

Hexham Neighbourhood Plan

Summary of representations received and submitted to the Independent Examiner

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

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

Electronic copies of the representations made on the Plan, and which were submitted to the independent examiner, are available under the Hexham tab on our Neighbourhood Planning web page:

<https://www.northumberland.gov.uk/Planning/Planning-policy/Neighbourhood.aspx>

List of Representations

1. Mr James Hall
2. Mr Radcliffe Hare
3. Mr John Loader
4. Mrs Sue Loader
5. Mr Terry Robson
6. Mr Clive Ward
7. Mr Nigel Warner
8. Mr Paul Wharrier
9. The Coal Authority
10. Commercial Estates Group
11. Galbraith Group
12. Gladman Developments
13. Go-Ahead North East
14. Hexham Civic Society
15. Highways England
16. Historic England
17. National Grid
18. Natural England
19. Northumberland County Council (NCC)
20. Northumbrian Water
21. Taylor Wimpey
22. Wylam Garage
23. Youngs RPS

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Name	Organisation (if applicable)	Summary of representation
James Hall	N/A	<i>Mr. Hall supports the Neighbourhood Plan but is frustrated at what he perceives to be the slow pace of change citing examples including the former workhouse site on Corbridge Road and the former bus station.</i>
Radcliffe Hare	N/A	<i>Mr. Hare commented that the draft Neighbourhood Plan is a 'well worked and progressive report'.</i>
John Loader	N/A	<i>Mr. Loader supports the Neighbourhood plan and applauds the time and effort put in by all those involved. In particular, he supports the recently revised Shopfronts guide.</i>
Sue Loader	N/A	<i>Ms. Loader supports the Neighbourhood plan. In particular, she endorses Policies HNP2, HNP5, HNP10, HNP13, HNP22 and HNP24.</i>
Terry Robson	N/A	<i>Mr. Robson fully supports and endorses the draft Neighbourhood Plan.</i>
Clive Ward	N/A	<i>Mr Ward supports the majority of proposals contained in the Plan particularly the use of brown field sites for future redevelopments. Citing Beaumont Street as an example, he argues for greater pedestrianisation of Hexham town centre to improve safety.</i>
Nigel Warner	N/A	<i>Mr Warner is broadly supportive of this Plan but disagrees strongly with Policy HNP 25 stating that Hexham has no need of more car parking areas and this approach is incompatible with a sustainable response to climate change. He argues that parking charges should be reintroduced and parking spaces gradually reduced.</i>
Paul Wharrier	N/A	<i>Mr Wharrier fully supports and endorses the draft Neighbourhood Plan.</i>
Melanie Lindsley Development Team Leader, Planning	Coal Authority	<i>The Coal Authority identify the Neighbourhood Area as lying within the current defined coalfield. In addition, there are recorded risks from past coal mining activity in the form of mine entries and likely historic unrecorded coal mine workings at shallow depth within the Hexham area. They have reviewed the sites proposed for future development and note that none of these appear to be in the area where their records indicate that coal mining legacy is present.</i>

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Alastair Willis Planning Director	Lichfields on behalf of Commercial Estates Group ('CEG')	<p><i>CEG have made representations to previous rounds of consultation on the Neighbourhood Plan.</i></p> <p><i>CEG are promoting the development of land to the west of Hexham, north and south of Shaws Lane. They say this site offers a genuinely sustainable development opportunity that Complies with the Neighbourhood Plan policy requirement and could make a significant contribution towards delivery of the objectives of the Neighbourhood Plan.</i></p> <p><i>CEG contend the housing requirement figure is based on unsubstantiated assumptions and it is too low which will not support the economic growth ambitions of Hexham.</i></p> <p><i>CEG object to what they state as an 'inadequate' supply of identified housing land, which they say renders the Plan unable to achieve its objectives.</i></p> <p><i>CEG state the constraints of the Green Belt within the Neighbourhood Plan Area place undue limitation on the ability of the Plan to achieve its objectives. They say the Plan is too reliant on the delivery of brownfield sites to meet the housing requirement and that only the designation of green field sites around the periphery of the town would resolve this issue. They recommend that the Town Council discuss strategic amendments to the Green Belt as part of the emerging Local Plan with the County Council to allow the Neighbourhood Plan to achieve its aspirations.</i></p> <p><i>Specifically CEG make the following comments with regard to:</i></p> <p><u><i>Objective 1: Sustainability</i></u></p> <p><i>CEG contend several policies are unreasonably restrictive, limiting the ability of the Plan to satisfy this Objective. Additional references to Green Belt restrictions throughout the Plan further support this view.</i></p>

