



Submission Plan

Consultation Statement

March 2019

This very important document contains the results of all consultations in Hexham with relevance to the Hexham Neighbourhood Plan, including all consultations conducted during the Plan process and their results and impacts on the Plan's content.

As well as links within the body of the text, the Appendix A to this document contains hyperlinks to all documents in numerical order.

The significant documents relating to the additional (final) October 2018 Regulation 14 Consultation for the HNP are linked to the relevant text, listed in Appendix A, presented here via hyperlinks for convenience, and physically attached to this Consultation Statement at Appendices B to E:

Additional Regulation 14 Consultation – full list of consultees: [available here](#)

Additional Regulation 14 Consultation: [submissions of statutory national and local bodies with the corresponding Steering Group's views/actions/modifications to the October draft Plan](#)

Additional Regulation 14 Consultation – summary of local residents' responses with SG actions [are available here](#).

Additional Regulation 14 Consultation – Northumberland CC submission: [the recommendations of NCC officers](#)

Additional Regulation 14 Consultation – Northumberland CC submission: summary of [Steering Group's resulting views/actions/modifications to the draft Plan](#)

Additional Regulation 14 Consultation – [submissions by other organisations](#)

HEXHAM TOWN COUNCIL

HEXHAM NEIGHBOURHOOD PLAN 2019-36

CONSULTATION STATEMENT

March 2019

Contents	Page
1. Introduction	3
2. Pre-HNP Town-wide Consultations (since 2012)	5
2.1 The Community Forum Well-being Survey	5
2.2 The Hexham Town Plan 2013	6
2.3 Hexham Vision 2020 and Town Plan 2014	7
2.4 Conclusions from Previous Consultations	8
3. HNP Use of Media Available to Local People	9
3.1 The HexPress Newsletter	9
3.2 The Hexham Courant	10
3.3 The HNP Website www.hexhamneighbourhoodplan.co.uk	10
3.4 Further Vehicles for Consultation and Engagement	11
3.5 Conclusions	12
4. HNP Public Forums	13
4.1 Introduction to a Hexham Neighbourhood Plan	13
4.2 Vision and Objectives for the HNP	14
4.3 Future Housing in Hexham (I)	14
4.4 Hexham's Sustainability	15
4.5 Our Natural Environment, Health and Well-being	16
4.6 Hexham's Built Environment and Heritage	16
4.7 Future Housing in Hexham (II)	17
4.8 Sustaining Hexham's Economy	18
4.9 The Draft HNP Drop-in	19
5. The Hexham Housing Needs Survey and Report 2016	20
6. The Strategic Environmental Assessment for the HNP	21
7. The Screening Opinion – Habitats Regulation Assessment	22
8. Healthcheck Report for the HNP March 2018	22
9. The Regulation 14 Pre-Submission Consultation for the HNP	23
March – April 2018	
10. The Additional SEA for the HNP	25
11. The Additional Regulation 14 Pre-Submission Consultation for the HNP	26
October – November 2018	
12. The SEA Addendum for the HNP February 2019	28
13. The HNP Habitats Regulations Screening Opinion March 2019	28
14. Conclusion	29

15. Appendix A Hyperlinks to Original Documents	30
Additional (final) Regulation 14 Consultation on Draft HNP, October 2018	
16. Appendix B List of Consultation Bodies	33
17. Appendix C Submissions of Statutory Consultation Bodies and SG Responses	41
18. Appendix D Local Residents' Submissions and SG Responses	54
19. Appendix E Northumberland County Council Submission* and SG Responses	60
(*summary; for full doc see P26 or hyperlink 90)	
20. Appendix F Submissions by Other Organisations	64

1. Introduction

A Consultation Statement is prepared to fulfil legal obligations set out in the Neighbourhood Planning (General) Regulations 2012 and subsequent amendments. These Regulations require that when a qualifying body (in this case, Hexham Parish Council) submit a neighbourhood development plan to the local planning authority, they must also provide a Consultation Statement. Regulation 15(2) describes what is required in a Consultation Statement. This states that a Consultation Statement must:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how those issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

This HNP Consultation Statement sets out therefore

- the methods and outcomes relevant to the HNP of earlier consultations (since 2012) in the Town (briefly);
- the purposes, methods, analysis and outcomes of the nine Public Open Forums held between April 2015 and April 2017 which have been important vehicles for publicity, engagement and consultation for Hexham residents (and neighbours) in the formulation of the HNP;

- details of specific town-wide consultations conducted in the course of the preparation of the HNP, including an initial consultation on the HNP's vision and objectives, a key consultation on housing need in Hexham and two pre-submission consultations, with the analysis and outcomes (i.e. in terms of modifications to the Plan) of these;
- the use of information vehicles available to residents of the Town (local paper, town newsletter, dedicated website) to enable local people to understand the purposes and follow the progress of the HNP;
- a summation of the levels of engagement that local people have had in the preparation of the HNP.

The majority of the documents linked to this Consultation Statement have been available on the HNP website since its inception or as soon as they were produced and approved by the HNP Steering Group, as a signal to local people of the value of their continuing engagement.

The role of the HNP Steering Group has been critical to the levels of consultation and engagement that the Plan has achieved. Its membership has consisted of, with changing personae over time, two Town Councillors and five Hexham residents who have been active in but not burdened by a representative function for some key Hexham organisations, for example the Hexham Community Partnership, the Hexham Civic Society, Transition Tynedale (with a sustainability focus) and the, now folded, Hexham BID. A strong shared principle has been that the HNP should be a people's plan, reflecting the interests, desires and needs of the wider Hexham community. (See [Aims of the HNP](#), agreed 11/2/2015).

2. Pre-HNP Town-wide Consultations (since 2012)

2.1 The Community Forum Well-being Survey

The Central Tynedale Community Forum (CTCF) was one of a network of local consultation forums established across Northumberland in 2009 as part of the new unitary local government processes. They were meagrely funded until 2012 when funding was withdrawn.

The CTCF covered a wide area centred on the town of Hexham. It performed active public consultations on issues key to the area, including car parking (especially important for people living outside the town), an older person survey, and most significantly in the context of the later HNP a town-wide Well-being Survey. This was conducted in 2011 and the [full report including an executive summary](#) was published in 2012. 413 questionnaires were completed.

The Well-being Survey results went on to influence the later Town Plan objectives in 2013 and 2014. The sections relevant to the HNP, summarised in the 22/4/2015 document [Extracts from Previous Town-wide Surveys](#), were already revealing where the issues of community concern and need lay in a spatial and land-use context and what the HNP should therefore later consider.

Very briefly here, as they are covered more fully in the above document, the principal issues of community concern and need uncovered in the 2012 Well-being Survey report were:

- a. more over-50s were positive about current housing provision (65%) than under-50s (47%);
- b. one in five (20%) of under-50s viewed housing provision negatively or very negatively;
- c. 54% of respondents felt encouraged to value the local built environment;
- d. over half of respondents would have liked to see a more attractive Market Place (58%) compared to 43% who think it's OK;
- e. half of people overall (51%) wished to see more emphasis on heritage in planning, while 29% think the situation is OK now;
- f. 72% of people saw the need for better local employment opportunities, only 12% thought that opportunities were OK;
- g. 80% of respondents saw a need for a better range of shops in the town, and less than 20% felt the range was OK;
- h. 44% felt to be part of a robust and thriving community, 15% did not;
- i. 72% of respondents felt that living in Hexham helped them to be active, and 20% felt OK in this respect;
- j. over 90% of residents recognised the benefits to their health of living in Hexham;

- k. 73% of respondents felt a supportive social network around them;
- l. only 11% (around one in ten) of respondents were very positive about the voice they had in the community, and one in every four (25%) felt they had no voice.

The 2012 Well-being Survey report started to lay the critical path for some important issues that were further researched and expressed in Town Plans and finally in the HNP.

2.2 The Hexham Town Plan 2013

Public consultation for the Hexham Town Plan was extensive and interactive (launch in Market Place, open meetings with group discussion, presentations to key groups, open steering group). While the 2013 Town Plan failed to gain Town Council approval, partly due to the changes in membership of the Town Council after the May 2013 elections, it did culminate in a broad and effective town-wide survey that used meetings of specific groups to encourage engagement.

It is clear that strands of interest, concern and need first revealed in the Well-being Survey were further concretised, analysed and reported in the Hexham Town Plan 2013 and its resident survey. [This Town Plan](#) and a [full table of the results of the associated survey](#) have been available on the HNP website since its launch, and the survey results have been summarised in the HNP early document [Extracts from Previous Town-wide Surveys](#). Thus they were able to inform the early thinking on the HNP and in particular the steps towards formulating its Vision and Objectives.

Very briefly here, as they are covered more fully in the above document, the principal issues of community concern and need uncovered in the Town Plan 2013 survey report were:

- a. all available space inside town to be used for new housing before greenfield sites outside the town (Strongly agree/agree 73.3%; Strongly disagree/disagree 16.3%);
- b. need for more houses that younger and older people can afford (Strongly agree/agree 70.8%; Strongly disagree/disagree 8.9%);
- c. something must be done to make the Market Place more attractive and flexible (Strongly agree/agree 68.5%; Strongly disagree/disagree 8.9%);
- d. Town and County Councillors must use all planning powers to protect the town's historic character (Strongly agree/agree 81.1%; Strongly disagree/disagree 7.2%);
- e. Hexham should try to attract a greater number of visitors who will spend money in the town (Strongly agree/agree 91.1%; Strongly disagree/disagree 4.2%);
- f. Hexham needs more visitor accommodation of all types across the full price range (Strongly agree/agree 73.6%; Strongly disagree/disagree 2%);
- g. I would cycle more if there were safe, well signposted cycle routes (Strongly agree/agree 64.6%; Strongly disagree/disagree 7.9%);
- h. Hexham Riverside must be used for more walking and cycle paths and fitness activities

(Strongly agree/agree 80%; Strongly disagree/disagree 4.4%);

i. Town and County Councils must put emphasis on saving energy, recycling waste, reducing carbon emissions and healthy lifestyles (Strongly agree/agree 81.6%; Strongly disagree/disagree 4.6%);

The Hexham Town Plan 2013 was not adopted by the Town Council. Its results therefore directly generated no outcomes. Its process and survey findings did however inform the subsequent more practical, realistic and readable Hexham Vision 2020 and Town Plan 2015.

2.3 Hexham Vision 2020 and Town Plan 2014

A newly formed Hexham Town Council, after the local elections of May 2013, agreed to proceed with a town planning process that was based on the contributions of at first 6 and after one year 3 working groups. These pulled in members of the Hexham public with different skills, experience and interests to discuss alongside councillors the pertinent issues of the day. The Generations, Health and Well-being, the Economy, Arts and Heritage and the Built Environment and Transport Working Groups were responsible for researching and formulating the respective sections of this Town Plan.

Iterative consultation included a public meeting chaired by the Mayor, attended by 26 members of the public. A [full report](#) containing all contributions at the meeting, email responses and responses via the Town Council website was pulled together. The resulting proposals under each section were then subject to town-wide, web-based consultation to inform relative implementation priorities for the Council before the full [Vision 2010 and Town Plan 2014](#) was published.

Again briefly, the areas of relevance to the HNP that took on added detail and were closer to implementation over time by the Town Council, via in most cases the HNP, have been extracted from the wider [Town Plan 2014 Proposals – Survey Rankings](#) and are presented here:

- a. a Neighbourhood Plan for Hexham: to secure some Hexham-specific planning powers (86% saw this as a high/medium priority for the Town Council);
- b. increase the town's visitor/tourist accommodation, and attraction (68% saw this as a high/medium priority for the Town Council) (ongoing and see HNP3-6, 23);
- c. improve the Hexham Riverside for walking, cycling, and fitness (85% saw this as a high/medium priority) (ongoing and see HNP14);
- d. prepare residents to live alongside and carefully support dementia sufferers (58% saw this as a high/medium priority) (ongoing and see HNP1b and 11);
- e. brownfield sites and housing approvals: collect data (92% saw this as a high/medium priority) (see HNP8);
- f. improve the safety of walking and cycling, initially at Hexham Bridge (86% saw this as a

high/medium priority) (latter complete, also see HNP21, 6 and 9b);
g. increase the supply of affordable rented housing in the town (74% saw this as a high/medium priority) (see HNP8 and 10);
h. slower speed areas: for the safety of elderly and people with a disability or mobility problems, pushchairs and children (84% saw this as a high/medium priority) (20mph zone introduced, and see HNP6 and f. above).

2.4 Conclusions from Previous Consultations

Clearly recurring themes over the town's consultations prior to the commencement of the neighbourhood planning process emphasise residents' continuing interests. These relate specifically to the use of brownfield sites, especially for more affordable housing to rent, increasing cycling and walking and the safety of these, and increasing the town's attraction for tourists including accommodation, all of which could be achieved by more Hexham-specific planning powers.

3. HNP Use of Media Available to Local People

The HNP Steering Group has been fortunate to have 3 principal vehicles available to regularly and widely raise residents' awareness of the purposes and importance of the HNP, give feedback on its development and progress, and demonstrate that residents' own inputs were having an impact on the detail and overall direction of the Plan. The latter has been vitally important in securing the continued engagement of residents in the neighbourhood planning process to the benefit of the respect the community gives to the Plan (as demonstrated in the impressive response rate to the first Pre-submission Consultation – overall 95.3% support for the Plan's intentions across 530 Hexham residents' replies).

There have been two very distinct phases in the gestation of the Hexham Neighbourhood Plan. The first consisted of two years of extensive local consultation which engaged local people to inform the Plan Steering Group in the process of the precise content and formulation of the Hexham Plan. A second period, of (hitherto) only slightly less than two years, has been necessary to accomplish the statutory obligations of the responsible body, with regard to a Strategic Environmental Assessment for the HNP and the conduct of and its responses to two Pre-submission Consultations.

Throughout these four years, the Plan Steering Group has taken every opportunity to inform and engage local people, via

- the Town's newsletter 'The HexPress' (a shared responsibility of the Town Council and the Community Partnership),
- the local Tynedale and Hexham weekly newspaper 'The Hexham Courant',
- and the HNP's own website, at www.hexhamneighbourhoodplan.co.uk.

3.1 The HexPress Newsletter

Delivered 3 times per year to every Hexham household and business, under an agreement between the HNP Steering Group and the newsletter editorial board, every copy of [the HexPress](#) has contained at least an update on the stage of progress of the HNP (see for example April and July 2018 editions). On two occasions, for the HNP Vision and Objectives consultation and the first Regulation 14 Pre-submission Consultation, the Hex-Press carried as an insert the respective consultation questionnaire through every letterbox in the Town.

When these consultations had closed and the outcomes in terms of modifications and improvements to the original drafts had been decided, the HexPress carried substantial articles detailing the latter and providing links to further detail on the Plan website.

When a HexPress publication date usefully preceded the date of a HNP Public Forum, between April 2015 and May 2017, it carried an introduction the theme of the particular Forum, underlining its relevance to readers' interests.

3.2 The Hexham Courant

There has been no formal agreement of support between the local weekly newspaper, the Hexham Courant, and the HNP Steering Group. The Hexham Courant values its editorial independence.

The newspaper's editorials have on occasions expressed strong views that have allied with the objectives of the HNP, for example a shortage of affordable homes, proposals for greenbelt incursions to provide (for most Hexham residents, irrelevant) 4-5 bedroom 'executive type' houses, town centre retail voids and an absence of any masterplan for the Town (although a senior reporter did review and value the Hexham Town Plan 2014). This has not been planned to coincide with particular focuses in the Plan's development.

On very many occasions, as the HNP has approached a significant milestone or a Public Forum event, a press release to the Hexham Courant has been issued. Many of these have been taken up and published with slight modifications, but there has never been a guarantee that this would be the case. A search for Hexham Neighbourhood Plan on the Hexham Courant website uncovers 10 articles (among others that appear relating to planning issues or other NPs) that together reveal the progress and key focuses over time of the HNP.

The HNP Steering Group has advertised each Public Forum on the local events page in two successive editions of the Hexham Courant. Public notices for each Regulation 14 Pre-submission consultation were issued in a number of ways, always including via the pages of the Hexham Courant.

Over the course of the March-April 2018 Pre-submission Consultation, the Hexham Courant provided on its digital newspaper a click-through to the consultation documents on the HNP website. The click-through registered 122 separate uses.

To fulfil its responsibilities towards the Neighbourhood Plan and to monitor its progress, the Hexham Town Council initiated in Autumn 2014 a Neighbourhood Planning Committee which has met approximately every 3-4 months. This added to the flow of information to the journalists who have attended monthly Hexham Town Council meetings, increasing their knowledge and via meeting minutes the knowledge of the Hexham general public in respect of the HNP.

3.3 The HNP Website www.hexhamneighbourhoodplan.co.uk

On-line in time for the first HNP Public Forum in April 2015, the HNP website has been a vital vehicle for an up-to-date flow of HNP information to the local public.

The homepage has been used to draw the public's attention to the latest developments and forthcoming events in the development of the HNP. Once they have been superseded, the documents have passed to other sections of the website.

The homepage central column has been used to show the progress of consultation and the ensuing decisions by the Steering Group and modifications to the Plan through the series of nine Public Forums, April 2015 to May 2017. A taste of these and links to further information and relevant documents have been provided cumulatively in the homepage's left-hand sidebar.

The website's right-hand sidebar has contained, since their production, the HNP Vision and Objectives and documentation showing how these were developed and modified through consultation with the Hexham public.

Again, the process of the HNP Vision and Objectives consultation and the two HNP Pre-Submission Consultations have highlighted the important role the website has played in securing the engagement of local people for the Plan's consultation processes.

Via the website, for the March-April Pre-submission Consultation, for example, the HNP registered 340 downloads of the draft consultation document. The websites in-built email click-through has always been open since the website launch. This was used particularly to gather local residents' responses to the October-November 2018 additional consultation, while the homepage centrally offered all necessary consultation documentation for access by residents and statutory local and national consultees.

As soon as they have become available, after discussion and decision within Steering Group meetings, a record of all consultation responses has been published on the website homepage, supported by a record of the outcomes of consultation in terms of modifications or additions to the Plan.

3.4 Further Vehicles for Consultation and Engagement

The HNP Steering Group has used a number of further means of engaging with the Hexham Community.

Drop-ins have been used on three occasions – members of the public have been invited to view a display and documentation and comment on a current aspect of the Plan:

1. 22 October 2015, a small Neighbourhood Plan display during its consultation on Vision

and Objectives, in a corner alongside a very substantial County Council Core Strategy/Local Plan consultation display; visitors were invited to take-away and complete a [consultation form](#) if they had not already sent in a response; HNP business cards were also available for this purpose; over 250 people visited the overall event;

2. 24 May 2017, the final HNP Public Forum, Forum 9, was a drop-in event, used to display the final post-consultation version of the Plan and ask for further key information that local residents were best placed to provide: detail of green spaces, wildlife corridors and sites for housing; there is more information about this particular drop-in event and its outcomes at Public Forum 9 below;

3. 14 April 2018, in the Foyer of the Hexham Queen's Hall and Library, in the course of the Regulation 14 Pre-Submission Consultation 1, planned to be a further opportunity to publicise the importance of this consultation and engage with the community to encourage further submissions from local people in the consultation; HNP business cards to this effect were available to take away; around 220 people attended during the six hours it was available; no discrete data was collected but there was no doubt it contributed to the very impressive overall rate of response to this consultation and thus to the outcomes in terms of resulting modifications/improvements to the Plan (see below Page 21).

Using Community Contact-Points has been an additional tactic in the HNP Steering Group's overall purpose of engaging different sections of the Hexham community. Copies of consultation documents or publicity for consultations have been made available in local cafes and waiting rooms, with the owners' collaboration, and in public places, for example the Library and Community Centre. Specific visits have been made and presentations given to Acomb Court and Abbey View (retirement homes), Hexham East Residents' Association, the Queen Elizabeth High School 6th Forum Committee, the Hexham Branch of the Labour Party, Number 28 (a support facility in an area of predominantly social housing), and Hexham Rotary. Interviews were conducted with a Hexham-based estate agent and with the development manager of Karbon Homes to add to the basis for HNP provisions for housing.

3.5 Conclusions

The HNP Steering Group was truly intent on producing a community-led Plan and generated therefore numerous and various means towards engagement with the Hexham public to provide opportunities for the reciprocal, very productive community engagement with the HNP. The Group has valued the feedback advice and direction that the process of consultation generates, in order to modify and fine-tune the content of the emerging Plan.

4. HNP Public Forums

To maximise levels of consultation and engagement, quarterly Public Forums were held between April 2015 and May 2017, advertised in the local weekly newspaper and, when timely, the local newsletter. All residents were invited. A large number of local clubs and other organisations, local business people and neighbouring parishes were contacted prior to the first Public Forum and invited to send a representative. Attendees of Forums became Forum Members who were notified of and invited to subsequent events.

After the Vision and Objectives of the HNP were established via the first Public Forums, these then covered the individual Objectives of the Plan, sometimes, for example in the case of Housing, on more than one occasion. An early section of most Forums was a recap on the results of the previous Forum and how they had informed the content and detail of the emerging Plan (both outputs and outcomes).

All HNP Public Forums were held in the Great Hall of Hexham Abbey, part of a 2014 sensitive refurbishment of old buildings linked to the Hexham Abbey. This was in keeping with the principles of the HNP and of course provided added interest for attendees.

4.1 HNP Public Forum 1: Introduction to a Neighbourhood Plan

HNP Public Forum 1 22 April 2015	
Theme: Introduction to a Hexham Neighbourhood Plan	
Purpose: To introduce what a neighbourhood plan can achieve, and what it can't (e.g. new home overall numbers, greenbelt issues), and apply this generally to Hexham in discussion groups. A copy of the Forum 1 programme is available.	
Inputs: The principal input was a PowerPoint presentation 'Welcome to the Hexham Neighbourhood Plan' – view the presentation here .	
Summary outputs: Group and plenary discussions (Hexham's 'good', 'bad' and 'must improve' (post-it exercises)) were very productive, providing good general guidance for the content of future HNP Objectives. Groups also expressed their vision for Hexham. All was captured in the collated notes and main messages .	
Attendance: 49, including 3 neighbouring Parish and 2 County Council representatives.	Evaluation: Do you know more about Neighbourhood Plans? YES: 90% Do you know enough about Neighbourhood Plans? YES: 60% Will you help us guide the Hexham Neighbourhood Plan to completion, for example by attending the next Forum? YES: 90% Full evaluation report is available here.
Outcomes: The Steering Group worked on the outputs and the results of previous consultations to produce a draft Vision and Objectives for the HNP. This was prepared as the focus of the ensuing town-wide consultation. See Forum 2.	

4.2 HNP Public Forum 2: the HNP Vision and Objectives

HNP Public Forum 2 15 th July 2015	
Theme: Vision and Objectives for the HNP	
Purpose: To refine and add further detail to the emerging Vision and Objectives of the HNP, and as its opening event draw attention to the town-wide consultation on this. A copy of the Forum 2 programme is available.	
Inputs: The Steering Group's draft Vision and Objectives as contained in the formal consultation document available to all households and on the website was the subject of group discussion.	
Summary outputs: The results of group discussions were collated and circulated back to attendees. See the document Group Responses , as lodged also on the website. Members present also requested an early update on wider consultation responses, which was made available in September 2015.	
Attendance: 41, including 21 returners from Forum 1, 3 representatives of neighbouring Parishes and 1 County Council Planning representative.	Evaluation: Do you know more about Neighbourhood Plans? YES: 16 No: 0 Do you know enough about Neighbourhood Plans? YES: 6 No: 7 (3 void) Will you help us guide the Hexham Neighbourhood Plan to completion, for example by attending the next Forum? YES: 16 No: 0 Full evaluation report is available here.
Outcomes: The results of the evening's Forum were considered along with other responses in the wider consultation on the HNP Vision and Objectives. Once the consultation had closed, Forum 5 conveyed detail about the changes to the consultation draft version. These documents were available on the homepage of the HNP website (at top of right-hand sidebar) since January 2016: the ' workings out ' showing how the Steering Group managed the modifications to the consultation draft, the report of all 169 consultation responses and the resulting revised HNP Vision and Objectives .	

4.3 HNP Public Forum 3: Future Housing in Hexham (I)

HNP Public Forum 3 21 st October 2015	
Theme: Future Housing in Hexham (I)	
Purpose: To update residents' knowledge of Hexham housing and the local housing market and gather views on future housing. A copy of the Forum 3 programme is available.	
Inputs: After feedback from Forum 2 and a report on HNP progress, 2 guest speakers introduced views and data on the current housing composition and market in Hexham. Speakers represented the social housing organisation ISOS and the County Council social housing department. A local estate agent and a regional representative of a national housing developer were unable to attend and make a presentation, but a developer representative who is a local resident was in attendance. Those present also undertook a mapwork exercise to identify potentially useable brownfield sites within the Town's boundaries.	
Summary outputs:	

There was a pretty much <u>universal conclusion</u> that there existed <u>insufficient data</u> to draw robust conclusions about future housing in Hexham. A full report of the Forum , containing (summaries of) presentations and group discussions is available along with the a list of potential brownfield sites for housing resulting from the mapwork exercise.	
Attendance: 51, including 28 returners from earlier Forums, 3 representatives of neighbouring Parishes and 3 County Council representatives.	Evaluation: Do you know more about Neighbourhood Plans? YES: 8/9 NO: 1 Do you know enough about Neighbourhood Plans? YES: 1/9 NO: 8 Will you help us guide the Hexham Neighbourhood Plan to completion, for example by attending the next Forum? YES: 9/9 NO: 0 An evaluation report is available.
Outcomes: The HNP Steering Group undertook negotiations with the Hexham Town Council (HTC) and later with Town Planning representatives of Northumberland County Council (NCC). As a result, HTC and NCC shared the funding for a full housing needs survey for Hexham Housing Area (includes the adjacent villages of Acomb and Sandhoe) with a sub-report to cover the Hexham Parish. After competitive tender, Arc4 undertook the survey and published respective reports in October 2017 (see Forum 7 below).	

4.4 HNP Public Forum 4: Hexham's Sustainability

HNP Public Forum 4 20 th January 2016	
Theme: Sustainability	
Purpose: To collect residents' views on the importance to Hexham of three areas of sustainability – economy, community and natural environment, in order to refine further the relevant sections of the HNP. A copy of the Forum 4 programme is available.	
Inputs: The sole inputs were brief and related to the results of the October 2015 Forum and the progress of the consultation on HNP Vision and Objectives, which, after extension, had just closed. Much time was spent, in acknowledgement of evaluation feedback, in 8 small working groups.	
Summary outputs: The collation of working group conclusions was made available routinely to all Forum members, town councillors and via the HNP website. This programme proved very challenging.	
Attendance: 41, including 25 returners and 1 adjacent Parish and 1 County Council representative.	Evaluation: Do you know more about Neighbourhood Plans? YES: 15/20 NO: 3 Do you know enough about Neighbourhood Plans? YES: 6/20 NO: 10 Will you help us guide the Hexham Neighbourhood Plan to completion, for example by attending the next Forum? YES: 19/20 NO: 0 A full evaluation report is available.
Outcomes: The SG processed the working group contributions with the Objective 4 within the results of the completed consultation. Overall the SG continued to discuss whether the HNP should contain a discrete section/objective relating to Sustainability or whether the wide-ranging sustainability issues weren so important and integral to the central direction of the HNP that they should stand within the other objectives and identifiably permeate the whole Plan. No conclusion at this stage.	

4.5 HNP Forum 5: Our Natural Environment, Health and Well-being

HNP Public Forum 5 20 th April 2016	
Theme: Our Natural Environment, Health and Well-being	
<p>Purpose:</p> <ul style="list-style-type: none"> • To update on the final HNP Vision and Objectives. • To update on the progress of the Housing Needs Survey (see Forum 7). • To use as stimulus an input by the County's specialist in the region's natural environment. • To air through reported group discussion and collect residents' ideas and priorities for important green spaces that are valued, with reasons, by the community. <p>Click for a copy of the Forum 5 programme. The introductory PowerPoint presentation for this Forum, which included the post-consultation editing of the Vision for the HNP, is available, as are three supporting documents – the 'workings out' showing how the Steering Group managed the modifications to the consultation draft, the report of all consultation responses and the resulting revised HNP Vision and Objectives. See also Forum 2 above.</p>	
<p>Inputs:</p> <p>Sam Talbot, the County Council Environment Officer, talked to her sections of the above PowerPoint presentation covering the significant features of the natural environment in the neighbourhood area. Structured round-table groupwork focussed on up-to-date natural environment maps of the neighbourhood area and revealed residents' priorities for green space designation, with reasons.</p>	
<p>Summary outputs:</p> <p>Group conclusions regarding green space designations were collated and made available to participants by email and more widely via the HNP website</p>	
<p>Attendance: 28, including 20 returners, 1 County Council and 2 adjacent Parish representatives.</p>	<p>Evaluation: No evaluation forms were issued.</p>
<p>Outcomes:</p> <p>The potential Green Space sites were investigated by the SG after discussion in a Working Group and a consolidated list was assembled for further consultation. This led to the production of a draft Natural Environment Objective section, using the outcomes of the Vision and Objectives consultation, the Natural Environment Working Group, and the outputs of Forum 5. This working document for the NE Objective, reviewed by the SG at its December 2016 meeting, is a good example of the iterative process that the HNP underwent.</p>	

4.6 HNP Public Forum 6: Hexham's Built Environment and Heritage

HNP Public Forum 6 27 th July 2016	
Theme: Hexham's Built Environment and Heritage	
<p>Purpose:</p> <ul style="list-style-type: none"> • Receive feedback from the BEH working group (3 preparatory meetings). • Stimulate discussion and collect feedback from participants on desired policy areas within this HNP Objective character areas within the town, key views of the town, and potential Local Heritage Assets. • Provide updates on the Housing Needs Survey and general HNP progress. 	

