

**Alnmouth Parish
Neighbourhood Development Plan**

2020-2036

Submission Version October 2020

Consultation Statement

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1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations set out in the Neighbourhood Planning (General) Regulations 2012. Regulation 15(2), defines what a consultation statement must contain:
- Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - An explanation of how the persons and bodies were consulted;
 - A summary of the main issues and concerns raised by the persons consulted; and
 - A description of how those issues and concerns have been considered and where relevant, addressed in the proposed neighbourhood development plan.
- 1.2 In order to meet the requirements of the Regulations, this consultation statement sets out:
- The background to the preparation of the Alnmouth Parish Neighbourhood Development Plan (the 'APNDP');
 - A summary of the publicity, engagement and consultation that has helped to shape and inform preparation of the APNDP;
 - Details of those consulted about the APNDP at the various stages of plan preparation and the extent to which efforts were made to ensure the APNDP was prepared with support and input from the local community; and
 - A description of the changes made to the APNDP in response to consultation and engagement.
- 1.3 Alnmouth Parish Council ('APC') considers that the extent of engagement meets the obligations set out in the regulations.
- 1.4 The consultation statement is intended to help the independent examiner review the process of the preparation of the APNDP and make any appropriate recommendations in relation to the APNDP, having regard to the extensive and iterative processes employed in preparing the Submission Draft APNDP.

2. Background to the Alnmouth Parish Neighbourhood Development Plan

- 2.1 On 15 October 2019, the civil parish of Alnmouth was designated as a neighbourhood area for the purposes of neighbourhood planning. APC led the plan preparation process.
- 2.2 During the preparation of the plan, the APC have been supported by Northumberland County Council ('NCC'), the local planning authority. This support has sought to ensure that the APNDP reflects both the wishes of the local community but that it will also meet the statutory 'basic conditions'. The preparation of the APNDP has involved comprehensive and inclusive publicity, engagement and consultation, which will be discussed further in this document.
- 2.3 The Pre-Submission Draft Plan was subject to consultation during March and April 2020 and again between July and September 2020. The draft Plan identified:
- The context in which the Plan had been prepared – an overview of Alnmouth, and the key issue for the plan to address;
 - The aim of the Plan;
 - How the aim of the Plan will be delivered through the planning policy.
- 2.4 A second round of consultation on the Pre-Submission Draft Plan was necessary because the first took place during the period within which social distancing restrictions were brought into force. Therefore, it would have been inappropriate and legally unsound for the Plan to be submitted to the County Council.
- 2.5 The Submission Draft Alnmouth Parish Neighbourhood Development Plan is a revised version of the Pre-Submission Draft Plan. It is supported by an updated evidence base and has been modified to take into account of representations received.

3. Pre-Submission Engagement

- 3.1 The first consultation on the Pre-Submission Draft APNDP (March 2020) took place between 5 March and 20 April 2020. In advance of the commencement of the consultation NCC provided advice to ensure it was in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 3.2 The local community, consultation bodies and other interested parties (Appendix 1) were informed of the consultation on the draft ANDP and the opportunity to comment on the Plan in the following ways:
- An article was published in the Northumberland Gazette on 2 March 2020 (Appendix 2)
 - Notices were published in the Alnmouth Village Newsletter in February and March 2020. This paper is distributed to all households in the Parish (Appendix 3)
 - A letter was set to the consultation bodies (Appendix 4)
 - Copies of the draft plan were available in the foyer of the Hindmarsh Hall, Alnmouth and the Porch of St John the Baptist Parish Church, Alnmouth
 - The draft plan and supporting documents were available online www.alnmouthparishcouncil.org.uk
 - A drop-in event was held on Saturday 14 March 2020 at Hindmarsh Hall between 10am and 12noon where copies of the Plan were available to view.
- 3.3 Responses were received from:
- The Coal Authority
 - The Environment Agency
 - Highways England
 - Historic England
 - The Marine Management Organisation
 - National Grid
 - Northumberland County Council
 - 5 local residents

3.4. A second 8-week consultation on the Pre-Submission Draft Plan took place between 20 July and 16 September 2020. The arrangements for this consultation adhered to the advice published by Northumberland County Council to ensure safe and equitable public engagement. In brief, these comprised the following:

- A notice was published in the Alnmouth Village Newsletter in August 2020 (Appendix 3)
- A letter was set to the consultation bodies (Appendix 4)
- The draft plan and supporting documents were available online www.alnmouthparishcouncil.org.uk
- Hard copies of the draft plan and background paper were available on request to be sent by post to people who do not have access to the internet or who are shielding.

3.5 Responses were received from:

- Natural England
- The Coal Authority
- National Grid
- Lesbury Parish Council
- Highways England
- Historic England
- Rev Lynda Coulthard, Methodist Minister for Alnmouth Methodist Church
- Northumberland County Council
- 1 local resident

3.5 The responses to both consultations and details of how they have been taken account of in the Submission Draft APNDP are included in Appendix 5.

