

Allendale Neighbourhood Development Plan - Summary of representations received submitted to the independent Examiner		
Name	Organisation	Summary
Alastair Welch	Natural England	<p>Natural England are pleased to see that an area which falls entirely within an AONB has been considered as part of the Neighbourhood Planning Process.</p> <p>Natural England would like to see further referencing to specific designations such as SSSIs, SPA, SACs and LWSs, and the BAP which fall within the Neighbourhood area.</p> <p>Suggested amendment to reference the protection and enhancement of habitats in objective 7.</p> <p>Suggestion that Policy ANDP1 should refer to the protection and enhancement of nature conservation sites.</p> <p>Suggestion that consideration to potential impacts on protected species should be made.</p>
Rachael Bust	The Coal Authority	<p>Background information that parish area lies within the current defined coalfield. No development is proposed in these areas, therefore it is not necessary to consider the issue of sterilisation of surface coal resources.</p> <p>Information regarding the Coal Authority Development High Risk Area Plans for Northumberland - there are 45 recorded mine entries, unrecorded probable historic shallow coal workings and thick coal outcrops within the parish. This legacy is found in the Kevelin Moor, Pike Stones, Tommy Sparks Fold, northern parish fringe, and Monk Wood/Monk Hills areas.</p> <p>Confirmation that since the Neighbourhood Plan does not allocate sites for future development in these areas, and if it had of done then consideration as how to the development would have needed to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the Planning Practice Guidance would have been necessary.</p> <p>The Coal Authority wishes the Parish Council every success with the finalisation of the Neighbourhood Plan.</p>

Andrew Wood	Durham County Council	<p>No objections.</p> <p>Congratulates the group on completion of the plan.</p>
Alan Hunter	English Heritage	<p>Congratulates the group.</p> <p>Would like to see inclusion of 'cultural heritage' in objective 7.</p> <p>Following suggestions:</p> <ul style="list-style-type: none"> • to change wording of Policy ANDP1 to replace the word 'and' with 'or' in 'built, historic, cultural and or natural heritage assets' • that development assessed under Policy ANDP2: should also be required to meet the tests in Policy ANDP1 • for an addition to section 7: Further commentary on what constitutes as 'within reasonable environmental limits' • redraft to section 8: to reflect the observation made in respect of safeguarding what is of heritage significance and value about it. • Policy ANDP7(e): should also require curtilages to be proportionate in their <i>extent</i> in order to curtail the unnecessary suburbanisation of the countryside • Paragraph 8.4: clarification as to what a developer is required to demonstrate as regards the condition of the building in question • Policy ANDP8: Further clarification in the commentary accompanying the policy on what is meant by dilapidation • Policy ANDP8: Criterion (f) relates, amongst other things, to curtilage. The need for proportionality referred to above in respect of Policy ANDP7 pertains. <p>Observation with regard to:</p> <ul style="list-style-type: none"> • Section 10 and Policy ANDP9: potential cumulative impact of successive extensions may lead to some very large and unattractive buildings satisfying policy.
Valeria Dunn		<p>Criticism of the disparity between the early drafted policies and those in the submitted version of the Neighbourhood Development Plan.</p> <p>Early drafted policies were a reflection of the needs of the Neighbourhood Area, for example no new development should be permitted on isolated sites. Exceptions have been added with no justification.</p>

		Caravan and chalet development should not be permitted if it requires screening.
Rod Milburn		Suggestion of a site for land allocation
Ken Hodcroft		Suggestion of clauses to clause 5.0 page 5 'Housing Development' to ensure housing quotas are not carried forward if a quota has not been met in one year. Suggestion that affordable housing would only be built if a need is identified.
Roddy Findlay	Land Factor on behalf of Allendale Estates	Supportive of the Neighbourhood Plan and the level of growth identified for Allendale. Concern over the balance of growth if only small scale schemes are delivered due to the physical constraints of the Parish. Suggestions: <ul style="list-style-type: none"> • policy should be more supportive to larger scale developments in order to meet housing numbers which are phased over time to restrict the number of developments per year • of two potential suitable sites which would deliver the scale of development required for the Parish • that Policy ANDP3 should have prescribed affordable housing targets for the Parish. Support of other policies within the Plan.