The programme for Forum 6 and the introductory PowerPoint are available.	
<p>Inputs: A BEH Working Group (composed of interested local people) had been established to assist the preparation of this, for Hexham people, very important Forum. Starting with a scoping paper produced by the HNP TP Consultant, the 3 planned meetings of 23 June, 27 June and 6 July (click for reports/output) provided the framework, principal questions and working paper for the group discussions at the July Forum 6.</p>	
<p>Summary outputs: The outputs of discussion groups were collated in document 1, 3 Big Questions, and document 2, Policy Intentions. These were fed back to participants, Forum Members generally and Hexham's wider population with access to the internet.</p>	
<p>Attendance: 31, including 17 returners, 1 neighbouring Parish and 1 County Council representative.</p>	<p>Evaluation: Do you know more about Neighbourhood Plans? YES: 13 NO: 2 Do you know enough about Neighbourhood Plans? YES: 4 NO: 9 Will you help us guide the Hexham Neighbourhood Plan to completion, for example by attending the next Forum? YES: 15 NO: 0 An evaluation report is available.</p>
<p>Outcomes: From the draft Objective 1 resulting from the Vision and Objectives consultation, via the Working Group scoping paper (see above), more detail was added to the emerging HNP. The SG acknowledged the importance to local people of</p> <ul style="list-style-type: none"> the Hexham shopfront design guide, local heritage assets beyond those already listed/designated, the avoidance of 'any town' architecture, the Market Place, as a key feature of Hexham's public realm <p>in defining the character of Hexham and telling the Hexham Story. Greater detail was subsequently added to the existing emerging draft HNP. It was becoming evident to local people that the Hexham Workhouse, a potential principal non-designated heritage asset, was under threat and the SG accordingly initiated the process towards a heritage assessment and report for this site.</p>	

4.7 Future Housing in Hexham (II)

HNP Public Forum 7	26 th October 2016
Theme: Future Housing in Hexham (II)	
<p>Purpose:</p> <ul style="list-style-type: none"> To introduce the findings of the arc4 Housing Needs Survey in Hexham. To facilitate discussion among members of the Hexham community present. To reflect and record the shared priorities for future housing in Hexham. <p>The programme for Forum 7 is available.</p>	
<p>Inputs: The Hexham Housing Needs Survey Report October 2016 and the Summary Report for Hexham were available in preparation for Forum 7. Dr Michael Bullock, senior researcher for the TP consultancy arc4, presented the findings and conclusions of the survey. A copy of his PowerPoint presentation is available. After time for questions, residents discussed in groups to agree key outcomes of the survey that should be reflected in the HNP's Housing Objective.</p>	
<p>Summary outputs: The conclusions of the 4 working groups were collated and fed back, to participants, town councillors, the HNP SG, the full Forum membership and via the website to the community generally.</p>	

<p>Attendance: 24+ (for some reason not all attendees were recorded), including at least 17 returners, 1 NCC Planning representative, 1 representative of neighbouring Parishes, and 1 resident who is also a housing developer representative.</p>	<p>Evaluation: No evaluation was conducted, as the guest speaker was central to the meeting.</p>
<p>Outcomes: This was a long-awaited and vital meeting for the SG's decision making. The SG, on the basis of the survey findings and conclusions, was able to add detail to the HNP Housing Objective, in relation</p> <ul style="list-style-type: none"> to the level of housing need across ages and groups, the tenures and types/sizes of dwellings <p>that would start to address the high level of housing need in Hexham.</p>	

4.8 Sustaining Hexham's Economy

<p>HNP Public Forum 8 25th January 2017</p>	
<p>Theme: Sustaining Hexham's Economy</p>	
<p>Purpose:</p> <ul style="list-style-type: none"> To emphasise how other Objectives (Housing, Built Environment and Heritage, and Natural Environment) will contribute to Hexham's economy. How Hexham's comparative advantages (location, heritage, growing population/people) can be harnessed to contribute to the economy. Facilitate group discussion and decision making on how HNP can support the sustainability of Hexham's economy. <p>A copy of the Forum 8 programme is available.</p>	
<p>Inputs: A dedicated PowerPoint presentation was designed to convey a 'can do' attitude before inviting the participants to discuss and prioritise in groups. At the time of this Forum, the Hexham Business Improvement District (BID) was in existence and an invitation was sent to the BID committee to attend and contribute. An invitation was also sent to the leadership of the Hexham Arts Forum, as a strong arts tradition has the potential to make a positive impact on the local economy, but no representation materialised.</p>	
<p>Summary outputs: The conclusions of the discussions with SG additional comments/intentions of each of the 4 groups were collated and fed back to the full HNP audience.</p>	
<p>Attendance: 26, including 16 returners, and 4 members of the Hexham BID.</p>	<p>Evaluation: No evaluation was undertaken at this the last structured HNP Public Forum.</p>
<p>Outcomes: Some new ideas and priorities were raised by participants, including dedicated premises not only for new start-ups (hubs) but also larger premises for relatively new, expanding businesses, which SG will include in draft HNP. Much of the groups' thinking confirmed what was, after previous consultations, already part of the HNP framework, i.e. support for visitor accommodation, utilising the space above shops in town, applying the Hexham shopfront guidance, the importance of affordable housing to help sustain local retail/economy.</p>	

4.9 The Draft Hexham Neighbourhood Plan – Drop-In

The 9th quarterly Public Forum was a drop-in event held on 24th May 2017 in the late afternoon and evening at which residents could study and comment on [the May 2017 Hexham Neighbourhood Plan](#). The [public invitation to Forum 9](#) is available.

A questionnaire was constructed to elicit some basic but useful comments on the Plan content, designed to make further use of residents' local knowledge to cement further the relevance and accuracy of the community-led Plan:

- are you in overall agreement with the Plan? (Yes 15/19, No 4/19)
- has the Plan got the right Green spaces?
- has the Plan got the right wildlife corridors?
- has the Plan got the right brownfield sites for housing?
- what has the Plan missed?

The [19 completed and returned questionnaire responses](#) were collated into a summary document which was circulated to participants, Forum members, councillors and the wider community via the HNP website, where the draft plan was also available.

The elements of the community feedback that the HNP Steering Group gave special attention as they reflected potential modifications or additions to the Plan were:

- do school playing fields qualify as green spaces as the public has no access to them? (the school playing fields, after further SG research, were withdrawn from the list of green spaces);
- the Bunker site and former Dalesway garage site were questioned as potential housing sites, as these are NCC employment land and within flood risk zone (both these sites, although retained within the March 2018 Pre-submission consultation draft, have since been withdrawn for these two reasons);
- confusion over whether some heritage buildings should be listed in Annex A as non-designated heritage assets, e.g. St Mary's Church (to obviate any possible misunderstandings on this issue and difficulties of terminology that endured, and after consultation with Historic England, a new Annex B was added to the Submission Plan, containing a full list of Grade II* listed buildings in the Town, which, with a re-wording of the Policy HNP7 Designated Heritage Assets, ensures all significant heritage assets are named and are thus recognisable to local people).

5. The Hexham Housing Needs Survey and Report 2016

The Hexham Housing Needs survey was conducted in June 2016 and the final report was available in October 2016. The process was conducted by the town planning consultancy arc4, selected after competitive tender. The costs and outcomes were shared by Northumberland County Council and Hexham Town Council. It came about in large part as a result of the HNP Forum 3 Housing (see above) at which there emerged a general consensus, strongly shared by the HNP Steering Group, that insufficient hard and up-to-date data was in existence upon which to base the HNP Housing Objective.

HNP Public Forums 3 and 7 dealt with Future Housing in Hexham, the latter already containing links to the discussion about the survey, the report and outcomes of the process. This section will therefore contain a brief summary of the process, outputs and outcomes.

Process

A full census survey of households across the Hexham, Acomb and Sandhoe parishes was conducted. A total of 5,964 households received the [survey instrument](#) through the post. The consultancy arc4 made available an advice line. Respondents had available the paper copy, an internet copy and the advice line for their submissions. In Hexham Parish, 5,210 households were contacted and 1,288 questionnaires were returned, representing a 24.7% and statistically very sound response rate.

Outputs

The arc4 analysis of the assembled data (and of existing secondary data, e.g. housing data, house prices and the housing market generally) lead to the publication of a [full report for the wider Hexham housing area](#) and individual [summary reports for Hexham](#) and Acomb. Dr Michael Bullock, arc4's senior consultant, provided feedback to the Hexham Town Council and later to the wider community, at HNP Public Forum 7. His [PowerPoint presentation of the results of the survey](#) is available, as is a [summary of his statistical recommendations](#) for future housing in Hexham. 10% of Hexham households had a housing need.

Outcomes

The new data and recommendations resulting from the Hexham Housing Needs Survey were vital for the SG's decision making. The SG, on the basis of the survey findings and conclusions, was able to add detail to the HNP Housing Objective, in relation

- to the level of housing need across ages and groups,
- the tenures and
- types/sizes of dwellings that should be built

to start to address the high level of housing need in Hexham within new housing to accommodate a growing population, important for the Town's overall sustainability.

6. The Strategic Environmental Assessment (SEA) for the HNP

Northumberland County Council Planning Department, in its [Screening Opinion of June 2017](#) and its [revised Screening Opinion](#), deemed that a full Strategic Environmental Assessment was necessary for the Hexham Neighbourhood Plan. Only Air Quality and Soil and Waste were scoped out of the process at this stage.

Approval and funding for a support package had been sought and received from Locality, and AECOM (Manchester office) was engaged to conduct the full assessment and report. In the course of the SEA process, the HNP Steering Group provided additional information and clarification on a number of occasions, relating to potential sites rejected by the Steering Group (after Public Forum 3), exception sites, the risk to particular green spaces, allotment sites and community facilities. To assist accuracy, some details were questioned – some distances between proposed housing sites and local services, and the application of flood risk zones to specific areas of Hexham especially in light of new planned flood containment measures.

The first [SEA report](#) was published by AECOM in February 2018. The table and text of the Summary of Findings as presented on Page 3 follow:

Biodiversity	Climate change mitigation	Climate change resilience	Cultural and natural heritage	Landscape and townscape	Water quality	Population and community	Health and wellbeing	Travel and transport
Significant +ve	Minor +ve Minor -ve	Minor +ve	Significant +ve	Minor +ve	Neutral	Significant +ve	Significant +ve	Minor +ve

The plan is predicted to have mostly positive effects, though in the main, these are not significant.

Four significant positive effects are predicted overall, relating to biodiversity, cultural heritage, housing and health and wellbeing.

The effects upon biodiversity are significant, as in the longer term there should be enhancement to wildlife corridors and green infrastructure networks more generally.

The effects upon cultural heritage are predicted to be significantly positive as the Plan offers a stronger policy framework for locally important buildings and features. The sensitive redevelopment of allocated sites should also lead to an improvement in the quality of the townscape.

The effects upon population and community are predicted to be significant, as the Plan should help to deliver housing to help meet specific local needs.

The effects upon health and wellbeing are predicted to be significant due to the cumulative positive effects associated with affordable housing provision, protection and improvement of recreational opportunities and improvements to accessibility.

No significant negative effects have been predicted.

A minor negative effect is predicted related to the potential for new homes to be located on sites that are at risk of flooding. However, these effects are uncertain, as there are flood engineering works planned that could reduce risks, and the plan policies also state the need to manage flood risk.

Advice from AECOM that would strengthen the intentions of the Plan was valued and modifications in terms of re-wordings were made to the Plan, relating to the retention of existing habitats (BE3 f.), the possible loss of pedestrian access routes (NE9), and rain-water harvesting (BE3 d.). The Steering Group noted the minor negative SEA judgements relating to three sites at risk of flooding and engaged further with the County Council about the status of two of these sites (the third was to be subject to further flood restriction measures in summer 2018).

7. The Screening Opinion – Habitats Regulations Assessment

The Northumberland County Council was consulted on the need for a Habitats Regulations Assessment for the HNP.

In September 2017 the resulting [HRA screening document](#) communicated the judgement that for the HNP a further habitats screening was not necessary and that the process could be concluded at that point without progressing to stage 2 appropriate assessment.

8. Healthcheck Report for the HNP, March 2018

As the draft HNP was approaching readiness for its Regulation 14 Pre-submission Consultation, the Steering Group followed advice to seek, via a Locality Support Package, a Healthcheck for the emerging Plan, in January 2018.

The resulting [Healthcheck report](#) was received during the Plan's first Regulation 14 Consultation, in March 2018.

The recommendations contained within this report were considered and acted upon in the extensive (extensive in no small part due to reassuringly large quantity of responses) post-consultation process in May to July 2018. Revisions to the March draft text were thus subject to the later additional consultation that commenced in October 2018.

A very small number of recommendations were reconsidered in the similar process after the additional Regulation 14 Consultation of October-November 2018. These are identified in blue in the associated [Healthcheck actions](#) paper.

9. The Regulation 14 Pre-Submission Consultation for the HNP

This statutory consultation ran from 16 March to 29th April 2018. The HNP Steering Group aimed at maximum publicity and engagement in order to achieve a high response rate and a broad range of views on the [March 2018 draft Plan](#) and advice on improvements.

The list of recommended consultees received from the County's Planning Department was expanded to match Hexham's purposes. The [resulting list of consultees](#), 76 national, regional and local organisations, received by email or surface mail a [notice of consultation and invitation](#) to participate at the opening of the consultation.

To maximise engagement locally, both the weekly Hexham Courant and the local town newsletter, the Hex-Press, covered the significance of this consultation. The HexPress (delivered to every Hexham home address) also contained within its folds a [FREEPOST consultation response proforma](#), to simplify participation for residents but not to exclude longer submissions. The FREEPOST response proforma was made available at contact points within the Town, a public drop-in was held centrally, and contacts were had with local groups (see above 3. HNP Use of Media Available to Local People and the [reach and response document](#) produced for early local feedback).

There were 17 responses from statutory organisation consultees, both local (9) and national (8). A [document collating these outputs](#) for circulation and for the HNP website was produced.

A logistically challenging total of 563 returns were received via the FREEPOST response form, 530 from Hexham people. These were collated in two documents, both anonymised to adhere to current legislation, one covering [all responses briefly](#), the second bringing together the [extended responses](#). A [summary of common points across residents' responses](#) made very interesting reading and was made available widely given its coverage and general interest to townspeople, via an article in the Hexham Courant and including to Hexham Town Council (as some important points raised were outwith the sphere of the HNP).

All submissions were considered by the HNP Steering Group and modifications were made to the Plan. These were recorded as outcomes of the consultation in

- an additional version of the statutory organisations' responses, indicating the [Steering Group's views and resulting actions](#), available here;
- a [summary of modifications to the March draft HNP](#).

The detail of the outcomes of the statutory consultation and cross-references to the Plan and consultation submissions are contained in the above documents, but the main points relating to the individual Plan Outcomes are as follows:

Built Environment and Heritage

- changes to structure and wording of paragraphs and policies to avoid suggestions that the Plan was too restrictive towards new town centre development and may lead to pastiche design, including a design policy explicitly relating to the Hexham Conservation Area;
- greater clarity regarding designated heritage assets, listed buildings and additional assets that the Plan intends to recognise;
- wider recognition of the Town's mediaeval history.

Housing

- proposed site allocations for housing were changed, including the withdrawal of two sites at risk of flooding and subject to NCC classification as employment land;
- new NPPF provisions meant the HNP had to provide for the full new OAN for Hexham of 530 units within the life of the Plan (previously site allocations were designed to make use of brownfield and in-fill sites giving easier access to town centre amenities in addition to the previous OAN of 900+);
- given the conflict between residents' views and those of local organisations with an interest in land in Hexham, the decision that the affordable unit requirement for larger sites, in keeping with the new emerging Local Plan, was fixed at 30%.

Natural Environment and Well-being

- meeting national standards (re Governments 25-Year Environmental Plan and NPPF para 118) in like-for-like or better-for-like compensation, in net gains in biodiversity;
- withdrawal of school fields from list of Community green spaces;
- additional references to health and health services to be included in the final draft HNP.

Economy

- additional policy to support modern IT-based high tech, highly specialised business, as proposed in Local Plan for two other areas in Northumberland;
- a clearer distinction in terminology relating the Town's retail zones.

Overall

- more effective paragraph reference numbers and cross-referencing to be achieved in the next edition of the Plan.

Given the new requirements for NPs relating to the OAN for the area, given the new OAN for Hexham in the NCC's emerging Local Plan, and given the ensuing and other changes to the list of sites proposed for new housing, it was clear that an additional SEA and Regulation 14 Pre-submission Consultation were necessary.

[As a result in part of the consultation responses that lay outwith the HNP scope but were relevant to the Hexham Town Council, in particular the high number of residents' responses that made reference to levels of untidiness and litter in the town centre (see [the summary of common points across residents' responses](#), as above), the County Council provided a mechanised pavement sweeper for sole use in the Town and the Town Council provided the funding for its operators for 5 days per week.]

10. The Additional Environmental Assessment for the HNP

An update and clarifications (see above) on

1. the sites to be proposed for housing in the revised draft HNP, and
 2. the other modifications to the March 2018 draft of the HNP, plus
 3. the consultation responses made explicitly on the March 2018 SEA
- were provided to the AECOM Manchester Office for further consideration, working towards a revised SEA for the HNP.

This led to the September publication of the [additional SEA for the HNP](#). The table and text of the Summary of Findings as presented on Page 3 read as follows:

Biodiversity	Climate change mitigation	Climate change resilience	Cultural and natural heritage	Landscape and townscape	Water quality	Population and community	Health and wellbeing	Travel and transport
Significant +ve	Minor +ve	Minor +ve	Significant +ve	Minor +ve	Neutral	Significant +ve	Significant +ve	Minor +ve

The plan is predicted to have mostly positive effects, though in the main, these are not significant.

Four significant positive effects are predicted overall, relating to biodiversity, cultural heritage, housing and health and wellbeing.

The effects upon biodiversity are significant, as in the longer term there should be enhancement to wildlife corridors and green infrastructure networks more generally.

The effects upon cultural heritage are predicted to be significantly positive as the Plan offers a stronger policy framework for locally important buildings and features. The sensitive redevelopment of allocated sites should also lead to an improvement in the quality of the townscape.

The effects upon population and community are predicted to be significant, as the Plan should help to deliver housing to help meet specific local needs.

The effects upon health and wellbeing are predicted to be significant due to the cumulative positive effects associated with affordable housing provision, protection and improvement of recreational opportunities and improvements to accessibility.

No negative effects have been predicted.

A minor negative effect is predicted related to the potential for new homes to be located on sites that are at risk of flooding. However, these effects are uncertain, as there are flood engineering works planned that could reduce risks, and the plan policies also state the need to manage flood risk.

This additional SEA for the HNP formed part of the additional Regulation 14 Pre-submission Consultation for the HNP.

11. The Additional Regulation 14 Pre-Submission Consultation

This was held between 5th October and 16th November 2018. The [revised pre-submission draft HNP](#) was available via the Council Office, the Hexham Library and the homepage of the HNP website, as were:

HNP [Policy Map 1 Hexham's Central Area](#)

HNP [Policy Map 2 The Full Neighbourhood Area](#)

The [SEA Report for the HNP September 2018](#)

The [HNP Background Housing Report October 2018](#).

The outputs and outcomes of the March Pre-submission consultation were already available on the HNP website homepage (see above).

The [Notice of Consultation](#) and [invitation to participate](#) were issued and displayed from 3rd October 2018 in key locations in the town. The Hexham Courant of 4th October 2018 carried a formal notice regarding this consultation, inviting Hexham residents to participate. The full HNP Public Forum membership received emails that invited them to participate in this consultation. The March 2018 list of Consultees, based on the outline list provided by the NCC, was expanded to contain all organisations that had responded within the March 2018 Regulation 14 Consultation, notably local organisations with an interest in land in Hexham; the full list is [available here](#).

All organisations in the list received either by email or by surface mail the notification and invitation to participate. The one exception to this was Haydon Bridge Parish Council, which was subsequently contacted with an apology, attention was drawn to the Additional Regulation 14 Consultation Draft of the HNP, and their support was expressed for the HNP.

The [submissions of statutory national and local bodies with the corresponding Steering Group's views/actions/modifications to the October draft Plan](#) are available.

Local residents' submissions with the corresponding actions/modifications to the October draft Plan [are available here](#).

The response rate did not match that of the earlier March 2018 Regulation 14 Consultation, but residents expressed support for the draft HNP with only two exceptions (one expressed a sole concern, one was ambivalent). For a truer reflection of the level of engagement by local people in the development of the HNP and their views, see Pp 23 and 24 and the links offered there.

One document contains [the recommendations of NCC officers](#) and an associated document summarises the [Steering Group's resulting views/actions/modifications to the draft Plan](#)

The [submissions by other organisations](#) which had responded within the March 2018 Regulation 14 Consultation, notably organisations with an interest in land or property in Hexham, and the associated Steering Group responses, were collated separately.

This second Regulation 14 Consultation had significant outcomes for the production of the Plan, not least in a further valuable exchange of information with and further advice from Historic England and the AECOM SEA authors.

12. SEA Addendum for the HNP February 2019

The [SEA Addendum for the HNP](#), received in February 2019, registers the impact of the updates made to produce the policies and text of the HNP Pre-Submission Draft October 2018 since the March-April 2018 Regulation 14 Consultation. It will inform the consultation undertaken at publication of the HNP and the subsequent independent Examination process.

The Addendum first considers all updates in order to identify those which require in-depth appraisal. The latter are then considered in detail to assess whether they will have a likely significant impact and, where relevant, whether this will differ from the assessment already undertaken and reported in the SEA Report (of September 2018). Of the 26 updates considered, within the purposes of the SEA regulations, four are significant and require in-depth appraisal. These are:

1. HNP4 Additional text for non-designated heritage assets, to incorporate provisions for archaeological features;
2. HNP7 Significant expansion to set out a range of provisions for designated heritage assets;
3. 10 Additional provisions relating to the management of flood risk;
4. HNP9 Additional provisions relating to the management of flood risk.

The rationale for these updates is acknowledged in the Addendum. Either their effects are considered to be positive or they ensure that the HNP meets the provisions of national policy.

Overall, however, these updates ‘will not have significant impacts, either on their own or in combination with other policies’, and as such do not justify changes to the judgements contained in the SEA Report of September 2018.

13. The Habitats Regulations Screening Opinion March 2018

In the [HRA final screening report](#), Northumberland County Council provides the following screening opinion for the purposes of the Habitats Regulations:

“Hexham Neighbourhood Plan Submission Plan January 2019 is not likely to have a significant effect on any European Sites for the reasons identified in Section 5 of this Report.

“As there are no effects which are more than *de minimus*, there is no requirement to consider impacts arising in combination with other plans and projects, and accordingly the HRA process can be concluded at this stage without progressing to stage 2 appropriate assessment”.

14. Conclusion

The Hexham Neighbourhood Submission Plan is the outcome of continuous community engagement in large variety of effective forms since 2015. After earlier town-wide consultations covered areas of judgement and aspiration within the scope of a neighbourhood plan, a planned two years of local consultation and direct community engagement ensued from April 2015 to May 2017. This resulted in a draft Plan for which further consultation with external specialist bodies, local organisations and local people has been strenuously sought, in the period to December 2018. In that time, guidance, input and support have been received from various sources, including on regular occasions the Northumberland County Council Planning Department, all of which has been useful and all of which has been afforded due consideration in the preparation of the Plan.

This has, as planned, contributed to a Plan that reflects the community's aspirations for the area, local people's needs and wider stakeholders' advice, whilst being in general conformity with local and national planning policy and meeting the basic conditions of a Neighbourhood Plan.

All legal obligations regarding the preparation of neighbourhood plans have been adhered to by the HNP Steering Group on behalf of the Hexham Town Council. The Hexham Town Council approved the Submission Plan at a full Council meeting on the 14th January 2019.

The Submission Plan is supported by a Basic Conditions Report and by this Consultation Statement both of which cover the requirements set out in the Neighbourhood Planning Regulations 2012 [as amended]. The Town Council has no hesitation in presenting the Plan as a policy document that has the support of the majority of the local community and external organisations that have been engaged in its preparation.

This Consultation Statement demonstrates that the publicity, consultation and engagement on the Plan has been meaningful, effective, proportionate and valuable in shaping the Plan, which will benefit current and future generations in Hexham Parish by promoting sustainable development.

15. Appendix A – Hyperlinks to Original Documents

1. HNP Aims: [Aims of the HNP](#)
2. Well-being Survey: [full report including an executive summary](#)
3. Previous Town-wide Surveys: [Extracts from Previous Town-wide Surveys](#)
4. Hexham Town Plan 2013: [This Town Plan](#)
5. Hexham Town Plan 2013 – Survey: [full table of the results of the associated survey](#)
6. Previous Town-wide Surveys: [Extracts from Previous Town-wide Surveys](#)
7. Vision 2020 and Town Plan 2014 – public meeting: [full report](#)
8. Vision 2020 and Town Plan 2014: [Vision 2010 and Town Plan 2014](#)
9. Vision 2020 and Town Plan 2014 – survey rankings: [Town Plan 2014 Proposals – Survey Rankings](#)
10. The HexPress: [the HexPress](#)
11. HNP Vision and Objectives consultation form: [consultation form](#)
12. Forum 1 Programme: [Forum 1 programme](#)
13. Forum 1 Presentation: [view the presentation here](#)
14. Forum 1 Group Notes: [collated notes](#)
15. Forum 1 Main Messages: [main messages](#)
16. Forum 1 evaluation report: [Full evaluation report](#) is available here
17. Forum 2 Programme – Vision and Objectives: [Forum 2 programme](#)
18. HNP draft Vision and Objectives: [draft Vision and Objectives](#)
19. Forum 2 Group Responses: [Group Responses](#)
20. HNP Vision and Objectives Consultation – update 09/15: [early update](#)
21. Forum 2 evaluation report: [Full evaluation report](#)
22. Draft HNP Vision and Objectives – progression: [workings out](#)
23. HNP Vision and Objectives: [report of all 169 consultation responses](#)
24. HNP revised Vision and Objectives: [revised HNP Vision and Objectives](#)
25. Forum 3 Programme – Housing: [Forum 3 programme](#)
26. Forum 3 Report: [full report of the Forum](#)
27. Forum 3 Residents’ Potential Sites for Housing: [brownfield sites for housing](#)
28. Forum 3 evaluation report: [evaluation report](#)
29. Forum 4 Programme – Sustainability: [Forum 4 programme](#)
30. Forum 4 working group conclusions: [The collation of working group conclusions](#)
31. Forum 4 evaluation report: [evaluation report](#)
32. Forum 5 Programme – Natural Environment, Health, Well-being: [Forum 5 programme](#)
33. Forum 5 Natural Environment Presentation: [introductory PowerPoint presentation](#)
34. HNP Vision and Objectives – progression: [workings out](#)
35. HNP Vision and Objectives: [report of all consultation responses](#)
36. HNP revised Vision and Objectives: [revised HNP Vision and Objectives](#)
37. Forum 5 Group Conclusions – green space designations: [Group conclusions were](#)
38. Natural Environment Objective – progression: [working document for the NE Objective](#)
39. Forum 6 Programme – Hexham’s Built Environment and Heritage: [programme for Forum 6](#)

40. Forum 6 BEH – Introductory Presentation: [introductory PowerPoint](#)
41. BEH Working Group 1, 23 June 2016: [23 June](#).
42. BEH Working Group 2, 27 June 2016: [27 June](#)
43. BEH Working Group 3, 6 July 2016: [6 July](#)
44. Forum 6 BEH: [3 Big Questions](#)
45. Forum 6 BEH: [Policy Intentions](#)
46. Forum 6 BEH: [evaluation report](#)
47. Forum 7 Future Housing in Hexham: [programme for Forum 7](#)
48. Forum 7 Housing Needs Survey Report – wider Hexham area: [Hexham Housing Needs Survey Report](#)
49. Forum 7 Housing Needs Survey Report – specifically Hexham (Parish) Summary: [Summary Report for Hexham](#)
50. Forum 7 Housing Needs Survey – Dr M Bullock's Presentation: [PowerPoint presentation](#)
51. Forum 7 Future Housing in Hexham: [conclusions of the 4 working groups](#)
52. Forum 8 Sustaining Hexham's Economy: [Forum 8 programme](#)
53. Forum 8 Sustaining Hexham's Economy – Presentation: [PowerPoint presentation](#)
54. Forum 8 Sustaining Hexham's Economy: [conclusions of the discussions with SG additional comments/intentions](#)
55. Forum 9 Drop-in – Draft Plan – Invitation: [public invitation to Forum 9](#)
56. Forum 9 Drop-in – Draft Plan: Summary of Residents' Comments: [19 completed and returned questionnaire responses](#)
57. Hexham Housing Needs Survey: [survey instrument](#)
58. Hexham Housing Needs Survey: [full report for the wider Hexham housing area](#)
59. Hexham Housing Needs Survey – summary report for the Hexham Parish: [summary reports for Hexham](#)
60. Hexham Housing Needs Survey – Dr M Bullock's Presentation: [PowerPoint presentation](#)
61. Hexham Housing Needs Survey: [summary of his statistical recommendations](#)
62. SEA for the HNP – Northumberland CC Screening Opinion: [Screening Opinion of June 2017](#)
63. SEA for the HNP – Northumberland CC [revised Screening Opinion](#)
64. SEA for the HNP – AECOM full Report February 2018: [SEA report](#)
65. Habitats Regulations Assessment – Northumberland CC [HRA screening document](#)
66. Healthcheck Report for the HNP, March 2018: [Healthcheck report](#)
67. Healthcheck – resulting actions/modifications to HNP: [Healthcheck actions](#)
68. Regulation 14 Pre-Submission Consultation – list of Consultees: [resulting list of consultees](#)
69. Regulation 14 Pre-Submission Consultation: [notice of consultation and invitation](#)
70. Regulation 14 Pre-Submission Consultation: [FREEPOST consultation response proforma](#)
71. Regulation 14 Pre-Submission Consultation: [reach and response document](#)
72. Regulation 14 Pre-Submission Consultation – organisation responses: [document collating these outputs](#)
73. Regulation 14 Pre-Submission Consultation – all residents' responses (brief): [all responses briefly](#)
74. Regulation 14 Pre-Submission Consultation – residents' extended responses: [extended responses](#)
75. Regulation 14 Pre-Submission Consultation: [summary of common points across residents' responses](#)
76. Regulation 14 Pre-Submission Consultation – organisation responses and SG actions: [Steering Group's views and resulting actions.](#)
77. Regulation 14 Pre-Submission Consultation: [summary of modifications to the March draft HNP](#)
78. Regulation 14 Pre-Submission Consultation: [summary of common points across residents' responses](#)