4. Conclusions

- 4.1 The submission version of the APNDP is the outcome of extensive engagement. Throughout the plan-making process, guidance, input and support has been obtained from various sources, all of which has been afforded due consideration in the preparation of the plan.
- 4.2 This has resulted in a Submission APNDP that reflects the community's aspirations for the area and the advice of stakeholders, whilst being in general conformity with local and national planning policy and that meets the basic conditions.
- 4.3 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 communities in Alnmouth Parish.

Appendix 1: Consultation Bodies

Consultation Body	Organisation	Contact
Local Planning Authority	Northumberland County Council	Rob Murfin (Director of Planning), Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF Tel: 01670 625542 Email: rob.murfin@northumberland.gov.uk
		David English (Planning Manager, Neighbourhood Planning and Infrastructure), Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF Tel: 01670 623619 Email: david.english@northumberland.gov.uk
The Coal Authority	The Coal Authority	Planning and Local Authority Liaison, The Coal Authority, 200 Lichfield Lane, Berry Lane, Mansfield, Nottinghamshire, NG18 4RG Email: planningconsultation@coal.gov.uk
Homes England	Homes England	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	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 Commission for England	Historic England	Historic England, 41-44 Sandgate, Newcastle upon Tyne, NE1 3JF Email: e-neast@HistoricEngland.org.uk

Consultation Body	Organisation	Contact
Network Rail Infrastructure Limited	Network Rail Infrastructure Limited	Network Rail Infrastructure Limited, George Stephenson House, Toft Hill, York, Y01 6JT townplanning.LNE@networkrail.co.uk
Highways England	Highways England	Asset Development Team - Yorkshire and North East, Highways England, Lateral, 8 City Walk, Leeds, LS11 9AT Email: PlanningYNE@highwaysengland.co.uk
Relevant Primary Care Trust	NHS Northumberland Clinical Commissioning Group	NHS Northumberland Clinical Commissioning Group, County Hall, Morpeth, Northumberland, NE61 2EF Tel.: 01670335161 Email: norccg.enquiries@nhs.net Jamie Mitchell Head of Commissioning, Estates and Premises NHS Northumberland Clinical Commissioning Group Email: jamie.mitchell4@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
	Briskona	enquiries@briskona.com
	CTIL (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

Consultation Body	Organisation	Contact
	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
	Openreach	newsitereceptionedinburgh@openreach.co.uk
Any person to whom the electronic communications code applies	CTIL (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	Matt Verlander, Avison Young, Central Square South, Orchard Street, Newcastle upon Tyne, NE1 3AZ Email: nationalgrid.uk@avisonyoung.com Spencer Jefferies, Town Planner, National Grid, National Grid House. Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA Email: box.landandacquisitions@nationalgrid.com

Consultation Body	Organisation	Contact
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	Katherine Dobson, Planning Team Leader, Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB katherine.dobson@nwl.co.uk
Water undertaker	Northumbrian Water Limited	Katherine Dobson, Planning Team Leader, Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB katherine.dobson@nwl.co.uk
Marine Management Organisation	Marine Management Organisation	Stakeholder & Networks Officer, Marine Management Organisation, PO Box 1275, Newcastle upon Tyne, NE99 5BN Email: consultations.mmo@marinemanagement.org.uk
Adjoining local authorities	Lesbury Parish Council	Mrs E Taylor, Clerk Rivendell, Steppey Lane, Lesbury, Northumberland, NE66 3PU Tel. (daytime): 01665 830040 Email: lesburyparishclerk@goolemail.com
	Shilbottle Parish Council	Mr Daniel Metcalf, Clerk Mejdel House, 30 Grange Road, Shilbottle, Northumberland, NE66 2XN Tel. (daytime): 01665 575369 / Tel. (mobile): 07714 262 502 Email: Daniel.metcalf1@hotmail.co.uk
	Warkworth Parish Council	Mrs Karon Hadfield, Clerk 30 Rothbury Drive, Ashington, Northumberland, NE63 8TQ Tel. (mobile): 07841 650640 Email: warkworthparish@gmail.com
Voluntary Bodies some	Sean Henderson, Secretary,	Hotspur Park, Alnmouth Rd, Lesbury, Northumberland, NE66 3PX

