

Acomb Neighbourhood Plan

Summary of representations received and submitted to the Independent Examiner

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

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

Copies of the representations made on the Plan, and which were submitted to the independent examiner, can be made available on request from the County Council by contacting the Neighbourhood Planning and Infrastructure Team on 01670 623619 or by email at: NeighbourhoodPlanning@northumberland.gov.uk

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Name	Organisation (if applicable)	Summary of representation
Hannah Bevins	Wood Group, on behalf of National Grid	The representation identified high voltage overhead power lines within the Neighbourhood Area but confirmed that these do not interact with any of the Neighbourhood Plan proposals. The representation also confirmed that there are no implications for National Grid Gas Distribution's intermediate/high pressure apparatus but that there may be Low/Medium Pressure gas distribution pipes present within development sites.
Laura Roberts	Northumbrian Water Ltd	Northumbrian Water Ltd expressed general support for the Plan, particularly Policy 3: Flooding and the action taken for future development in relation to flood risk. Strong support was expressed for Policy 6: New Housing and Policy 10: Design in New Development. Both policies include the incorporation of SuDS in the design of development. Northumbrian Water Ltd considered that the Acomb Neighbourhood Plan sees sustainable development at the heart of the community aspirations in Acomb.
Lucy Mo	Environment Agency	The Environment Agency had no detailed comments to make on the Acomb Neighbourhood Plan but considered the Plan to be legally and procedurally compliant and sound.
Planning and Local Authority Liaison Team	Coal Authority	The Coal Authority confirmed that had no specific comments to make on the Neighbourhood Plan. However, they did identify the Neighbourhood Area as lying within the current defined coalfield. In addition, there are recorded risks from past coal mining activity in the form of 8 mine entries as well as recorded and likely unrecorded coal workings at shallow depth. The Coal Authority noted that the Neighbourhood Plan does not allocate sites for future development and therefore had no specific comments to make.
Paul Dixon	Highways England	<p>Highways England's representation provided some general information about the role of the agency and its responsibilities relating to the strategic road network.</p> <p>With specific reference to the Acomb Neighbourhood Plan, Highways England confirmed that, despite the absence of an up-to-date adopted Local Plan, they had no particular concerns with the policies and provisions within the Neighbourhood Plan.</p> <p>General support was given to the Plan's Vision and Objectives, with support expressed for Policy 4:</p>

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		<p>Walking, Cycling and Horse-riding, which seeks to support measures to improve safety for pedestrians, cyclists and other road users. The provisions of Policy 5: Howford Quarry/Howford Lane were also supported in seeking to ensure that the intensification of development will not significantly increase traffic movements. General support was expressed for Objectives 1, 4 and 5 which provide for small scale housing and to protect and support economic development and supporting community facilities where development is in a sustainably accessible location and commensurate with the level of identified local need. As such, the corresponding policies, Policy 2: Community Facilities, Policy 6: New Housing, and Policy 7: Local Economy, were also generally supported.</p>
Jules Brown	Historic England	<p>Historic England reiterated a number of points which they had previously made during consultation on the Pre-Submission Draft Plan.</p> <p>It was considered that Objective 6 could refer more generally to the historic environment, rather than focusing on the Conservation Area. The Plan made reference to buildings, but Historic England considered that other types of heritage asset should also be considered.</p> <p>It was suggested that reference to CIL could be made within the Plan as CIL revenue (if adopted by the Local Planning Authority) could be used to fund some costs associated with a range of heritage assets.</p> <p>Historic England considered that part of Policy 8 repeats a requirement already set out in legislation. Concern was raised about part of the policy which requires a positive contribution to be made, rather than allowing development to leave character unharmed.</p> <p>It was also considered that, with regard to non-designated heritage assets identified in Appendix A, these could be identified on the proposals map.</p>
Peter Caris, Director	Howford Recycling Ltd and Howford Park Ltd	<p>Specific comments were made on Policy 5: Howford Quarry/Howford Lane. A suggestion was made with regard to provision of a separate footpath for pedestrian access but this was not a proposal included in the submitted Neighbourhood Plan.</p>