Allendale Neighbourhood Development Plan - Schedule of representations received submitted to the independent Examiner	
Vision for Allendale Neighbourhood Plan	
Alan Hunter, English Heritage	Although the Vision for the Plan makes no specific reference to the value of the historic environment to the quality of life in the Parish, I am pleased to note that Objective 7 concerns itself with conserving the assets of the area, including its 'cultural heritage'. Because the phrase covers a broad range of asset types, however, including, for example, music, language, social history etc., it would be helpful if, in line with the terminology of the NPPF, the objective made explicit that 'cultural heritage' includes the built and historic environment and its component heritage assets, be they designated or otherwise.
Objective7	
Alastair Welch, Natural England	Given the extensive areas of habitat within the plan area that are protected at a national and international level (see SSSIs, SACs and SPA listed above), the protection and enhancement of these important habitats should also be referred to in this objective.
Policy ANP1: General Development Principles	
Alan Hunter, English Heritage	<p>English Heritage welcomes the requirement for all development to be located such that it does not significantly and adversely affect the character and appearance of the settlement in which it is located, or the social, built, historic, cultural and or natural heritage assets of the parish. English Heritage would suggest the use of the word 'or' to make clear that a significant or adverse effect on any one of the assets described would be unacceptable.</p> <p>However, and in order to conform with the NPPF, English Heritage would suggest that the policy test in respect of heritage assets should be amended and better aligned with the concept of heritage 'significance'. The NPPF requires any harm to heritage assets to demonstrate that it is outweighed by the need to achieve public benefits which are necessary and which cannot be met in any other way. The greater the status of the heritage asset and the greater the harm, the greater the public benefits must necessarily be in order to justify that harm.</p>
Alastair Welch, Natural England	In addition to protection of the AONB's landscape, this policy should refer to the protection and enhancement of nature conservation sites (as identified in the nature conservation site map) in accordance with international and national legislation, and national and local planning guidance.
Valeria Dunn	Above all else, the Plan applies to the geographical defined Allendale Parish Neighbourhood in the North Pennines Area of Outstanding Natural Beauty (AONB). This natural environment is the asset that properly underpinned and shaped the Working Group's proposed <u>local</u> planning policies. Yet the addition to our first, overarching Policy 1, of a series of 'acceptable exceptions' in respect of isolated sites is utterly at odds with the overriding significance that, from a planning perspective, we place on our

	Neighbourhood's location in the North Pennines AONB.
Section 5: Housing Development	
Ken Hodcroft,	5.2 " requirement for 100 dwellings" by 2031 Further to the above I suggest a clause is added to each clause " if needed at the time and that if one year's quota of 5 or 9 is not used it cannot be carried forward " ---if carried forward was allowed it could result is larger schemes being approved (despite Clause5.5 which could be over ruled or appealed at any time in the next 20 years)
	5.2 "5 dwellings per year "Further to the above I suggest a clause is added to each clause " if needed at the time and that if one year's quota of 5 or 9 is not used it cannot be carried forward " ---if carried forward was allowed it could result is larger schemes being approved (despite Clause5.5 which could be over ruled or appealed at any time in the next 20 years)
	5.5 Housing schemes of up to" 9 dwellings "Further to the above I suggest a clause is added to each clause " if needed at the time and that if one year's quota of 5 or 9 is not used it cannot be carried forward " ---if carried forward was allowed it could result is larger schemes being approved (despite Clause5.5 which could be over ruled or appealed at any time in the next 20 years)
Policy ANDP2: Scale of Housing Development	
Alan Hunter, English Heritage	Development assessed under Policy ANDP2: <i>Scale of Housing Development</i> should also be required to meet the tests in Policy ANDP1 (amended as suggested).
Roddy Findlay Land Factor on behalf of Allendale Estates	We are encouraged that the Parish Council Local Housing Needs Survey is largely consistent with the County Council draft Core Strategy identifying a requirement for one hundred dwellings in Allendale, together with further development throughout the Parish. We believe that this level of growth in Allendale is required to ensure it retains its Service Centre status within the county and for it to provide homes for those growing up and wishing to remain in the area.
	The Estate's intention would be try to develop a master plan for whichever area to the north of Allendale may be considered the most appropriate and then to bring this forward in small scale developments through local developers. We recognise that at paragraph 5.5, Policy ADNP2 is intending to achieve the growth of Allendale through natural additions, rather than as larger new streets or estates of housing. The cumulative impact of a number of small scale developments on either of the fields to the