Consultation Body	Organisation	Contact
or all of whose activities benefit all or any part of the neighbourhood area	Alnmouth Utd FC	sean1970tth@hotmail.com
	Andrew Hodgeson, Chair, Alnmouth & Lesbury CC	The Wicket, Alnmouth Rd, Lesbury, Northumberland, NE66 3PX secretary@alnmouthlesburycricketclub.co.uk
	Ian Simpson, Secretary, Alnmouth Village GC	The Club House, Marine Rd, Alnmouth, Northumberland, NE66 2RZ secretaryavgc@btconnect.com
	Kathryn Archibald, Secretary, Alnmouth WI	info@alnmouthwi.co.uk
	Donald Hall, Chair, Alnmouth Burgage Holders	PO Box 128, Alnmouth, Northumberland, NE66 9EJ alnmouthburgageholders@outlook.com
Bodies which represent the interests of different religious groups in the neighbourhood area	Rev Ian MacKarill, Vicar Aln & Coastland Parishes	Vicarage, Lesbury, Northumberland, NE66 3AU rev@mackarill.co.uk
	Rev Lynd Coulthard, Minister The Methodist Church	The Chapel, Chapel Lane, Alnmouth, Northumberland, NE66 2RR
Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area		None identified by the Parish
Bodies which represent the interests of persons carrying on business in the neighbourhood area		None identified by the Parish
Bodies which represent the interests of disabled persons in the neighbourhood area		None identified by the Parish

Organisations, which 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 Email: mark.price@theatretrust.org.uk
Sustrans	Sustrans, 2 Cathedral Square, College Green, Bristol, BS1 5DD Email: reception@sustrans.org.uk
National Farmers Union	Andy Stephenson, Planning, National Farmers Union, Agriculture House, 207 Tadcaster Road, York, YO24 1UD Email: andrew.stephenson@nfu.org.uk
All Things Neighbourhood Planning	Ed Dade (www.neighbourhood-planning.co.uk) Email: info@neighbourhood-planning.co.uk
SSA Planning	Steve Simms steve.simms@ssaplanning.co.uk Mark McGovern mark.mcgovern@ssaplanning.co.uk
Quod Planning	Estelle Hutchinson Estelle.hutchinson@quod.com
Tetlow King Planning	Consultation@tetlow-king.co.uk

Appendix 2: Article in Northumberland Gazette, 2 March 2020

News > Politics

Consultation set to start on Alnmouth Neighbourhood Plan

Formal consultation on Alnmouth's draft Neighbourhood Plan is set to begin.

By Ian Smith
Monday, 2nd March 2020, 4:00 am
Updated: Monday, 2nd March 2020, 4:08 am

[Email](#) [Facebook](#) [Twitter](#) [WhatsApp](#)



Alnmouth.

The six-week consultation period will begin on March 3 and close on April 14.

Public drop-in sessions are being held at the Hindmarsh Hall on March 14 and 28, from 10am-12pm.

[Alnmouth Parish Council is bidding to ensure that any new dwelling that is built or created in the parish is subject to a 100 per cent residency condition and not used as a second home or holiday let.](#)

Most Popular

-  Northumberland town centre set for £750,000

Appendix 3: Articles in the Alnmouth Village Newsletter

February 2020

The Neighbourhood Plan

Work on the Neighbourhood Plan continues apace. The Parish Council is working closely with the NCC Planning Department and will soon have completed the Draft Plan. It is expected that extensive consultation with various interested parties including neighbouring Parish Councils will start in March. Remember - this is a Single Issue Plan which if accepted by the Authorities will ensure that permission for any new dwelling is subject to a Permanent Residency condition.

This process will of course include asking parishioners for comments and to facilitate this, the Parish Council will organise Drop-In sessions so that anyone can come along to inspect the plans and ask questions. These sessions will be well advertised in the Newsletter, on posters and on Noticeboards around the Parish. Documents will also be available on:

www.alnmouthparishcouncil.org.uk

March 2020

Neighbourhood Plan:

Public Consultation & Information Sessions

Progress on the Neighbourhood Plan continues. The next stage requires a six-week Public Consultation Period. During this period, (which will run from the **5th March 2020**) draft copies of the Plan will be available for inspection in the Porch of St John the Baptist and the Hindmarsh Hall. There will also be two Drop In sessions on **Saturdays the 14th & 28th of March** in the Hindmarsh Hall. Both will last from 10am to noon. Members of the Parish Council will be available to answer any questions you may have. Details of how you can comment on the Plan which intends to ensure that all new dwellings in the Parish will be subject to a permanent residency condition, will be widely advertised.

July 2020

Neighbourhood Plan

If you recall, the Lockdown de-railed the Alnmouth Parish Neighbourhood Plan's Public Consultation in March which had to be called off half way through. The Government has now allowed the process to be re-booted and you may have already seen signs announcing the Consultation period has been restarted from 20th July. It will run for 8 weeks and closes on the 16th September. For obvious reasons there will not be any Drop In Sessions this time and the documents will not be available for public inspection, but if you would like a copy sent to you or have any queries please call the APC Chair Shaun Whyte on 01655 830028. Comments to our Clerk please.

