insert “The type and tenure of new housing should reflect the local and affordable needs of the community.” as the second sentence of criterion d.**
 - **Delete criterion f.**
 - **Delete “and” at the end of criterion e. and insert “and” at the end of the penultimate criterion**
 - **Delete part 2.**
- M3 – Amend the Policies Map to include the Amble settlement boundary
- OM4 – [Replace references to “new dwellings” (paragraph 5.10) and “new market housing” (paragraph 5.11) with “new market dwellings”]

Distinctive natural, built and historic environment

Local Green Space

66. **Policy W3** – This designates 16 Local Green Spaces to be protected in a manner consistent with the Green Belt.

67. The broad location of each Local Green Space is provided in Figure 8 which also indicates that the detailed boundaries are provided in the “policies map”. A Local Green Space Background Paper addresses the reasoning behind designation of each Local Green Space in accordance with the requirements of the National Planning Policy Framework (paragraph 102). This is a comprehensive document which also records the process through which the Local Green Spaces have been identified and consulted on. 19 sites were included in the pre-submission draft Plan. This consultation process resulted in two

proposals not being taken forward and further sites being assessed. The proposed boundaries of Local Green Spaces have also been amended through the process. In total 24 sites have been assessed. The process has included all the landowners. I am content with the rigour of the approach.

68. I visited each of the proposed Local Green Spaces and agree with the rationale and proposed boundaries in a majority of cases. There are detailed considerations relating to:

LGS02 – This includes an area of hard standing used as a car park. In visual and functional terms this forms part of the highway and should be excluded. The area of land used as a picnic car park and with surface matting is appropriate for inclusion.

LGS03 – The areas of green space alongside the River Coquet to both north and south of the proposal appear to serve the same function. The area to the south includes a public footpath which is shown on the Policies Map. Warkworth Parish Council confirmed that these have not been included because the area to the north is privately owned, the area to the south is part of a SSSI, and both are subject to flooding. The fact of an area being in private ownership or not having public access does not prevent its designation as Local Green Space provided it can be shown to be “*demonstrably special*” to the local community. Nevertheless, I am content with the reasons given and recommend no change.

LGS09 – The rationale for designation of this Local Green Space is its important role as a recreational area with a full sized football pitch. This role is not served by the short extension along the hedgerow and path at the north east corner and I recommend this area is excluded. It remains as protected “open space” as defined by Local Plan Policy INF5.

LGS10 – This is a significant area on the edge of Amble and there is a notable level of public support for its designation in representations on the Plan. The southern boundary does not run logically along The Cut watercourse or the urban edge because it must by necessity follow the parish boundary that defines the

neighbourhood area. There have been representations from John Howey concerning the value of including land to the north of the proposal and my visit confirmed the merit of this. I am aware that a significant additional area was included in earlier proposals but it would not be appropriate to reinstate or extend the proposed designation as the change would be significant and not subjected to public consultation on the submitted Plan. It is a matter which could be addressed through a future Plan review.

LGS12 – The rationale supporting designation provided in the Background Paper focuses largely on the important community role played by St Lawrence Church. This is despite the church not being included in the proposed designation. I am satisfied, however, that the role of the grounds in providing tranquillity and wildlife habitats and in contributing to the beauty of the location are significant and that Local Green Space designation is appropriate.

69. I note the representations that Northumberland County Council Strategic Estates object is to the designation of LGS 11 for operational reasons relating to Warkworth School. I do not consider the issues raised in this objection to be material to the designation and being a Local Green Space confers no additional public access.

70. To be afforded a level of protection consistent with them being Green Belt, Local Green Spaces need only be designated by the Plan. This follows a Court of Appeal case relating to a Local Green Space policy in a neighbourhood plan (Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council, [2020] EWCA Civ 1259) which means it is inappropriate without clear justification to include any wording that sets out how development proposals should be managed.

71. Policy W3 does not meet the Basic Conditions.

- **M4 – Amend Policy W3 to delete from “which” to “Belt”**
- M5 – Amend the boundaries of LGS02 and LGS09 as recommended

Heritage assets

72. **Policy W4** – This addresses the impact of development in relation to Warkworth Conservation Area.