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		<p><u>Objective 3: Housing</u></p> <p><i>CEG recognise changes to wording resulting from their November 2018 representations but argue that the revised wording still fails to recognise the intrinsic link between housing development and population growth to maintaining and supporting the level of facilities commensurate with a Main Town.</i></p> <p><u>Policy HNP2</u></p> <p><i>CEG suggest the allocated sites are unlikely to satisfy the requirements of this policy.</i></p> <p><u>Policy HNP8: Housing Site Allocations</u></p> <p><i>CEG state these allocations will not solve the housing shortage in Hexham over the plan period.</i></p> <p><u>HNP9: New Housing Development</u></p> <p><i>CEG contend the Plan places inappropriate weight on the public consultation stage, including a test of 'proactive and effective engagement' which they note has no definition and cannot be objectively assessed in the decision taking process. They recommend deleting this wording from the policy.</i></p> <p><i>CEG contend that development of the Shaws Lane site could achieve each of the criteria of this policy.</i></p> <p><u>HNP10: Affordable Housing Provision</u></p> <p><i>CEG state the current requirement of 30% affordable housing is not supported by robust evidence and does not accord with the emerging Local Plan. They suggest that the</i></p>

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		<p><i>requirement should be revised to align with the emerging Local Plan.</i></p> <p><i>CEG state the use of the ‘minimum’ figure does not provide developer certainty on what may be sought on any proposed development and is not consistent with the emerging Northumberland County Local Plan which adopts a range of figures, depending on local viability. They suggest the policy should be amended in line with the emerging Local Plan.</i></p> <p><i>CEG maintain that the proposed housing allocations alone will deliver significantly less affordable housing than is needed. They suggest that allocation of the Shaws Lane site in the Neighbourhood Plan (with an affordable housing policy which is consistent with the emerging Local Plan) would allow a greater amount of affordable housing to be delivered, as well as address the other local housing market requirements in terms of property types, sizes and tenures, addressing the Objectives of the Neighbourhood Plan.</i></p> <p><u><i>HNP12: Rural Exception Sites for Affordable Housing</i></u></p> <p><i>CEG welcome the removal of the requirement for such sites to be 100% affordable housing, recognising that such sites often require an element of open market housing to ensure they are viable and deliverable.</i></p> <p><i>CEG suggest the specified distances set out in HNP12 should be removed as they lack justification and represent an unreasonable constraint on the delivery of the homes which the Plan area needs.</i></p> <p><u><i>Objective 4: Natural Environment, Health and Well-Being / Policy HNP15: Wildlife Corridors</i></u></p> <p><i>CEG claim that designation of two wildlife corridors within the Shaws Lane site is not supported by sufficient evidence and does not align with the emerging Northumberland County Local Plan.</i></p>

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		<p><u>Annex C: Glossary</u></p> <p><i>CEG say that definitions are not consistent with the NPPF and can be misleading. They suggest updating the definitions in accordance with, and with reference to, the NPPF. In particular, they highlight: Affordable Housing, Green Belt (which should correctly reference paragraph 134 of the NPPF, rather than paragraph 80), and Sustainable Development (which should reference the ‘three overarching objectives’ set out at paragraph 8 of the NPPF).</i></p>
Roddy Findlay	On behalf of Galbraith	<p><i>Galbraith state that previous comments submitted at pre-submission stage have not been considered.</i></p> <p><u>Housing</u></p> <p><i>They criticise the required housing number, saying it is too low and it fails to address some of the issues facing Hexham including an ageing population and a lack of affordable housing. In addition, Galbraith does not believe that Hexham can achieve the required housing number in the Plan period.</i></p> <p><i>Galbraith contend the deliverable supply stated in the site allocations paper is significantly overstated.</i></p> <p><i>They are concerned that reliance on windfall sites to achieve the required housing number may result in more of the historic retail and commercial core of Hexham being converted to residential use affecting the viability of remaining retailers. In addition, they say the reliance on small windfall sites will not contribute any affordable housing.</i></p> <p><i>Galbraith believe that some of the 10 allocated sites are undeliverable or inappropriate for allocation which will reduce the housing supply.</i></p> <p><i>They say the Neighbourhood Plan should re-consult on the release of Green Belt sites to</i></p>

