

EXAMINER'S REPORT  
BELFORD PARISH  
NEIGHBOURHOOD DEVELOPMENT PLAN  
2016 - 2036

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## ABBREVIATIONS and ACRONYMS

The following are acronyms and abbreviations used in this examination:

HRA - Habitats Regulation Assessment.  
 NDP- Neighbourhood Development Plan.  
 NCC- Northumberland County Council  
 NPPF - National Planning Policy Framework.  
 NPPG - National Planning Practice Guidance.  
 SEA - Strategic Environmental Assessment.  
 SAC - Special Area of Conservation  
 SSSI - Site of Special Scientific Interest  
 The Plan - the Neighbourhood Development Plan under examination.

## INTRODUCTION

1. This is an independent examination of a Neighbourhood Plan prepared by the Parish Council of Belford in consultation with the local community. The Localism Act 2011 provided local communities with the opportunity to have a stronger say in their future by preparing neighbourhood plans, which contain policies relating to the development and use of land.
2. If the plan is made, following a local referendum, which must receive the support of over 50% of those voting, it will form part of the statutory development plan. It will be an important consideration in the determination of planning applications as these must be determined in accordance with development plan policies unless material considerations indicate otherwise.
3. I have been appointed by Northumberland County Council (NCC) in consultation with the Town Council to carry out this independent examination. I am a Chartered Town Planner with over 30years experience working at a senior level in local government and as a private consultant. I am a member of the Royal Town Planning Institute
4. I confirm that I am independent of the Parish Council and NCC and have no interest in any land, which is affected by the Neighbourhood Development Plan (the Plan).
5. This report is the outcome of my examination of the submitted version of the Plan.
6. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum.

## BACKGROUND DOCUMENTS

7. I have considered the following documents as part of this examination:

### Documents submitted for the examination

Belford Parish Neighbourhood Development Plan, 2023-2036, Submission Plan Version Basic Conditions Statement, August 2022.  
Belford Neighbourhood Plan Policies Map - Submission Draft.  
Belford Neighbourhood Plan Policies Map Inset-Submission Draft.  
Belford Neighbourhood Plan, Environmental Designations Map.  
Belford Neighbourhood Plan Strategic Environmental Assessment (SEA) Environmental Report, NCC ,November 2022.  
Belford Neighbourhood Plan, Strategic Environmental Assessment (SEA) Environmental Report Addendum Report April 2022.  
Habitat Regulations Assessment Report January 2023 of Belford Neighbourhood Plan Submission Draft Plan, November 2022.

Consultation Statement, Belford Neighbourhood Plan – Submission Version (2023-2036), March 2023, Belford Parish Council.  
Belford Parish Neighbourhood Plan: Settlement Boundary Methodology and Background Report, November 2022.  
Belford Parish Neighbourhood Plan: Protecting Open Space Background Report (March 2021).  
Belford Parish Neighbourhood Plan: Valued Landscapes Background Report December 2022.  
Belford Neighbourhood Area designation application.  
Belford Neighbourhood Area designation application map.  
Belford Neighbourhood Area designation application decision report  
Belford Neighbourhood Area designation application decision document.

#### Local and National Policies and relevant evidence

“National Planning Policy Framework”, (NPPF), July 2021.  
“National Planning Practice Guidance”, (NPPG).  
Northumberland Local Plan 2016 – 2036 Adopted 31 March 2022.

Planning application validation checklist 2022, Northumberland County Council  
The introduction of nutrient neutrality for Lindisfarne SSSI and Special Protection Area  
Guidance for applicants on completing a nutrient budget, Northumberland County Council.  
Appendix 1 - Northumberland Consolidated Planning Policy Framework, Northumberland County Council.

#### Documents submitted during the examination

Responses from Northumberland County Council, 15 June 2023 and Parish Council, 5<sup>th</sup> July 2023, to examiner’s questions.

### THE EXAMINATION

8. The nature of the independent examination is set out in Section 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

9. The examiner has to make a recommendation as to whether the Plan should be submitted to a referendum, with or without modifications, and if the area for the referendum should extend beyond the plan area.