79. Additional SEA for the HNP – AECOM Report September 2018: [additional SEA for the HNP](#)
80. Additional Regulation 14 Consultation: [revised pre-submission draft HNP](#)
81. Additional Regulation 14 Consultation: [Policy Map 1 Hexham's Central Area](#)
82. Additional Regulation 14 Consultation: [Policy Map 2 The Full Neighbourhood Area](#)
83. Additional Regulation 14 Consultation: [SEA Report for the HNP September 2018](#)
84. Additional Regulation 14 Consultation: [HNP Background Housing Report October 2018](#)
85. Additional Regulation 14 Consultation: [Notice of Consultation](#)
86. Additional Regulation 14 Consultation, organisations: [invitation to participate](#)
87. Additional Regulation 14 Consultation – list of consultees: [available here](#)
88. Additional Regulation 14 Consultation: [submissions of statutory national and local bodies with the corresponding Steering Group's views/actions/modifications to the October draft Plan](#)
89. Additional Regulation 14 Consultation – local residents' responses with SG actions: [are available here](#)
90. Additional Regulation 14 Consultation – Northumberland CC submission: [the recommendations of NCC officers](#)
91. Additional Regulation 14 Consultation – Northumberland CC submission: [Steering Group's resulting views/actions/modifications to the draft Plan](#)
92. Additional Regulation 14 Consultation - [submissions by other organisations](#)
93. SEA Addendum February 2019: [SEA Addendum Feb 2019](#)
94. HRA Final Screening Opinion March 2019: [HRA final screening report](#)

16. Appendix A – List of Consultees

HEXHAM NEIGHBOURHOOD PLAN HEXHAM TOWN COUNCIL CONSULTEES (in conjunction with the NCC advisory appendix)

September 2018

HNP Additional Regulation 14 Pre-submission Consultation 5 October to 16 November 2018

Neighbourhood Plan Consultation Bodies for **Hexham Town Council**

1. Neighbourhood Plan Statutory Consultation Bodies:		
Consultation Body	Organisation	Contact
Local Planning Authority	Northumberland County Council	Liz Sinnamon (acting Head of Planning Services) Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF. Tel.: 01670 622388 Email: Elizabeth.Sinnamon@northumberland.gov.uk
		David English (Neighbourhood Planning and Infrastructure Manager) Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF. Tel.: 01670 623619 Email: David.English@northumberland.gov.uk
The Coal Authority	The Coal Authority (Melanie Lindsley)	Planning and Local Authority Liaison, The Coal Authority, 200 Lichfield Lane, Berry Lane, Mansfield, Nottinghamshire, NG18 4RG. Email: planningconsultation@coal.gov.uk
Homes England	former Homes and Communities Agency	Homes England, St George's House, Kingsway, Team Valley, Gateshead, NE11 0NA. Email: enquiries@homesengland.gov.uk
Natural England	Natural England	Consultation Service, Natural England, Hornbeam House, Electra Way, Crewe Business Park, Crewe, CW1 6GJ. Email: consultations@naturalengland.org.uk
The Environment Agency	The Environment Agency (Lucy Mo)	Planning Consultations, Environment Agency, Tyneside House, Skinnerburn Road, Newcastle Business Park, Newcastle upon Tyne, NE4 7AR. Email: planning.nane@environment-agency.gov.uk
Historic Buildings and Monuments	Historic England	Historic England, 41-44 Sandgate, Newcastle upon Tyne, NE1 3JF. Email: e-neast@HistoricEngland.org.uk

1. Neighbourhood Plan Statutory Consultation Bodies:		
Consultation Body	Organisation	Contact
Commission for England		Jules.Brown@historicengland.org.uk
Network Rail Infrastructure Limited	Network Rail Infrastructure Limited	Network Rail Infrastructure Limited, George Stephenson House, Toft Hill, York, Y01 6JT.
Highways England	Highways England	Asset Development Team - Yorkshire and North East, Highways Agency, Lateral, 8 City Walk, Leeds, LS11 9 AT. Email: planningYNE@highways-england.co.uk
Relevant Primary Care Trust	NHS Northumberland Clinical Commissioning Group (Ian Cameron)	NHS Northumberland Clinical Commissioning Group, County Hall, Morpeth, Northumberland, NE61 2 EF. Tel.: 01670335161 Email: norccg.enquiries@nhs.net
Any person who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority	Avonline	Avonline, 42 Ashton Vale Road, Ashton Vale, Bristol, BS3 2AX. Tel.: 0117 953 1111 Email: info@avonline.co.uk
	British Telecommunications Plc.	British Telecommunications Plc, Openreach Newsites PP 4AB, 21-23 Carloli Square, Newcastle CTE, Newcastle upon Tyne, NE1 1BB.
	Cybermoor	Cybermoor, Town Hall, Front Street, Alston, CA9 3RF. Tel.: 01434 382808
	EE	Alex Jackman, Corporate and Financial Affairs Department, EE, The Point, 37 North Wharf Road, London, W2 1AG. Email: public.affairs@ee.co.uk
	Three	Jane Evans, Three, Great Brighams, Mead Vastern Road, Reading, RG1 8DJ. Email: jane.evans@three.co.uk
	Virgin Media Limited	Virgin Media Limited, Unit 2, Network House, New York Way, New York Industrial Park, Newcastle upon Tyne, NE27 0QF Virgin Media Limited (Head Office), 270 & 280 Bartley Way, Bartley Wood Business Park, Hook, Hampshire, RG27 9UP
	Wildcard Networks	Wildcard Networks, Reliance House, Skinnerburn Road, Newcastle upon Tyne, NE4 7AN. info@wildcard.net.uk
	Arqiva	Email: community.relations@arqiva.com

1. Neighbourhood Plan Statutory Consultation Bodies:		
Consultation Body	Organisation	Contact
Any person to whom the electronic communications code applies	CTIL (Cornerstone Telecommunications Infrastructure Limited) Acting on behalf of Vodafone and O2	Cornerstone Telecommunications Infrastructure Limited, EMF Enquiries, Building 1330 – The Exchange, Arlington Business Park, Theale, Berkshire, RG7 4SA. Email: EMF.Enquiries@ctil.co.uk
	EE	Alex Jackman, Corporate and Financial Affairs Department, EE, The Point, 37 North Wharf Road, London, W2 1AG. Email: public.affairs@ee.co.uk
	Three	Jane Evans, Three, Great Brighams, Mead Vastern Road, Reading, RG1 8DJ. Email: jane.evans@three.co.uk
Any person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989.	Northern Powergrid	Northern Powergrid, Records and Information, Manor House, Station Road, Penshaw, Houghton le Spring, County Durham, DH4 7LA.
	National Grid	National Grid, National Grid House, Warwick, Warwickshire, CV34 6DA. Spencer Jefferies, Development Liaison Officer, Hannah Lorna Bevins, Consultant Town Planner National Grid House, Warwick Technology Park, Wood E&I Solutions UK Ltd Gallows Hill, Warwick CV34 6DA Gables House, Kenilworth Road box.landandacquisitions@nationalgrid.com Leamington Spa CV32 6JX n.grid@amecfw.com
Any a person to whom a licence has been granted under section 7(2) of the Gas Act 1986.	Northern Gas Networks	Northern Gas Networks, 1100 Century Way, Thorp Business Park, Colton, Leeds, LS15 8TU.
Sewerage undertaker	Northumbrian Water Limited	Laura Kennedy New Development Team (Planning), Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB. laura.kennedy@nwl.co.uk 0191 419 6767
Water undertaker	Northumbrian Water Limited	Laura Kennedy New Development Team (Planning), Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB.

1. Neighbourhood Plan Statutory Consultation Bodies:				
Consultation Body	Organisation	Contact		
		laura.kennedy@nwl.co.uk 0191 419 6767		
Adjoining local authorities	All local authorities, including parish councils, that adjoin the neighbourhood area	Parish council contact details are available from Northumberland County Council website http://www.northumberland.gov.uk/Councillors/Parish-Town.aspx See below:		
Acomb Parish Council		Mr WC Grigg, Clerk, Acomb Parish Council griggbill@gmail.com		
Sandhoe PC		Mr WC Grigg, Clerk, Sandhoe Parish Council griggbill@gmail.com		
Warden PC		Ms Claire Miller, Clerk, Warden Parish Council clairemillerparishclerk@hotmail.co.uk		
Haydon Bridge PC		Carole McGivern, Clerk, Haydon Bridge Parish Council haydonbridgeparish@gmail.com		
Hexhamshire PC		Gaynor Scandle, Clerk, Hexhamshire Parish Council gaynor.scandle@yahoo.co.uk		
Corbridge PC		Mrs M Senior, Clerk, Corbridge Parish Council corbridge@ukpc.net		
Voluntary Bodies some or all of whose activities benefit all or any part of the neighbourhood area	Local Voluntary/Representative organisations with a direct interest			
	HTC	Jane Kevan	clerk@hexhamtowncouncil.gov.uk	Town Clerk
	HCP	Peter Rodger	admin@hexhamcommunity.net	Partnership Chair, Queen's Hall, Beaumont St, NE46 3LS
	Civic Society	Paul Wharrier	hexhamcivicsociety@yahoo.co.uk	Chair
	History Society	Yvonne Purdy	secretary@hexhamhistorian.org	Secretary
	Hexham East Residents' Association	Claire Heaviside	number28@hexhamcommunity.net	
	Number 28	Claire Heaviside	number28@hexhamcommunity.net	Manager, 28 Derwent Rd, 1DJ
	Hexham Rotary Club	Brian Sanderson	sanderson281@outlook.com	President, HRC
	U3A	Sue Loader	sloader@hotmail.com	Representative to HNP, Tynedale U3A
	QEHS	Cc Graeme Atkins	Cc gatkins@qehs.net	Executive Headteacher

1. Neighbourhood Plan Statutory Consultation Bodies:					
Consultation Body	Organisation	Contact			
		Simon Litchman	admin@qehs.net	Chairperson Hadrian Learning Trust, Whetstone Bridge Rd, 3JB	
	Hexham Youth Initiative	Keda Norman	keda@hexhamyi.org.uk	HYI Manager, Hexham Community Centre, Market Street, NE46 3NP	
	Community Centre	Jacqui Hogg	hexcomcentre@gmail.com	Manager, Hexham Community Centre, Market Street, NE46 3NP	
	Transition Tynedale	Pat Turner	pat.turner@itchyknee.co.uk		
	Hexham in Bloom	Joao Correia	hexhaminbloom@gmail.com jmpc@talktalk.net	Secretary, Hexham in Bloom	
	Tyne Rivers Trust	Director	info@tyneriverstrust.org	TRT, Shawwell Business Centre, Stagshaw Rd, Corbridge NE45 5PE	
	Northumberland National Park Authority	Duncan Wise	duncan.wise@nnpa.org.uk	Eastburn, South Park, 1BS	
	Forum Cinema	Tamsin Beevor	tmbeevor@btinternet.com	Manager, Market Place, NE46 1XF	
	Sports Clubs				
	Rowing Club	Ben Haywood Smith	ben@consultsmc.co.uk	Chair, HRC	
	Tynedale Tennis Club	Patricia Gillespie	trish@tynedaletennisclub.co.uk	Secretary, Prior's Flat, Eilansgate, NE46 3EW	
	Hexham Racecourse	Robert Whitelock	robert@hexham-race-course.co.uk	Chief Executive, Hexham Racecourse, High Yarridge, 2JP	
	Hexham Leazes Cricket Club	Andrew Webster	leazesc@outlook.com	Chairman, Leazes Lane, Hexham NE46 3BN	

1. Neighbourhood Plan Statutory Consultation Bodies:					
Consultation Body	Organisation	Contact			
Bodies which represent the interests of different religious groups in the neighbourhood area	Church Organisations				
	Hexham Abbey	Sally McRobie	admin@hexhamabbey.co.uk	Development Manager, The Parish Centre, Hexham Abbey, NE46 3NB	
	St Mary's RC	Judith Chaffey	email@stmaryshexham.plus.com	Parish Secretary, St Mary's Parish Church, Hencotes, NE46 2EB	
	Hex Trinity Methodist Church	Rev David Goodall	minister@hexhamtrinity.org.uk	Minister, HTMC, Beaumont St, NE46 3LS	
	St Aidan's	Mrs Linda Gowland	secretarystaidans@yahoo.co.uk	Hencotes, NE46 2EQ	
	Churches Together	Rosemary Theobalds	r.theobalds@myinbox.net	The Partnership Representative,	
	Hexham Quakers		by letter	HQ, c/o The Community Centre, Market Street, NE46 3NP	
	Hexham Community Church	Pauline Woodhouse	zen105366@zen.co.uk	HCC, Central Chambers, Beaumont St, NE46 3LS	
	Salvation Army	Eunice Blakey	No email address	Divisional Envoy, Market Street, Hexham NE46 3NS	
Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area	Tynedale EU Group	Anne Russell	tynedaleeu@hotmail.com	Anne Russell Convenor TEUG	
Bodies which represent the interests of persons carrying on business in the neighbourhood area	The Hexham Business Improvement District (BID) Management Committee, special invitees to the HNP Public Forum 8 'Sustaining Hexham's Economy', has ceased to function.				
Bodies which represent the interests of disabled	Voluntary Orgs/Care Orgs/Minority/Hard-to-Reach Groups				

1. Neighbourhood Plan Statutory Consultation Bodies:					
Consultation Body	Organisation	Contact			
persons in the neighbourhood area	Adapt NE	Liz Prudhoe	generaloffice@adapt-tyndale.org.uk	Manager, Burn Lane, NE46 3HN	
	Food Bank	Sam Gilchrist	westnorthumberlandfoodbank@gmail.com	Manager, Burn Lane, NE46 3HN	
	StopGap	Paul Sloane	Paul.Sloane@stopgapinhexham.com	Stopgap Supported Housing, Office 3, 4 Meal Market, 1NF	
	Tynedale Hospice at Home	Alison Hands	admin@tyndalehospice.com	Chief Executive Officer, THH, 1 Legion House, Beaufront Park, Anick Rd, 4TU	
	Chrysalis at Tynedale	Phil Smith	chrysalis.tynedale@gmail.com	Co-ordinator, CaT, Torch Centre, Corbridge Rd, 1QS	
	Torch Centre	Torch Association	hexhamtorch@btconnect.com	Torch Centre, Corbridge Rd, 1QS	

2. Organisations who have asked to be notified about neighbourhood plans in Northumberland	
The Theatres Trust	Mark Price (Planning and Heritage Adviser) The Theatres Trust, 22 Charing Cross Road, London WC2H 0QL. Tel.: 02078368591 Email: mark.price@theatretrust.org.uk
Sustrans	2 Cathedral Square, College Green, Bristol, BS1 5DD Email: reception@sustrans.org.uk
National Farmers Union	Mr Andy Stephenson Planning, Agriculture House, 207 Tadcaster Road, York, YO24 1UD. Tel: 01904 451562 Email: andrew.stephenson@nfu.org.uk

3. Organisations with an interest in land/property in Hexham which made submissions in the March/April 2018 Reg 14 Consultation				
Land Factor	Roddy Findlay	rodny.f@landfactor.co.uk	Land Factor Ltd, Hexham Business Park, Burn Lane, NE46 3RU	
Estate Agency Youngs RPS	Robbie Hutchinson Managing Director	Robbie.Hutchinson@Youngsrps.com	Youngs RPS Priestpopple NE46 1PS	
Karbon	Michael Farr	michael.farr@isoshousing.co.uk michael.farr@karbonhomes.co.uk	Development Manager Karbon Homes Ltd, Number Five, Gosforth Park Avenue, Gosforth Business Park, Newcastle upon Tyne, NE12 8EG	
Esh	Simon Phillips Executive Director	simon.phillips@esh.uk.com	Esh Group, Esh House, Bowburn North Industrial Estate, Durham DH6 5PF	
GW-DS	Geoff Woodcock (formerly Esh)	geoff@gw-ds.com	Consultant, GW-DS	
Lambert Smith Hampton	Helen Marks	hmarks@lsh.co.uk	on behalf of Union Properties Ltd	
Lichfields	Jonathan Wallace	Newcastle@lichfields.uk	on behalf of Jomast Developments Ltd	
Lichfields	Dominic Smith	Newcastle@lichfields.uk	on behalf of Stella property Investments	
Lichfields	Dominic Smith	Newcastle@lichfields.uk	on behalf of Hexham Hotels Ltd	
WYG Planning Ltd	John Wyatt	john.wyatt@wyg.com	On behalf of HMC Land Ltd	

17. Appendix C – Submissions of Statutory Consultation Bodies and SG Responses

Hexham Town Council

HEXHAM NEIGHBOURHOOD PLAN

Pre-submission CONSULTATION 2

5th October to 16th November 2018

CONSULTATION SUBMISSIONS by National and Local Organisations (statutory bodies) with HNP Steering Group responses and resulting modifications to the Draft Plan

Consultee Organisation and ref	HNP ref	Submission in full	HNP SG RESPONSE AND PROPOSED CHANGES TO PLAN
SB 1 Clinical Commissioning Group - NHS	Obj 3	<p>Although there is some mention of health in the cited sections 3.5.3, 3.5.30 and 3.5.42, none of these recognise that the revised projected 530 new homes in Hexham would likely overwhelm existing primary care infrastructure. Provision of health infrastructure will be reviewed by the CCG as major housing development plans are submitted to the council. Any significant housing development is likely to require section 106/CIL contributions towards healthcare infrastructure.</p> <p>Please can you ensure the revised draft recognises (where applicable) that we not only need to preserve existing community facilities (as already written in to the draft), but actually need to expand them when large numbers of new home are planned?</p>	<p>This is a strategic matter which will be addressed in strategic planning policy in the NLP</p> <p>Agreed. Add 'expand' into Policy HNP1.</p>
SB 2 Environment Agency	HNP8 HNP10	<p>We welcome the inclusion of points raised by the Environment Agency in the previous consultation period regarding the Natural Environment and the longer term enhancement to wildlife corridors and green infrastructure networks.</p> <p>Flood Risk We note that recognition is given to our concerns regarding the allocation of sites within flood zones 2 and 3, with the revision of site allocations for housing. However, we remain concerned with the allocation of site 10, Burn Lane Bus Depot/Chareway Lane.</p> <p>The Neighbourhood Plan needs to consider whether the flood risk issues related to this site can be safely managed.</p>	<p>Noted. Changes have been made to the policy, and specific recommendations incorporated into the policy for the Bus Depot/Chareway lane site.</p>

		<p>Should development come forward on this site a detailed site-specific flood risk assessment (FRA) would need to include</p> <ul style="list-style-type: none"> • an assessment of the condition and location of existing flood defences in discussion with the Environment Agency who operate and maintain them. • the risk of flood defences failing, for example could defences be breached or pumped assets fail. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. • the current plan relies heavily on defence measures for existing properties as mitigation for future development, an FRA for new development will need to make an assessment on an undefended basis. Any loss of floodplain must be compensated for elsewhere on the site and there must be no increase in flood risk elsewhere. <p>We are unable to support the housing allocation within flood zones 2 and 3 without this understanding and assessment of the above issues.</p>	
SB 3 Northumbrian Water	HNP2	<p>We will make comment on topics which we feel are of relevance or have an impact on us, as the statutory water and sewerage undertaker.</p> <p>We note and support policy HNP2 relating to high quality sustainable design, in particular sub-section d). which promotes the conservation of water and the use of sustainable drainage systems.</p>	Noted.
	HNP8	<p>We note in policy HNP8 that there are ten housing allocations sites identified, and that all of these are brownfield sites. We recommend that the Neighbourhood Plan seeks to encourage a surface water run-off rate that is 50% of the previous flows off the site immediately prior to the new development where appropriate and achievable. We recommend this level of betterment in all emerging policy. We are unable to provide a high level assessment of the proposed allocation sites at this stage as they are not mapped or defined in the Neighbourhood Plan. We previously said in April that we would welcome early consultation on proposed development sites to ensure that water and wastewater infrastructure will be in place to support new development. We are still happy to provide such assessment if the appropriate locational information of the sites can be supplied.</p>	<p>A policies map was consulted on, which included all sites. Support appreciated.</p> <p>Additions to supporting text re run-off.</p>
	SuDS		

		<p>We always encourage the authors of Local Plans and Neighbourhood Plans to make note of the Defra Technical Standards for Sustainable Drainage Systems in order to minimise the potential for surface water and sewer flooding. In accordance with building regulations requirements there is a hierarchy of preference for managing surface water:</p> <p>a). Discharge into the ground b). Discharge to a surface water body c). Discharge to a surface water sewer or lastly d). Discharge to a combined sewer</p> <p>We would encourage Hexham Town Council to consider making reference to such a policy, or at least ensure that there is cross-reference to the Northumberland Local Plan which will explicitly set this out. The following wording is an example that we have recommended to other emerging Neighbourhood Plans:</p> <p>“In order to manage surface water drainage, development proposals should look to incorporate Sustainable Drainage Systems (SuDS) in line with the principles of ‘control, separate and minimise’ for both Greenfield and brownfield development.”</p> <p>We understand that Neighbourhood Plans are an iterative process and that the Hexham Neighbourhood Plan will be reconsidered in the forthcoming years as the Northumberland Plan is drafted and adopted.</p>	<p>Addition to supporting text.</p> <p>Change incorporated into policy.</p>
SB 4 Theatres Trust	HNP15	<p>Thank you for consulting the Trust.</p> <p>We welcome and support Policy HNP15 (Community Facilities) which identifies key community and cultural facilities within the town which are valued by local people including the Queen's Hall Arts Centre and Forum Cinema. The presumption against loss articulated within the policy should provide strong protection for the town's valued facilities, and reflects paragraph 92 of the NPPF (2018).</p>	Support noted with thanks.
SB 5 Hexham Civic Society	HNP10	<p>Hexham Civic Society whole heartedly supports the visions and objectives of the revised Neighbourhood Plan.</p> <p>We support the allocation of new homes, in particular the need to provide affordable, and a range of older people's accommodation. We also would support innovative delivery methods such as Community-led housing which the traditional housing market isn't resolving.</p>	Support noted with thanks.

	<p>HNP23</p> <p>HNP21/22</p> <p>HNP1-3</p> <p>HNP8</p>	<p>We support the approach to shopping, the role of art and the furthering the tourism offer.</p> <p>We support the emphasis on public transport, walking and cycling and the regeneration of the market place.</p> <p>In particular the Society supports the approach to the natural historic and built environment with the emphasis on quality and sustainable design and the value of listed buildings and the conservation area.</p> <p>We welcome this opportunity to work with Hexham Town Council to deliver heritage-led regeneration bringing back into use Hexham's brown-field sites, vacant and underused buildings and securing public realm improvements, especially around the Market Place.</p>	
<p>SB 6</p> <p>Chrysalis at Hexham</p>	<p>HNP11 and intro</p> <p>HNP19</p> <p>HNP8</p> <p>HNP19</p>	<p>We do support the Plan's overall intentions however, despite recognising the ageing population within Hexham, the need to continue to improve the overall health and wellbeing of its residents, support for existing community facilities and creation of new accessible community facilities, there is no provision for how or where this would be achieved. Existing community facilities are not particularly well suited for people with dementia. They need facilities which are close to transport links, near the town centre, are suitably lit and heated, have sufficient flexible space to use for active activities but support quiet space, have good acoustics to reduce the impact of noise on their condition and has sufficient storage space for equipment. The facilities also need to have good parking facilities and not be based on industrial estates tucked away from the community. Hexham is working towards being Dementia Friendly and we need to reflect this in the facilities provided for those affected by this condition.</p> <p>We agree with the identified sites however, those sites within the town centre also need to be considered for community facilities or a mixture of both.</p> <p>The priority for securing current community facilities but also creating new community facilities that are affordable for small local charities and would meet the changing needs of the residents and in particular secure accessible sites in the town centre.</p> <p>What we importantly disagree with in the Plan? The fact that no potential new community facilities in accessible locations in Hexham have been identified. Current community provisions is outdated and does not meet the current needs of our ageing population never mind the future ageing population.</p>	<p>Additional criteria added into Policy HNP1 to reflect Hexham's aspirations to be a 'Dementia Friendly' town.</p>

SB 7 Coal Authority	HNP8	<p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the form of 6 mine entries and likely historic unrecorded coal mine workings at shallow depth.</p> <p>I have reviewed the sites proposed for future development and note that none of these appear to be in the area of coal mining legacy and we therefore have no specific comments to make.</p> <p>Should the Neighbourhood Plan allocate sites for development in the future in the areas of past coal mining activity then consideration will need to be given to the potential risks posed to surface stability in accordance with the National Planning Policy Framework and the Development Plan. In addition any allocations on the surface coal resource will need to consider the impacts of mineral sterilisation in accordance with the National Planning Policy Framework and the Development Plan.</p>	Noted.
SB 8 Hexham Community-Led Housing	HNP8 HNP10	<p>On behalf of the Hexham Community-Led Housing group I wish to make the following points:</p> <ol style="list-style-type: none"> 1. we very strongly support the policy that the sites to be allocated for housing remain brownfield and/or in-fill; 2. we very strongly support Policy HNP10 – Affordable and Community-Led Housing, as C_LH may be the only vehicle for large numbers of affordable homes in the town; 3. important within the associated documents is the report of the 2016 Housing Need Survey in Hexham – the statistics confirm the high level of need in Hexham, among young families, first time buyers and older people; 4. 30% affordable homes on larger sites should be seen as the minimum. 	Noted with thanks.
SB 9 National Grid		<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. <i>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</i></p>	Noted.
SB 10 Natural England		<p>Natural England is satisfied that our previous advice has been taken into account and we have no further comments to make.</p>	Noted.
SB 11 Historic England		<p>I would like to congratulate Hexham Town Council on the draft neighbourhood plan and the great amount of work which has clearly gone in to its preparation. In general it is a very good plan. I have one major concern (relating to evidence for housing allocations and the related SEA</p>	Noted with thanks.

		<p>process). In addition, I set out a series of suggested minor amendments to ensure it is accurate and clear, and that it has regard to the National Planning Policy Framework (NPPF, 2018).</p> <p>I welcome the many positive references to heritage in your plan. You have a clear, positive strategy for the historic environment and you recognise the important role that conservation should play in ensuring sustainable development in Hexham. I very much welcome that you see heritage as a key driver to meeting your plan's vision and objectives, including preventing unjustified harm, reducing risk and seeking enhancement. Your policies support, shape and direct the delivery of strategic policies at a local level (as required by NPPF paragraphs 13 and 28), and you have taken advantage of opportunities offered through neighbourhood planning including identifying Local Green Space with historical significance (NPPF paragraph 100) and identifying the special qualities of the area to be reflected in development (NPPF paragraph 125).</p> <p>Despite being such a long way through your neighbourhood planning process, I would still like to draw your attention to our new guidance <i>Neighbourhood Planning & the Historic Environment, Historic England Advice Note 11</i> (2018) which can be downloaded here: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/. We also have a wealth of neighbourhood planning advice and case studies on our website, here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p> <p>The following detailed comments on the draft neighbourhood plan are set out under your headings.</p>	Noted with thanks.
	Para 1.5	<p>Hexham Today</p> <p>Paragraph 1.5 is very good, particularly the strong references to non-designated heritage assets, place-making, heritage-led regeneration and the impact of good design. In setting out the various types of designation in the town, you have omitted reference to Grade II listed buildings, the most numerous type; this should be rectified. In the first bullet, I suggest changing "list" to "identify" to avoid any confusion with statutory listing. I suggest changing the last bullet to read "where heritage assets present an opportunity for constructive re-use".</p>	Changes made.
	Para 1.7	<p>Paragraph 1.7 is also good; it could include discussion of town centre diversification, which could lead to a modest move away from retail to other compatible uses in some locations when seen in the light of some of your plan's other drivers: tourism, heritage and the arts.</p>	
		<p>Vision and objectives</p> <p>Objective 2 is welcome but I suggest replacing "character" with "significance" as it is a stronger term which includes aspects beyond just character, such as built fabric, history, archaeological</p>	'Significance' added to objective.