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		<p><i>deliver the required housing for Hexham.</i></p> <p><u><i>General comments</i></u></p> <p><i>Galbraith contend the Plan is anti-growth and polices are deliberately vague to allow development proposals to be refused.</i></p> <p><u><i>Policy HNP2</i></u></p> <p><i>Galbraith state the policy is too subjective and it is unclear what development will be allowed. They contend the requirement for BREEAM standards is excessive and unreasonable.</i></p> <p><u><i>Policy HNP3</i></u></p> <p><i>Galbraith state the policy is too subjective and it is unclear what development will be allowed.</i></p> <p><u><i>Policy HNP5</i></u></p> <p><i>Galbraith suggest this policy is too onerous and will put further pressure on retailers.</i></p> <p><u><i>Policy HNP10</i></u></p> <p><i>Galbraith contends that due to over-reliance on small scale sites, the Plan will not deliver affordable housing.</i></p> <p><u><i>Policy HNP18</i></u></p> <p><i>Galbraith contend this policy is unnecessary and will add to the burden and expense of development within the Plan area.</i></p>

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		<p><u>Policy HNP19</u></p> <p><i>Galbraith have no objection to this policy.</i></p> <p><u>Economic Policies</u></p> <p><i>Galbraith contend these policies do not support the stated objectives. They suggest policy support for change of use of upper floors to residential use will have a negative impact on retailers.</i></p> <p><u>Policy HNP25</u></p> <p><i>Galbraith state there has been no attempt to identify or allocate suitable car parks near the town centre.</i></p>
John Fleming	<p>Gladman Developments Limited ('Gladman')</p>	<p><i>Gladman consider that some policies do not reflect the requirements of national policy and guidance.</i></p> <p><u>Policy HNP7: Designated heritage assets</u></p> <p><i>Gladman recommend deleting the last sentence as they say it infers protection on buildings which are not designated heritage assets and would give rise to inconsistencies in the decision-making process.</i></p> <p><u>Policy HNP8: Housing Allocations</u></p> <p><i>Gladman say that this policy merely seeks to duplicate those sites identified in the emerging Northumberland Local Plan and as such is contrary to paragraph 16f of the NPPF. They recommend the deletion of this policy.</i></p>

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		<p><u>Policy HNP10: Affordable Housing Provision</u></p> <p><i>In principle, Gladman support the general thrust of this policy, however, they have concerns regarding the requirement that at least 50% of affordable housing should be 2 bed properties comprising an equal mix of houses and bungalows. They say that as housing mix will inevitably change over a period of time this policy should be re-worded to allow for greater flexibility.</i></p> <p><u>Policy HNP15: Wildlife corridors</u></p> <p><i>Gladman consider the wording used in this policy is far too prescriptive and no adverse effects at all is a very high bar. They say this element of the policy needs further flexibility.</i></p>
Michael Hepburn Senior Director	Lichfields on behalf of Go North East	<p><u>Objective 1: Sustainability</u></p> <p><i>Go North East broadly support the intention of this objective.</i></p> <p><u>Objective 3: Housing</u></p> <p><i>Go North East broadly support the intention of this objective. However, they consider that the Plan is overly focused on the needs of residents today and does not sufficiently look to the needs of Hexham over the entire Plan period. They also note errors in the wording of the last sentence of the Objective and recommend it is re-worded.</i></p> <p><u>Policy HNP8: Housing Site Allocations</u></p> <p><i>The Go North East Bus Depot and Land at Chareway Lane have been allocated within the Plan as a Housing site. Go North East are concerned about the requirements of criteria i) and vi). They argue that criteria i) lacks clarity and should therefore be deleted. Go North East disagree with the designation of the adjacent Wildlife Corridor running through the</i></p>