10. As a general rule the examination should be carried out on the basis of written representations unless a hearing is necessary to allow adequate consideration of an issue or to allow a person a fair chance to put a case.

## PROCEDURAL MATTERS

11. It is necessary to determine that the Plan complies with the following procedural matters<sup>1</sup>:

- The Plan has been prepared and submitted by a qualifying body
- The Plan has been prepared for an area that has been properly designated
- The Plan specifies the period to which it has effect, does not include provisions about excluded development and does not relate to more than one neighbourhood area
- The policies relate to the development and use of land for a designated neighbourhood area.

12. The Plan had been prepared and submitted by a qualifying body, Belford Parish Council and relates to the whole of the area covered by it. Following a formal boundary review which was approved by NCC and came into force on 1 April 2021, the parish boundary of Belford was modified to incorporate the former civil parish of Easington. This new neighbourhood area replaced the area previously approved on 22 September 2015.

13. Belford Parish Council applied to the County Council seeking designation of the parish as a new neighbourhood area. The application was approved by Northumberland County Council on 20 May 2021.

14. In accordance with the regulations<sup>2</sup>, the Plan sets out policies in relation to the development and use of land and does not refer to “excluded” development which is specified as not to be referred to in neighbourhood plans. It specifies the period for which it has effect (2023-2036). It does not relate to more than one neighbourhood area.

## CONSULTATION

15. The Consultation Statement explains the manner in which the public, and statutory bodies were involved in the development of the Plan. The Plan’s inception stretches back to 2013 with the designation of the Plan area.

16. The initial community consultations in 2013 and 2014 asked residents whether they desired a plan and in early 2015 a steering group was formed to oversee its development.

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<sup>1</sup> Paragraph 8(1) of Schedule 4 B of the Town and Country Planning Act 1990 (as amended)

<sup>2</sup> Neighbourhood Planning (General) Regulations 2012

17. In February 2015 a public meeting was held and included, parish councillors residents of the parish and adjoining parishes, landowners and businesses. The meeting was intended to develop ideas and options for policies.

18. In March 2015, a further meeting confirmed the need for the Plan and an application to NCC for formal designation of the Plan area was submitted.

19. In 2016 a questionnaire was sent out to ascertain the key issues and main objectives. The analysis of this was presented to a public meeting in October 2016 and some main issues were identified.

20. Other meetings were held with the local business community to highlight what could be done to promote business. A meeting in February 2016 was attended by four of the larger employers in the area.

21. In 2019, the Bell View Centre carried out a housing needs assessment focussing on affordable housing. The report forms part of the evidence submitted with the Plan.

22. The Covid pandemic stalled the Plan during 2020 and 2021. In 2022, the parish council prepared a draft plan which was put forward for the first formal stage of public consultation in accordance with regulation 14<sup>3</sup>. This took place for 6 weeks in July and August, 2022.

23. The Plan consultation was advertised in a local leaflet "Whats On in Belford". The Plan was placed on the parish council's web site and hard copies were made available. Six responses were received from statutory consultees but none from residents or businesses. The Consultation Statement adequately demonstrates the parish council's response and whether these comments were included in the final plan.

24. The Consultation Statement also includes copies of the various questionnaires and summaries of responses together with details of the public meetings.

25. The plan was then submitted to NCC and the final formal consultation<sup>4</sup> was carried out from 3/4/23 to 19/3/23. I will assess the comments received as part of this examination.

26. I am satisfied that the "Consultation Statement", demonstrates an adequate level of consultation, which has engaged the community and offered the opportunity for technical consultees and developers to be effectively involved in the emerging Plan.

## BASIC CONDITIONS

27. It is necessary to decide whether the Neighbourhood Development Plan meets the

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<sup>3</sup> Regulation 14 of the Neighbourhood Planning (General) Regulations 2012

<sup>4</sup> Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

“basic conditions” specified in the Act.<sup>5</sup> This element of the examination relates to the contents of the Plan.

28. This Plan meets the basic conditions if:

- a) It has regard to national policies and advice contained in guidance issued by the Secretary of State,
- b) The making of the plan contributes to sustainable development,
- c) The making of the plan is in general conformity with the strategic policies contained in the development plan for the area,
- d) The making of the plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements,
- e) prescribed conditions are met in relation to the Plan and prescribed matters have been complied with in connection with the proposal for the plan.
- f) The making of the neighbourhood development plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010(2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007(3)) (either alone or in combination with other plans or projects).