	north of Allendale will over time produce an estate of housing that will be contrary to paragraph 5.5, however it is in our opinion that the natural growth of Allendale Town would be to the north over time, as this provides relatively level land with good access to the main road and services and will ultimately help to link the houses to the north of Allendale with the town itself. The fact that the growth area will have been delivered over a longer period and potentially via a number of different developers will mean that there is a greater mix of housing types and materials and that the area will not appear as a uniform housing estate.
Section 6: Affordable Housing	
Ken Hodcroft	In addition “ affordable housing” to only be built if a need is identified ,again so as not to just meet a quota , which could give too many houses thus allowing people from outside the area to be asked to take them up if none in the area needed them .(as noted in the affordable housing section of the report) This prevents building houses for the sake of it or to meet NCC quota/targets that may exist now or in the next 20 years
Policy ANDP3: Retention of Affordable Housing	
Roddy Findlay Land Factor on behalf of Allendale Estates	With regard to Policy ANDP3, we feel it would be helpful to prescribe a target for affordable housing in terms of percentage of units consented and tenure split within the Neighbourhood Plan Policy.
Section 7: Rural Business Development	
Para 7.8	
Alan Hunter, English Heritage	refers to new-build business space and tourism facilities being supported if, amongst other things, they are linked to existing development or a farm diversification scheme, <i>within reasonable environmental limits</i> . The commentary, however, provides little clarity on what those environmental limits might be.
Policy ANDP5: New build tourism accommodation	
Valeria Dunn	A number of other additions and revisions included in this version of the Allendale Neighbourhood Development Plan are similarly contradictory to its original content, for example, the carte blanche permission for chalet and caravan developments anywhere in ‘areas of open countryside’. The proviso of adequate and effective screening surely begs the question: if you have to hide it, why permit it? Check the state of the current chalet development in Catton to see what this amended policy results in.
Policy ANDP7: Conversion of Redundant Buildings in the Open Countryside	
Alan Hunter, English Heritage	(a) dealing with the historic importance of the building in question, should be redrafted to reflect the observation made above in respect of safeguarding what is of heritage significance and value about it. As written the policy suggests that provided the significance of the building is properly identified and recorded (before loss) this criterion will be satisfied. Such an approach would not be NPPF-compliant. (d) Paragraph 8.4 makes reference to the need for proposals to satisfy policy in relation to structural