73. The Policy comprises three parts:

- A general approach to development within or affecting the setting of Warkworth Conservation Area – this does not add anything distinct to the neighbourhood area and does not serve a clear purpose as it duplicates Local Plan Policy ENV 9 and national planning policy (Section 16, NPPF). There is also a risk of ambiguity as the Policy introduces different wording to address the impact of development on the Conservation Area. In response to my questioning Warkworth Parish Council acknowledged that this part *“reflects the requirements of the NPPF and NLP policy ENV9”*.
- Key considerations relating to the impact of development on the Conservation Area – this is informed by the consultation process on the Plan and the current and draft Warkworth Conservation Area Character Appraisal and introduces considerations distinct to the neighbourhood area. It would be more consistent with Warkworth’s designation as a *“service village”* in Local Plan Policy STP 1 to refer to it as a *“village”* and not a *“town”* as suggested in representations from Anna Willey.
- An expectation that development will address the impact on buildings and structures identified in the Character Appraisal – the role of Character Appraisals is not directly referenced in Local Plan Policy ENV 9 and so the Policy serves a clear purpose. An updated Character Appraisal is expected to be adopted shortly and I agree with Northumberland County Council’s suggestion that this is addressed.

74. Policy W4 does not meet the Basic Conditions.

- **M6 – Amend Policy W4 to:**
 - **Delete Part 1**
 - **Replace “*The following are*” with “Development proposals should address the following” in Part 2**
 - **Insert “(and any subsequent updates)” after “*Appraisal*” in Part 3**
 - **Renumber the Parts**

- OM5 – [Replace references to “*town*” with “*village*” throughout]

Inclusive and sustainable community

Community facilities

75. **Policy W5** – This identifies six facilities as “*having great importance*” to the local community, supports development which sustains existing shops and facilities and establishes policy requirements to be met before valued services and facilities can be lost.

76. The six community facilities are identified on the Policies Map and I visited each of them. Their significance was identified through the consultation process and there is support for the approach in public consultation feedback.

77. The third part of the Policy serves no clear purpose and duplicates Local Plan Policy INF 2 which applies to all the facilities specifically identified in the Policy. There is no evidence supporting the need for slightly different wording. This could also create ambiguity with the development plan having two policies that deal with planning applications in very similar but different ways.

78. Policy W5 does not meet the Basic Conditions.

- **M7 – Amend Policy W5 to delete Part 3**

Transport and accessibility

79. **Policy W6** – This supports development which improves the public rights of way network and establishes policy considerations where development might result in loss to

the network. I share Northumberland County Council's view that the Definitive Map rather than the Policies Map is the best location to show the public rights of way and be sure it is up to date. This includes all forms of route, including for cyclists and horse riders, and addresses the need for the Policy to be clear and unambiguous (paragraph 16, NPPF). A link to the Definitive Map should be provided. The policy drafting can also be improved to address the role of planning decisions in protecting the public rights of way network. The Policies Map can continue to show the public rights of way network, with a note in the Legend that these are defined on the Definitive Map and providing a link

80. Policy W6 does not meet the Basic Conditions.

- **M8– Amend Policy W6 to:**
 - **Delete “, including cycle routes, identified on the policies map,” in the first paragraph**
 - **Replace the first two lines of the second paragraph with “Development proposals should protect the public rights of way network unless”**
- M9 – Reference and provide a link to the Definitive Map in the supporting text and reference it in the Policies Map

8. Recommendation and Referendum Area

81. I am satisfied the Warkworth Neighbourhood Plan meets the Basic Conditions and other requirements subject to the modifications recommended in this report and that it can proceed to a referendum. I have received one representation that inclusion of The Braid as a Local Green Space supports extension of the referendum area to include Amble. While important this proposal forms just one part of the Plan. I do not consider that its significance merits extending the referendum area and consequently I recommend the referendum area matches that of the Neighbourhood Area.