Appendix 4: Letters to Consultation Bodies

March 2020

<p style="text-align: center;">ALNMOUTH PARISH COUNCIL NEIGHBOURHOOD PLAN</p> <p style="text-align: right;">3rd March 2020</p> <p>Dear Consultee</p> <p>Alnmouth Neighbourhood Plan Neighbourhood Planning (General) Regulations 2012: Regulation 14 consultation and publicity</p> <p>Alnmouth Parish Council, as a qualifying body for the purposes of neighbourhood planning for the Alnmouth Neighbourhood Area, has completed the preparation of the Pre-Submission Draft Alnmouth Neighbourhood Plan.</p> <p>You are identified by the Parish Council as a consultation body whose interests may be affected by the policies contained in the Draft Plan for the purposes of the Regulations. I am therefore writing to consult you about the Draft Plan. Written representations are being invited on the Draft Plan for a period of six weeks, commencing Thursday 5th March 2020 and ending at midnight on 20th April 2020.</p> <p>Representations may be posted to Lesley Long, Clerk to Alnmouth Parish Council:</p> <p>c/o 5 Meadow Riggs Alnwick Northumberland NE66 1AP</p> <p>Or emailed to: alnmouthclerk@aol.com</p> <p>Printed copies of the Plan and the background paper may be viewed at these locations:</p> <ul style="list-style-type: none">• The Foyer of the Hindmarsh Hall, 1 Northumberland Street, Alnmouth, NE66 2RS (Opening times are variable: please check the website before visiting www.hindmarshhall.com)• The Porch of St John the Baptist Parish Church, Northumberland St, Alnmouth, NE66 2RJ (open daily 8am till dusk) <p>Digital versions of the Plan and the background paper can be viewed on the Parish Council's website: www.alnmouthparishcouncil.org.uk/</p>	<p>Drop-in sessions will be held at the following times:</p> <ul style="list-style-type: none">• 10am-12noon at Hindmarsh Hall (Lower Hall) on Saturday 14th March• 10am-12noon at Hindmarsh Hall (Upper Hall) on Saturday 28th March <p>If you have any questions about this consultation, please do not hesitate to contact us.</p> <p>Yours sincerely</p> <p>Shaun Whyte Chair, Alnmouth Parish Council</p>
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July 2020

ALNMOUTH PARISH COUNCIL

Parish Clerk: Lesley Long

5 Meadow Riggs, Alnwick, Northumberland. NE66 1AP
Tel: 01665 606841 Email: alnmouthclerk@aol.com

18th July 2020

Dear Consultee

**Alnmouth Neighbourhood Plan
Neighbourhood Planning (General) Regulations 2012: Regulation 14 Consultation and
Publicity**

Alnmouth Parish Council, as a qualifying body for the purposes of neighbourhood planning for the Alnmouth Neighbourhood Area, has completed the preparation of the Pre-Submission Draft Alnmouth Neighbourhood Plan.

You are identified by the Parish Council as a consultation body whose interests may be affected by the policies contained in the Draft Plan for the purposes of the Regulations. I am therefore writing to consult you about the Draft Plan. Written representations are being invited on the Draft Plan for a period of eight weeks, commencing **Monday 20th July 2020** and ending at **midnight on Wednesday 16th September, 2020**.

Please note that an earlier Regulation 14 Consultation (Mar/April 2020) was suspended because of social distancing restrictions in force due to coronavirus. We are now satisfied that we can consult on our proposals in a safe and equitable manner, having regard to current Government advice on public access to buildings and social distancing.

Representations may be posted to Lesley Long, Clerk to Alnmouth Parish Council:

c/o 5 Meadow Riggs
Alnwick
Northumberland
NE66 1AP

Or emailed to: alnmouthclerk@aol.com

Printed copies of the Plan and the Background Paper may obtained by contacting the Clerk. Tel 01665 606841.

Digital versions of the Plan and the background paper can be viewed on the Parish Council's website: www.alnmouthparishcouncil.org.uk/

If you have any questions about this consultation, please do not hesitate to contact us.

Yours faithfully



Shaun Whyte
Chair, Alnmouth Parish Council

Appendix 5: Pre-Submission Consultation - Written Comments and APC Responses

First Consultation on Pre-Submission Draft Plan March to April 2020

Consultee	Comment	Response from APC
The Coal Authority	The Neighbourhood Plan area lies within the current defined coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. On the basis of the above the Coal Authority has no specific comments to make on the Neighbourhood Plan.	Noted. No amendments required.
The Environment Agency	Based on matters within our remit, it is considered that we have no comments to make on the Pre-Submission Alnmouth Neighbourhood Plan.	Noted. No amendments required.
Highways England	Strategic Road Network Context: Considering the location of Alnmouth Parish, the A1 is the only part of the SRN which could be impacted by development proposals within the parish, with the junction with the A1068 located approximately 3.5 miles to the north-west and various other at-grade junctions approximately 3 miles west of the parish boundary, via Shilbottle. We have undertaken a review of the NDP and have no particular concerns with the provisions therein. As the NDP does not seek to allocate land for housing or identify any future housing numbers the permanent residency condition stipulated is not of concern to Highways England regarding the safe and efficient operation of the SRN.	Noted. No amendments required.