	<p>soundness. Unless those guidelines are in the documents referred to in criterion (d), [and from my reading they are not], it is not clear what a developer is required to demonstrate as regards the condition of the building in question.</p> <p>(e) makes reference to curtilage boundary treatments in the context of impacts upon landscape and visual amenity. In order to safeguard the largely undeveloped appearance of the landscape the policy should also require curtilages to be proportionate in their <i>extent</i> in order to curtail the unnecessary suburbanisation of the countryside.</p>
Valeria Dunn	<p>We originally concluded that, in <u>our</u> neighbourhood of <u>the AONB</u>, there is no reason why any <u>new</u> build should be permitted on isolated sites that is not well-related to any existing built development “.....except where development involves conversion or re-build of existing disused buildings in line with (relevant) Policies ANDP7 and 8.</p> <p>The exceptions that have now been added arbitrarily are therefore completely unwarranted from a local perspective, as follows:</p> <ol style="list-style-type: none"> i. In our Neighbourhood’s valleys, everywhere is readily accessible from everywhere else and higher up, ‘on the tops’, the land comprises designated local nature reserves and ‘Special Areas’ of different types where new, isolated build development should obviously never be permitted. Accordingly, there is simply no foreseeable or justified requirement for ‘essential’ building development at or near a ‘new, isolated’ place of work. Yet this generic exception has now been added. Why? ii. No subjective judgement of ‘exceptional design’ warrants any new isolated build in an AONB. By definition, an Area of <u>Outstanding Natural Beauty</u> is no place to experiment with architectural whims. Yet this possible exception has now been added. Why? iii. In our particular, <u>local</u> Neighbourhood there are actually no foreseeable ‘....other uses that (could be) considered appropriate in the open countryside’ and for which ‘....no reasonable alternative (to building development) could be adopted. In practice, therefore, this additional exception serves as a disingenuous, generic ‘catch all’ that, if adopted, would mean there are no reasons why decisions could not be taken to develop, from new, on isolated sites, anywhere in our Neighbourhood. Why?
Policy ANDP8: Demolition and Reconstruction of Derelict Buildings	
Alan Hunter, English Heritage	<p>As drafted, Policy ANDP8 allows for the conversion of derelict, disused, abandoned, and dilapidated buildings. Dilapidation covers a broad spectrum of disrepair. Further clarification in the commentary accompanying the policy on what is meant by dilapidation would be helpful otherwise someone occupying a building, which was perhaps missing its rainwater goods or a few slates, may argue that it is dilapidated and covered by the policy. Criterion (a) (1st bullet point) is the key to those instances</p>

	<p>where the policy applies, and should require buildings to be “.....structurally unsafe and incapable of being safely and economically <i>repaired</i> or converted to a new use”.</p> <p>The observation in respect of Policy ANDP7 (a) above has application in respect of Policy ANDP8.</p> <p>At the other end of the dilapidation spectrum, the Policy would appear to allow for a building that was, for example, now no more than an unstable gable end to be redeveloped. I am unclear as to whether or not this is the intention of the Plan. Were Criterion (d) to be amended to provide that the replacement building should be faced employing materials which have been salvaged principally from the site itself (‘substantially’ meaning, presumably, in excess of 50%) this would ensure that there was still sufficient a building remaining with which to work.</p> <p>Criterion (f) relates, amongst other things, to curtilage. The need for proportionality referred to above in respect of Policy ANDP7 pertains.</p> <p>It is important to ensure that the policy does not introduce an inducement to deliberately fail to maintain existing buildings in anticipation of obtaining consent for demolition and rebuilding. Such an outcome would be counter to the thrust of the Plan and the concept of sustainability.</p> <p>Even a building which is derelict, disused, abandoned or dilapidated may still be possessed of historic value. They may be regarded as heritage assets and may even still be statutorily designated as such. In such circumstances, there must be a presumption in favour of the retention of any element of it that contributes to its significance and proposals resulting in the loss of any significance or harm to it will need to demonstrate that they are necessary to achieve public benefits that outweigh that harm or loss. Without this test the policy would not satisfy the NPPF.</p>
Policy ANDP 9: Extensions to Dwellings	
Alan Hunter, English Heritage	gives consideration to the cumulative effect of extensions on the plan area generally but not, it would appear, to the cumulative effect of the proposals on the building itself in relation to earlier extensions. Additionally, as drafted, the policy would appear to allow for multiple applications over a period of time, each one being judged on its effect on the host building as it exists at the time of each application, not its effect on the original building nor, for example, the building as it existed on the date the Plan was adopted. Such an accrual process could lead to some very large and unattractive buildings satisfying policy.
Further comments	
Alan Hunter, English Heritage	The Steering Group is to be congratulated on making the Plan a succinct and focussed document setting out policy for a range of planning issues pertinent to the Parish. The difficulties arising from the absence of an adopted post-National Planning Policy Framework (NPPF) Local Plan during this process should not pass without acknowledgement.
Alastair Welch, Natural England	Designated sites The neighbourhood development plan falls entirely within the North Pennines Area of Outstanding

Natural Beauty (AONB). This is a nationally important landscape and Natural England is pleased to see this has been considered as part of the neighbourhood development plan. However there are other internationally, nationally and locally designated sites that are found within the boundary of the neighbourhood development plan that have not been clearly referenced and that need to be considered as part of the neighbourhood development plan process.