		<p>potential, aesthetic qualities and communal values. Significance is a very important concept which underpins all historic environment planning policy in the NPPF and the local plan. Your plan would be stronger by making appropriate reference to it (I suggest further amendments below), and adding the definition of significance from the NPPF's glossary to your own. In making this change, you could insert the word "character" at the end of the box in the series of words starting "underline..." to ensure it remains in the objective.</p> <p>Reference to the historic environment in Objectives 4 and 5 is very welcome. This highlights it is a cross-cutting issue affecting many planning matters in the town.</p>	
	HNP1	<p>Section 3.3 Planning policies: built environment</p> <p>Policy HNP1</p> <p>I welcome inclusion of heritage-related community facilities in this policy.</p>	<p>Support noted.</p> <p>Support noted.</p>
	HNP2	<p>Policy HNP2</p> <p>In the policy I am concerned about including "where possible, practical and viable" as this gives a broad opportunity for applicants to get round the policy's requirements; I suggest reconsidering this wording. Clause (h) could more accurately read "...to designated and non-designated heritage assets and their settings...". The sentence at the end of this policy could be more comfortably incorporated in to clause (a).</p>	Change incorporated
	Para 3.3.1	<p>The final sentence of paragraph 3.3.1 should read "preserve or enhance" not "and". Also, this paragraph highlights a common vocabulary problem seen in several places in the plan, which should be corrected to ensure clarity: in this paragraph, "listed buildings" should be deleted together with the brackets around "designated heritage assets", because "designated heritage assets" by itself is the accurate term. By definition it includes listed buildings along with the three other types of designation relevant to your plan area: scheduled monuments, registered parks and gardens, and conservation areas. I suggest you would not want to downgrade the policy's protection to some types of asset over others. I recommend you copy the definitions for "heritage asset" and "designated heritage asset" from the NPPF's glossary in to your own so you can familiarise yourself with these important terms.</p>	Changes incorporated
	Para 3.3.8	<p>Paragraphs 3.3.3 to 3.3.7 and 3.3.11 to 3.3.14 are excellent summaries of the historic character and content of the place. I suggest deleting "and structures" from the last line of paragraph 3.3.8 because all listed buildings are so called, no matter what structural form they take.</p>	Changes incorporated
	HNP3	<p>Policy HNP3</p> <p>This policy is welcome in bringing good detail to help apply higher level policy in your</p>	Changes incorporated

		neighbourhood. In the policy , I suggest changing “special character” to “significance”, which is more accurate (see above). I also suggest simplifying clause (d) by using the term designated heritage assets, which encompass all relevant types of designation (see above). It could read “...contribution to the conservation area and to designated and non-designated heritage assets within it, as well as their settings.”	
	Para 3.3.9	Similarly, in paragraph 3.3.9 I suggest replacing “listed building” with “designated heritage asset” to ensure accuracy. You could then add a phrase to explain that the term covers all four types of designated heritage asset in the plan area (see above). I also suggest adding “as these are aspects which help define the conservation area’s significance” to the end of the first line.	Changes incorporated Change incorporated.
	Para 3.3.10	In paragraph 3.3.10 , I suggest changing “wider context” to “setting” as this is a more accurate term (again defined in the NPPF’s glossary) which would bring clarity to your plan. I also suggest changing “context and character” to “character and setting”, whilst leaving the very final “context” in the paragraph as written.	
	Para 3.3.16	I suggest amending the third sentence of paragraph 3.3.16 to say “...protected by relevant policy in the NPPF and strategic policies in the Northumberland County Council development plan”.	Changes incorporated
	3.3.17	In the final sentence of paragraph 3.3.17 , I suggest changing “general character” to “special character” to reflect the legislative basis for the town’s conservation area.	
	HNP4	Policy HNP4 and Annex A The focus of this policy is very welcome. In the policy and explanatory text , you should consistently use the term “non-designated” rather than “non-listed” for the same reasons as those relating to designated heritage assets above. To ensure your plan is accurate and implementable, the correct vocabulary should be used. Non-designated heritage assets can include monuments, sites, places, areas and landscapes as well as buildings, all of which I suggest may be relevant to your plan area (see the NPPF glossary).	Changes incorporated
	3.3.18	In the second sentence of paragraph 3.3.18 , I suggest replacing the word in brackets with “(for example through listing or registration)”. Note also, it is the case that the NPFF offers protection to non-designated heritage assets whether they are on a local list or not.	
	3.3.20	In paragraph 3.3.20 , the sentence starting “In listing a...” should be changed to “In identifying a...” to ensure there is no inference that non-designated heritage assets are statutorily listed; by definition they cannot be. For the same reason, at the start of paragraph 3.3.21 I suggest you change “This full list...” to “All these assets...”, and in the final sentence change “proposed list	Changes incorporated

		is...” to “proposed assets are...”. Also in this paragraph change “local register” to “local list” for accuracy.	
	Annex A	In related Annex A , the term “non-designated” should be used rather than “non-listed” for the same reasons of clarity and accuracy. It would be worth adding a sentence to the effect that the assets identified may not be exhaustive. It would also be worth clarifying that although the annex singles out 14 buildings, many others do make a positive contribution to the special architectural and historic interest of Hexham Conservation Area.	Information added into the supporting text to identify the fact that NDHA can be identified on a case by case basis in addition to those identified in the Plan.
	HNP5	Policy HNP5 This policy is very welcome. In the policy , I suggest removing “as defined on the Policies Map” in case the boundary of the conservation area changes in the future. For clause (a) , it would be worth using the explanatory text to say what “historic” means in the context of Hexham’s architectural history. It might commonly be taken to mean pre-First World War, which could downgrade the policy’s protection to any later 20th century shopfronts with significance; for example you note elsewhere in the plan the significance of the Art Deco period in some parts of the area. Also, I suggest adding “...and the street scene” to the very end of paragraph 3.3.25 .	Agreed. Reference to policies map removed.
	3.3.25		Changes made.
	HNP6	Policy HNP6 This policy is very welcome in highlighting an important local heritage issue. I draw your attention to our recently updated guidance on this topic, <i>Streets for All</i> (2018), to help inform the balance needed between heritage and access issues that your policy highlights (See https://historicengland.org.uk/images-books/publications/streets-for-all/).	Support welcomed. Reference to ‘Streets for All’ to be referenced in the Plan.
	HNP7	Policy HNC7 Parks and gardens are registered not listed, so both occurrences of “listed” in the policy should read “registered” instead. The same change should be made to the explanatory text in paragraphs 3.3.30 and 3.3.33 . I suggest it also worth adding “Registered parks and gardens are designated heritage assets” to the end of paragraph 3.3.30 for clarity.	Major changes have been made to this policy. Suggested changes incorporated as well, but policy has been changed to apply to all designated HAS.
	HNP8 Heritage Assets within sites	Section 3.4 Planning policies: housing In this section, I am concerned that the right assessment to decide to allocated each site has not yet been demonstrated. I should make clear I am not immediately concerned about the heritage implications of the allocated sites (and where I do have concerns I offer suggested amendments for each policy below), yet demonstrating the right process has been followed will strengthen each allocation policy as well as improving the plan’s chance of meeting the basic conditions at examination. This is my strongest concern for the plan; it also relates to my comments below on the SEA.	

		<p>Paragraph 190 of the NPPF (which footnote 62 makes clear does apply to plan-making) says the particular significance of any heritage asset affected by a proposal (in this case, a proposed site allocation) should be identified and assessed, taking account of available evidence and necessary expertise. The impact of the proposal on that significance should be considered, aiming to avoid or minimise any conflict between the asset's conservation and the proposal. Paragraphs 195 to 197 of the NPPF set out how to handle this. If the assessment identifies harm to significance, it should set out how that harm can be removed or reduced (which would then be included in the relevant policy and explanatory text). If harm cannot be removed or reduced then the site should not be allocated unless there are clear public benefits to outweigh the harm (again, which would inform the wording of the relevant policy and text).</p> <p>I am concerned that the <i>Background Housing Report, Site Allocations For Housing 2016-2036</i> (October 2018) and the earlier <i>Site Options & Assessment Report</i> (AECOM, February 2017) to which it refers, do not contain such an assessment. For example, Table 2, Table 3 and Appendix C of the 2017 report rely only on noting the presence or absence of a heritage asset rather than giving an assessment of the asset's significance and the impact (positive or negative) the proposed allocation would have on it.</p> <p>e.g. HNP8.1</p> <p>For example, in these two reports, assessment for the Workhouse allocation mentions historic buildings as both an opportunity and a constraint, but it does not appear to set out the assets' heritage significance or the allocation's impact on that by referring to available evidence and necessary expertise. I suggest that significance and harm are not fully addressed, risking a lack of clear evidence to support the policy's aim of retaining the historic buildings on the site. This could undermine their retention at implementation stage. The current stage of your plan's preparation is the right time to proactively create and strengthen the case you wish to make about each site, using the site allocation and policy development process open to you now, rather than risking a more reactive debate at planning application stage.</p> <p>I refer you to our guidance on this matter: <i>The Historic Environment & Site Allocations in Local Plans, Historic England Advice Note 3</i> (2015), which also applies to neighbourhood plans. See page 5 in particular. You can download it here: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ (Note, this guidance refers to old paragraph numbers from the 2012 version of the NPPF but it is still valid.)</p> <p>It is worth me pointing out that, in August this year, we raised the same concern with the County Council regarding their process for assessing allocations in the draft Northumberland Local Plan. In doing so, we referred to (unnamed) allocations in Hexham amongst others in the county.</p>	<p>Noted. The SEA was commissioned and carried out by AECOM. Concerns will be fed back to them for consideration.</p> <p>Noted.</p>
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------

		<p>Importantly, I do recognise the allocations in your draft plan may not have unacceptable negative impacts on the significance of the heritage assets they affect, yet it is nonetheless important to demonstrate appropriate assessments have been undertaken. Doing so strengthens your policies. As I have noted above, your plan's approach to the historic environment is generally strong so I am confident that demonstrating the appropriate process would be straightforward to do.</p>	
	HNP8 Sites	<p>Comments on housing site allocations Policies HNP8.1 to HNP8.10</p> <p>Specific comments on the allocations policies are as follows, all issues which would be likely to emerge from the full assessment process discussed above:</p> <ul style="list-style-type: none"> <input type="checkbox"/> For all site allocation policies affecting heritage assets, I suggest you use the site assessment process discussed above to demonstrate that the housing numbers identified have a good chance of being incorporated without unjustified harm, particularly where retention of existing buildings is the policy intent. <input type="checkbox"/> In policies HNP8.1 (a), HNP8.6 (i), HNP8.7 (i) and HNP8.8 (i), I suggest you replace “in a” with “which make a positive contribution to the” if that is the conclusion drawn through full site assessment. <input type="checkbox"/> For policy HNP8.2, due to the site's size and elevated position, I suggest inserting a clause emphasising protection of the setting of the conservation area and its roofscape. This issue would be likely to emerge from a full site assessment. <input type="checkbox"/> For policies HNP8.4 and HNP8.10 it would be worth setting out in the explanatory text any criteria or thresholds that you would want “where possible” to be judged against. For example, this could relate to scheme viability, the type of housing that would fit in the buildings in question, the design of new housing alongside heritage assets, or another issue you have in mind. Such issues would be likely to emerge from a full site assessment. <input type="checkbox"/> In policies HNP8.4 (ii) and HNP8.9 (iii), I suggest changing “respects” to “pays special attention to”, which reflects the statutory duty the local planning authority has when determining planning applications. I suggest you also use full site assessments to conclude whether such a clause should be added to any of the other allocation policies. <input type="checkbox"/> In policies HNP8.1 (b) and HNP8.4 (ii), I suggest you insert “and appearance” after “character” to ensure alignment with the legislation. 	Changes made
	Obj 3	<p>Section 3.5 Planning policies: natural environment and community wellbeing</p> <p>I recommend a vocabulary change away from “listed” when you set out buildings in text, to avoid confusion with statutory listed buildings. For example in paragraph 3.5.42, “identified” or “set out” could be used instead to avoid any misunderstanding.</p>	Changes made.
	Obj 4	<p>Section 3.6 Planning policies: local economy</p> <p>In Policy HNP22 or its explanatory text, it would be worth setting out which Use Classes would be</p>	Noted. Further information has been

		<p>acceptable or preferred when considering a change away from A1. For example, A3 (food and drink) and A4 (drinking establishments) often give a stronger active frontage than A2 (professional services), whilst the latter can be more suited to residential mixed use than the former. A5 (hot food takeaway) can notably change the character of a street, particularly when clustered. Other possible town centre uses (eg. those in Use Class D, non-residential institutions) also have their own impacts. I suggest this policy and text could be developed further to ensure it will change the town centre in the way you intend.</p>	<p>added to the supporting text to better explain the meaning of 'contributing to vitality and viability'</p>
	HNP25	<p>I suggest Policy HNP25 includes a caveat about impact on the historic environment. You should also be sure that it would provide the protection you might be seeking over any impact from multi-storey car-park proposals.</p>	<p>Statement added to policy.</p>
	Glossary	<p>Annex B: glossary</p> <p>I have suggested several additions to the glossary above. You should ensure that definitions taken from the NPPF are accurately copied. I also suggest the following amendment "Registered Parks and Gardens: historic parks or gardens added to the statutory register due to their special historic interest. They are designated heritage assets."</p>	<p>Agree. Changes made to glossary.</p>
	SEA	<p>SEA Environmental Report</p> <p>In commenting on the SEA scoping report in our letter of 17 November 2017 to Northumberland County Council (our ref: PL00088982), we noted deficiencies in the proposed assessment framework and baseline information. I am now concerned the resultant environmental report does not demonstrate a robust assessment in relation to the historic environment. Whilst the assessment should follow a proportionate approach, I suggest that for site allocations in the historic environment, the report is based primarily on an assertion not backed up by evidence of an assessment.</p> <p>For example, I am concerned that the report's justification for site allocations set out in Table 4.2 does not mention heritage even though this topic scores 'amber' for all relevant allocations in the summary of findings shown in Table 4.1. Other than for one allocation on page 25 (now HNP8.10), there is no evidence the assessment has addressed significance, impact, alternatives, mitigation or optimisation for the heritage. This is a similar deficiency to that identified above in the background evidence for the plan itself (indeed the SEA would be expected to use the same information as that used to inform the plan).</p> <p>The only assessment which appears to be given in the SEA environmental report is the second paragraph under Housing Policies on page 25. It is not clear what has informed the conclusion that "the sites do not form an important part of the setting of the historic environment" (a phrase</p>	<p>Noted. Comments will be forwarded to AECOM.</p>

	Historic Environment	<p>which is itself misleading as many of the sites are part of the historic environment rather than within its setting).</p> <p>Overall, I am concerned about the lack of a clear train of thought to conclude an absence of significant environmental effects on the historic environment - even if this might well be the case. Bearing in mind the prominence of heritage in the plan's objectives, I would question whether the environmental report follows paragraphs 036 to 039 of the Planning Practice Guidance.</p> <p>I draw your attention to our guidance on the SEA process (<i>Sustainability Appraisal & Strategic Environmental Assessment, Historic England Advice Note 8</i>, 2016). Paragraph 3.3 sets out ways of identifying and predicting significant effects on the historic environment to produce a rounded, compliant assessment. Paragraphs 3.4 and 3.5 set out the importance of clear, evidence-based assessment to show that proposals can be accommodated without harm, and benefits to the heritage are optimised. Paragraphs 3.6 and 3.7 show how this leads to policy development in the draft plan (or other mitigation) plus effective monitoring (paragraphs 2.13 to 2.17).</p>	
SB 12 Northumberland County Council		See separate document.	

N.b. The Haydon Bridge Parish Council was inadvertently excluded from the Additional Reg 14 Consultation. Subsequent direct contact and apology resulted in the following submission.

SB 13 Haydon Bridge Parish Council		Thank you for sending us the October 2018 Regulation 14 Consultation Draft Hexham Neighbourhood Plan which has our support. We look forward to hearing from you as you progress your Plan.	
----------------------------------------------	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

18. Appendix D – Local Residents' Submissions and SG Responses

Hexham Neighbourhood Plan

Pre-submission Consultation 2

5 October to 16 November 2018

Summary of CONSULTATION RESPONSES – LOCAL PEOPLE

with HNP Steering Group resulting actions

1. Local Residents

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
Jane Brookes	001	Expresses one concern.	HNP8.2 Concern re access to Telephone Exchange site				0510
M Penman	002	Yes, especially green spaces.		HNP6 No pedestrianisation of the Market Place.			0810
Chris Dunne	003	Yes	HNP8.8 Site is not accurately marked on maps. Must include the pottery.			HNP8.8 The Policy maps will be corrected to include the pottery in line with text.	2310
E Leonard	004	Yes		HNP generally must provide actual powers to Local Council in face of national retailers and developers.			2610
T Tatman	005	Yes: complete support					0211
S Loader	006	Yes, fully support a 'strong plan'.		HNP10 30% affordable housing and housing for elderly.			0811
Paul Bell	007	Yes.	HNP8 Supports these proposals				0811
R Bell	008	Yes, totally support	HNP8 sites supported as these avoid use of greenfield.	HNP10 affordable housing not 4-5 bedroom detached for non-locals.			0811

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
H Ward	009	Yes	HNP8 support for brownfield sites.				0911
Patricia Bell	010	Yes.	HNP8 support for brownfield sites, will enhance the town.	HNP10 2-3 bedrooms for locals/retired couples.			0811
P Arnold	011	Yes	HNP8 Supports prioritisation of brownfield sites.				0911
R Johnson	012	Yes, a considered and thoughtful way forward for the town.	HNP8 supports brownfield	HNP3.6.4 and mixed use development. HNP10 supports affordable and for elderly. HNP24 IT-related new businesses. HNP3.6.23 car parking (like or loathe) is essential. HNP13-21 protecting and developing the environment.			1211
P Johnson	013	Yes, comprehensive and sensible plan for future of the town.	HNP8 supports brownfield development	HNP10 need for flats and apartments for young and old close to centre. HNP8 Proposes living above the shops. HNP3-7 maintaining attractive ambience, retaining essential character. HNP23 Tourism			1211
A Lynch	014	Yes, in agreement	HNP8 supports brownfield and protection of green belt.	HNP24 Attract innovative business			1211

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
Barry Cornes (2)	015	Yes, authors should be commended		HNP general – by the people for the people. Plan emphasises: HNP2-7 the special nature of the town, HNP23 the important role in itself as a tourist attraction.	HNP13 seeks equivalence as Local Green Space for 2 nd green field at Highford Park.	HNP13 the SG were minded to achieve equivalence based on the evidence provided, but this will be held back till subsequent HNP review as NCC advice indicated need for a full consultation on revised Green Space.	1211 & 1611
Stephen Mills NE46 3AT	016	Yes, full support	HNP8 The Brown Field sites identified seem ideal to be redeveloped for Affordable Housing.	HNP 2-4 maintaining feel of a small town, HNP8 avoiding overexpansion and infrastructure failure, HNP13-17 maintaining healthy green spaces, supporting attractive wildlife, no removal of greenbelt boundary.			1411
Rad Hare	014	Yes, wholehearted support					1411
Ted Liddle	015	Yes, excellent doc		3.5.13 Delete <i>new</i> – the Sandstone Way	HNP21 Walking and Cycling – lacks substance. Offers new specific wording. HNP Obj3.5: nothing about air quality	Text modified at HNP21. Air quality referenced as a key issue p13.	1411
Tom Gillanders	016	Yes, fully supportive					1411
Richard Laidler	017	Yes	HNP8 , especially brownfield development is appropriate.	HNP General: addresses lack of central residential and affordable homes,			1411

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
				rejuvenation of town centre and falling footfall. Developers have a different agenda.			
M Payne NE46 3JN	018	Yes, very impressed	HNP8 yes	HNP21 – especially in approval of new sites			1411
Robert Potter	019	Yes, full support					1411
Maggie Davison	020	Yes	HNP8, especially brownfield sites for future housing development, protecting the Green Belt.				1511
Alan Davison	021	Yes	HNP8: supports brownfield development and protecting asset of greenbelt.				1511
R Siebrand NE46 2HS	022	Yes	HNP8 No building on flood plains unless on stilts.	HNP9 2-3 bedroom homes are needed, with good build quality. HNP21 It can feel pretty unsafe walking. Air quality v v poor @ busy times. HNP25 Park & ride “loop” buses. We need alternatives. HNP6 Abbey a wonderful tourist attraction but on all sides besieged by cars.			1511
James Swabey NE46 2HS	023	Yes, a good marker for future improvement of Hexham.	HNP8 If insufficient brownfield, greenfield to east before west.	HNP25 park and ride a good alternative to more parking.	HNP6 disappointed, that pedestrians and cyclists are not given	HNP6 will include increased priority but not absolute priority (Council still	1511

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
					priority over motorised vehicles. SEA: Disappointed to note that air quality was scoped out. Can be v poor in town centre locations.	pursuing consultation outcome). Air quality will figure as key issue p13.	
R Higgins NE46 3HN	024	Yes, commends the authors	HNP8: supports sensitive recommendation of infill sites for residential development and focus on the regeneration of brownfield sites.				1511
HA and JA Spittle	025	Yes, correct way forward					15/11
Sheena Montgomery	026	1 concern, and 1 approval: ambivalent	HNP8.5: questions the inclusion of the Wanless Lane site (Bogacre).	HNP2,3: welcomes development that's in keeping with local area and enhances what we have.			15/11
Ian Clark	027	Yes	HNP8: very encouraging that the Plan acknowledges H's history and outstanding landscape by identifying sites within the town to provide the necessary housing for the future.	HNP22: this will not only reinvigorate town centre but minimise the impact on the already stretched infrastructure.	HNP9, 25: any site beyond walking distance to shops or transport will inevitably lead to a significant increase in traffic into a town already at capacity.	But developers of larger sites must include provisions for cycling and walking, HNP9b), and generally HNP1e) and HNP12.	1611
Malcolm West	028	Yes, full support	HNP8: to be applauded	HNP8, protecting the greenbelt is step in right direction environmentally.			1611

Postcode/Name	Nº	Overall support	Sites	Important	Disagree with	HNP SG action	Date
S & R Gavan	029	Yes, pleased to endorse – it's positive and aspirational	HNP8 : close to amenities – meets needs of older and young people	HNP9 : smaller homes – good for young families			1611
End							

19. Appendix E NCC Submission and SG Responses

(summary; for full NCC submission see P26 or hyperlink 90)

Hexham Neighbourhood Plan Steering Group

26 November 2018

REGULATION 14 CONSULTATION

Steering Group Decisions and Actions relating to the Northumberland County Council Submission

Reference	Issue; SG action
Throughout, formatting and styles	Yes, to be improved
Throughout, integrate figs etc	Figures to be referenced; yes, to be improved
Page 6, 2 nd paragraph, last sentence: conformity	Ref to strategic plan(s); will reword.
Page 6, 3rd paragraph, first sentence	Delete 'planning officers at' (also committees); add: officers 'and elected members'.
Page 6, 3rd paragraph, third sentence: HNP's relationship to Stat Dev Plan	Not 'supersede'; add 'will take priority over relevant policies of the ...'
Page 8, 1 st paragraph, second sentence: repetition of sentence	Repetition has purpose; no, stet.
Page 11 'National and Local Planning Policy Context' : paragraphs do not fit with heading	1.1.1 to 1.1.5 not key issues but planning context; reposition and add to bottom P6 as key issues; not relevant to basic requirements.
Page 11, para 1.1.4	Delete "; Yes
Page 11, para 1.1.5: proposed re- ordering	Yes, 1.1.5 add to 1.1.4; wording stet.
Page 13, Section 1.4; terminology	Yes, use 'blue space'; otherwise stet.
Page 14, Section 1.6: suggests ref to recently re-established NCC body	Ref to NCC Walking and Cycling Board; will include.
Page 13,14 and 15	Bullets and style of headings; yes
Page 17: repetition and re- wording offered	Repetition; yes.
Page 19, para 3.1.2: seeks ref to use of draft NLP data for housing	Delete ref to NLP; add sentence re housing evidence base.
Page 19 para 3.1.3: again relationship of HNP to Stat Dev Plan	Ref to strategic plans; yes, add 'will take priority over relevant policies of ..' Yes

Delete 'Therefore	
Page 19: numbering, typo	No 3.1; yes, will address
Section 3: Planning Policies: Omit repeated Objectives	Omit Objectives; No, stet as existing is clearer, adds to understanding
Page 20, Policy HNP1 Sustainable Development in the Neighbourhood Area: significance of Hexham town as inset in greenbelt is unclear	Much of HN is in green belt, so yes, add appropriate wording to Policy HNP1. Also insert caveats; will be covered as above.
Page 21, Policy HNP2 High quality sustainable design in the neighbourhood area.	Viability references will be covered in the Basic Conditions report. Hexham is clearly a high value area. This is covered in the NCC publication on CIL and Viabiity to support the emerging LP.
Some policy costs and development viability Recommends simple policy on good design	Remove rainwater harvesting, as too onerous. Do not consider 'splitting' policy is the right way forward. Policy HNP2 to remain as is. Previous responses from NCC confirmed that the design requirements were too onerous in the last pre-submission Plan, so these have been changed. Yes, will add reference to good design.
Pages 21, 22 and 23 Conflict between sustainability measures and affordability	Disagree with these comments. The argument that incorporating renewables into housing pushes up the prices to an unaffordable level is flawed. Although the house price may be (very slightly) higher, the cost savings in the later stages are significant. Rather narrow interpretation with which we do not agree. It is not an 'either/or' situation here. We are planning for affordable housing AND higher environmental standards. One does not negate the other. The affordable housing scheme recently constructed along Corbridge Road has renewables embedded and this should be good practice for all new development.
Page 24: Section 3.3; absence of policy for the many listed buildings	Listed buildings; yes, additional specific policy, and include lack of enforcement.
Page 27, Policy HNP3 Design in the Hexham Conservation Area Questions focus on conservation area and what may, by implication, be permissible elsewhere	Disagree with these comments. Policy has been changed following criticism previously that the plan was too restrictive in places outside the Conservation area. Earlier HNP2 already states principles of good design in Hexham context. Stet, covered. 'Anytown architecture' is defined in text if term is too specific.

<p>Page 29, Policy HNP4 Non-designated heritage assets</p> <p>Terminology</p> <p>Suggests further emphasis on archaeology interest.</p>	<p>Not 'locally listed'; yes, non-designated. The policy is 'future-proofed' so that when/if NCC do produce a local list, that the policy will then apply.</p> <p>Delete 'historic'; yes Not 'sensitively'; yes</p> <p>Yes, further information on archaeology added to policy, and recording of lost heritage assets.</p> <p>Anglo-Saxon period; existing paragraph to sit in policy. Also reference in supporting text to Extensive Urban Survey.</p>
<p>Page 34, Policy HNP7 Listed Parks and Gardens in Hexham; rewording proposed</p>	<p>Yes, policy re-worded to include other designated heritage assets.</p>
<p>Page 37, Policy HNP8 Housing Site Allocations</p>	<p>Consistency of numbering; yes.</p> <p>Remove ref to schools; yes.</p> <p>Consistent access requirements for all sites; yes.</p>
<p>Page 38 to 42 Site Specific Allocations HNP 8.1 to HNP 8.10</p>	<p>Add quantum of development; withdrawn based on previous advice, but yes.</p>
<p>Page 39, POLICY HNP 8.5 Bog Acre Cottage and Haulage Site</p>	<p>7 dwellings rejected; delete reference to dwellings in the planning application.</p>
<p>Page 42, Policy HNP 9 New housing development: design/access statements not universal</p> <p>Repetition</p> <p>Approval beyond contact with HTC</p>	<p>Design and access statements; yes, will specify where applicable.</p> <p>Yes, cross-ref unnecessary; affordable text moved from HNP10 to HNP9.</p> <p>Pre-application engagement; add .. 'While all applications will be judged on design merit ..'</p>
<p>Page 44, Policy HNP 10 Affordable housing and community led housing</p> <p>NPPF and tenure splits</p> <p>Commuted sums – ringfenced to Hex NPPF provision for greenbelt</p>	<p>Delete 'where viable'; yes</p> <p>NPPF first 10% to be for purchase; currently at 12% in the HNP. (first 10%?)</p> <p>Ring-fencing and available over 5 years; stet. Yes, align with NPPF; add 'built inset of Hexham'.</p>
<p>Page 45, Policy HNP 11 Housing for older people; conflict with NPPF/greenbelt</p>	<p>Yes, express NPPF green belt limitations; relevant to 'built inset of Hexham'</p>
<p>Page 46, Policy HNP 12 Exception sites for affordable housing; unspecific edge of Hexham</p>	<p>Yes, extra detail 'edge of Hexham'; add 'built up area of Hexham town'. Reference to NPPF added.</p>

Page 48, Policy HNP 13 Local green spaces: these are technically irreplaceable	National Green Space Policy; yes, text adjusted. Numbering local green spaces; yes.
Page 50, Policy HNP 15 Wildlife corridors: greater location detail recommended	Greater detail; stet. Not sure how this can be detailed further.
Page 53 Policy HNP16 Allotments: difficulties of identification	Yes, improve detail of allotments, also on map; yes, within the policy.
Page 52, Policy HNP 18 Dark skies: universal application is questioned	Yes, restrict policy; add 'where applicable to ..'
Page 56, Policy HNP19 Community facilities: inconsistent terminology, unclear overall intent.	Clarify intent; delete 'highly' to avoid confusion.
Page 57 Policy HNP19: wrongly numbered	HNP19 to HNP20; yes.
Page 58, Policy HNP 21 Improvements to Cycling & Walking	Add ref to national policy; yes. Yes, rewording implemented.
Page 62, Policy HNP 22 Hexham's primary shopping area: map unnecessary	Yes, map unnecessary; (map was included for information for Steering Group and has now been removed).
Clarity of terms – 'key' and 'primary'	Yes, delete 'key, replace with 'primary'. Add further clarification.
Page 63, Policy HNP23 Hotel and tourism accommodation: clarity of location, with offered wording;	Yes, add 'greenbelt inset area' with clarification.
Page 65, Policy HNP 24 New business units: designation of greenbelt is limitation	Yes, will add clarity of location; within the (add) 'greenbelt inset area'
Page 66, Policy HNP 25 Car parking facilities: acknowledge NCC structured process for extensions to parking	NCC structured process; welcome support for HNP policy.

Site on Policies maps: additionally by telephone, the NCC provided a correction to the Policy Maps: HNP8.9 Police Houses: Numbers 1 and 2 (2 units in a block of 3) were omitted. This correction was investigated, but stet.