Consultee	Comment	Response from APC
Historic England	We have no comment to make on the draft plan.	Noted. No amendments required.
The Marine Management Organisation	The MMO had no specific comments to make on the draft Plan.	Noted. No amendments required.
National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted. No amendments required.
Northumberland County Council	<p>We would like to congratulate the Parish Council on reaching this stage in plan preparation.</p> <p>We have reviewed the evidence presented in support of the Neighbourhood Plan and would agree that the introduction of occupancy controls would be appropriate having regard to that evidence. However, in order to allow for alternative controls over the occupation of new dwellings, and, in the interests of fairness, to ensure that reasonable opportunities remain to rebuild dwellings without such controls being introduced, we have recommended some minor modifications to the policy. These suggestions are set out in Annex A to this letter.</p> <p>Our suggested changes seek to ensure that the policy meets the 'basic conditions' and in particular that, having regard to national policy and guidance it would be appropriate to make the Neighbourhood Plan;</p>	<p>Comments noted and support welcomed. The Parish Council agrees that the suggested amendments are appropriate. Amend the policy and supporting text as suggested.</p>

Consultee	Comment	Response from APC
	<p>and the need to ensure the Plan does not breach and is otherwise compatible with European Union obligations.</p> <p>Changes suggested to the policy would ensure that the occupation restriction would apply to all new dwellings, with the exception of proposals to rebuild dwellings since adding occupation controls in such circumstances would, in our opinion, be generally unreasonable, and has the possibility that failure to allow this exemption could be seen as interfering with rights established in Article 8 of the European Convention on Human Rights regarding the right to respect for private life and family. These rights seek to ensure protections to existing property rights; hence the imposition of additional burdens on a rebuilt property on the same site could be seen as unreasonable.</p> <p>We have more recently considered whether sufficient controls can be created to limit occupation in the way proposed through the effective use of planning conditions. Having regard to policies currently being applied elsewhere in England, particularly in St Ives in Cornwall, we are aware that the use of planning conditions has been successfully defended in planning appeals and are seen by the Planning Inspectorate as a sufficient and enforceable measure to control occupation of new dwellings. We have recommended modification in this respect.</p> <p>We also recommend that some additional supporting text in the Plan would help in giving an indication of the types of documentary evidence that occupiers could use to demonstrate occupation as a principal residence. A suggestion in this respect is shown in Annex A</p>	

Consultee	Comment	Response from APC
	<p>to this letter.</p> <p>Annex A</p> <p>Suggested modifications to Policy:</p> <p><i>Proposals for new housing, excluding replacement dwellings, will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence.</i></p> <p><i>Principal Residence housing is that which is occupied as the sole or main home of the occupants and where the occupants spend the majority of their time when not working away from home.</i></p> <p><i>The restriction will be secured through a planning condition or, if necessary, through a planning obligation secured under section 106 of the Town and Country Planning Act 1990, or any subsequent successor legislation legal agreement.</i></p> <p><i>The restriction will require occupiers to keep proof that they are occupying the dwelling only as a principal residence. Occupiers will be obliged to provide this proof whenever requested to do so by Northumberland County Council.</i></p> <p>Suggested modifications to supporting text:</p> <p>We would recommend that the supporting text in the Plan includes</p>	

Consultee	Comment	Response from APC
	<p>reference to the types of proof that could be provided to demonstrate compliance with occupancy controls. This could include, amongst other things, occupiers:</p> <ul style="list-style-type: none"> • being registered on the local electoral register; • being registered with a local GP or other medical practitioners; • being registered to attend local schools; and • providing details of other property ownership and occupation elsewhere. <p>A modification to this effect would be helpful in explaining what records an occupier may be expected to produce on request.</p>	
Aongus and Judith Mullen	<p>We support the permanent residency condition on newly built or created dwellings in the Parish. We would suggest that the permanent residency condition should also be applied to Planning Permissions involving a significant increase in the surface area of a dwelling.</p>	<p>Comments noted and support welcomed. It would not be appropriate to impose occupation controls on part of a dwelling created through increasing its surface area (we presume this means an extension to the dwelling) since this would not involve the creation of an additional planning unit for the</p>

Consultee	Comment	Response from APC
		<p>purposes of interpreting and applying development plan policy. Controls on occupation introduced through the proposed policy could not reasonably or practicably be applied to only part of a dwelling created as an extension to that dwelling. This would not make practical sense. Furthermore, it would be unlawful to impose occupation controls through planning conditions on an existing dwelling simply because it may be enlarged.</p> <p>No amendments proposed.</p>
Bill Bourne	<p>The Parish Council has been concerned about the problem of maintaining a viable residential population in Alnmouth for many years and the present Council is to be congratulated for taking steps to address the issue.</p> <p>I support the Council's underlying intention but am unable to support this proposal and would object to its implementation. My reasons for this are as follows:</p>	<p>Support for the intention welcomed. Opinions on impact and efficacy of the Parish Council's objectives and the proposed policy noted.</p>