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		<p><i>Industrial Estate and consequently argue that this criterion is deleted.</i></p> <p><u><i>Policy HNP9: New Housing Development</i></u></p> <p><i>Go North East say the final paragraph of Policy HNP9 should be removed as it duplicates the guidance set out in Paragraph 40 of the NPPF, and does not accord with Paragraph 16 of the NPPF.</i></p> <p><u><i>Policy HNP10: Affordable Housing and Community Led Housing</i></u></p> <p><i>Go North East say the minimum requirement of 30% is not supported by robust evidence and does not accord with emerging Local Plan Policy HOU5. To meet the basic conditions, they argue the figure should be lowered to 20%, given that the precise affordable housing need as set out in the emerging Local Plan still needs to be established.</i></p> <p><i>In addition, they say reference should be made to the ‘Vacant Building Credit’ set out in Paragraph 63 and Footnote 28 of the NPPF and the requirement for the Go North East site at Chareway Lane should be reduced accordingly due to the amount of occupied buildings on the site.</i></p> <p><u><i>Objective 4: Natural Environment, Health and Well-Being</i></u></p> <p><i>Go North East broadly support the intention of this objective but express concern regarding Policy HNP15.</i></p> <p><u><i>Policy HNP15: Wildlife Corridors</i></u></p> <p><i>Go North East contend the area running North-South through Burn Lane Industrial Estate should not be designated as a Wildlife Corridor under Policy HNP15, given the urban nature of the area, a lack of green infrastructure and a lack of evidence in respect of its biodiversity value.</i></p>

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Paul Wharrier, Chair	Hexham Civic Society	<i>Hexham Civic Society fully support and endorse the plan.</i>
Paul Dixon Planning & Development Yorkshire & North East	Highways England	<p><i>Highways England did not have comments on specific policies but made the following remarks:</i></p> <p><i>They note a shortfall between the quantum of housing identified for the Plan Period and that delivered through the ten specific HNP8 housing allocations, even accounting for the possible opportunity presented by the schools merger. Highways England would seek consultation on any future major windfall, rural exception or other sites that may be identified or promoted to address this shortfall.</i></p> <p><i>They note that in relation to the Local Economy the proposals principally focus on maintaining the vibrancy of Hexham, encouraging more tourism and small business development opportunities. Highways England highlight the Harwood Meadows site currently proposed for development in the emerging Northumberland Local Plan. Though outside the Neighbourhood Area, they suggest these proposals and associated indicative mitigation should be noted in relation to the Neighbourhood Plan.</i></p>
Jules Brown Historic Places Adviser	Historic England	<p><i>Historic England welcome changes made as a result of previous comments but recommend also making the suggested additions to the glossary.</i></p> <p><i>In addition, Historic England recommend making the changes to the evidence documents that support the housing policies as set out in a letter sent in November 2019. They therefore remain concerned that the right assessment to decide to allocate each site has not yet been demonstrated.</i></p> <p><i>Historic England recognise the changes that have been made to the SEA environmental report (Addendum February 2019) but states that these do not appear to relate to concerns about the historic environment which were also set out in the November 2019 letter. Historic England have concerns about the lack of a clear train of thought to conclude an absence of</i></p>

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		<i>significant environmental effects on the historic environment, even if this might well be the case. They would question whether the environmental report follows paragraphs 036 to 039 of the Planning Practice Guidance.</i>
Lucy Bartley Consultant Town Planner	Wood Group, on behalf of National Grid	<i>National Grid have identified that it has no record of electricity and gas transmission apparatus, including high voltage electricity assets and high-pressure gas pipelines, within the Neighbourhood Plan area.</i>
Michael Miller Lead Sustainable Development Advisor	Natural England	<i>Natural England have no further comments to make.</i>
David English Planning Manager - Neighbourhood Planning & Infrastructure	Northumberland County Council (NCC)	<p><i>The County Council, as Local Planning Authority, responded with comments on the following parts of the Plan:</i></p> <p><u><i>Page 6, 2nd paragraph, last sentence</i></u></p> <p><i>NCC suggest modifying the sentence to indicate the proper tests in the basic conditions that require the Neighbourhood Plan to be in general conformity with the strategic policies in the statutory Development Plan in place for the neighbourhood area. Reference to ‘...and with the Northumberland Local Plan’ is factually incorrect.</i></p> <p><u><i>Page 10 National and Local Planning Policy Context</i></u></p> <p><i>NCC suggest that paragraphs 1.1.1 – 1.1.5 are out of place under the heading of ‘Key Issues’ and would be better placed in a modified Introduction at the start of the Plan.</i></p> <p><u><i>Page 11 Section 1.3</i></u></p> <p><i>NCC support the key issues identified at the end of this section. They suggest the incorporation of ‘green and blue space’ in the Plan.</i></p>