20. Appendix F Submissions of Other Organisations with interests in land/property in Hexham

Hexham Town Council

HEXHAM NEIGHBOURHOOD PLAN

Pre-submission CONSULTATION 2

5th October to 16th November 2018

CONSULTATION SUBMISSIONS by Other Organisations with an interest in land or property in Hexham with HNP Steering Group responses and any resulting modifications to the Draft Plan

Organisation and ref	HNP ref	Submission in full	HNP SG RESPONSE AND PROPOSED CHANGES TO PLAN
OO 1 Union Property Development (Hexham) by Lambert Smith Hampton	HNP1	They (client, UPD) are now progressing with detailed proposals for the site which is retail led and which will also include a hotel, restaurant and additional parking for the town centre.	Support noted.
		Given our client's emerging proposals for the site we wish to make the following representations on their behalf: Policy H1: Housing and Mixed-Use Allocations We note and support the withdrawal of the Bunker site as an allocated housing and / or mixed use development site as detailed in the Post-Consultation Modifications to the (March 2018) Draft Plan document (Ref 2.2).	
	HNP23	Policy HNP23: Hotel and Tourism Accommodation We support policy HNP23 which encourages the provision of new tourist facilities and services which contribute to further develop the tourism offer, encouraging longer stays. Our client's proposals include a hotel and restaurant which will support the development of Hexham as a tourist destination and will add to the local tourism economy. We note that Hexham would benefit from additional visitor accommodation as current provision is limited (Ref: 3.6.16) and note that	Support noted

	<p>HNP25</p> <p>NLP</p>	<p>support is offered under this policy for the provision of further hotel accommodation in the town as well as the creation of new facilities (Ref: 3.6.19).</p> <p>Policy HNP25: New Car Parking Facilities We welcome policy HNP25 which supports proposals to provide car parking areas as our client's intentions for this site include additional parking provision for the town of circa 250 spaces which will be easily accessible from the road network and the town centre.</p> <p>For your information we have also submitted representations to the Northumberland Draft Local Plan. The representations submitted to the Council are summarised below:</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Support for Hexham as a main town and service centre in the Draft Plan (Draft Policy STP1) given the support it provides to a wide rural hinterland; • <input type="checkbox"/> The removal of the site as an employment allocation from the Draft Plan (Draft Policy ECN6); • <input type="checkbox"/> Support for Draft Policy ECN8 in that it supports Main Town Centre Uses on the Bunker site <p>subject to the relevant tests;</p> <ul style="list-style-type: none"> • <input type="checkbox"/> The allocation of the site within the town centre boundary of Hexham for main town centre uses including retail, hotel and restaurant as defined at Annex 2 of the NPPF (2018) (Draft Policy ECN20); • <input type="checkbox"/> Revision of the draft proposals map to show the Former Bunker site within the town centre boundary of Hexham; • <input type="checkbox"/> Support for policy Draft Policy ECN 17 that encourages tourism development, and in particular accommodation, in the main town and service centres including Hexham. <p>We look forward to receiving acknowledgment of these representations. Please do not hesitate to contact me should you have any queries or require any additional information.</p>	<p>Support noted</p> <p>Noted.</p>
<p>OO 2 Land Factor</p>	<p>HNP8 And Housing Background Paper</p>	<p>The site allocations paper that has been produced is reliant on data produced by the County Council. The paper states that there is an Objectively Assessed Need for Hexham of 530 houses. The actual position is that Northumberland County Council have produced a county wide OAN, rather than one for individual settlements. The OAN for the County fails to address some of the key issues that Hexham faces that are raised in the plan including an ageing population, a significant lack of younger people particularly in the 20-45 cohort, and a significant lack of</p>	<p>Noted. Incorrect. NCC have provided Hexham with an OAN figure, in line with national planning policy. Issues raised</p>

		<p>affordable housing. Hexham should have been given an allocation of housing above that required proportionately for the County, notwithstanding this the proportionate allocation for Hexham of the Local Plan Housing Requirement is 663, this has been scaled down in the Local Plan simply to reflect that the capacity to accommodate additional housing is constrained by the Green Belt. As set out below I do not believe that Hexham can achieve the required housing numbers in the plan period, and if it is to do so, it will only be by significant loss of retail and commercial space. The Local Plan should be allowing for the continued sustaining of Hexham as a principle service centre within the County, and in the absence of that the Neighbourhood Plan should have taken on this obligation. Instead both seem to be happy to plan for a reduction in population in the town and the continued loss of services from the town that will result from this. Hexham is not alone in demonstrating a long term reduction in household size but given that the age profile of the town has become increasingly skewed towards old age, this trend is more pronounced here than elsewhere in the county. The table below uses figures taken from Census info via NCC, the table shows an average reduction in household size of 9% per decade over the last 90 years.</p> <table border="1"> <thead> <tr> <th>Census year</th><th>Homes</th><th>Population</th><th>Household size</th></tr> </thead> <tbody> <tr> <td>1921</td><td>1896</td><td>8843</td><td>4.66</td></tr> <tr> <td>1931</td><td>2101</td><td>8888</td><td>4.23</td></tr> <tr> <td>1951</td><td>2809</td><td>9715</td><td>3.46</td></tr> <tr> <td>1961</td><td>3155</td><td>9910</td><td>3.14</td></tr> <tr> <td>1971</td><td>3370</td><td>9806</td><td>2.91</td></tr> <tr> <td>1981</td><td>3531</td><td>9350</td><td>2.65</td></tr> <tr> <td>1991</td><td>4563</td><td>11342</td><td>2.49</td></tr> <tr> <td>2001</td><td>4869</td><td>11446</td><td>2.35</td></tr> <tr> <td>2011 (incl Acomb)</td><td>6017</td><td>13097</td><td>2.17</td></tr> </tbody> </table> <p>If the trend in the reduction in household size in Hexham continues at a rate of 8% (lower than long term projected rate) over the Plan period it will mean that Hexham requires a further 900 additional homes just to sustain the existing population. It is the case that in 1911 Hexham was the largest township in Northumberland, it now ranks ninth, and without the opportunity to grow it will struggle to sustain the services it provides for the town and the significant area surrounding it. There is little chance of the Neighbourhood Plan vision for the town being achieved if the reality is that the constraints imposed by the Plan mean Hexham can no longer sustain the services that it presently provides. The site allocations paper has accepted the position that there are 286 dwellings either delivered or deliverable within 5 years. I have been unable to obtain a list of the deliverable commitments,</p>	Census year	Homes	Population	Household size	1921	1896	8843	4.66	1931	2101	8888	4.23	1951	2809	9715	3.46	1961	3155	9910	3.14	1971	3370	9806	2.91	1981	3531	9350	2.65	1991	4563	11342	2.49	2001	4869	11446	2.35	2011 (incl Acomb)	6017	13097	2.17	<p>with respect to this figure should be addressed to NCC. These are strategic matters, outside the scope of the HNP.</p> <p>Evidence based from NCC used, and comprehensive background papers have been produced</p>
Census year	Homes	Population	Household size																																								
1921	1896	8843	4.66																																								
1931	2101	8888	4.23																																								
1951	2809	9715	3.46																																								
1961	3155	9910	3.14																																								
1971	3370	9806	2.91																																								
1981	3531	9350	2.65																																								
1991	4563	11342	2.49																																								
2001	4869	11446	2.35																																								
2011 (incl Acomb)	6017	13097	2.17																																								

	<p>but was advised at a Local Plan drop in session that the figures are based on the Northumberland County Council reports on the Supply of Deliverable Site. Having looked at those reports for 2016 and 2017, I believe the figures are as stated below:</p> <table><tr><th>Property</th><th>Units</th><th>Affordable</th><th>Comments</th></tr><tr><td>Bus Station and Ropery</td><td>0</td><td>0</td><td>Planning granted for 36 units, 5 of which were to be affordable, the planning has now expired.</td></tr><tr><td>St Cuthberts Close</td><td>38</td><td>28</td><td></td></tr><tr><td>Royal Hotel</td><td>11</td><td>0</td><td></td></tr><tr><td>Gilesgate</td><td>45</td><td>Not known</td><td>Planning granted in 2013, one developer has already abandoned the site.</td></tr><tr><td>Craneshaugh</td><td>122</td><td>24</td><td>Commenced 2015</td></tr><tr><td>East of Farmway</td><td>16</td><td>0</td><td>Developed</td></tr><tr><td>Burn Brae</td><td>2</td><td>0</td><td>6 units in total, 4 exchanged prior to 2016</td></tr><tr><td>St Cuthberts demolition</td><td>-43</td><td>-41</td><td>It is not known if all 41 units let by Karbon/ISOS were affordable</td></tr><tr><td>Gilesgate demolition</td><td>-2</td><td></td><td></td></tr><tr><td>North Of Corbridge Road</td><td></td><td></td><td>Developed and sold prior to 2016</td></tr><tr><td>Prospect House</td><td>18</td><td>0</td><td>Stated to have been approved, but still awaiting decision according to County Council website, there will be no on site affordable provision but a payment towards off site provision, this may not be in Hexham.</td></tr><tr><td>5 Battle Hill</td><td>5</td><td>0</td><td>Development yet to commence</td></tr><tr><td>Total</td><td>212</td><td>11</td><td></td></tr></table> <p>I therefore calculate that there is a deliverable commitment of 212 homes, only 11 of which (approx. 5%) are affordable. The now lapsed consent at the bus station has not been included in these numbers as no lapse rate has been applied, and it appears reasonable to do so given that this has expired and one developer has dropped the Gilesgate site already. My belief is that the deliverable supply stated in the site allocations paper is significantly overstated.</p> <p>The Neighbourhood Plan have suggested a windfall figure of 112 should be delivered during the plan, based on extrapolating past delivery, and provide details of current applications pending decision. It should be noted that the town council are objecting to one of these applications. It is also the case that two of these applications are for the conversion of</p>	Property	Units	Affordable	Comments	Bus Station and Ropery	0	0	Planning granted for 36 units, 5 of which were to be affordable, the planning has now expired.	St Cuthberts Close	38	28		Royal Hotel	11	0		Gilesgate	45	Not known	Planning granted in 2013, one developer has already abandoned the site.	Craneshaugh	122	24	Commenced 2015	East of Farmway	16	0	Developed	Burn Brae	2	0	6 units in total, 4 exchanged prior to 2016	St Cuthberts demolition	-43	-41	It is not known if all 41 units let by Karbon/ISOS were affordable	Gilesgate demolition	-2			North Of Corbridge Road			Developed and sold prior to 2016	Prospect House	18	0	Stated to have been approved, but still awaiting decision according to County Council website, there will be no on site affordable provision but a payment towards off site provision, this may not be in Hexham.	5 Battle Hill	5	0	Development yet to commence	Total	212	11		<p>which clearly set out the housing figures for the Neighbourhood Area, and how they have been calculated.</p> <p>The figures are up to 2036, and therefore sites that have not yet been delivered, are expected to be delivered within the Plan Period. Much of the evidence is based on work carried out by NCC, and by AECOM.</p> <p>The windfall figure is calculated based on a thorough assessment by NCC Housing Officer based on past delivery of small unallocated sites.</p> <p>Disagree that this will mean double counting.</p>
Property	Units	Affordable	Comments																																																							
Bus Station and Ropery	0	0	Planning granted for 36 units, 5 of which were to be affordable, the planning has now expired.																																																							
St Cuthberts Close	38	28																																																								
Royal Hotel	11	0																																																								
Gilesgate	45	Not known	Planning granted in 2013, one developer has already abandoned the site.																																																							
Craneshaugh	122	24	Commenced 2015																																																							
East of Farmway	16	0	Developed																																																							
Burn Brae	2	0	6 units in total, 4 exchanged prior to 2016																																																							
St Cuthberts demolition	-43	-41	It is not known if all 41 units let by Karbon/ISOS were affordable																																																							
Gilesgate demolition	-2																																																									
North Of Corbridge Road			Developed and sold prior to 2016																																																							
Prospect House	18	0	Stated to have been approved, but still awaiting decision according to County Council website, there will be no on site affordable provision but a payment towards off site provision, this may not be in Hexham.																																																							
5 Battle Hill	5	0	Development yet to commence																																																							
Total	212	11																																																								

		<p>existing retail and office premises into residential, and one is for development within existing garden and objected to by the Conservation Officer for the harm it imposes on the Conservation Area. I am concerned that the reliance to deliver windfall sites will lead to more and more of the historic retail and commercial core of Hexham being converted to residential use putting even greater pressure on parking capacity in the town and further affecting the viability of the remaining retailers in the town.</p> <p>The Neighbourhood Plan are relying on some very small sites within the allocations discussed below. It is the case that these allocations would otherwise be providing houses to the windfall numbers. I think the windfall numbers need to be reduced to reflect this double counting. Due to their size windfall sites will not contribute any affordable housing during the plan period.</p> <p>The Neighbourhood Plan identifies 10 allocation sites with an assumed delivery of 166 homes. I believe that some of these sites are not deliverable or inappropriate for allocation and comment where this is the case below:</p>	
	HNP8.1	<p>1. The Workhouse site. The site has been on the market for over three years without any purchase proceeding, I am concerned that there will be viability issues in relation to the delivery of this site, and given the greater conservation status being imposed on the site suggest the deliverable units are unlikely to exceed 50, and I do not believe the 30% affordable level will be achieved.</p>	Still expected to be delivered within the Plan period. Existing housing allocation
	HNP8.2	<p>2. Telephone exchange. The telephone exchange still has a functioning requirement, it is unlikely that that requirement will disappear in the next ten years as hoped by the Neighbourhood Plan, and no site for relocation has been suggested.</p>	Still expected to be delivered within the Plan period. Existing housing allocation.
	HNP8.3	<p>3. Land at Edgewood. There is likely to be some opposition to this site, and given that it has been open for use by the public in the longer term there is a significant risk of a right of way claim or village green claim reducing or preventing delivery of any homes on this site. No affordable housing would be delivered by this allocation.</p>	There has been no local opposition to the allocation of this site.
	HNP8.4	<p>4. Land west of Station Road. This is an existing employment site, for one of the town's main employers. It is not known where the speculation about alternative uses comes from, but the loss of space for the adjoining employment site may make the business unviable and force closure. If development on this site is realised there are likely to be remediation costs and therefore viability issues, it is unlikely that any affordable housing would be delivered on this site if it can deliver the expected 10 to 15 units.</p>	The site has been submitted through the SHLAA and is proposed for allocation in NLP.
	HNP8.5	<p>5. Bog acre cottage. An application has been refused for the net addition of 6 homes as opposed to the 11 suggested in the Neighbourhood plan. The reason for refusal was the</p>	The application has been withdrawn, but the developer is re-submitting.

	HNP8.6	loss of amenity for neighbouring properties, to overcome this it is unlikely that anything more than four additional units will be realised, none of which will be affordable.	Owners have declared that their site is available within the Plan period.
	HNP8.7	6. County Buildings. This is an existing retail site within the Primary retail Area of the town. The site comprises multiple freehold interests, and it is unclear if all owners are in support of redevelopment. The necessity for lease surrenders and collaboration agreements means it is unlikely that all of this site will be redeveloped. If developed this site will not yield any affordable housing.	Again, owner has declared site is available within the Plan period.
	HNP8.8	7. Graves Yard. This site comprises multiple freehold interests plus leasehold interests. The site is acknowledged as not being available in the short term, there is no guarantee that it will be available in the longer term. It is not clear whether the shlaa submission for this site has been put in by the owner(s) or by the Neighbourhood Plan. Development of this site will involve the loss of an existing employment site with no indication of where that would relocate to. If delivered this site would not yield any affordable housing.	No evidence submitted as to why a lower yield is likely. Apartments could deliver a higher yield. The fact that a site may not be in a position to deliver affordable housing does not mean it should not be allocated.
	HNP8.9	8. Broadgates. Redevelopment of this site to provide four houses with parking seems ambitious and a lower yield is likely. There will be no affordable housing delivered from this site.	
	HNP8.10	9. Police Houses site. This site was marketed as an investment or development opportunity, there should not be an assumption therefore that the site will be redeveloped. If the site is redeveloped the existing number of units is 14 not 12 so the net yield would be two less than stated. Given this I think it is more likely that the houses will be retained as a let portfolio or sold off individually when they become vacant. The houses have been managed as let houses by Isos and subsequently Karbon (local Registered Social Housing Landlord), the likelihood is that the houses will in future be market rent properties or private house sales. I do not think that this site will contribute any new housing, the more likely outcome is there will be an effective loss of 14 affordable rented houses.	9.The loss of units has been included in the calculations, although only 12 – the extra 2 will be added to the supporting evidence paper.
		10. Burn Lane Bus Depot. This is an existing employment site with only an indication that it may become available. There is no identified relocation site, and Green Belt surrounding Hexham will mean loss of employment for Hexham if this site is delivered. Remediation of this site will be required for housing, and it may well be that redevelopment is unviable in any event. The access to the Chareway site is constrained and may prevent redevelopment, likewise steep ground to the rear, and flood zone status are likely to reduce the yield of this site. A more realistic yield (if any) would be 20 with a maximum of	10.Disagree. Site is suitable for housing, and bus depot use is having a negative input on amenity of

		<p>6 affordable units. There is no indication of where or whether the caravan site would be relocated to.</p> <p>On the basis of the above I do not believe there will be any houses yielded by sites 2, 3, 6, and 9, the existing employment and retail allocation of site 4 should be retained. From the remaining sites I expect yield is likely to be 50 (site 1), 4 (site 5), 6 (site 6), 6 (site 7), 3 (site 8), 20 (site 10), giving a total supply of 91 homes. Of these allocations only site 10 and site 1 will yield affordable housing, both are likely to be affected by viability and I suggest the yield of affordable housing may be 16 at most. I would argue that the transfer of the Police housing site to private hands is the effective loss of 14 affordable houses and the net affordable housing gain will only be 2 affordable houses.</p> <p>On the basis of the above I believe there is a deliverable supply of 212 houses, the windfall allowance of 112 is overstated, even if this is allowed to stand it would include sites 5, 6, 7 and 8 above, giving a supply from the allocated sites of just 70 homes, and a supply over the plan period of 394 homes. This housing supply figure is less than 60% of the allocation that should be applied to Hexham under the emerging Local Plan. In terms of affordable houses there will be a net contribution of 13 over the plan period, this is just 3.3% and given that the lack of affordable housing is a key issue facing Hexham this is an unacceptably low figure.</p> <p>The Neighbourhood Plan allocations paper is deficient and if the Plan is to be accepted there should be a requirement on the Neighbourhood Plan Committee to consult on the release of Green Belt sites to deliver the required housing for Hexham. As demonstrated above the housing need of Hexham in order to sustain the existing population would be 900, but I would prefer to see a more ambitious plan for Hexham that would allow growth, provide meaningful amounts of affordable housing, section 106 contributions to invest in the towns infrastructure and an opportunity for the younger cohort to be able to afford to live here.</p> <p>Turning to the plan itself. The case for the Plan is set out on Page 8. I remain of the view that the true context and desire for the plan is as set out in my earlier representations. The Neighbourhood Plan was first discussed at a Hexham Town Council meeting in December 2013, this item immediately followed the Town Council discussing the Northumberland County Council Core Strategy preferred options that had just been published. It is clear from the minutes of the meeting that the Council were strongly opposed to the Preferred Options, particularly any significant housing growth and any development in the Green Belt at Hexham. It is this strong opposition to growth and development that was the inspiration for the Neighbourhood Plan, and this overarching position that has shaped the development of the plan.</p> <p>The case for the plan suggests that the policies will provide clear guidance as to what kind of development will or will not be allowed. I do not believe this is the case, many of the policies, described later are deliberately vague so that any development can be objected to as being contrary to policy. The Plan is also intended to give residents and businesses a greater say in</p>	<p>residents. There is no requirement to re-locate the caravan park.</p> <p>Green Belt is a strategic matter, and it is not within the remit of HTC to release land from the Green Belt.</p> <p>Noted.</p> <p>Noted, but factually incorrect. HNP site allocations were clearly made as additional to NCC Preferred Options and 2015 draft LP/Core Strategy to benefit local people</p>
	Greenbelt		
	Gen		

	<p>HNP2 HNP3</p> <p>HNP2</p> <p>HNP5</p>	<p>how the town develops, the reality is that once the plan has been adopted the policies are set and there will be no opportunity to amend the plan until the next review.</p> <p>Policies HNP 2 and HNP 3 are examples of policies that do not provide clear guidance on what development will be allowed. Policy HNP3 does not define high quality, locally distinctive, or Hexham vernacular (other than to suggest flat roofs are not acceptable). The reality is that in a town developed over the last thirteen centuries there are a vast range of different architectural designs and building materials that have been used to develop the town. The policies are far too subjective to give any meaningful guidance that the plan suggests exist. HNP 3 also makes clear that applications that could be located anywhere “anytown architecture” will not be supported. This definition is so wide ranging as to be meaningless, and appears to be included simply to give objectors to development more ammunition. The policy explanation makes clear that anytown architecture already exists, but does not offer any examples of developments that are considered by the Neighbourhood Plan committee to be unacceptable.</p> <p>Policy HNP 2 continues to insist on BREEAM excellent as a prerequisite for any non housing development. There is no explanation as to why BREEAM should be adopted only a link to the standards themselves. Despite BREEAM being in existence for almost 30 years, the standards have never been applied to any project in Hexham (despite significant numbers of large scale private and public schemes in recent years – Hexham hospital, Hexham Fire Station, Wentworth Leisure Centre, Egger extension, former railway yard), nor have they been applied to any project in the former Tynedale planning area, the only project in the Tyne Valley that has used BREEAM is the Sill National Landscape Centre, this managed to achieve a standard that would still fail to be compliant with the Neighbourhood Plan. The standards are excessive, unreasonable and will deter any non-residential development in the plan area.</p> <p>Policy HNP5 specifically addresses shop front design. The policy will require that all refurbished shop fronts must use the historic shopfront, restore the historic shopfront, or reinstate the historic shopfront, only where there is no evidence of there having been a previous shopfront is a contemporary design allowed – subject to a proviso that the contemporary design may be acceptable provided it uses traditional scale, proportion and material. Given that contemporary and traditional design are diametrically opposed this policy will prevent any contemporary shopfronts in Hexham. The policy will also prevent retailers embarking on refurbishment of shop fronts due to the expenses and uncertainty of doing so. Whilst I accept that inappropriately designed shopfronts can erode the quality of the street scene, they are less damaging on the street scene than empty shop fronts. In the principle shopping streets of Hexham (Priestpopple to Battle Hill, Beaumont Street, Fore Street, St Marys Chare, Market Street) there are currently 27 vacant retail/commercial/café premises. There has never been a more difficult time to be a retailer, and the Neighbourhood Plan only intends to work against retailers by perpetuating a reduced footfall in the town centre and making the refurbishment of stores more expensive, more</p>	<p>See responses to previous comments at last consultation stage.</p>
--	----------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------

		<p>time consuming and less certain. This is not a policy that will assist in the sustainability of the Hexham commercial/retail area.</p> <p>I have already discussed the flawed housing allocations paper and these comments apply equally to the housing allocations policies that have been brought forward into the plan. The Neighbourhood Plan states that it cannot deal with strategic matters such as Green Belt boundary changes, I do not believe that this is the case, and if there was any desire within the Neighbourhood Plan Committee to see Hexham flourish and grow rather than being constrained I do not believe that any Planning Inspector would stand in the way of Green Belt release if it was requested by the Neighbourhood Plan. This has never been debated within the forums. The proposed Local Plan makes clear that there will be a Green Belt release for employment land at Hexham, and a Green Belt release for education at Hexham, there is clearly no case against development on the edge of Hexham impacting upon the purposes of the Green Belt therefore. The effect of not releasing any land from the Green Belt is that a substantial number of residential conversion and redevelopment schemes will come forward in the town centre at a higher density than is necessary. Development of this nature is more likely to impact on the historic core of Hexham that the Green Belt is supposed to protect than development on the edge of town. Policy HNP10 requires that there shall be a minimum of 30% affordable Housing. Paragraph 3.4.59 sets out the need for affordable housing in Hexham. As you will see from my comments above in relation to the housing allocations paper the Neighbourhood Plan looks set to deliver a net addition of 13 affordable homes during the plan period – approximately one third of the annual requirement. This is an unacceptably low figure and is due to the over reliance on small scale sites, rather than considering any large scale release that would make a meaningful contribution. Policy HNP 18 will impose new obligations on any applicants within the HNP area to provide evidence of how their proposal is compatible with an entirely separate planning authorities masterplan. The accompanying photo to the policy is the upwardly floodlit Abbey which would clearly be in breach of any such policy. Hexham already emits significant amounts of light from floodlit sports pitches, 24 hour retail and commercial sites, floodlit buildings, and the Egger factory. The suggested planning policy will not apply to properties outwith the HNP area and closer to the National Park Dark skies area. This is an unnecessary policy that will only add to the burden and expense of trying to undertake development within the HNP area and should be removed. I have no objection to the Community Facilities listed in Policy HNP19. I would prefer to see the HNP work towards protecting these facilities by providing the town with sustainable population growth rather than decline. It will not be difficult to prove viability once the facilities have closed down, and my own view is that protection is better afforded by providing a growing community than a policy that requires a bit more justification for the change of use once the facility has already been lost.</p> <p>The Local Economy Policies are left to the very end of the Plan which I find disappointing, but probably reflective of the committees priorities. The stated objective is that the plan will be</p>	<p>Again, there is demonstrably no desire at the strategic level (LPA) to release green belt for housing.</p>
	HNP10		
	HNP18		
	HNP19		

	HNP25	<p>supportive of existing industry and business, with a focus on the role of Hexham as a growth area for business and enterprise. However I see no desire for this objective to be met within the economy policies or elsewhere in the plan. As stated previously the restrictions placed on housing numbers will result in a decreasing population and reduced footfall within the town. I accept that with the number of vacant retail units currently within the town, it may be necessary to consider change of use from A1 use, I am disappointed to see this change of use given direct policy support, particularly as there is no restriction on what use classes they can change to. There is direct policy support for the change of use of upper floors to residential use (probably to fulfil the windfall aspirations). This policy will artificially raise the rental (and therefore rateable) value of storage areas on upper stories and will benefit landlords without benefitting retailers at all. Retailers will be forced to carry less stock necessitating more frequent deliveries to stores, and therefore more traffic and more unloading vehicles. The reduced stock carried in stores is also likely to direct more customers on-line, this is a double blow to retailers.</p> <p>Policy HNP 25 provides support for additional car parking in town, recognising that the lack of parking is a hindrance to Hexham providing its full economic potential. Despite this policies such as conversion of upper floors to retail are being proposed, these conversions will not provide any residential parking and will increase pressure on town centre parking spaces putting further pressure on retailers. Many of the housing allocations sites within the plan or sites already consented occupy town centre positions but either have inadequate or no parking provision. The existing pressure on town centre parking will increase significantly therefore without introducing additional town centre residential use. Whilst there has been a meticulous search of the town to find any sites that may be suitable for conversion to housing without releasing Green Belt there has been no such attempt to identify or allocate suitable car parks near the town centre that would help towards the securing of the town's economic future.</p> <p>I understand that further amendments may be made to the draft Neighbourhood Plan prior to submission to the Independent Examiner, I would appreciate the opportunity to be able to correspond with the Examiner once appointed.</p>	<p>Thank you for your comments. There will be an opportunity to comment direct to the Examiner at Regulation 15 stage.</p>
OO 3 GO North East by Lichfields	HNP8.10	<p>On behalf of our client, Go North East, we write in response to the current consultation on the Hexham Neighbourhood Plan. The Go North East bus depot on Chareway Lane is suitable for allocation as a market housing development subject to the satisfactory relocation of the bus depot.</p> <p>In order to ensure that Hexham is a vibrant town where people can afford to live and where businesses can thrive, the Neighbourhood Plan needs to address the substantial and widening disparities in the age of its population. Providing an appropriate scale of homes for working age people is essential for the future of the town.</p>	

	<p>Obj 1</p> <p>Obj 3</p>	<p>The Hexham Neighbourhood Plan provides an opportunity for local residents and businesses to influence the future of the town through identifying how and where new development should come forward in order to meet the needs of the town.</p> <p>Objective 1: Sustainability</p> <p>“All policies in the Hexham Neighbourhood Plan, read together, will contribute to the delivery of truly sustainable development. New development must be built to high environmental standards, located where people can walk/cycle to town, and it must have a positive impact on the social, environmental and economic objectives for the town.”</p> <p>Go North East broadly support the intention of this objective, and agree that new housing development can deliver a positive impact on the social, environmental and economic objectives for the town.</p> <p>Objective 3: Housing</p> <p>Objective 3 of the Neighbourhood Plan is as follows: “Hexham will have the right number, type and size of new homes needed for the local population. New housing will have energy efficiency at its heart. It will be in the right place, look good and be well connected to the rest of Hexham. The necessary infrastructure will be in place to make new build viable giving desirable and sustainable places to live.”</p> <p>We broadly support the intention of this objective, and agree that the Plan should aim for the right number, type and size of new homes needed for the residents of the Plan area. However, we also consider that the Plan is overly focused on the needs of the residents of today, and that the Plan does not sufficiently look to the needs of Hexham over the entire Plan period. We also note errors in the wording of the last sentence of the Objective.</p> <p>In order to address these oversights, we suggest that Objective 3 is re-worded as follows:</p> <p>“Hexham will have the right number, type and size of new homes needed for the local population over the Plan period in order to support the services and facilities that Hexham requires to enable it to maintain its function as a Main Town within Northumberland. New housing will have energy efficiency at its heart. New housing will be suitably located, feature a high standard of design, and</p>	
--	---------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

	<p>HNP8</p> <p>be well connected to the rest of Hexham. The necessary infrastructure will be brought forward to make new build developments desirable and sustainable places to live.”</p> <p>Policy HNP8: Housing Site Allocations</p> <p>Policy HNP8 identifies the Neighbourhood Plan’s housing allocations, which are expected to deliver a maximum of 166 homes across the 20-year plan period from 2016-2036¹.</p> <p>HNP8.10</p> <p>The site at Chareway Lane has been allocated within the Plan as a Housing site, and is listed under Policy HNP8.10: Bus Depot and Land at Chareway.</p> <p>Policy HNP8.10 requires proposals on this site to demonstrate how a set list of six criteria are incorporated into the development. We express concern regarding the requirements of criteria i) and vi) of this Policy.</p> <p>Criteria i) of this Policy requires proposals to demonstrate “Retention of existing structures of historic interest where possible and viable”. Whilst we appreciate the aim of this requirement given the aims of Objective 2 of the Plan, the Policy does not specify which existing structures within the site are considered by the Plan as being of historic interest. The setting of the adjacent Grade II Listed Building ‘the House of Correction’ is already covered under criteria ii) of the Policy. Given that the site does not fall within the Hexham Conservation Area and that the setting of the adjacent Listed Building is already covered by the Policy, this part of the Policy is not necessary. The lack of clarity would be a source of contention between an applicant and the local planning authority during the determination of applications. Accordingly, criteria i) should be removed from Policy HN8.10 of the Plan.</p> <p>Criteria vi) of this Policy requires proposals to demonstrate “How the scheme can be landscaped to contribute positively to the wildlife corridor running opposite the site frontage.” We disagree with the designation of the adjacent Wildlife Corridor running through the Industrial Estate on this side of Hexham, which will be covered in further detail in this response. Accordingly, we consider that in the absence of clear justification of the Wildlife Corridor designation adjacent to the site that criteria vi) is removed from Policy HN8.10 of the Plan.</p> <p>(¹ Background Housing Report for Hexham Neighbourhood Plan Site Allocations for Housing 2016-2036 (October 2018)</p>	
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