Consultee	Comment	Response from APC
	<ul style="list-style-type: none"> • Complex problems are rarely susceptible to simple solutions. What is being proposed will not, in my view, have the intended impact upon Alnmouth’s demographic situation and should be rejected if only on the grounds that ineffective regulations should not be introduced because they bring the whole process into disrepute. • The proposal does nothing to address the affordability of housing in Alnmouth. As the Background Paper makes clear, the median house price to median income ratio is higher in Alnmouth than for the County as a whole, which is in turn higher than for other North-East Local Authority Areas. This is in part driven by “people looking to retire to the district with much stronger purchasing power than local residents” (Alnwick District Local Development Framework 2007). It is clear that the real problem is not merely how to sustain a viable residential population, but how to sustain one which is not primarily composed of retired persons. • The potential for new build in the parish is limited, so the proposal, in the short term at least, is restricted to so few developments as to be insignificant in its effect. • It may be simple to control holiday cottages which are registered as businesses, but it is hard to see how second homes can be controlled. I may be wrong, but I understand that the Local Authority can identify second homes only by the Council Tax concession they attract. The draft policy for 	<p>The Parish Council accept that the issues it seeks to address through the Neighbourhood Plan are complex. Other solutions may exist, for example through taxation regimes. However, these are not within the remit of neighbourhood planning and are beyond the control of the Parish Council.</p> <p>Second homes do not attract any council tax concession in Northumberland. The proposal fits directly with draft policies proposed through the Northumberland Local Plan. The Parish Council has pursued the matter through the Neighbourhood Plan because there is no certainty that a new Local Plan will</p>

Consultee	Comment	Response from APC
	<p>Principal Residence Housing suggests defining a new dwelling as the “sole or main home of the occupants and where the occupants spend the majority of their time when not working away from home”. How and by whom is this going to be defined, quantified, and monitored? Is there anything to prevent a member of a family normally resident in Newcastle identifying their new house in Alnmouth as their principal residence, paying the Council Tax on it, and using it as a second home? They would be spending the majority of their time in it when not working away from it.</p> <ul style="list-style-type: none"> • By restricting future supply, the proposal could drive up the value of existing potential second home/holiday cottages in the parish. • It is not clear how this proposal fits with the emerging Northumberland Local Plan and it might better to develop a strategy on a County basis rather than piecemeal measures. <p>I should declare an interest. My wife and I moved to Alnmouth upon retirement and converted a derelict building on a large plot of land into a house. We are currently developing a house on a neighbouring plot for us to move into when we are too old to live where we do now (another of Alnmouth’s housing problems is a lack of suitable housing for elderly people) and we would want to rent it out until we need to move into it ourselves. If the Parish Council’s proposal is implemented we would not be able to do this. A measure of the ineffectiveness of</p>	<p>pass examination.</p> <p>Controls imposed through planning conditions and through planning obligations are legally enforceable by the local planning authority and are revealed through land registry information which must be provided when property is bought. We have no reason to expect that such controls cannot or would not be enforced.</p> <p>We accept that there will always be people who may wish to manipulate any system of controls. However, we would firmly reject any suggestion that this means the policy would be ineffective. The policy would be effective in controlling future new</p>

Consultee	Comment	Response from APC
	<p>the proposal is that it would not prevent our moving into our new house and letting out our current one as a holiday home.</p> <p>If the Local Authorities are serious about engineering the demography of communities like Alnmouth in the interests of sustainable development they should concentrate their efforts on the provision of affordable homes, particularly for young families with children. It is better to solve a problem by proactively doing something than by stopping someone doing something else and trusting that good will arise. It is to be hoped that a sensible housing policy not dependent upon private developers will be a feature of the emerging Northumberland Local Plan but, in the meantime, I urge rejection of the proposal.</p>	<p>residential development. We appreciate that the policy provides only part of the solution to the objectives being pursued by the Parish Council. In our opinion this does not mean that it is not worthwhile.</p> <p>The personal circumstances and aspirations described in this representation are also noted. The Parish Council considers that the intentions described involving the construction of another dwelling are precisely those that we consider need to be controlled. The alternative scenario without the policy would result in there being two dwellings in this person's control, both of which could be let as holiday accommodation or used as</p>

Consultee	Comment	Response from APC
		second homes. No amendments required.
E McKee	I understand that the Neighbourhood plan may be amended to include a restrictive provision that would prevent the modification or enlargement of a property for commercial gain without prior permission. The applicant would be required to declare the reason at this stage. I believe that it is vitally important to establish a ratio of permanent residents to holiday visitors and to maintain that balance for the benefit of both. It is to the Parish Council credit that they recognize the developing situation at this early stage.	Comments noted and support welcomed. No such modification to the Plan described in this representation has been proposed by the Parish Council. No amendments required.
Isabel Chalmers	Having had the opportunity to study the Alnmouth Neighbourhood Plan I would like to make the following comment on the Proposed Planning Policy. I wish to fully support the proposed policy but feel very strongly in addition to the proposal for new housing/flats the following further restriction should be included. That Permanent Residency condition should also be attached to those Planning Permissions proposing to significantly increase the floor area of existing properties, for use as holiday accommodation or second homes.	Comments noted and support welcomed. Planning permission is not generally required under current legislation for the use of a dwelling as a second home or as holiday accommodation since both uses fall within the same use class as a dwelling house for planning purposes (unless it can be demonstrated that a material change of use has occurred).