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		<p><u>Page 17 Para 3.1.2</u></p> <p><i>NCC recommend updating this paragraph to reflect the progress of the Northumberland Local Plan and the relevance of the HNP in its position in the planning system.</i></p> <p><u>Page 17 Para 3.1.3</u></p> <p><i>NCC recommend amending this sentence so it starts by referring to the fact that the policies in the HNP will form the most up to date policy for the Neighbourhood Area and qualify how any conflict with other policies in the Development Plan will be handled.</i></p> <p><u>Policy HNP1 Sustainable Development in the Neighbourhood Area</u></p> <p><i>NCC support the inclusion of sustainable transport themes.</i></p> <p><u>Policy HNP2 High Quality Sustainable Design in the Neighbourhood Area</u></p> <p><i>NCC suggest that applying this policy to 'All new development' is likely to be too onerous. NCC recommends that consideration be given to splitting these matters into relevant policy areas throughout the Plan or in separate policies. For example, NCC question whether biodiversity gains could be genuinely seen as a design matter.</i></p> <p><i>NCC recommend creating a separate and specific design policy that supports good design and seeks to prevent poor design as this would better reflect the expectations of NPPF (2018).</i></p> <p><i>NCC support the incorporation of cycle storage facilities in new developments and the inclusion of electric vehicle charging points where feasible and viable.</i></p>

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		<p><u>Pages 19, 20, 21</u></p> <p><i>NCC note the supporting text does not address issues of development viability. NCC thinks it would be appropriate to explain in greater detail and with evidence how the implementation of a range of measures that exceed Building Regulations requirements would be achievable.</i></p> <p><u>Policy HNP3 Design in the Hexham Conservation Area</u></p> <p><i>NCC support this policy, however, as drafted, they say it fails to pay attention to the design and impact of development further afield. NCC suggest that the policy could concentrate on identifying those important aspects of the Conservation Area which will be described in the Character Appraisal.</i></p> <p><i>NCC say the last sentence of the policy, because it relates only to the Conservation Area, implies that ‘any town architecture’ would be acceptable in parts of the Town further away from the Conservation Area. They contend the term has no particular meaning, is imprecise and therefore does not meet the basic conditions.</i></p> <p><u>Page 25 para 5.1.17</u></p> <p><i>NCC contend that this paragraph has been added without any justification or qualification. NCC objects and states this is unsubstantiated criticism.</i></p> <p><u>Policy HNP4 Non-designated Heritage Assets</u></p> <p><i>NCC suggest that the word ‘sensitively’ is too imprecise. They recommend removing the word ‘historic’ with regard to the significance of the asset to better reflect NPPF wording.</i></p>

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		<p><u>Policy HNP8 Housing Site Allocations</u></p> <p><i>NCC note the housing is in accordance with the emerging Local Plan.</i></p> <p><i>NCC question the accuracy of paragraph 6.1.13.</i></p> <p><i>NCC notes there remains an inconsistent approach to the description of access requirements in the specific allocations described in Policies 8.1 to 8.10. They recommend amending this to provide clarity.</i></p> <p><i>NCC note there is inconsistent wording to describe what each site could achieve in terms of housing numbers. They recommend using the term: ‘could accommodate at least’.</i></p> <p><i>NCC recommend modifying paragraph.6.1.10 in line with the new NPPF (July 2018, updated Feb 2019, para136).</i></p> <p><i>NCC support the ambition to improve cycle and pedestrian access within new housing developments and linking to the town centre.</i></p> <p><u>Policy HNP8.1 The Workhouse Site</u></p> <p><i>NCC note the emerging Local Plan now allocates this site for a much higher indicative 80-85 dwellings capacity. NCC recommend updating the policy and supporting text to reflect this (para.6.1.14 would be no longer relevant if these two housing applications are permitted).</i></p> <p><u>Policy HNP8.3 Land at Edgewood</u></p> <p><i>NCC note this site is no longer allocated in the draft Local Plan. They suggest that given the mature trees on site, it is likely any development would be less than 5 dwellings and therefore below the threshold for allocation.</i></p>