The following Sites of Special Scientific Interest (SSSIs) are triggered by Natural England's Impact Risk Zones (IRZs). Therefore an assessment to clarify whether there are any potential impacts on this SSSI's interest features is recommended. The IRZs can be viewed on the MAGIC website (<http://magic.defra.gov.uk/>). Further information on the SSSIs can be found using the following link (<http://www.sssi.naturalengland.org.uk/special/sssi/search.cfm>)

- Monk Wood SSSI– An impact risk has been identified for any development within 50m of this nature conservation site.
- Allen Confluence Gravels SSSI – An impact risk has been identified for any development within 50m of this nature conservation site.
- Catton Lea Meadow SSSI – An impact risk has been identified for any development within 50m of this nature conservation site.
- Allendale Moors & Hexhamshire Moors SSSIs – An impact risk has been identified for all planning applications with a new/additional footprint of greater than 500m² outside existing settlements and any residential developments with a total net gain in residential units within 2km and any development within 500m of these nature conservation sites. These sites are also part of North Pennine Moors Special Protection Area (SPA) and Special Area of Conservation (SAC).
- Peckriding Top Lot SSSI – An impact risk has been identified for any development within 50m of this nature conservation site.

Haggburn Gate SSSI – An impact risk has been identified for any development within 50m of this nature conservation site.

- Peckriding Meadows & High Knock Shield Meadow & White Ridge Meadow SSSIs – An impact risk has been identified for any development within 50m of these nature conservation sites. These sites are also part of North Pennine Dales Meadows SAC.

West End, Bells Grooves, Swinhope Burn and Hindleyhill Woods Local Wildlife Sites (LWSs) are located within the neighbourhood development plan boundary. You should ensure you have sufficient information to fully understand the impact of the plan on the LWSs. Northumberland Wildlife Trust may be able to provide further information in relation to these sites. Local environmental record centres also

	<p>hold a range of information on the natural environment. A list of local records centre is available at: http://www.nbn-nfbr.org.uk/nfbr.php</p> <p>We advise that the neighbourhood development plan includes criteria based policies for the protection and enhancement of the international, national and locally designated sites present. This is in line with para 113 of the NPPF which makes it clear that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological network. The neighbourhood development plan should always seek to avoid environmental impacts by directing development away from the most sensitive areas with mitigation considered only when this is not possible.</p> <p>Ancient Woodland Hag Wood, Studdon Dean, Rude Cleugh, Hindley Hill Wood, Hindleywrae Wood, Asheybank Woods and Sheybank Woods are ancient woodland sites which have not been identified within the neighbourhood development plan and should be considered as part of the neighbourhood development plan process.</p> <p>BAP (Biodiversity Action Plan) Priority Habitat Natural England note that there is BAP Priority Habitat within the boundary of the neighbourhood development plan. The value of these areas and their contribution to the ecological network of local, national and internationally protected sites should be considered when locating new development. The neighbourhood development plan should, in accordance with paragraph 117 of the NPPF, encourage the preservation, enhancement and creation of priority habitats where these opportunities exist.</p>
Alastair Welch, Natural England	<p>Protected species You should consider whether your plan has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.</p> <p>Opportunities for enhancing the natural environment Neighbourhood development plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature. 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 should also be considered as part of any new development proposal.</p>