HNP9	Pg 2/5 16785058v1)	Policy HNP9: New Housing Development	<p>This Policy sets out the principles against which development for new housing will be assessed against. The last paragraph of the Policy states the following:</p> <p>“Applications that can demonstrate early, proactive and effective engagement with the community and Hexham Town Council will be looked on more favourably than those that cannot.”</p> <p>This part of the Policy is not explained in further detail in the surrounding text in the Plan. This last requirement of the Policy would create an issue for the local planning authority during the determination of applications, as there isn’t a legislative context for this requirement, nor are there any thresholds by which the engagement with the Town Council can be assessed. The degree of the ‘proactiveness’ and ‘effectiveness’ of engagement is not specific enough and could therefore be a source of contention between an applicant and the local planning authority during the determination of applications.</p> <p>It is therefore considered that this last paragraph should be removed from the Policy, in order to meet the requirements of Paragraphs 16 and 40 of the NPPF. Criterion d) of Paragraph 16 requires Policies to be clearly written and unambiguous, so it is evident how a decision maker should assess development proposals. It is considered that the lack of a specific threshold for the decision maker to use when considering proposals against this Policy means that the Policy does not accord with criterion d) of Paragraph 16 of the NPPF. Paragraph 40 of the NPPF already adequately supports applicants to engage with the Local Planning Authority, therefore this specific requirement within the Neighbourhood Plan is unnecessary and risks delay and confusion during the decision-making process. Therefore, the Policy also does not accord with Criterion f) of Paragraph 16 as it duplicates an existing requirement in the NPPF.</p> <p>Notwithstanding these concerns about the Policy, Go North East is keen to engage with the Town Council and other local groups, as well as the wider local community, to inform the details of the proposed development at Chareway Lane.</p>
HNP10		Policy HNP10: Affordable Housing and Community Led Housing	

	HNP9 30%	<p>This Policy sets out the principles for affordable housing contributions against which all housing development would be assessed and the principles for community led housing schemes.</p> <p>The first part of the Policy states the following:</p> <p>“Where viable, all housing developments of 10 units or more must provide a minimum of 30% affordable housing.”</p> <p>Paragraph 3.4.59 of the Plan explains that this requirement is based on an identified need taken from the Hexham Housing Needs Assessment (2016).</p> <p>It is noted that the emerging Local Plan requires the provision of a minimum of 20% affordable units on major developments, under Policy HOU 5. Policy HOU5 of the emerging Local Plan also states that:</p> <p>“A contribution in excess of this target, up to a maximum cap of 30%, will be expected where a higher target is required by a ‘made’ neighbourhood plan, or where justified by evidence of a higher local need identified in a published document.”</p> <p>The current minimum requirement of 30% within the Neighbourhood Plan is not supported by robust evidence. The Housing Needs Assessment currently being referred to dates from 2016. As set out under the basic conditions required of Neighbourhood Plans, a Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan of the area. Following scrutiny of the emerging Local Plan and its evidence base, we recommend that the requirement set in Policy HNP10 of the Neighbourhood Plan is revised to 20%, given that the precise affordable housing need as set out in the emerging Local Plan still needs to be established.</p> <p>We agree with the Neighbourhood Plan’s acknowledgement that the delivery of Affordable Housing in the Plan area is an important element of the Plan. However, the discrepancy outlined above poses a risk that the Plan would fail the basic condition because it would not conform with the affordable housing requirement of the emerging Local Plan, particularly if that document’s figure is revised to a lower amount. Therefore updated, robust evidence of the affordable housing need in the Plan area is required, otherwise it should be lowered.</p>	
--	-------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p>Reference should also be made to the Vacant Building Credit set out in Paragraph 63 and Footnote 28 of the NPPF. This is intended to support the redevelopment of brownfield sites by offsetting the amount of affordable housing according to the proportion of the site occupied by buildings. This should be reflected in a Policy in the Neighbourhood Plan 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.</p> <p>Objective 4: Natural Environment, Health and Well-Being</p> <p>“Hexham's residents will enjoy improved health and well-being through good access to leisure, sport, heritage, arts, and other facilities in Hexham. Accessible and well-linked green spaces (including to the surrounding countryside) will mean a better natural environment for residents and a more wildlife- friendly Hexham.”</p> <p>We broadly support the intention of this objective, and agree that the Plan should aim to provide access facilities and green spaces within the Plan area for residents, whilst also making Hexham more wildlife- friendly. However, we express concern regarding Policy HNP15 within this part of the Plan, which will be explained in further detail below.</p> <p>Policy HNP15: Wildlife Corridors</p> <p>This Policy requires identified Wildlife Corridors, as shown on the Policies Map, to be protected and enhanced. A Wildlife Corridor has been designated along the east side of Tyne Green Road, which runs North-South through the Burn Lane Industrial Estate.</p> <p>The designated route features very little vegetation or open spaces, and as such would not serve the purpose of a Wildlife Corridor, even if a development on the Chareway Lane site comes forward with suitable landscaping. Whilst we acknowledge the Plan's intention to promote the biodiversity of the Plan area, we do not consider that this route merits designation as a Wildlife Corridor, given it's sparsely vegetated and heavily fragmented nature and very limited biodiversity value. The Plan has not sufficiently justified the designation of this area as a Wildlife Corridor.</p> <p>It is therefore considered that the proposed Wildlife Corridor which runs along the east side of Tyne Green Road is removed from the Plan, as it does not have sufficient merit to justify its designation within the Plan.</p>	
	Obj 4		
	HNP15		
	HNP15 and HNP8.10		

	<p>HNP9</p> <p>Obj 3 and 4</p> <p>HNP9</p> <p>HNP15 and HNP8.10</p>	<p>Summary Go North East welcome the opportunity to comment on the Hexham Neighbourhood Plan, however there are a number of concerns. These are set out within this letter and summarised below:</p> <p>1 The current requirement of 30% affordable housing under Policy HNP10 is not supported by robust evidence and does not accord with emerging Local Plan Policy HOU5. The requirement should therefore be revised down to 20%, given that the precise affordable housing need as set out in the emerging Local Plan still needs to be established.</p> <p>2 Objective 3 of the Plan should be re-worded as suggested on Page 2 of this representation to address the identified issues with its wording.</p> <p>3 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.</p> <p>4 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.</p> <p>Chareway Lane provides an excellent opportunity to provide housing needs Hexham during the Plan period subject to the satisfactory relocation of the Go North East depot. Go North East is keen to engage with the Neighbourhood Plan Steering Group and the Town Council to discuss its proposals in order to inform the details of the scheme.</p> <p>We look forward to further engagement on the Neighbourhood Plan and specifically the Chareway Lane site.</p>	
<p>OO 4</p> <p>Taylor Wimpey UK Limited</p> <p>By Barton Willmore</p>		<p>We welcome the opportunity to comment on your draft document, and with our experience and knowledge, we believe we can assist you in ensuring that your Neighbourhood Plan is a sound and deliverable one. Due to our client having land ownership interests within the Hexham Neighbourhood Plan Area, they are keen to work with the Hexham Parish Council and the Hexham Neighbourhood Plan Steering Group (hereafter referred to as 'the Steering Group') to ensure it</p>	

		<p>produces a sound Neighbourhood Plan. Taylor Wimpey is associated with a parcel of land located on land adjacent to Gallows Bank.</p>	
	2 sites proposed	<p>2. Site</p> <p>The sites are located west of Gallows Bank and east of Loughbrow Park and are situated to the south east of Hexham. The sites have been assessed in Northumberland County Council's 2018 Strategic Housing Land Availability Assessment (SHLAA) under references 9001 and 9002. The site plans are appended in Appendices A and B.</p>	
	NPPF	<p>3. National Planning Policy Framework</p> <p>The revised National Planning Policy Framework (hereinafter referred to as 'the NPPF') was published in July 2018 shows support for Neighbourhood Plans and, with further detailed guidance contained in the Planning Practice Guidance (PPG).</p> <p>Paragraph 29 of the NPPF states neighbourhood planning gives communities the power to develop a shared vision for their area with the ability to direct and help deliver sustainable development and should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. Footnote 16 requires neighbourhood plans to be in general conformity with the strategic policies contained in any development plan that covers the area.</p> <p>Paragraph 37 states that neighbourhood plans must meet 'basic conditions and other legal requirements before being made, which will be tested at public examination before proceeding to a referendum. The legal requirements are provided in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The basic conditions include having regard to national policies and advice contained in guidance by the Secretary of State. Schedule 4b also requires Neighbourhood Plans to be in general conformity with the strategic policies of the adopted development plan, insofar as it exists.</p>	<p>These sites are in the Green Belt. The Neighbourhood Plan does not allocate housing sites in the green belt, as to do so would mean that it would fail to meet the Basic Conditions. Green Belt is a strategic matter, and not in the remit of the HNP but in the remit of the County Council.</p>
	OAN	<p>Strategic policy-making authorities, in accordance with paragraph 65 should establish a housing requirement figure for designated neighbourhood areas (or an indicative figure where not possible) which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once these strategic policies have been adopted, they do not need re-testing at the neighbourhood plan examination, unless there has been significant change in circumstance</p>	

	<p>that affects the requirement. Paragraph 70 identifies that where there is an allowance for windfall sites within plans, there should be compelling evidence that they will provide a reliable source of supply.</p> <p>In relation to Green Belt boundaries, Paragraph 136 gives Neighbourhood Plans the authority to make detailed amendments to Green Belt boundaries, should the need for Green Belt boundaries to be amended be established at a strategic level.</p> <p>Also, Paragraph 13 requires neighbourhood plans to support the delivery of strategic policies contained in local plans, shaping and directing development that is outside of these strategic policies.</p> <p>4. Comments on Policies</p> <p>Objective 1: Sustainable Development</p> <p>Policy HNP1 provides suitable general criteria controlling the contribution of sustainable development in Hexham.</p>	<p>There is no strategic level desire to amend green belt boundaries. This is therefore outside the remit of the HNP.</p> <p>There is no strategic priority locally to remove land from the green belt.</p>
	<p>HNP1</p> <p>Criterion (a) supports new market and affordable housing which provide a mix of housing types and tenures to support the growth of Hexham as a sustainable community, this should be amended to states that support will be provided for new market and affordable housing which provide a 'suitable' mix of housing types and tenures to support the growth of Hexham as a sustainable community, and meet its existing and future housing needs.</p> <p>Criterion (f) supports making the best use of previously developed land which accords with the principles of the NPPF, this could be supplemented by adding that where possible, all opportunities are taken to guide development towards supporting the ongoing sustainable nature of the town. A concern that our client has is that there is only a finite amount of previously developed land within the Neighbourhood Area and we are mindful of NPPF paragraph 84 which, when making reference to planning polices, states:</p> <p>"The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist. "</p>	

		Underlining our emphasis	
		<p>We recommend that Policy HNP1 is therefore amended to reflect the policy guidance from the NPPF in allowing greenfield sites on the edge of settlements where appropriate.</p>	
	HNP2	<p>Policy HNP2 sets out comprehensive and suitable requirements for development to meet in terms of sustainable design. Criterion (h) states that new development should, where relevant, make a positive contribution to the setting of designated and non-designated heritage assets. Our client supports the aspirations but considers the current wording to be overly prescriptive, and not in line with either National policy, or emerging local policy. It is clear from policy guidance that heritage assets are an important consideration when considering planning applications, but decisions must be a balanced judgement and, in particular, situations where less than substantial harm is considered to apply to a heritage asset, this would be weighed against the public benefits of the scheme.</p> <p>Section 66 (1) – in relation to Listed Buildings, and Section 72 (1) – in relation to Conservation Areas, of the Planning (Listed Buildings and Conservation Areas) Act 1990 both talk about preserving or enhancing the heritage assets and form the basis for policy guidance in this respect.</p> <p>It is not practical to expect new development to make a demonstrable positive contribution to heritage assets or non-designated heritage assets through policy, when it is clearly an aspiration. Policy HN2 should be modified to reflect this.</p> <p>Objective 2: Built Environment</p>	<p>Greenfield sites are all in the green belt. HNP cannot contravene strategic green belt policy.</p>
	HNP3	<p>Policy HNP3 has special regard to the desirability of preserving or enhancing the character or appearance of the conservation area and the preservation of the setting of non-designated assets. However, there is no clear support for the preservation of development affecting the setting of listed assets and Policy HNP4 should include this to undoubtedly meet basic condition (b) under point 2 of paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p> <p>Again, we also reiterate that the draft policies combine policy with aspirational elements. The policies should be clear and related to land use, with aspirations set out separately and made</p>	<p>These policies have been amended following advice from Historic England to ensure they meet the relevant tests. Disagree.</p> <p>Policy HNP3 is supported by Historic England, subject to some minor amendments at their suggestion. It seems that in their opinion</p>

		<p>clear the difference between the two. The use of the objectives could draw the aspirations out further, and more clearly, allowing the policy to focus on land-use purposes.</p> <p>It is also considered that part (d) of policy HNP3 is duplication of part (f) of HNP2 and is not required.</p> <p>Objective 3: Housing</p> <p>The objective sets out that Hexham will have the right number, type and size of new homes needed for the local population. Policy HNP8 allocates 10 brownfield sites for new housing in Hexham.</p>	<p>this policy does meet the Basic Condition tests. Disagree.</p> <p>Part d) of HNP3 is about heritage assets. Part f) of HNP2 is about amenity. No duplication.</p>
	HNP8		
	HNP8.3	<p>Of the 10 sites identified in policy HNP8, we do note that site 3 (Land at Edgewood) is actually greenfield, being land which is infill between two sets of end dwellings. The policy wording needs modifying to reflect this, so as to ensure consistency. This also undermines the rhetoric of only allocating brownfield sites, when it is clearly not the case.</p>	<p>Agree. Policy has been amended to remove 'brownfield'</p>
	HNP8.4	<p>Notwithstanding the above, it is clear that sites have been allocated which are possibly unsuitable or unavailable. Land West of Station Road has been allocated under Policy HNP8.4, however the site is not immediately available and there is no guarantee that the site will become available at all. The site has been assessed as part of the SHLAA and was concluded not available. Likewise the Telephone Exchange sites in HNP8.2.</p>	<p>A full assessment has been carried out of all the housing sites, both by AECOM, and in most cases, by NCC as part of their sites allocations process.</p>
	HNP8.2	<p>Furthermore, Broadgates which is allocated under Policy HNP8.8 is an area part-designated under Flood Zone 3. Most notably, the former bus depot allocated under Policy HNP8.10 is split into two sections. One part of the site has contamination matters that need to be dealt with and a section of the site falling in Flood Zone 3. The second part of the site to the rear can only come forward in conjunction with part 1 of the site due to access constraints.</p>	<p>These matters are addressed within the policy.</p>
	HNP8.8	<p>By relying so heavily on-site allocations which have known constraints to development, and rely on aspirational timeframes for development, the policy allocations undermine the HNP's own aspiration to deliver housing to meet its needs.</p>	<p>Disagree.</p>

		<p>Consideration must be given to the NPPF stance on Deliverable and Developable. To be considered developable:</p> <p>“sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”</p> <p>It is clear, when viewing the evidence available, that a number of the sites are constrained in one form or another, are not deliverable and ultimately likely to not be not developable within the plan period. For the HNP to consider bringing housing sites forward under a policy, it must look to ensure it brings sufficient sites forward at a sufficient rate to address the town’s need. If it is not possible to do this based on existing identified sites that the Steering Group has assessed, it must look to further sites such as greenfield, edge of settlement sites which can help meet the town’s needs.</p> <p>Reference must also be had at this point to PPG ref: 41-009-20160211 which states:</p> <p>“Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan.”</p> <p>Given the ongoing situation with the July 2018 Northumberland Draft Local Plan (NLP), and the significant level of objection it has received, this element of guidance from the PPG is critical to the proposed allocation of sites under policy HNP8. The sites in Hexham that are identified in the latest version of the NLP differ from those in this latest version of the HNP, but the issues raised are the same, namely availability and deliverability. The site allocations in policy HNP8 must therefore be reconsidered to include further sites, including land not considered to be previously developed land, and sites that can act as reserve sites.</p> <p>As a separate issue, point 3.4.52 of the policy justification states that neighbourhood plans cannot amend the Green Belt boundary and therefore all Green Belt sites has been found as unsuitable, however this contradicts paragraph 136 of the NPPF which allows neighbourhood plans to make changes where a need for changes is identified through strategic policies.</p>	<p>All sites are in sustainable locations within Hexham.</p> <p>Disagree.</p> <p>The OAN over the Plan period for Hexham has been met by the identified sites and existing commitments.</p> <p>See previous points with regard to Green Belt.</p> <p>... where a need is identified through strategic policies. No</p>
	NLP and HNP8		
	3.4.52		

	Greenbelt	Point 8.4 of the Green Belt Review Technical Paper (July 2018) notes that it may be considered there are exceptional circumstances to revise Green Belt boundaries for educational purposes. It is clear from this that there may be a reason to revisit the Green Belt boundaries at Hexham prior to the adoption of the NLP.	need has been identified through strategic policies.
	HNP/OAN	Further to that, point 5.44 of the draft NLP justifies the amending of the Green Belt boundary to the east of Egger Plant, at Harwood Meadows, totalling 10 hectares of general employment land which cannot be met within the existing Green Belt inset boundary around Hexham. Egger, and more specifically the land proposed for Green Belt deletion, falls outside the neighbourhood area, but given its proximity, and significance at a size of 10 hectares, it is unjustifiable to not consider the impact the development of this land on the housing requirements of Hexham.	This is outside the Hexham Neighbourhood Area, and not relevant.
		<p>The allocation of 10 hectares of employment adjacent to the Egger plan has the potential to create in the region of 884 jobs. It is our consideration that the proposed housing target for Hexham will not meet the increase in job creation. This is even more stark when considering the population of the town which has a disproportionate number of over 65s. By not increasing the housing target, this will have the impact of increase the amount of over 65s as part of the working population and generating an unsustainable level of commuting to Hexham from outside of the town. From our own Hexham Housing Need Technical Note, when taking into account the 10 hectares of employment land east of Egger, simply to ensure the minimum of a stable, economically active population in the 16-64 age group, and ensure undue pressure is not placed on the 65+ age group and on commuters to the area to fill jobs, an absolute minimum of 724 dwellings between 2016- 2036 is considered to be required in Hexham. Our Hexham Housing Need Technical Note, that we submitted as part of our client's NLP Representations, is included as part of these representations in Appendix C.</p> <p>The latest SHLAA identified that there were 'deliverable' sites which could accommodate 443 units over the plan period. Notwithstanding that we contest the deliverability and developability of a number of those sites, that leaves a net shortfall of 281 units (724-443). A small percentage of that will be accommodated by windfall sites and those delivered between 2016-18, but it is clear from the evidence provided that additional sites must be considered to meet the minimum requirement, and our client's land at Gallows Bank/Loughbrow Park will go some way towards doing this.</p>	<p>Not relevant.</p> <p>See previous comments.</p>

	AECOM SA Report	<p>Clearly the sites proposed to be allocated in the HNP are not the most suitable and amending the Green Belt boundaries around Hexham should be considered to ensure that suitable sites can come forward and contribute to the growth of the settlement in the most sustainable way. It is our client's belief that the Steering Group should consider further with Northumberland County Council about the future housing needs of Hexham, in line with policy guidance as the only realistic option is to review potential sites in the Green Belt which can meet the housing needs of the town and provide sustainable development.</p> <p>A further point to raise is that our client is unsure as the site selection methodology which was used at each stage. It is noted in the AECOM Site Allocations Report (February 2017) report that the Steering Group identified sites and subsequently refined its criteria to then increase the number of sites in the final group to be assessed in more detail. There is a lack of detail as to what that criteria was, and why, as an example the Green Belt site on Corbridge Road was included but other sites, such as our client's land, were not given the issues raised above, it is our belief that the site assessment criteria must be reviewed to allow for an assessment of a greater number of sites, including the land at Gallows Bank and Loughbrow Park.</p>	<p>See previous comments.</p> <p>The green belt site on Corbridge Road was removed fairly early on in the assessment process, because it was in the green belt.</p>
	Proposed site	<p>The Site was assessed within the SHLAA June 2018 SHLAA (ref:9001/9002) and it was concluded that the site is available and achievable, however the site is not suitable based on the fact it is in the Green Belt. We consider that the site would be a suitable allocation to alleviate the pressure on the housing provision within the existing Green Belt boundaries around Hexham. In accordance with paragraph 128 of the NPPF, the site has a willing developer and site is considered to be available, developable and deliverable, and we would welcome the opportunity to discuss the site in more detail with the Steering Group.</p>	<p>Not relevant to the HNP.</p>
	HNP8	<p>For these reasons we strongly object to policy HNP8 and highly recommend further consultation and a review based on the emerging Local Plan's economic aspirations for Hexham and anticipated modifications to the NLP.</p>	<p>Objection noted.</p>
	HNP10	<p>In relation to policy HNP10: Affordable Housing, paragraph 13 of the revised NPPF states that 'Neighbourhood Plans should support the delivery of strategic policies contained in local plans...and should shape and direct development that is outside of these strategic policies.</p> <p>Delivering affordable housing forms part of the strategic needs of the County and its delivery should therefore be considered within the formation of a Local Plan having considered need and</p>	<p>See previous comments on affordable housing.</p>


		<p>its resulting future provision requirements. Allowing Neighbourhood Plans to dictate their own level of Affordable Housing is not considered consistent with national policy and it is something which will clearly evolve and change over time, and more attributable to a Local Plan which will undergo reviews and potentially revisions over time. We therefore do not consider it appropriate for the HNP to set an affordable housing target.</p>	
	30%	<p>We note the draft HNP policy proposes a minimum of 30% affordable housing. The latest draft of the Local Plan proposes a maximum cap of 30% affordable housing (Draft Policy HOU 5). The HNP draft policy therefore essentially serves the purpose of fixing the amount of affordable housing provision, with no flexibility built in to accommodate changes in needs and tenure over the plan period.</p> <p>As noted in the PPG, a proposed affordable housing policy requirement should be informed by evidence of affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards. For the neighbourhood plan to include an affordable housing percentage in a policy, it must be based on a full and robust viability exercise, in the same way the Local Plan would. This is currently not the case. To propose a minimum level of affordable housing without the robust viability exercise is not a sound approach.</p>	See previous comments.
	HNP12	<p>Policy HNP12: Exception Sites for Affordable Housing makes reference to reasonable walking distances. The supporting text provides further explanation, making reference to a walking distance of 1500m to the town centre (750m where there are 'steep hillsides'). It is our client's belief that the proposed policy, and its reliance on reasonable walking distances will actually serve to add another constraint to development, particularly one which is aimed at providing affordable housing.</p> <p>The NPPF and PPG make no reference to specified walking distances when it considers sustainable development, and the policy would potentially exclude sites which may be above the threshold but are located near to bus stops with regular services to the town centre and beyond, or those sites which have or will significantly improve pedestrian and cycle links to the town centre. Notwithstanding the above, we also question what the definition of a 'steep hillside' is, and what the defined boundary of the Town Centre is, given it is not identified on the proposals map. We</p>	<p>Noted.</p> <p>Noted. No changes. A steep hillside is fairly self explanatory.</p>

	HNP/NLP	<p>recommend the policy is reworded to remove references to reasonable walking distances and to ensure that it is in accordance with the NPPF and PPG.</p> <p>5. Summary</p> <p>These representations have been made in relation to the Pre-Submission draft of the Hexham Neighbourhood Plan. Whilst the aspirations are welcomed, it is not considered that the HNP currently meets the basic requirements set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and the requirement to having regard to national policies and advice contained in guidance issued by the Secretary of State. In particular we object to draft policy HNP8 which we do not consider adequately considers and supports the needs of the town.</p> <p>Furthermore, we consider the Steering Group should take into consideration the timing and progression of the emerging local plan, as it is likely it will supersede the NP once adopted. This has the potential to create conflict between the two plans, considering the level of objection against the most recent version of the NLP, and the issues it must overcome. It is considered likely that Northumberland County Council will have to update its evidence base, including a Green Belt review, which if the HNP proceeds on its current timeframe, will mean it will have been based on out of date evidence. As is stated in PPG paragraph ID: 41-009-20160211:</p> <p>"It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan."</p> <p>Any conflict arising between the two documents will therefore favour the NLP if adopted later, and, for example, should Green Belt amendments be required, the HNP would therefore be out of date.</p> <p>As evidenced by our Hexham Housing Need Technical Note, we consider the housing requirement to be a minimum of 724 dwellings over the plan period in order to just maintain status-quo regarding the levels of working age population. Even based on the SHLAA, Hexham does not have enough housing sites to meet its minimum need because of the constraints placed upon it, and</p>	<p>Noted.</p> <p>There are no conflicts with housing supply policies. HTC has worked closely with NCC to bring the Neighbourhood Plan forward.</p> <p>No conflict identified at this stage.</p>
--	---------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<div>Taylor Wimpey Hexham Housing Need Technical Note</div> <div>Taylor Wimpey Hexham Housing Need Technical Note</div>	<div>the proposed site allocations are not likely to assist because of the deliverability and developability issues they possess. It is highly recommended that reviewing the housing site allocations under Policy HNP8 should be carried out immediately and that an amendment to the Green Belt boundaries would be appropriate and actionable under NPPF paragraph 136, as well as the removal of the affordable housing policy HNP10.</div> <div>In view of the comments made within this representation, our client does not consider that the HNP should be advanced to submission to Northumberland County Council, and instead should be reviewed further by the Steering Group. Our client offers further engagement and collaborative working with the Steering Group to bring forward a high quality scheme to meet the growth needs of Hexham in a wholly sustainable manner and of the NPPF.</div> <div>Hexham Housing Need Technical Note</div> <div>HEXHAM HOUSING NEED TECHNICAL NOTE</div> <div>August 2018</div> <div><table><tr><td>Project Ref:</td><td>29259/A5/DU</td><td>29259/A5/DU</td></tr><tr><td>Status:</td><td>Draft</td><td>Final Draft</td></tr><tr><td>Issue/Rev:</td><td>01</td><td>02</td></tr><tr><td>Date:</td><td>August 2018</td><td>August 2018</td></tr><tr><td>Prepared by:</td><td>DU</td><td>DU</td></tr><tr><td>Checked by:</td><td>DM/RS</td><td>DM/RS</td></tr><tr><td>Authorised by:</td><td>RS</td><td>RS</td></tr></table></div> <div>Barton Willmore LLP The Observatory Southfleet Road Ebbsfleet</div> <div>Dartford DA10 0DF</div>	Project Ref:	29259/A5/DU	29259/A5/DU	Status:	Draft	Final Draft	Issue/Rev:	01	02	Date:	August 2018	August 2018	Prepared by:	DU	DU	Checked by:	DM/RS	DM/RS	Authorised by:	RS	RS	<div>The OAN for Hexham has been determined by NCC.</div>
Project Ref:	29259/A5/DU	29259/A5/DU																					
Status:	Draft	Final Draft																					
Issue/Rev:	01	02																					
Date:	August 2018	August 2018																					
Prepared by:	DU	DU																					
Checked by:	DM/RS	DM/RS																					
Authorised by:	RS	RS																					

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>	<p>Tel: (01322) 374660 E-mail: research@bartonwillmore.co.uk</p> <p>COPYRIGHT</p> <p>Ref: 29259/A5/DU/kf Date: 15 August 2018</p> <p>The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.</p> <p>All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.</p> <p>CONTENTS</p> <p>PAGE NO. 1.0 INTRODUCTION 01</p> <p>2.0 HEXHAM STUDY AREA AND DRAFT PLAN OBJECTIVES 02</p> <p>3.0 HEXHAM DEMOGRAPHIC MODELLING SCENARIOS 06</p> <p>4.0 LAND WEST OF GALLOWS BANK AND EAST OF LOUGHBROW PARK - ECONOMIC BENEFITS 12</p> <p>5.0 SUMMARY AND CONCLUSIONS 14</p> <ol style="list-style-type: none"> 1. 1.0 INTRODUCTION 2. 1.1 This Technical Note has been prepared by Barton Willmore's Development Economics Team on behalf of Taylor Wimpey, who have development interests on Land west of Gallows Bank and east of Loughbrow Park, south east of Hexham, Northumberland. The Note has been prepared in order to support representations to the Regulation 18 Consultation of the Northumberland Local Plan (July 2018). 3. 1.2 The Technical Note refers specifically to demographic change and housing need in the settlement of Hexham, set in the context of the Draft Local Plan's aims and objectives for growth in Hexham. This relates specifically to the Draft Plan's identification of Hexham as an area for Green Belt release for employment, and the need for sufficient levels of housing to support this employment growth and maintain the place of Hexham as a 'main centre' in the Draft Plan's settlement hierarchy. 	<p>Noted. No changes to plan. We are aware of this site, but as stated previously, there is no strategic policy at present to amend green belt boundaries around Hexham. The HNP cannot propose amending green belt when it is not a strategic policy to do so.</p> <p>See previous comments on housing sites, OAN, and affordable housing.</p>
---------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		<p>4. 1.3 Barton Willmore's Development Economics Team have employed bespoke demographic modelling to determine how the population of Hexham is expected to change over the Plan period. This is based on a number of scenarios including a 'business as usual' scenario (no development) over the Plan period; change based on sites considered 'deliverable' as set out in the Council's evidence base; and the development of Taylor Wimpey's site.</p> <p>5. 1.4 Alongside the analysis of demographic change, we have also identified headline economic benefit figures that would be generated by the allocation of the site which in turn would benefit Hexham and the wider area of Northumberland.</p> <p>6. 1.5 The remainder of this Technical Note is presented as follows:</p> <ul style="list-style-type: none"> ○ • Hexham study area and Draft Local Plan objectives; ○ • Hexham demographic modelling scenarios; ○ • Headline economic benefits of Taylor Wimpey's scheme on Land west of Gallows Bank and east of Loughbrow Park; ○ • Summary and conclusions. <p>Introduction</p> <p>2.0 HEXHAM STUDY AREA AND DRAFT PLAN OBJECTIVES i) Introduction</p> <p>2.1 This section of the Technical Note provides a summary of how Barton Willmore have selected the study area of Hexham for the purposes of demographic modelling. We have also summarised the key policy aims and objectives for Hexham set out in the Draft Plan.</p> <p>ii) Hexham Study Area and Demographic Assumptions</p> <p>2.2 Barton Willmore have consulted all levels of administrative geography for the purposes of establishing the most precise study area representing Hexham. This includes output, lower super output, middle super output, Parish, and ward areas. The larger areas of geography did not provide as specific a 'fit' as the smaller output area level geography, and we have therefore determined the study area based on 38 output areas. Figure 1 illustrates the study area we have selected.</p> <p>Figure 1: Hexham Study Area</p>	
---------------------------------------------------------------------	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		 <p>3. 2.3 Using the study area illustrated in Figure 1, Barton Willmore have used the most recent 2016-based Office for National Statistics (ONS) Mid-Year Population Estimates, which are available at the Output Area level of geography. The 38 Output Areas provide the base population for the first year of the Northumberland Draft Plan (2016), and cumulatively total a population of 11,576 people. This is the starting population from which our demographic forecasting scenarios all start.</p> <p>4. 2.4 The demographic assumptions we have then applied for the purposes of our demographic modelling can be summarised as follows. The rates for the administrative area of Northumberland have been used where assumptions are unavailable at sub-District level.</p>	
---------------------------------------------------------------------	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