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		<p><u>Policy HNP8.5 Bog Acre Cottage and Haulage Site</u></p> <p><i>NCC note a recent Planning Application for around 7 dwellings was not approved on this site due to issues of overdevelopment (size, massing etc.). They recommend this matter should be considered when assessing likely yield from this site.</i></p> <p><u>Policy HNP8.8 Housing Allocation at Broadgates</u></p> <p><i>NCC note this site is not allocated in the emerging Local Plan.</i></p> <p><u>Policy HNP8.9 Police Houses Land Adjacent to the Police Station</u></p> <p><i>NCC recommend adding 'safe access for vehicles, pedestrians and cyclists' as a requirement.</i></p> <p><u>Policy HNP8.10 Bus Depot and Land at Chareway Lane</u></p> <p><i>NCC note that Go North East made representations to the Reg.19 draft Local Plan asking for this site to be split. However, NCC consider that given the narrowness of Chareway Lane it is likely that improved access to that site may need to be through the Burn Lane depot so that it is sensible to consider them together.</i></p> <p><u>Policy HNP9 New Housing Development</u></p> <p><i>NCC suggest this implies that a poorly designed scheme could receive support simply because the applicant engaged with the Town Council. NCC state this is not a reasonable expression of national policy and therefore the policy fails to meet the basic conditions.</i></p> <p><u>Policy HNP10 Affordable Housing Provision</u></p> <p><i>NCC note the 30% requirement is evidenced through the local housing needs assessment,</i></p>

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		<p><i>while also acknowledging that it is not clear what viability assessment work has been carried out.</i></p> <p><i>NCC note the percentage of tenure splits in the policy is unclear and recommends this is amended in line with NPPF.</i></p> <p><i>NCC point out the use of commuted sums being limited for use within Hexham has some risks if the monies can't be used within the specific time. NCC suggest including a cascade arrangement to allow expenditure beyond the Neighbourhood Area as necessary.</i></p> <p><u><i>Policy HNP12 Rural Exception Sites for Affordable Housing</i></u></p> <p><i>NCC recommend adding the term “small sites” to the policy for clarity to developers and decision makers and to have regard to the NPPF on rural exception sites.</i></p> <p><i>NCC note the extra provisions for such sites to be within walking distance of the town centre or close to public transport links are beyond the NPPF definition of Rural Exception Sites and thus could unreasonably limit the scope for such sites to come forward around the edges of Hexham.</i></p> <p><u><i>Policy HNP15 Wildlife Corridors</i></u></p> <p><i>NCC still have concerns about whether the highlighting of the locations of the Wildlife Corridors on the proposals map offers enough clarity to a decision maker to be able to use the policy effectively.</i></p> <p><u><i>Policy HNP18 Dark Skies</i></u></p> <p><i>NCC have reservations about how this policy will work in practice and doubt it will be effective. They suggest this policy be reworded to refer to development which is likely to affect the dark sky park, rather than all proposals requiring external lighting.</i></p>

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		<p><u>Policy HNP21 Improvements for Walking and Cycling in Hexham</u></p> <p>NCC support the inclusion of HNP21 cycling and walking infrastructure within Hexham and welcomes the addition of the intention to develop an LCWIP within the document.</p> <p><u>Policy HNP23 Hotel and Tourist Accommodation</u></p> <p>NCC recommend clarifying what is meant by ‘overnight accommodation’.</p>
<p>Laura Kennedy, Developer Services</p>	<p>Northumbrian Water</p>	<p>Northumbrian Water welcome the vision and objectives identified for the neighbourhood plan. They are equally supportive of the policies and supporting content relating to water management, covering topics such as sustainable drainage systems, surface water runoff and water efficiency. Northumbrian Water particularly welcome that the multi-functional benefits of sustainable drainage systems, such as amenity and biodiversity value, are recognised and promoted in the plan.</p>
<p>Richard Swann, Senior Planner</p>	<p>Barton Wilmore on behalf of Taylor Wimpey</p>	<p>Taylor Wimpey do not consider that the Neighbourhood Plan currently meets the basic requirements set out in paragraph 8 of Schedule 4B of the TCPA 1990 (as amended), and the requirement to having regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>They recommend the Neighbourhood Plan should consider fully the outcome of the Northumberland Local Plan examination and any modifications that may be recommended by an Inspector ahead of its potential adoption. In particular this relates to possible changes to Hexham’s specific housing target and deletion of land from its Green Belt.</p> <p>Taylor Wimpey are promoting the development of land west of Gallows Bank (9.4ha) and east of Loughbrow Park (1.2ha) for residential use and has made representations to previous</p>