	<p>Basic Conditions Assessment Natural England have no additional comments to make on this document.</p> <p>Consultations Statement Natural England have no additional comments to make on this document.</p>
Miss Rachael A Bust The Coal Authority	<p>As you will be aware the Allendale parish area lies within the current defined coalfield. According to current records the surface coal resources about the northern parish boundary and a small area of resource is also located in the south-western corner (Kevelin Moor) of the parish. No development is proposed in these areas, therefore it is not necessary to consider the issue of sterilisation of surface coal resources.</p> <p>According to the Coal Authority Development High Risk Area Plans for Northumberland, there are a number of recorded risks from past coal mining activity within the parish. There are 45 recorded mine entries, unrecorded probable historic shallow coal workings, and thick coal outcrops within the parish. This legacy is found in the Kevelin Moor, Pike Stones, Tommy Sparks Fold, northern parish fringe, and Monk Wood/Monk Hills areas.</p> <p>The Neighbourhood Plan does not allocate sites for future development in these areas, if it had of done then consideration as how to the development would have needed to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the Planning Practice Guidance would have been necessary.</p> <p>The Coal Authority wishes the Parish Council every success with the finalisation of the Neighbourhood Plan.</p>
Andrew Wood Durham County Council	<p>This is to confirm that having read the above document I confirm that Durham County Council has no objections to the Allendale Neighbourhood Plan. The council congratulates the group on completion of the plan.</p>
Rod Milburn	<p>We understand the County Council are looking for land for potential development within the Parish of Allendale and would like our land at Catton to be included in this.</p> <p>The land in question is on Splitty Lane, Catton, opposite land already on your possible land for development in the name of Calverly.</p>
Roddy Findlay Land Factor on behalf of Allendale Estates	<p>I confirm that we are supportive of the Neighbourhood Development Plan, however, we would like to make various comments in relation to the latest consultation.</p> <p>The Allendale Estates own two potential sites immediately to the north of Allendale and we believe that either of these two sites could be appropriate for bringing forward by way of a number of small scale developments over the Plan period. We also believe that it will be easier to deliver affordable housing,</p>

	<p>particularly affordable let housing that may be transferred to a Registered Social Landlord if small scale developments on the same site are brought forwards as part of a larger scale development. In combination these developments can release a sufficient number of affordable housing units, that a Registered Social Landlord may be able to get involved and develop some of the affordable houses as affordable let dwellings. This will also allow the affordable housing to be developed over a timeframe that means it can meet local needs over the plan period rather than all being released at once and then being occupied by those in housing need from across the wider county.</p>
	<p>We feel that if new housing is to be delivered only by individual small scale developments it will be difficult to achieve more than two or three affordable units from each development and therefore difficult to develop a sufficient number of affordable let units in one location for an RSL to take over.</p>
	<p>Elsewhere I confirm that we are in support of the other policies developed by the Neighbourhood Plan.</p>
Valeria Dunn	<p>As a member of the Working Group who prepared the original draft version of the Allendale Parish Neighbourhood Planning Report, I want to register my criticism of the subsequent versions that have been revised centrally for Submission for Independent Examination.</p>
	<p>I expected our original Draft Plan to be edited for such aspects as technical/ legal compliance and general consistency. However, the 'central third parties' responsible for reviewing our output have taken it upon themselves, in successive iterations of their work, to make fundamental changes to the <u>local policy wordings</u> that we had so carefully drafted.</p>
	<p>In effect these alterations contradict important elements of policy wording that the Working Group had submitted and ignore the particular local character of the Allendale area that we had been so keen – and, indeed, established – to represent. One can only assume that, at worst, they have been made to serve particular, undeclared interests and, at best, they are typically inept applications of anonymous central authority over local knowledge and interpretation. In either case, they are unwarranted and unacceptable.</p>
	<p>All these such changes to our Plan leave me quite unconvinced of the real value and purpose of the exercise in the first place. Boxes have been ticked and lip service has been paid to evidencing the implementation of devoted, grass routes involvement. But, in reality once more, local voices have sadly been silenced.</p>