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		<p>It was also suggested that Policy 5 of the Neighbourhood Plan should include additional wording to allow for additional buildings on the site.</p> <p>The representation also expressed support for the possibility of future further employment development in the area if there was the prospect of another tenant wishing to carry out a business from the site.</p>
<p>David English, Planning Manager - Neighbourhood Planning & Infrastructure</p>	<p>Northumberland County Council</p>	<p>The County Council, as Local Planning Authority, responded with comments on the following parts of the Plan:</p> <ul style="list-style-type: none"> • Policy 1: Local Green Spaces The County Council supported the intention to designate Local Green Space in the Plan where those spaces are demonstrably special to the local community for those reasons set out in the NPPF. However, the County Council also raised some concerns regarding the evidence used to inform the proposed designations and suggested that the Examiner may wish to seek clarification on this matter before reaching a conclusion. In addition, the County Council considered that the protection of Acomb Playing Field should be included in a separate policy to seek to protect the Playing Field. The County Council considered that, as drafted, the Policy 1 would conflict with national policy as the policy prevents the loss of the Playing Field while, under national policy, in some circumstances, the loss and replacement of such recreational land may be acceptable. • Policy 2: Community Facilities The County Council suggested that community facilities could be more clearly shown on the Policies Map. The County Council also questioned the protection of the Hair Salon as a community facility and suggested its removal. There was also concern that part of the policy also appeared to offer unqualified support for new or extended community facilities and that the policy should include a degree of qualification. • Policy 4: Walking, Cycling and Horse Riding The County Council suggested that the policy be reworded to make the policy clearer and to support the definition of public rights of way on the Policies Map.

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		<ul style="list-style-type: none"> <p>• Policy 5: Howford Quarry/Howford Lane The County Council were generally supportive of improvements to the highway network in the interests of pedestrian and cyclist safety. However, the County Council had concerns regarding the requirements of the policy, particularly given the planning consents already in place at Howford Quarry, none of which restrict vehicle movements to and/or from the site. In addition, the County Council set out the position of its emerging Local Plan which seeks to safeguard the quarry site and associated minerals infrastructure. The County Council, as Highways Authority, also considered that there was insufficient evidence to justify the improvements that the policy required, or that any evidence had been provided regarding the availability of adjoining land to improve pedestrian/cycle access as the existing lane is very narrow and constrained. The County Council therefore considered that it could not be envisaged how compliance with Policy 5(b) could be achieved.</p> <p>• Policy 6: New Housing The County Council raised concerns regarding the Plan’s support for “small-scale” housing development. The NPPF (2018) provides national policy in relation to the definition of small and medium sized housing developments, which is the scale of development suggested should be considered in neighbourhood plans. NPPF describes such sites as being no more than one hectare. The County Council suggested that this was unlikely to be the scale of development envisaged as being “small scale” by the Parish Council, and also suggested that, in the context of Green Belt constraints and available land for development within Acomb, that it is unnecessary for the policy to refer to scale. In addition, the County Council raised concern over constraints being applied to brownfield sites and considered that these should apply to all housing developments, not just those on previously developed land. Concerns were also raised regarding the lack of reference to off-street parking provision and the requirement for a “design brief”. The County Council therefore considered that a number of revisions to the policy should be considered.</p> <p>• Policy 8: Acomb Conservation Area The County Council noted that the Conservation Area was not shown on the Policies Map and</p>

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		<p>suggested that this should be rectified. The County Council considered that some rewording of the policy would be appropriate, particularly with reference to “local” building materials as this implied that materials should be locally-sourced.</p> <ul style="list-style-type: none">• Policy 9: Non-designated Heritage Assets The County Council supported the recognition of the value of non-designated heritage assets. However, it was considered that further work to justify the inclusion of any assets on the list is required; no evidence was available to demonstrate any structured and informed assessment of the merit of those assets listed in Appendix A. Amendments to Policy 9 were therefore suggested to ensure that the policy would simply offer protection to non-designated heritage assets in accordance with their significance.• Some minor changes to wording and/or terms used were also suggested by the County Council in order to improve the Plan generally.