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		<p><i>rounds of consultation on the Neighbourhood Plan. They are concerned that the Plan does not address the local housing need in the town, will constrict housing delivery, and further exacerbate the widening the gap between the economically active population and the 65+ age group.</i></p> <p><i>Taylor Wimpey have made the following comments about specific policies.</i></p> <p><u><i>Policy HNP1: Sustainable Development in the Neighbourhood Area</i></u></p> <p><i>Criteria a) – They state it is not clear what mix is appropriate or how it would be achieved and recommend further revisions to the wording or supporting text to provide clarity. In addition, they argue this criterion is not supported by the proposed housing allocations identified in Policy HNP8 which, they contend, will not be able to support Hexham’s housing needs and therefore its proposed employment growth.</i></p> <p><u><i>Policy HNP2 – High Quality Sustainable Design in the Neighbourhood Area</i></u></p> <p><i>Taylor Wimpey are concerned that ‘where possible, practical and viable’ has been deleted from the policy, arguing that this removes the element of flexibility. They recommend that this should be reinstated.</i></p> <p><i>They argue the policy sets the bar too high, citing criteria c and h as examples and state this is contrary to planning policy guidance.</i></p> <p><u><i>Policy HNP8 – Housing Site Allocations</i></u></p> <p><i>They say the Objectively Assessed Need (OAN) for the town (350) is too low when tested against the Government’s standard method and a Countrywide proportionate population split.</i></p>

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		<p><i>Taylor Wimpey have significant concerns over the long-term delivery of a number of sites proposed to be allocated within the HNP stating that of the ten sites identified in policy HNP8, eight of them have, at least in part, significant constraints or barriers to development. They argue it is not possible to meet the town's needs through the small allocation of sites and windfall sites alone and therefore land should be released from the Green Belt.</i></p> <p><u><i>HNP10 – Affordable Housing Provision</i></u></p> <p><i>Taylor Wimpey object to the removal of the wording 'where viable' from the beginning of Policy HNP10, arguing that this removes the flexibility the previous wording afforded developers if the delivery of housing sites is marginal when factoring in land values and abnormal costs.</i></p> <p><i>They also have significant concerns regarding the proposed mix and tenure and object to it in its current form. They argue the wording should be amended to allow for flexibility.</i></p>
Sean Conley Managing Director	Wylam Garage	<p><i>They propose that the land currently occupied by Wylam Garage on Burn Lane is allocated under Policy HNP8 for a mix of uses including car sales (and associated offices) and residential. They point out that the garage has operated for over 20 years and currently employs 22 people, many of whom are local, in a variety of roles. The proposal, they state, would provide several benefits: securing the future of an important local business; contributing to addressing the housing needs identified in the Neighbourhood Plan; and enhancing the appearance of the site.</i></p>
Richard Morgan	YoungsRPS	<p><i>YoungsRPS commend the Town Council for taking a pro-active role in shaping the future of Hexham. However, YoungsRPS object to the reliance on brownfield sites to meet the local housing requirement saying such sites are difficult to deliver and are often subject to viability issues. They argue that many of the allocated sites would fail the NPPF deliverability test.</i></p> <p><i>In addition, YoungsRPS are concerned that the majority of housing allocations are small sites of between 5-10 dwellings. They argue that without larger, greenfield sites, Hexham will</i></p>

Name	Organisation (if applicable)	Summary of representation
		<p><i>lose out on the inherent benefits that come with larger sites, including on-site affordable housing, more housing types and increased developer contributions towards infrastructure upgrades.</i></p> <p><i>YoungsRPS note the shortfall between allocated housing sites and housing need. They suggest the Plan does make clear how this shortfall will be delivered. They recommend including reserve sites suitable for housing allocation in the event a review of the Green Belt boundary is necessary.</i></p> <p><i>YoungsRPS contend in order to meet the economic objectives for the town and reverse the ageing population projection trends, the housing delivery targets for Hexham should be far more ambitious. They suggest a review of Green Belt boundaries in Hexham is essential in order to find suitable and available sites for housing growth and address affordability issues.</i></p>