<p>Taylor Wimpey Hexham Housing Need</p>		<ul style="list-style-type: none"> ○ • Fertility rates – 2016-based ONS subnational population projections; ○ • Mortality rates – 2016-based ONS subnational population projections; ○ • Internal and International migration rates – 2016-based ONS subnational population projections; ○ • Population Base – 2016-based ONS mid-year population estimates for output areas; ○ • Household Formation Rates – 2014-based Ministry for Housing, Communities and Local Government (MHCLG) household projections; ○ • Communal population – 2014-based MHCLG household projections; ○ • Economic Activity Rates – Office for Budget Responsibility (OBR) January 2017 Projections; ○ • Unemployment – Annual Population Survey (APS); return to pre-recession average by 2021. <p>5. 2.5 The scenarios tested and the results of our demographic modelling are set out in the following section of this report.</p> <p>iii) Northumberland Draft Plan – Aims and Objectives for Hexham</p> <p>6. 2.6 The purpose of undertaking the demographic modelling scenarios is to determine whether the Draft Plan’s aims and objectives for Hexham can be supported by the proposed level of housing set out in the Plan. Table 6.1 of the Draft Plan states how 530 new homes will be delivered in Hexham between 2016 and 2036 (an average of 27 homes per annum).</p> <p>7. 2.7 Hexham is identified by the Draft Plan as a main town/service centre in the Settlement Hierarchy of the Draft Plan (Table 4.2, page 52) and Policy STP 1 (page 54). Paragraph 2.51 of the Draft Plan states how four main towns of the ‘Central Northumberland Delivery Area’ (Morpeth, Hexham, Ponteland and Prudhoe) are the “key hubs for housing, employment, retailing and services.”¹</p> <p>¹ Paragraph 2.51, page 27, Northumberland Local Plan - Draft Plan for Regulation 18 Consultation (July 2018)</p> <p>8. 2.8 The Draft Plan also comments that Hexham and other main towns have “a good level of retail provision along with wide ranging town centre community facilities. They are also hubs for public transport and offer a good level of off-street car parking. They can be regarded as pivotal points for community activity, jobs and services for large populations and wide hinterlands.” ² Furthermore, of the main towns listed in the Draft Plan, Hexham is classified as</p>	
--------------------------------------------------	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

<p>Technical Note</p>		<p>a 'larger centre'. It is important for Hexham and the other main centres that housing is of the necessary quantum to ensure that these characteristics are maintained over the Plan period.</p> <p>9. 2.9 In respect of employment, the Draft Plan identifies the importance of Hexham at the present time and for the future, stating that "In the Tyne Valley, at Hexham and Prudhoe wood processing industries are major employers. The towns of Hexham, Morpeth, Prudhoe and Ponteland contain successful industrial estates, many of which have limited land for new businesses. The area is increasingly a focus for knowledge based and creative businesses." ³</p> <p>10. 2.10 The influence of Hexham in the wider area is also noted, the Draft Plan commenting that "the influence of Hexham and Morpeth extends into the West and North Northumberland Delivery Areas respectively, with the towns providing employment and services for wide hinterlands." ⁴</p> <p>11. 2.11 Specifically, there is clear identification for Hexham to accommodate significant employment growth. Paragraph 5.44 explains this as follows: "Hexham has been identified as needing 10 to 15 hectares of general employment land over and above the small amount that remains in the town's existing employment areas. This cannot be achieved within the existing Green Belt inset boundary. It is considered that the strategy of maintaining the role of each main town as a provider of general employment opportunities in an accessible location will not be fulfilled unless this order of land can be added to the portfolio of general employment land at Hexham. For this reason, it is considered that exceptional circumstances warrant the deletion of an area of Green Belt to the east of the Egger Plant, at Harwood Meadows, totalling about 10 hectares." ⁵</p> <p>12. 2.12 Development of 10 hectares for employment purposes will have the potential to create a significant number of jobs, and there will need to be enough homes to support workers. In this context the 'Employment Land Site Option Appraisal – Hexham (July 2018)' identifies that the site could accommodate a mix of B1c, B2, and B8 uses, supporting a total of 884 jobs on site. This excludes employment from the development of the site.</p> <p>² Paragraph 5.98, page 101, Northumberland Local Plan - Draft Plan for Regulation 18 Consultation (July 2018) ³ Paragraph 2.59, page 29, Northumberland Local Plan - Draft Plan for Regulation 18 Consultation (July 2018) ⁴ Page 29, Northumberland Local Plan - Draft Plan for Regulation 18 Consultation (July 2018) ⁵ Paragraph 5.44, page 83, Northumberland Local Plan - Draft Plan for Regulation 18 Consultation (July 2018)</p> <p>13. 2.13 It is therefore imperative that enough homes are built to support a significant proportion of these jobs. Without these homes the employment created will need to be filled by people travelling in from outside of Hexham, leading to unsustainable commuting patterns.</p>	
-----------------------	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		<p>Summary</p> <p>14. 2.14 In summary, this section of the report has provided the context for which our analysis is based. Our analysis is based on a detailed consideration of the assessment area and uses the most recent demographic data available from ONS and MHCLG.</p> <p>15. 2.15 Hexham is clearly regarded in the Draft Plan as one of the main centres in Northumberland and is earmarked for significant economic growth and development over the Plan period. This is primarily represented by the decision of the Council to afford Hexham exceptional circumstances in respect of its requirement for new employment land, and to delete an area of Green Belt to enable an employment allocation of 10 hectares to be made. This site alone has been determined by the Council to support 884 jobs, although this excludes any additional job growth created by the development of the site, or additional job growth in Hexham itself.</p> <p>16. 2.16 It is therefore considered appropriate to determine how much job growth could be supported through existing housing allocations and the Draft Plan housing target for Hexham. This will enable a conclusion to be drawn as to whether housing in excess of the sites considered 'deliverable' by the Council in Hexham (443 homes) and the Draft Plan target (530 homes) need to be made.</p> <p>3.0 HEXHAM DEMOGRAPHIC MODELLING SCENARIOS</p> <p>i) Introduction</p> <p>1. 3.1 The previous section of this Technical Note identified the Hexham study area analysed in this report, the data sources used in the demographic modelling, and the policy context in which the analysis in this Technical Note is made.</p> <p>2. 3.2 This section of the report summarises the results of the demographic modelling scenarios undertaken, and how this will affect the demographics of the settlement over the 20-year Plan period.</p> <p>ii) No development</p>	
---------------------------------------------------------------------	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Taylor Wimpey
Hexham
Housing Need
Technical Note

3.3 As a starting point, it is useful to understand the implications of providing no housing development in Hexham over the next 20 years. This first scenario provides that analysis, and a summary of results are set out in Table 3.1 below:

Table 3.1: No additional housing, 2016-2036

	2016	2021	2026	2031	2036	2016-2036
0-15	1,840	1,969	1,893	1,811	1,756	-84
16-64	6,742	6,582	6,305	6,001	5,779	-963
65+	2,994	2,962	3,158	3,383	3,520	526
Total	11,576	11,514	11,356	11,195	11,056	-520
Economically Active (16-64)	5,304	5,246	5,023	4,810	4,678	-626
Jobs	4,447	4,499	4,394	4,285	4,193	-255

Source: Barton Willmore demographic modelling

3.4 This scenario shows how no development would result in a decline of Hexham’s population of 4.5%. However, in respect of broad age groups, there would be an increase in the elderly (+17.6%) and a decline in both child age (-4.6%) and broad working age (-14.3%).

5. 3.5 Using the Office for Budget Responsibility (OBR) economic activity rate projections, the scenario shows a decline in job growth (-5.7%) over the Plan period, and a decline in the economically active in the 16- 64 age group (-11.8%).

6. 3.6 It is therefore clear that no new homes over the Plan period would polarise the population towards the elderly, whilst fuelling a significant decline in those of broad working age and meaning that additional job growth would need to be supported by people living

Taylor Wimpey
Hexham
Housing Need
Technical Note

outside of Hexham, or those in the 65+ age group. This would wholly conflict with the Draft Plan objectives for Hexham.

iii) 2018 SHLAA

7. 3.7 The 2018 SHLAA and policy HOU 3 (Housing development site allocations) of the Draft Plan provide a list of allocated sites in Hexham, which ranges from 111 – 157 new homes. However the 2018 SHLAA also provides a list of sites considered as ‘deliverable’ which totals to 443 homes over the Plan period.

8. 3.8 The results of delivering these 443 homes over the Plan period are summarised in Table 3.2:

Table 3.2: SHLAA 2018 (Deliverable sites in Hexham), 2016-2036

Hexham Demographic Modelling Scenarios

	2016	2021	2026	2031	2036	2016-2036
0-15	1,840	2,032	2,041	1,964	1,900	60
16-64	6,742	6,782	6,770	6,477	6,223	-519
65+	2,994	3,021	3,339	3,644	3,810	816
Total	11,576	11,834	12,150	12,086	11,933	357
Economically Active (16-64)	5,304	5,407	5,396	5,191	5,037	-268
Jobs	4,447	4,634	4,715	4,624	4,516	69

Taylor Wimpey Hexham Housing Need Technical Note		Source: Barton Willmore demographic modelling					
		3.9 Delivery of all 443 homes over the Plan period would result in a small increase to the overall population (3.1%) and to the child age population (3.3%). There would also be a significant increase in the elderly (+27.3%).					
		10. 3.10 Notwithstanding that there would be a small increase in the number of jobs supported (69 jobs over 20 years, or 1.6%) over the Plan period, there would be a significant decline in the broad working age population (-519 people or -7.7%) and the economically active 16-64 population (-268 people or -5.0%). This emphasises how all of the job growth would need to be supported by people in the 65+ age group. This may include part-time work, and in any case is significantly lower than the 884 jobs which could be created at Harwood Meadows. Furthermore the use classes earmarked for that site (B1c, B2, and B8) may not be suitable for those working in the 65+ age group.					
		11. 3.11 It is therefore clear that development in excess of 443 new homes is required in the study area.					
		iv) 2018 SHLAA + development at Land west of Gallows Bank and east of Loughbrow Park					

	12. 3.12 Having considered the deliverable sites included in the 2018 SHLAA, the following two scenarios consider how the development of Taylor Wimpey’s site on Land west of Gallows Bank and east of Loughbrow Park would affect demographic change in Hexham.					
	13. 3.13 The site has been considered on the basis of a range of development (between 192 and 222 homes), calculated on the basis of 26 and 30 dwellings per hectare. In addition to the deliverable sites considered in the previous scenario this increases the housing delivery in Hexham to between 635 and 665 homes, 2016-2036. Tables 3.3 and 3.4 summarise the results of these scenarios.					

Table 3.3: SHLAA 2018 (deliverable sites in Hexham) plus Land west of Gallows Bank and east of Loughbrow Park (192 homes), 2016-2036						
---------------------------------------------------------------------------------------------------------------------------------------------	--	--	--	--	--	--

	2016	2021	2026	2031	2036		2016-2036
--	------	------	------	------	------	--	-----------

Taylor Wimpey Hexham Housing Need Technical Note							
	0-15	1,840	2,032	2,047	2,042	1,965	125
	16-64	6,742	6,782	6,799	6,722	6,421	-321
	65+	2,994	3,021	3,344	3,737	3,933	939
	Total	11,576	11,834	12,191	12,501	12,319	773
	Economically Active (16-64)	5,304	5,407	5,420	5,390	5,197	-108
	Jobs	4,447	4,634	4,734	4,795	4,660	213
Source: Barton Willmore demographic modelling							
Table 3.4: SHLAA 2018 (deliverable sites in Hexham) plus Land west of Gallows Bank and east of Loughbrow Park (222 homes), 2016-2036							
		2016	2021	2026	2031	2036	2016-2036
0-15		1,840	2,032	2,055	2,049	1,975	135
16-64		6,742	6,782	6,829	6,742	6,452	-290
65+		2,994	3,021	3,349	3,747	3,952	958
Total		11,576	11,834	12,234	12,539	12,380	804
Economically Active (16-64)		5,304	5,407	5,444	5,406	5,222	-82
Jobs		4,447	4,634	4,755	4,810	4,683	236
Source: Barton Willmore demographic modelling							

14. 3.14 The two scenarios show how the addition of the Taylor Wimpey site would increase the number of jobs that would be supported in Hexham (between 213 and 236 jobs, 2016-2036). However this would remain significantly lower than the amount of jobs (884) determined by the Council to be supported at Harwood Meadows. Furthermore, a decline in the broad working age population (between -4.3% and -4.8%) and the economically active population aged 16-64 (-108 people to -82 people, or -1.5% to -2.0%) would again mean that all new jobs would need to be filled by those in the 65+ age group.

15. 3.15 It is therefore clear that additional housing above and beyond the land proposed for development in the 2018 SHLAA plus the Taylor Wimpey proposals at Land west of Gallows Bank and east of Loughbrow Park would be required to support the allocation for employment land at Harwood Meadows. Without significant additional housing in Hexham, the broad working age population will decline over the Plan period, and any job growth would need to be filled by a significant number of workers commuting from elsewhere.

v) Stable economically active population (16-64 years)

3.16 In the context of the above, it is considered appropriate to determine the number of homes needed to ensure the economically active population in the broad working age group (16-64 years) remains stable over the Plan period. This should be considered the **minimum** objective for Hexham. An increase in this age group would be more appropriate in order for the town to provide a supply of workers that are 16+ for the amenities and services in the town alongside the employment allocation at Harwood Meadows. We would therefore consider this scenario to represent the minimum number of homes that should be planned for in the town to begin to meet Draft Plan objectives and maintain Hexham's place in the settlement hierarchy. The results of this scenario are set out below:

Table 3.5: Stable broad working age population (16-64 years), 2016-2036

	2016	2021	2026	2031	2036	2016-2036
Dwellings	5,534	5,716	5,896	6,076	6,258	724
0-15	1,840	2,047	2,034	2,008	2,005	165
16-64	6,742	6,830	6,750	6,613	6,552	-190
65+	2,994	3,035	3,339	3,694	3,965	971

Taylor Wimpey
Hexham
Housing Need
Technical Note

Total	11,576	11,912	12,123	12,314	12,522	946
Economically Active (16-64)	5,304	5,446	5,379	5,302	5,305	0
Jobs	4,447	4,667	4,701	4,719	4,751	304

Source: Barton Willmore demographic modelling

17. 3.17 Table 3.5 shows how **724 new dwellings** over the Plan period would be required in Hexham to do the **minimum** of keeping the broad working age population stable over 20 years. It is important to note how this would not contribute any increase in the economically active 16-64 age population, meaning again that all new job growth over the Plan period would have to be filled by the 65+ age group. It would again support a level of job growth (304 jobs) significantly lower than the number of jobs that will be created solely at the Harwood Meadows employment allocation (884), or additional employment generated in the town itself by the existing amenities and services.

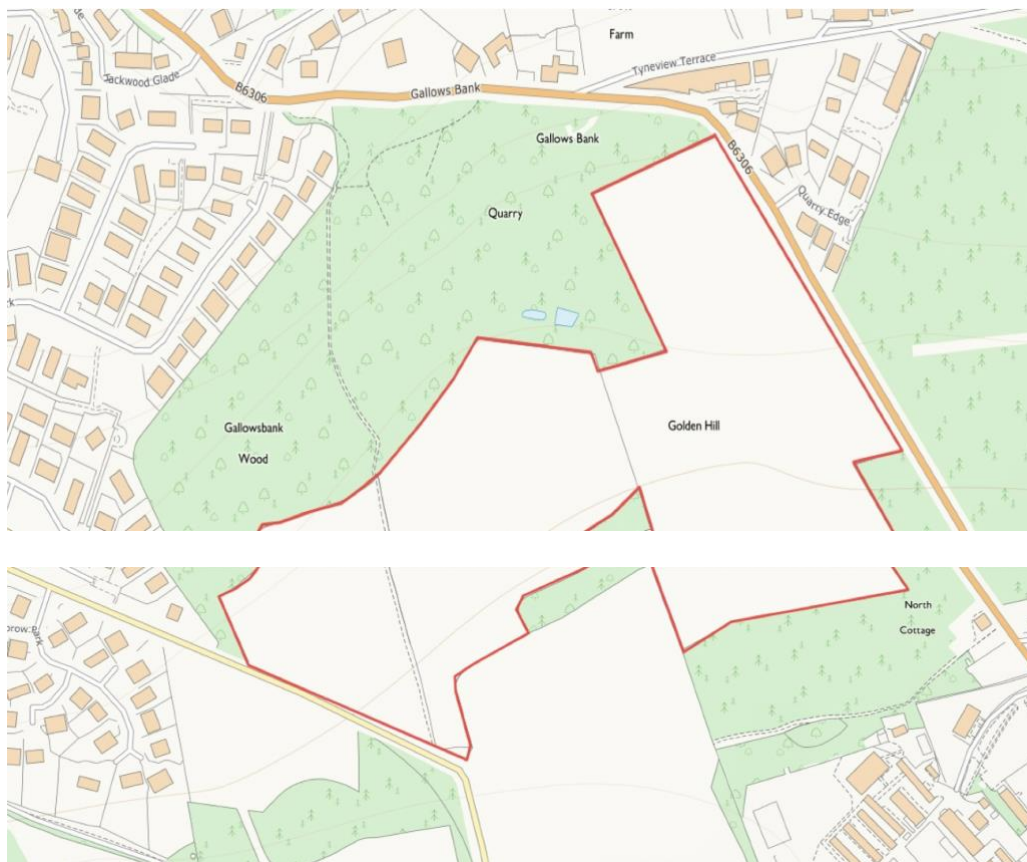
18. 3.18 This level of provision exceeds the cumulative total of sites set out in the 2018 SHLAA and the development proposed on Land west of Gallows Bank and east of Loughbrow Park (635 – 665 dwellings, 2016-2036). Even in the event that the Draft Plan target for Hexham of 530 dwellings is achieved, the addition of the Gallows Bank/Loughbrow Park scheme would be required to provide between 722 and 752 and do the minimum of stabilising the economically active population aged 16-64, although additional housing would be required for the 16-64 economically active population to grow.

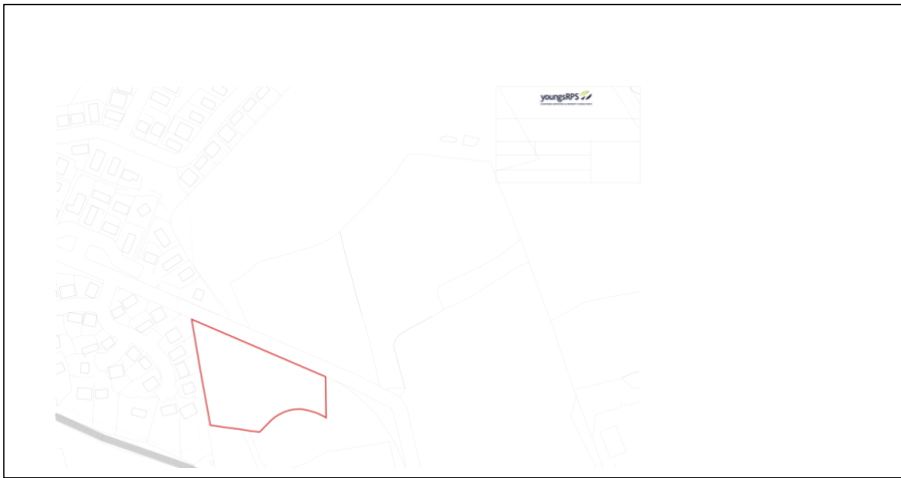
<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		<p>29259/A5/DU/kf 10 August 2018</p> <p>Summary</p> <p>3.19 The bespoke demographic modelling scenarios set out in this section provide the following key conclusions:</p> <ul style="list-style-type: none"> • The number of homes suggested as being ‘deliverable’ by the Council’s 2018 SHLAA (443 homes, 2016-2036) would lead to a decline in the broad working age (16-64) population, and the economically active population (16-64 years) of Hexham; • The decline in broad working age would mean that the minimal job growth (69 jobs, 2016-2036) created by delivery of 443 homes would have to be provided by the 65+ age group. This is not considered to be sustainable and would fail to support the 884 jobs planned for the Harwood Meadows Employment Allocation and additional job growth required to maintain the status of Hexham in the settlement hierarchy as a ‘main town’; • The addition of Taylor Wimpey’s development on Land west of Gallows Bank and east of Loughbrow Park would lead to an overall housing figure of between 635 and 665 homes in Hexham between 2016 and 2036. Notwithstanding this exceeding the deliverable sites (443 homes, 2016-2036) and the Draft Plan target for Hexham (530 homes, 2016-2036), this level of delivery would still result in a decline of the broad working age (16-64 years) population (minimum -290 people, 2016-2036), and the economically active population in this age group (-82 to -108 people, 2016-2036) which would mean that all job growth would have to be filled by those aged 65+; • In the context of the Draft Plan’s strategy for Hexham to represent a ‘pivotal point’ for jobs, housing delivery over and above the deliverable sites determined by the 2018 SHLAA (443 dwellings), the Draft Plan target (530 dwellings), and the increase to these figures that would occur from development of Taylor Wimpey’s site at Gallows Bank/Loughbrow Park (635-665 dwellings) is required; • Simply to ensure the minimum of a stable economically active population in the 16-64 age group, and ensure undue pressure isn’t placed on the 65+ age group and in-commuters to the area to fill jobs, a minimum of 724 dwellings, 2016-2036 is considered to be required in Hexham over the Plan period. <p>Hexham Demographic Modelling Scenarios</p>	
---------------------------------------------------------------------	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		<p>4.0 LAND WEST OF GALLOWS BANK AND EAST OF LOUGHBROW PARK – ECONOMIC BENEFITS</p> <p>i) Introduction</p> <p>4.1 The NPPF (paragraph 8a) sets out three overarching objectives for the planning system, one of which is the economic objective. The NPPF notes that local planning authorities should approach decisions on proposed developments in a positive way and work to secure developments that will improve the economic conditions of the area⁶. It is therefore of value in seeking to establish the economic benefits that a housing scheme may bring to an area such as Hexham. In this section we briefly summarise headline economic benefit statistics that the development at Gallows Bank/Loughbrow Park would generate.</p> <p>ii) Economic benefits of completed development at Gallows Bank/Loughbrow Park</p> <p>4.2 It is envisaged that a range of 192 – 222 dwellings could be completed on Taylor Wimpey’s site on Land west of Gallows Bank and east of Loughbrow Park, Hexham. Using the most up-to-date data available, Barton Willmore have calculated the economic benefits that this scheme could deliver to the benefit of Hexham and the wider local authority area of Northumberland.</p> <p>Table 4.1: Economic benefits generated by Gallows Bank/Loughbrow Park, Hexham</p> <p>Notes:</p> <ol style="list-style-type: none"> 1. Average GVA per person of £42,152 per person (Source: Oxford Economics); 2. Commercial expenditure is based on Experian Consumer Retail Planner (2016) data & includes convenience, comparison and leisure services expenditure; 3. Council tax payments based on Northumberland CC website - Council tax bands for Hexham Town Council <p>(2018/2019) http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Council-Tax/Band-Charges-2018_19.pdf</p> <ol style="list-style-type: none"> 4. DCLG New Homes Bonus Calculator – Northumberland 	
---------------------------------------------------------------------	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Taylor Wimpey Hexham Housing Need Technical Note		6 Paragraph 38, National Planning Policy Framework, July 2018																		
		<table><tr><th>Indicator</th><th>192 Dwellings</th><th>222 Dwe</th></tr><tr><td>1. Economic output (GVA) generated by residents assumed to be in employment per annum;</td><td>£7.9m</td><td>£9.1m</td></tr><tr><td>2. Commercial expenditure (per annum)</td><td></td><td></td></tr><tr><td>3. Council Tax (per annum)</td><td>£3.5m £407k</td><td>£4m £471</td></tr><tr><td>4. New Homes Bonus (over 4 years)</td><td>£1.3m</td><td>£1.5m</td></tr></table>				Indicator	192 Dwellings	222 Dwe	1. Economic output (GVA) generated by residents assumed to be in employment per annum;	£7.9m	£9.1m	2. Commercial expenditure (per annum)			3. Council Tax (per annum)	£3.5m £407k	£4m £471	4. New Homes Bonus (over 4 years)	£1.3m	£1.5m
		Indicator	192 Dwellings	222 Dwe																
		1. Economic output (GVA) generated by residents assumed to be in employment per annum;	£7.9m	£9.1m																
		2. Commercial expenditure (per annum)																		
		3. Council Tax (per annum)	£3.5m £407k	£4m £471																
		4. New Homes Bonus (over 4 years)	£1.3m	£1.5m																
		3. 4.3 Table 4.1 outlines how the Gallows Bank/Loughbrow Park development would contribute between £7.9m and £9.1m in GVA per annum. Furthermore residents of the development would create commercial expenditure upwards of £3.5m, a significant amount of which has the potential to be spent in Hexham, thereby providing a significant contribution to maintaining the town’s range of services which serve the surrounding hinterland as well as Hexham itself. This would represent a significant contribution to maintaining Hexham’s position as one of the main towns in Northumberland.																		
		4. 4.4 In addition, the development would create significant amounts in respect of Council Tax (£407k-£471k per annum) and the New Homes Bonus (£1.3m-£1.5m), assisting in supporting important local services maintained by Northumberland Council.																		
		5. 4.5 These economic benefits should be afforded significant weight in consideration of the proposed site and its associated development, in the context of Hexham’s importance within the Draft Plan, and the economic growth objectives of the NPPF.																		
1. 5.0 SUMMARY AND CONCLUSIONS																				
2. 5.1 This Technical Note represents a robust assessment of how Taylor Wimpey’s proposed residential development on Land west of Gallows Bank and east of Loughbrow Park would generate demographic and economic benefits to the town of Hexham and its immediate surrounds, assisting in ensuring that the Draft Plan’s aims and objectives for the town are maintained.																				
3. 5.2 Through detailed, robust demographic modelling, we can draw the following key conclusions:																				
○ • The total number of ‘deliverable’ sites in Hexham over the Draft Plan period (443 dwellings 2016-2036) as evidenced in the Council’s 2018 SHLAA, or the Draft Plan																				

<p>Taylor Wimpey Hexham Housing Need Technical Note</p>		<p>housing target of 530 dwellings, 2016-2036, would fail to generate an increase in the broad working age and economically active population (16-64 years of age) of Hexham, thereby meaning any job growth in Hexham and its immediate surrounds would have to be filled by those aged 65+ or by an unsustainable increase in those commuting into Hexham from further afield;</p> <ul style="list-style-type: none"> ○ • The addition of between 192 and 222 new homes at Gallows Bank/Loughbrow Park would contribute to lessening the impact of a declining 16-64 age group, although additional housing above and beyond the 635 to 665 dwellings (2018 SHLAA plus Gallows Bank/Loughbrow Park) is needed in Hexham to ensure the economically active population in the 16-64 age group at least remains stable over the Plan period; ○ • To do the minimum of ensuring the economically active population of the 16-64 age group does not decline over the Plan period, at least 724 dwellings will be required between 2016 and 2036. The Gallows Bank/Loughbrow Park development would provide this additional housing; ○ • However it is important to note how 724 new homes, 2016-2036, would only support 304 jobs in Hexham, many of which would still need to be filled by those in the 65+ age group. This should be considered in the context of additional job growth in the town to support amenities and services and Hexham's place at the top of Northumberland Council's settlement hierarchy as a main town, and the 884 jobs which are predicted to come forward on the employment allocation at Harwood Meadows. In this context, 724 dwellings in Hexham should be the very minimum target over the Plan period to maintain the Draft Plan's status for Hexham; 	
---------------------------------------------------------------------	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--



		 <p>The Gallows Bank/Loughbrow Park development also has the potential to contribute significant economic benefits to Hexham, through the contribution of GVA, commercial expenditure, and supply of economically active residents. Furthermore Northumberland Council would experience the economic benefits of Council Tax and New Homes Bonus payments.</p>	
OO 5 Youngs RPS		<p>Thank you for your invitation to provide comments on the Revised Pre-Submission Draft Hexham Neighbourhood Plan (HNP). We commend the Town Council for taking a pro-active role in shaping the future of Hexham by working to prepare a Neighbourhood Plan for the area.</p>	

		<p>However, at this stage we must again raise our grave concerns that the HNP in its current form does not support the needs of the town or allow for a sustainable future for the local economy. This echoes previous feedback we have given in our meetings and past responses.</p> <p>The crux of our objection relates to the HNP's approach to addressing housing need. The reliance on brownfield sites to meet the local housing requirement is fundamentally flawed. Whilst we acknowledge that brownfield sites are sequentially preferable, they are notoriously difficult to deliver and are often plagued by viability issues. This has a knock-on effect to delivery timescales.</p> <p>It is equally concerning that from all the sites proposed for housing allocation, the largest site has a maximum identified capacity of only 30-40 dwellings, and the majority are small sites of between 5-10 dwellings. Without any larger, greenfield sites, Hexham will lose out on the inherent benefits that come with larger sites; notably on-site affordable housing, mixed house types, and developer contributions towards infrastructure upgrades that will support new and existing residents.</p> <p>Hexham is the main settlement in the Tyne Valley and benefits from excellent retail provision, good schooling and regular train and bus services into the conurbation of Tyneside. As such, it is a logical location for sustainable housing growth and a desirable place to live. NPPF paragraph 85(f) recognises that residential development plays an important role in ensuring the vitality of town centres. Yet for the period up to 2036, the draft HNP allocates sites capable of delivering at best around 160 dwellings. This falls woefully short of what is required to support Hexham's status as a main town, and the aspirations to attract a working age population and facilitate job creation.</p> <p>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. The green belt is stifling sustainable development and economic growth, therefore a review of green belt boundaries in Hexham is essential in order to find suitable and available sites for housing growth.</p> <p>This will inevitably come to light in the course of the Northumberland County Council's local plan preparation and examination. As such, the HNP should be more flexible to avoid future conflict with strategic policies in the emerging Local Plan, and acknowledge that green belt boundaries will need to be amended to deliver an appropriate level of housing.</p>	See previous comments.
	HNP8		
	HNP8.1 to 8.10		
	Greenbelt		
	NLP		

		Accordingly, we would strongly urge you to review the HNP again in advance of submission to Northumberland County Council. We would welcome the opportunity to engage in this process and look forward to providing further input in support of a sustainable future for Hexham.	
00 6 Commercial Estates Group (CEG) by Lichfields	<p>age disparities</p> <p>House prices</p>	<p>On behalf of our client, Commercial Estates Group (CEG), we write in response to the current consultation on the Hexham Neighbourhood Plan. CEG have an interest in land to the west of Hexham, north and south of Shaws Lane, and is promoting a sustainable extension to the town consisting of up to 600 homes and substantial areas of public open space.</p> <p>The Issues facing the community of Hexham</p> <p>In order to ensure that Hexham is a vibrant town where people can afford to live and where businesses can thrive, the Neighbourhood Plan needs to address the substantial and widening disparities in the age of its population. Providing an appropriate scale of market and affordable homes for working age people is essential for the future of the town.</p> <p>The 2016 Office of National Statistics' Mid-Year Population Estimates (see Annex 1) show that older people account for a greater proportion of Hexham's population than they do for Northumberland, particularly among the oldest age groups (those aged 78 and over). Those aged over 70 comprise a higher proportion of the total population of Hexham (17.7%) compared to Northumberland (14.7%), the North East (12.1%) and Great Britain (11.5%). Conversely, in Hexham, those aged between 27 and 45 comprise a smaller proportion of the total population than for Northumberland as a whole.</p> <p>Table 1 (below) shows the average house prices split by house type from 2015 to 2017. For each of the house types in each year, house prices in Hexham exceed the County average. House prices in Hexham increased by 16.3% over the period, with the price for flats/maisonettes increasing by 19.3% and detached house prices increasing by 13.2%. This is a greater rate of increase than experienced across Northumberland, where average house prices increased by 5.1% across the period, with flat/maisonette prices increasing by 10.1% and detached house prices increasing by 7.2%. These statistics clearly show the need to plan for and deliver more market and affordable housing in the town to address these imbalances which are set to increase further going into the future throughout the Plan period.</p> <p>Table 1 Average house prices in Hexham</p>	See previous comments regarding green belt.