Consultee	Comment	Response from APC
		It would be unlawful to impose occupation controls through planning conditions on an existing dwelling simply because it may be enlarged. No amendments proposed.
Sandy and Mike Clements	<p>Here are our comments on the proposed Neighbourhood Plan submission.</p> <p>1. Most people would agree, we are sure, that a sense of community is desirable and important to a village like Alnmouth. However we do not agree with limiting the few, future new developments to permanent residences. This seems to be the trend without the need for a planning constraint.</p> <p>In summary, we think this is a well meant proposal but is likely to be a symbolic gesture with few hard arguments to support it. Also it could have the opposite effect to the one desired by discouraging those who start as second home owners but who then take up permanent residence.</p> <p>2. Shaun's foreword, which we assume is not part of the plan itself, includes the following statement as a context: "This Plan, whilst simple in scope is a modest attempt to protect what we have and arrest the inexorable drift towards a community overly</p>	<p>Comments and opinions noted by the Parish Council. We recognise that the proposal to introduce this policy may have limited impact due to the expectation that few new dwellings may be built in the Parish. However, in our opinion, this does not negate the purpose of the objective and it is not possible to predict all future windfall development.</p> <p>We also recognise and celebrate the fact that there are those who own second</p>

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	<p>dependent upon the holiday interests to an extent that it threatens its sustainability."</p> <p>We understand the spirit of this proposal but in reality there will be few new dwellings in Alnmouth in the years ahead so it is questionable how this proposal will have any significant impact on the spirit of community and whether it might have more downsides than positive effects.</p> <p>3. Many second home owners, including regular weekenders, play an active part in the village both in community and economic terms. Similarly there are permanent residents who are never seen at events or in the restaurants or pubs. And importantly, many second home owners go on to be permanent residents as do holiday makers who rent holiday lets. We are very fortunate to live in Alnmouth but that doesn't give us special rights and we should allow others to have the same opportunities we enjoyed and there is zero evidence this proposal will have any impact on the community and its sustainability.</p> <p>4. As for inexorable drift, Alnmouth's housing stock is established and this proposal will likely have minimal, and even a possible adverse effect, albeit small, on increasing permanent residency within the village. There may have been an increase in second home ownership and this may well continue as existing residents' property is sold or passed on. Anecdotal evidence suggests that many visitors would like to move to Alnmouth should the right property become available and</p>	<p>homes, and those who come to the Parish on holiday staying in holiday-lets, who contribute to the local economy and the local community.</p> <p>We recognise that introduction of the policy can have no effect on the occupation of existing dwellings, and that these may continue to be sold as second homes. The Parish Council cannot control that matter, and furthermore does not wish to, but it can seek to introduce appropriate controls on new dwellings.</p> <p>We are pleased to note the impression that more recent new-build dwellings and those created by conversion</p>

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	<p>this should be encouraged as part of community building. A trend of more people working from home is likely to make Alnmouth even more attractive. On the other hand limiting a few new dwellings to only permanent residents will have minimal effect if any.</p> <p>5. We do not have all the facts about occupancy of new builds but we have the impression that most are permanent residences (Boys Club development, Methodist Church, the Wellfield house, the house behind The Servicemen's Club and our own dwelling). There have also been some 8 new builds and major conversions at Foxton and all are permanent residences. This seems to reinforce our final point in 3 above re second home owners becoming residents.</p> <p>4. We assume that under this proposal new dwellings would not include those built within the curtilage of an existing property with the same owner and address, subject to established planning regulations.</p>	<p>seem to have been largely bought and occupied as permanent residences. However, this anecdotal impression cannot be translated into actual control over future occupation. The fact that there have been recent developments seems to us to demonstrate that we cannot foresee what may be proposed and approved by the local planning authority as windfall residential development in the future. It would therefore be unwise to assume that seeking to impose the proposed controls would be pointless or of limited effect. We disagree with the sentiments expressed in this representation in this respect.</p>

Consultee	Comment	Response from APC
		<p>The policy will apply to all new dwellings, including any built within the curtilage of existing dwellings. This is precisely the means by which many new dwellings are delivered. The assumptions expressed on this matter present no rationale or explanation about why it is assumed the policy would not apply in those circumstances.</p> <p>No amendments proposed.</p>

Second Consultation on Pre-Submission Draft Plan July to September 2020

Consultee	Comment	Response from APC
Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted. No amendments required.
The Coal Authority	As you are aware the Neighbourhood Plan area lies within the current defined coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. On the basis of the above the Coal Authority has no specific comments to make on the Neighbourhood Plan.	Noted. No amendments required.
National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted. No amendments required.
Lesbury Parish Council	We note the Draft Plan put together by your Parish Council and if these are the policies your Parish wishes to pursue then Lesbury Parish Council wishes you well and is happy to support you in your endeavour.	Comments noted and support welcomed. No amendments required.
Highways England	As per our previous consultation response we have undertaken a review of the NDP and have no particular concerns with the provisions therein. The permanent residency condition stipulated is not of concern to Highways England regarding the safe and efficient operation of the SRN. However, accordingly, any planning applications for housing coming forward within the parish that has the potential to impact at the SRN will only be accepted by Highways England if assessed as dwellings for	Noted. No amendments required.

Consultee	Comment	Response from APC
	permanence residency, rather than second or holiday homes to let.	
Historic England	Thank you for consulting Historic England on the pre-submission draft of the above neighbourhood plan. We are the public body that advises on England's historic environment. We have no comment to make on the draft plan.	Noted. No amendments required.
Rev Lynda Coulthard, Methodist Minister for Alnmouth Methodist Church	<p>As the Methodist Minister with pastoral responsibilities for the congregation in Alnmouth I wish to add my support to your application. I have worked in Alnmouth for the past 9 years & have benefitted from the community spirit within Alnmouth. We have & continue to work alongside other Christians in Alnmouth & although I don't reside in Alnmouth I have been made to feel welcome. I am aware of a number of families with small children who have struggled to find suitable accommodation in Alnmouth despite the fact that they & their family have been part of the community for many years. At one time the Methodist Church ran a thriving youth club once a week during term time which has dwindled in number which is inevitably partly due to the reduction in the age profile of Alnmouth.</p> <p>May I wish you every success in what you are trying to achieve with the Alnmouth Neighbourhood Plan. It would be such a shame to lose the atmosphere & community feel that exists in Alnmouth & I believe is one of the things that make it a popular destination for visitors which I fear could happen if the restrictions are not put in place.</p>	Comments noted and support welcomed. No amendments required.
Northumberland County Council	We would like to congratulate the Parish Council on reaching this stage in plan preparation. For clarity, we have recommended minor modifications to the policy. These suggestions are set out in Annex A to this letter. Our	Comments noted and support welcomed. The Parish Council agrees with

Consultee	Comment	Response from APC
	<p>suggested changes seek to ensure that the policy meets the ‘basic conditions’ and in particular that, having regard to national policy and guidance it would be appropriate to make the Neighbourhood Plan.</p> <p>Suggested modifications to Policy (‘clean’ version) ‘Principal Residence Housing Proposals for all new housing, including that created by change of use and by sub-division of existing dwellings, but excluding replacement dwellings, will only be supported where occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence. New second homes will not be supported. Principal Residence housing is that which is occupied as the sole or main home of the occupants and where the occupants spend the majority of their time when not working away from home. This restriction will be secured through a planning condition or, if necessary, through a planning obligation secured under Section 106 of the Town and Country Planning Act 1990, or any subsequent legislation. The occupier will be required to provide evidence that they are meeting the terms of the occupation restriction whenever requested to do so by Northumberland County Council.’</p>	<p>the minor modifications proposed to the wording of the policy. Changes will be made to the submission version of the Plan.</p> <p>Modification made to the policy and supporting text.</p>
Pamela Allen	<p>There are two points I would like to bring to your attention –</p> <ol style="list-style-type: none"> 1. On page 7, para.2.12 of the Principal Residence Background Paper, it is stated that Alnmouth Parish lies within the AONB. This is incorrect as the A1068 marks the boundary to the AONB - the settlement of High Buston and all the land to the west of the A1068 in Alnmouth 	<p>Comments noted. Not all the Parish lies within the AONB and we recognise this minor error. This will be corrected in the</p>

Consultee	Comment	Response from APC
	<p>Parish lie outside the AONB.</p> <p>2. Throughout the Plan document, it is stated that the Plan is designed to ensure that a permanent residency condition is attached to the creation of any new housing in the Parish. Is it intended that the permanent residency condition would apply to the settlement of High Buston?</p>	<p>Submission Plan.</p> <p>The Neighbourhood Plan will apply to the Parish of Alnmouth. NCC formally designated the Parish as a Neighbourhood Area on the 15th October last year and a map showing the extent of this Parish is shown on page 6 of the Plan. Para 1.11 of the Plan states that the Alnmouth Parish Neighbourhood Area includes the village of Alnmouth and the settlement of High Buston.</p> <p>Minor amendments to supporting text will be made.</p>
The Marine Management Organisation	The MMO had no specific comments to make on the draft Plan.	Noted. No amendments required.