		<p>Source: HM Land Registry Price Paid / Lichfields Analysis</p> <p>The Hexham Neighbourhood Plan provides an opportunity for local residents and businesses to influence the future of the town through identifying how and where new development should come forward in order to meet the needs of the town. The Neighbourhood Plan should accommodate the required need for housing in the Plan area in order to achieve its aspirations, whilst controlling where this growth is located and how it is brought forward. Without providing additional housing allocations, the Neighbourhood Plan will exacerbate existing issues in the local housing market, such as the high house prices and the lack of smaller house types, which have been raised by residents in previous rounds of consultation¹.</p> <p>This representation highlights a number of areas where the Neighbourhood Plan, as currently drafted, is ineffective in assisting with addressing these issues and often where it may exacerbate these existing problems. This representation also suggests solutions to these issues to inform the Town Council of how these issues can be overcome in order to ensure that the Plan delivers on its aspirations.</p> <p>Objective 1: Sustainability</p> <p>Objective 1 of the Neighbourhood Plan is as follows:</p> <p>“All policies in the Hexham Neighbourhood Plan, read together, will contribute to the delivery of truly sustainable development. New development must be built to high environmental standards, located where people can walk/cycle to town, and it must have a positive impact on the social, environmental and economic objectives for the town.”</p> <p>CEG broadly supports the intention of this objective, and agree that new development can deliver a positive impact on the social, environmental and economic objectives for the town. However, some Policies within the Plan unjustifiably limit the Plan’s ability to provide social, environmental and economic benefits, which are set out later in this representation. Therefore, CEG consider that various policies within the Plan are not sustainable for Hexham and do not meet the provisions of Objective 1.</p> <p>Policy HNP1: Sustainable development in the Neighbourhood Area</p>	
	HNP9		
	HNP1		

		<p>This Policy supports development provided that it meets the criteria set out within the Policy. CEG is broadly in support of the provisions of the Policy, however in respect of part a), CEG do not consider that the housing numbers provided within the allocated sites set out in Policy HNP8 of the Plan would meet the aspirations of part a).</p> <p>¹ Hexham Neighbourhood Plan Revised Pre-Submission Consultation Draft 'Hexham Today – Key Issues' Chapter (October 2018)</p> <table><tr><th></th><th colspan="2">2015</th><th colspan="2">2016</th><th colspan="2">2017</th></tr><tr><th></th><th>Hexham</th><th>Northumberl and</th><th>Hexham</th><th>Northumberla nd</th><th>Hexham</th><th>Northumberland</th></tr><tr><td>Detached</td><td>£321,057</td><td>£285,348</td><td>£334,869</td><td>£293,133</td><td>£363,311</td><td>£305,855</td></tr><tr><td>Semi- Detached</td><td>£198,339</td><td>£159,296</td><td>£201,848</td><td>£157,503</td><td>£205,013</td><td>£159,956</td></tr><tr><td>Terraced</td><td>£183,132</td><td>£132,131</td><td>£176,275</td><td>£136,496</td><td>£182,671</td><td>£131,235</td></tr><tr><td>Flat/ Maisonette</td><td>£118,597</td><td>£106,325</td><td>£147,472</td><td>£118,591</td><td>£141,497</td><td>£117,053</td></tr><tr><td>All</td><td>£217,222</td><td>£186,612</td><td>£228,481</td><td>£192,390</td><td>£252,689</td><td>£196,212</td></tr></table> <p>As set out later in this representation, some Policies within the Plan would not support the growth of Hexham as a sustainable community and therefore the Plan would be unable to fulfil the aims of this Policy and the aims of Objective 1 of the Plan. The Plan acknowledges the need for further housing, however its Policies and significant dependence on a limited number of brownfield sites for new housing would prevent the required housing to be delivered, and therefore limit the town's sustainable potential.</p> <p>CEG's proposed development at Shaw's Lane would provide an opportunity for genuinely sustainable growth which would bring social, environmental and economic benefits to the local community by ensuring the provision of market and affordable housing; utilising opportunities to improve existing and create new open spaces and habitat; and ensuring the economic vitality of the town. The inclusion of this site within the Plan would therefore help the Plan meets its aspirations.</p>		2015		2016		2017			Hexham	Northumberl and	Hexham	Northumberla nd	Hexham	Northumberland	Detached	£321,057	£285,348	£334,869	£293,133	£363,311	£305,855	Semi- Detached	£198,339	£159,296	£201,848	£157,503	£205,013	£159,956	Terraced	£183,132	£132,131	£176,275	£136,496	£182,671	£131,235	Flat/ Maisonette	£118,597	£106,325	£147,472	£118,591	£141,497	£117,053	All	£217,222	£186,612	£228,481	£192,390	£252,689	£196,212	
	2015		2016		2017																																															
	Hexham	Northumberl and	Hexham	Northumberla nd	Hexham	Northumberland																																														
Detached	£321,057	£285,348	£334,869	£293,133	£363,311	£305,855																																														
Semi- Detached	£198,339	£159,296	£201,848	£157,503	£205,013	£159,956																																														
Terraced	£183,132	£132,131	£176,275	£136,496	£182,671	£131,235																																														
Flat/ Maisonette	£118,597	£106,325	£147,472	£118,591	£141,497	£117,053																																														
All	£217,222	£186,612	£228,481	£192,390	£252,689	£196,212																																														

Obj 3	<p>Objective 3: Housing</p> <p>Objective 3 of the Neighbourhood Plan is as follows:</p> <p>“Hexham will have the right number, type and size of new homes needed for the local population. New housing will have energy efficiency at its heart. It will be in the right place, look good and be well connected to the rest of Hexham. The necessary infrastructure will be in place to make new build viable giving desirable and sustainable places to live.”</p>
HNP9	<p>We broadly support the intention of this objective and agree that the Plan should aim for the right number, type and size of new homes needed for the residents of the Plan area. However, there are Policies within this Plan which are focused on the needs of the residents of today and that the Plan does not sufficiently look to the needs of Hexham over the entire Plan period. We also note errors in the wording of the last sentence of the Objective.</p> <p>In order to address this, we suggest that Objective 3 is re-worded as follows:</p> <p>“Hexham will have the right number, type and size of new homes needed for the local population over the Plan period in order to support the services and facilities that Hexham requires to enable it to maintain its function as a Main Town within Northumberland. New housing will have energy efficiency at its heart. New housing will be suitably located, feature a high standard of design, and be well connected to the rest of Hexham. The necessary infrastructure will be brought forward to make new build developments desirable and sustainable places to live.”</p>
HNP8	<p>Policy HNP8: Housing Site Allocations</p> <p>Policy HNP8 identifies the Neighbourhood Plan’s housing allocations, which deliver a maximum of 166 homes across the 20-year plan period from 2016-2036².</p> <p>Calculating housing need requires an unconstrained assessment of the number of homes needed in an area. Establishing the housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure, and preparing policies to address this such as site allocations. The government’s standardised methodology uses a formula to identify the minimum</p>

		<p>number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.³</p> <p>² Background Housing Report for Hexham Neighbourhood Plan Site Allocations for Housing 2016-2036 (October 2018)</p> <p>³ Government Guidance on Housing Need Assessment (2015) (As Amended 2018)</p> <p>Pg 3/15</p> <p>Based on the Government's indicative housing requirement for Northumberland⁴ the allocation of 166 homes during the Plan period represents just 0.94% of the plan period requirement for the County, which is indicated as 17,700⁵ and is subject to challenges seeking a higher figure. As one of twelve Main Towns in the County as identified in the emerging Northumberland Local Plan, and one of only four in the Central Delivery Area, Hexham should accommodate a far higher proportion of the County's housing requirement to enable it to function as a Main Town. Hexham needs to provide an adequate amount of the right types of housing for its current and future population in order to maximise the benefits that this will deliver with regard to jobs, investment, expenditure in local shops, and improvements to services and infrastructure.</p> <p>The emerging Northumberland Local Plan⁶ acknowledges the Central Delivery Area has some of the highest levels of development pressure within Northumberland, and acknowledges that house prices are high in this area of the County, resulting in affordability pressures in settlements such as Hexham. The emerging Local Plan also acknowledges that past planning policies have constrained development across the Central area, through Green Belt designations, low housing targets and policies to restrict development in the countryside. The effects of previous restrictive Policies are now being felt in the local housing market, as acknowledged within the 'Hexham Today – Key Issues' chapter of this Neighbourhood Plan, and within Table 1 of this representation. Despite this, the Neighbourhood Plan's allocation of 166 homes represents just 3.73 % of the plan period requirement for the Central Delivery Area, which is indicated as 4,450 homes⁷.</p>	
	OAN		
	NLP	<p>The emerging Local Plan identifies twelve site allocations within Hexham which are projected to deliver between 111 and 157 new homes across the plan period. These allocations represent a maximum of 29% of Hexham's housing requirements to 2036, based on table 6.1 of the draft Local Plan. Therefore, the minimum housing requirement of the town is approximately 450 homes, far higher than the 166 homes that the Neighbourhood Plan is allocating. There is also a notable</p>	

	HNP1	<p>discrepancy between the emerging Local Plan's figure of 157 homes and the Neighbourhood Plan's figure of 166 new homes. We therefore suggest that the Town Council discuss this with the County Council as the reasoning for this discrepancy is not currently clear, and would need to be made clear given the importance of this figure within the Neighbourhood Plan. Notwithstanding this CEG wish to make clear that these figures still fall well short of the identified requirement in Hexham.</p> <p>By limiting the amount of housing delivery in Hexham, the Plan would not accord with Policy STP 1 of the emerging Northumberland Local Plan, which states that as a Main Town, Hexham will be a main focus for employment, housing, retail and services within the County. Policy ST1 intends to deliver sustainable development which enhances the vitality of communities across the County, whilst Policy HNP1 of the Neighbourhood Plan also supports development which provides genuinely sustainable growth which would bring social, environmental and economic benefits to the local community. Hexham is a sustainable location for development – it features a high school, two middle schools and several primary schools; provides a retail offer which would not require regular trips for consumers outside of the town for the goods that they want and need; has good road links to the Tyneside conurbation and Carlisle via the A69 trunk road; features a train station which provides a frequent service to Carlisle, Corbridge, Prudhoe and the Tyneside conurbation beyond; is served by the sports facilities at Wentworth Leisure Centre; and is served by several doctors' surgeries. Hexham also serves as a focal point for services and facilities for a very wide rural hinterland, with many rural communities being dependant on the economic vitality of the town so that these services and facilities are retained. Therefore, in order to align with the principles of Policy HNP1 of the Neighbourhood</p> <p>⁴ Based on the Government's Standardised Housing Needs Methodology</p> <p>⁵ Table 6.1 - Northumberland Local Plan: Draft Plan for Regulation 18 Consultation (July 2018) ⁶ Northumberland Local Plan: Draft Plan for Regulation 18 Consultation (July 2018)</p> <p>⁷ Table 6.1 - Northumberland Local Plan: Draft Plan for Regulation 18 Consultation (July 2018)</p> <p>Pg 4/15 16770136v3</p> <p>Plan and Policy STP1 of the emerging Local Plan, the Hexham Neighbourhood Plan will need to allocate a greater amount of housing within the Plan area, to allow for sustainable growth in the Plan area.</p>	
--	------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

		<p>The Neighbourhood Plan does not provide any policy support for non-brownfield sites, with the exception of Policy HNP12 which supports only 100% affordable housing schemes on accessible sites on the edge of Hexham. This limitation will restrict the overall amount of housing being brought forward, which will then restrict the Neighbourhood Plan's aim of addressing the identified shortage of affordable homes and the imbalanced supply of housing types. Whilst HNP12 could in theory allow for further affordable units to be brought forward in the Plan area, this is still dependant on the wider housing market, as a 100% affordable scheme is less likely to be viable for developers than a scheme which provides a proportion of affordable units within it.</p>	
	HNP8	<p>Due to the very limited capacity of the brownfield sites identified in Policy HNP8 and the constraints associated with them that may limit their deliverability further, it is clear that without further development on greenfield and Green Belt sites, Hexham will not be able to deliver the number and types of homes it needs to maintain its role as a Main Town in Northumberland. We note that many of the sites identified are currently in use for non-residential purposes which represents an obstacle to their delivery. There are also existing buildings on these sites, therefore the provisions of Paragraph 63 and Footnote 28 of the NPPF would apply for proposals being submitted for consideration by the Local Planning Authority. Under these provisions, development on these sites could deliver significantly fewer affordable units than the Plan currently depends upon.</p>	
		<p>The Neighbourhood Plan is a critical document for the future of Hexham and must strike the right balance between preserving what makes it special whilst facilitating an appropriate scale of development to address its demographic problems and support a vibrant town centre. Without providing additional housing allocations, this document will exacerbate existing issues in the local housing market, such as the high house prices and the lack of smaller house types, which have been raised by residents in previous rounds of consultation⁸. The Neighbourhood Plan should therefore look to allocate further sites beyond the existing built up area of Hexham, with the provision that development on these sites would meet the relevant Policies set out both in this Plan and the emerging Northumberland Local Plan and National Policy.</p>	
	Greenbelt in NPPF	<p>Under the provisions of Paragraph 136 of the NPPF, Neighbourhood Plans can amend Green Belt boundaries where a need for their amendment has been established through strategic policies in the Local Plan. We acknowledge that the most recently published draft of the emerging Local Plan⁹ does not seek strategic amendments to the Green Belt around Hexham. We have previously submitted an objection to this approach to the County Council on behalf of CEG during the recent consultation period on the Local Plan. The emerging Local Plan is limiting the Neighbourhood Plan's ability to shape Hexham's Green Belt. Due to the constraints within the</p>	

	Shaw's Lane	<p>Plan area, such as the River Tyne, Flood Zones and Ecological designations, it is likely that this process would require a review of Green Belt boundaries around Hexham.</p> <p>The County Council had carried out a Green Belt Review in 2015 as part of the evidence base for the former Core Strategy. Whilst related to the now withdrawn Local Plan Core Strategy, paragraph 2.14 of the County Council's Green Belt Review Technical Paper (July 2018) states:</p> <p>⁸ Hexham Neighbourhood Plan Revised Pre-Submission Consultation Draft 'Hexham Today – Key Issues' Chapter (October 2018)</p> <p>⁹ Northumberland Local Plan: Draft Plan for Regulation 18 Consultation (July 2018)</p> <p>Pg 5/15 16770136v3</p> <p>"Although the Northumberland Local Plan - Draft Plan for Regulation 18 Consultation does not propose the same strategic approach to the Green Belt as the withdrawn Core Strategy, the land parcel assessment stands and it has informed decision-making on the proposed boundary in the Northumberland Local Plan."</p> <p>The Green Belt Review document had assessed an area to the North East of Hexham which is now proposed under the emerging Local Plan for deallocation for employment use. The Review document also assessed CEG's Shaws Lane site (ref. HM18a) as making a "medium" contribution to the Green Belt, the same conclusion as site HM03a which is the proposed employment allocation to the North East of Hexham. There were no sites within Hexham that make a 'low' contribution, meaning that any future locations for development are likely to require release of Green Belt land making a 'medium contribution', such as this site.</p> <p>The proposed site at Shaws Lane, as shown on the appended Vision Document, features strong defensible boundaries and would make a logical and legible urban extension to the Hexham. In accordance with Paragraph 139 of the NPPF, the site would have clear boundaries consisting of an area of Mature Woodland along the West boundary; the existing urban area of Hexham along the East boundary; Allendale Road and an existing urban area along the Southern boundary; and the West Road / B6531 along the Northern boundary; all of which are readily recognisable physical features which are likely to be permanent. The site also falls outside of Flood Zones 2 and 3, which are acknowledged within the Plan as significant constraints to development elsewhere within the Plan area.</p>	
--	-------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

	NCC/NLP	<p>We therefore suggest that the Town Council raise this matter with the County Council, so that sustainable locations for an appropriate scale of development can be identified and are allocated in both Plans. This would then allow the Neighbourhood Plan to accommodate the required need for housing in the Plan area in order to achieve its aspirations, whilst controlling where this growth is located and how it is brought forward.</p>	
	HNP9	<p>CEG's proposed development at Shaw's Lane would provide the identified need for market and affordable housing in a cohesive and sustainable scheme, and would be carefully planned in consultation the local community. The provision of market and affordable units on this site would allow for the necessary infrastructure, public open space and biodiversity improvements to be delivered in cooperation with the Local Planning Authority, which would be more effective than allowing for smaller, more numerous piecemeal development across the Plan area which may avoid delivering these contributions.</p> <p>Policy HNP9: New Housing Development</p> <p>This Policy sets out the principles against which development for new housing will be assessed against. The last paragraph of the Policy states the following:</p> <p>"Applications that can demonstrate early, proactive and effective engagement with the community and Hexham Town Council will be looked on more favourably than those that cannot."</p> <p>This part of the Policy is not explained in further detail in the surrounding text in the Plan. This last requirement of the Policy would create an issue for the local planning authority during the determination of applications, as there isn't a legislative context for this requirement, nor are there any thresholds by which the engagement with the Town Council can be assessed. The degree of the 'proactiveness' and 'effectiveness' of engagement is not specific enough and could therefore be a source of contention between an applicant and the local planning authority during the determination of applications.</p> <p>It is therefore considered that this last paragraph should be removed from the Policy, in order to meet the requirements of Paragraphs 16 and 40 of the NPPF. Criterion d) of Paragraph 16 requires Policies to be clearly written and unambiguous, so it is evident how a decision maker should assess development proposals. It is considered that the lack of a specific thresholds for the decision maker to use when considering</p>	<p>See previous comments in relation to this point.</p>

	HNP10	<p>Pg 6/15 16770136v3</p> <p>proposals against this Policy means that the Policy does not accord with criterion d) of Paragraph 16 of the NPPF. Paragraph 40 of the NPPF already adequately supports applicants to engage with the Local Planning Authority, therefore this specific requirement within the Neighbourhood Plan is unnecessary and risks delay and confusion during the decision-making process. Therefore, the Policy also does not accord with Criterion f) of Paragraph 16 as it duplicates an existing requirement in the NPPF.</p> <p>Notwithstanding these concerns about the Policy, CEG is keen to engage with the Town Council and other local groups, as well as the wider local community, to inform the details of the proposed development at Shaws Lane.</p> <p>Policy HNP10: Affordable Housing and Community Led Housing</p> <p>This Policy sets out the principles for affordable housing contributions against which all housing development would be assessed and the principles for community led housing schemes.</p> <p>The first part of the Policy states the following: “Where viable, all housing developments of 10 units or more must provide a minimum of 30% affordable housing.”</p> <p>Paragraph 3.4.59 of the Plan explains that this requirement is due to an identified need taken from the Hexham Housing Needs Assessment (2016) which was carried out to form part of the evidence base for this Plan.</p> <p>It is noted that the emerging Local Plan¹⁰ requires the provision of a minimum of 20% affordable units on major developments, under Policy HOU 5. Policy HOU5 of the emerging Local Plan also states that:</p>	
--	-------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

	30%	<p>"A contribution in excess of this target, up to a maximum cap of 30%, will be expected where a higher target is required by a 'made' neighbourhood plan, or where justified by evidence of a higher local need identified in a published document."</p> <p>The current minimum requirement of 30% within the Neighbourhood Plan is not supported by robust evidence. The Housing Needs Assessment currently being referred to dates from 2016. As set out under the basic conditions required of Neighbourhood Plans¹¹, a Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan of the area. Following scrutiny of the emerging Local Plan and its evidence base, we recommend that the requirement set in Policy HNP10 of the Neighbourhood Plan is revised to 20%, given that the precise affordable housing need as set out in the emerging Local Plan still needs to be established.</p> <p>We agree with the Neighbourhood Plan's acknowledgement that the delivery of Affordable Housing in the Plan area is an important element of the Plan. However, the discrepancy outlined above poses a risk that the Plan would fail the basic condition because it would not conform with the affordable housing requirement of the emerging Local Plan, particularly if that document's figure is revised to a lower amount. Therefore updated, robust evidence of the affordable housing need in the Plan area is required, otherwise it should be lowered.</p> <p>Given the scale of development proposed within CEG's site at Shaw's Lane, it would provide the most realistic opportunity for the delivery of the identified need for affordable units, and would be done so in</p> <p>¹⁰ Northumberland Local Plan: Draft Plan for Regulation 18 Consultation (July 2018) ¹¹ Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)</p> <p>Pg 7/15 16770136v3</p> <p>consultation with the local community to inform the number of certain house types which are needed within the Plan area.</p> <p>Policy HNP12: Exception Sites for Affordable Housing</p>	
	HNP12		

	Obj 4	<p>This Policy supports proposals for 100% affordable units which are at 'accessible' sites on the edge of Hexham. The Policy requires that these sites are "within reasonable walking distance of Hexham Town Centre".</p> <p>Paragraph 3.4.69 of the Plan acknowledges that there is not a criterion for determining what is a 'reasonable walking distance', though goes on to say that for the purposes of this Plan the distance used would be less than 1500m. Given the size of Hexham and the distances between the edge of the current built up area of the town and the edge of the identified town centre, this is a restrictive requirement which would rule out future sites consisting of genuinely affordable units being brought forward.</p> <p>It is therefore considered that this specified distance is removed from the Policy, as it is not justified and would restrict the delivery of much-needed affordable housing in the Plan Area.</p> <p>Objective 4: Natural Environment, Health and Well-Being</p> <p>Objective 4 of the Neighbourhood Plan is as follows:</p> <p>"Hexham's residents will enjoy improved health and well-being through good access to leisure, sport, heritage, arts, and other facilities in Hexham. Accessible and well-linked green spaces (including to the surrounding countryside) will mean a better natural environment for residents and a more wildlife- friendly Hexham."</p> <p>We broadly support the intention of this objective, and agree that the Plan should aim to provide access facilities and green spaces within the Plan area for residents, whilst also making Hexham more wildlife- friendly. CEG's proposed development at Shaws Lane would include high quality new green spaces and links to the town and the surrounding countryside. Notwithstanding this, we provide comments on Policies within the part of the Plan below.</p>	<p>The policy does say: 'or close to public transport links'. A location that is not within reasonable walking distance OR close to PT links would not be a sustainable location in planning terms.</p>
	HNP15	<p>Policy HNP15: Wildlife Corridors</p> <p>This Policy requires identified Wildlife Corridors, as shown on the Policies Map, to be protected and enhanced. Two Wildlife Corridors have been designated through the site at Shaw's Lane; one of which runs through an identified area of Ancient Woodland, whilst the other runs along a fractured row of trees to the south of Shaw's Lane.</p>	<p>This is a riverine corridor and offers</p>

	HNP15 and Shaw's Lane	<p>The identified corridor south of Shaw's Lane is a fragmented row of trees running west to east. Whilst we acknowledge the Plan's intention to promote the biodiversity of the Plan area, we do not consider that the Plan has fully justified that this area merits designation as a Wildlife Corridor, given its fragmented nature and a lack of evidence in respect of its biodiversity value. Therefore, this Wildlife Corridor should be removed from Policy HNP15 given the lack of justification for its designation.</p> <p>CEG's proposed development at Shaw's Lane would provide an opportunity for this area of land to be enhanced, in order to bring genuine biodiversity and visual amenity benefits to the area. During the application stage, the development would be designed to contribute to the biodiversity of the site through detailed surveys and the production of a site-specific habitat management plan, the implementation of which can be conditioned by the Local Planning Authority. The development can also be designed in consultation with the local community to ensure that the opportunity is fully utilised to improve biodiversity in this part of the Plan area.</p> <p>Pg 8/15 16770136v3</p> <p>Summary</p> <p>CEG welcome the opportunity to comment on the Hexham Neighbourhood Plan, however CEG has a number of significant concerns. These are set out within this letter and summarised below:</p>	<p>opportunity for improvement.</p>
	HNP9/10	<p>1. 1 The housing requirement figure is too low. It is predicated on past trends and unsubstantiated assumptions which will not support the economic growth ambitions of Hexham. The Plan represents a snapshot of existing permissions rather than a proactive strategy to meet Northumberland's needs.</p>	<p>NCC provided the housing figure for the Neighbourhood Area.</p>
	HNP8	<p>2. 2 The Plan is too reliant on the delivery of brownfield sites to meet the housing requirement it has set out, despite this figure already being too low. Only the designation of green field sites around the periphery of the town would resolve this issue.</p>	<p>See previous comments in relation to green belt.</p>
	HNP8 and greenbelt	<p>3. 3 The housing requirement for Hexham is acknowledged by the County Council as being too low due to existing Green Belt boundaries with unmet need being delivered in lower order settlements such as Corbridge. Due to these constraints, the Town Council should 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.</p>	<p>This is not in the remit of the NP.</p>
	HNP10	<p>4. 4 The current requirement of 30% affordable units under Policy HNP10 is not supported by robust evidence and may not accord with the emerging Local Plan if Policy HOU5 of the Local Plan is amended. The requirement should therefore be revised down to 20%,</p>	<p>Disagree. There is robust evidence in the HNA (2016).</p>

	<p>Obj 3</p> <p>HNP9</p> <p>HNP12</p> <p>HNP15</p>	<p>given that the precise affordable housing need as set out in the emerging Local Plan still needs to be established.</p> <p>5. 5 Objective 3 of the Plan should be re-worded as suggested on Page 3 of this representation to address the identified issues with its wording.</p> <p>6. 6 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.</p> <p>7. 7 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.</p> <p>8. 8 The row of trees to the South of Shaw's Lane which is designated as a Wildlife Corridor under Policy HNP15 needs further justification for its designation, given its fragmented nature and a lack of evidence in respect of its biodiversity value.</p> <p>Shaws Lane provides an excellent opportunity to meet the market and affordable housing needs for Hexham during the Plan period. It is clear that Hexham requires a large site on its periphery to meet its housing needs due to the scale of demand and the constraints associated with the allocated sites. CEG's site at Shaws Lane represents the most sustainable and deliverable option in Hexham. The annexed Vision Document provides further detail as to how the site can meet Hexham's housing needs over the plan period through a sensitively designed development. CEG is keen to engage with the Neighbourhood Plan Steering Group and the Town Council to discuss its proposals in order to inform the details of the scheme.</p> <p>We are keen to work with and meet the steering group of the Neighbourhood Plan to discuss the comments submitted within the representation and specifically the Shaws Lane site.</p> <p>Annexed to this response is a Shaw's Lane Vision Document, August 2018. This will be forwarded and/or presented as a separate attachment.</p>	<p>The objectives are determined in consultation with residents.</p> <p>Disagree. Para 184 encourages early engagement.</p> <p>Disagree.</p> <p>Disagree.</p>
--	----------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------

End of Consultation Statement