29. The parish council has submitted a “Basic Conditions Statement” to seek to demonstrate conformity. The analysis of conformity with the basic conditions is carried out below. Note this is not in the order specified above.

## SUSTAINABLE DEVELOPMENT

30. The parish council submits in the Basic Conditions Statement that the Plan complies with NPPF core policies, which require the Plan to promote sustainable development. The NPPF establishes that the three components of sustainability are economic, social and environmental and that these underpin all planning policy.

31. Table 1 of the Statement demonstrates that the Plan is firmly aligned with the core principles of the NPPF and the principles of sustainability, which underpin them.

32. In the social respect, the Plan seeks to support a strong, healthy vibrant community. It contains policies to provide housing which meets the community’s identified needs, and protects appropriate community facilities, including sports and recreation facilities. The Plan further encourages healthy lifestyles by protecting local green spaces and encouraging active travel.

33. In its environmental role the Plan seeks to protect and enhance the particularly sensitive natural and physical environment. Policies protect the landscape character,

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<sup>5</sup> Contained Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended)



green spaces, ecology and the built character and heritage.

34. In economic terms the Plan has policies to promote appropriate tourism development and existing business locations including the village centre. The Plan seeks to protect key local community facilities and services which support business uses.

35. I accept that the policies in the Plan meet the claims referred to in the Statement. I am satisfied that the Plan contributes to sustainable development as defined by the NPPF.

36. In the final public consultation response<sup>6</sup>, a County Councillor expresses concern that there is a conflict between the Plan's commitment to sustainability and recent decisions by County Council "Highways Development Management", which have been against most proposals in the rural area which are dependent on car travel. The implication is that the Plan's commitment to sustainability is unlikely to be achieved as, in practice, rural development will be stifled by concerns about increased private transport and increases in emissions. I do not consider this indicates the Plan policies are unimplementable. The Plan achieves an acceptable balance between promoting housing and economic development and protecting the local environment and combating climate change. I would add that the "Highways Development Management" section of the County Council is not itself the decision-making authority.

## EU OBLIGATIONS, HUMAN RIGHTS REQUIREMENTS

37. A neighbourhood plan must be compatible with European Union Directives as retained into UK law, under the European Withdrawal Act 2018. Key directives are the Strategic Environmental Assessment Directive<sup>7</sup> and the Habitats and Wild Birds Directives<sup>8</sup>. These require that consideration should be given to the need for a Strategic Environmental Assessment (SEA) to assess any significant environmental impacts and /or an appropriate Habitats Regulations Assessment (HRA) to assess any impact on a site/habitat recognised as protected under European legislation<sup>9</sup>. A neighbourhood plan should also take account of the requirements to consider human rights.

38. The aim of undertaking a SEA is to suggest measures to avoid, reduce or manage damaging environmental impacts and enhance positive effects.

39. The NCC carried out a screening exercise to determine whether or not the content of

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<sup>6</sup> Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

<sup>7</sup> Article 3(5) of Directive 2001/42/EC transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations

<sup>8</sup> European Directives 92/43/EEC and 2007/147/EC transposed into the Conservation of Habitats and Species Regulations 2010.

<sup>9</sup> Often referred to as "Natura 2000 sites".

the emerging Plan required a full SEA or HRA. It concluded that an “appropriate” HRA assessment was required as the plan would be likely to have significant effects on “European sites” designated on account of their ecological value as habitats. The further need for an SEA was triggered by the need for the HRA assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) .

40.The initial report, prepared by NCC, in November 2021 concluded that to prevent likely significant environmental effects, modifications to the Plan were required to protect water quality and flood defences. Following successive modifications to the Plan further reports were prepared to consider these including “The Addendum Report (April 2022)” considered at the regulation 14 public consultation stage. The report was amended to form the final version in November 2022.

41.In accordance with the SEA regulations the report evaluates the likely significant effects on the environment of implementing the Plan and the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The report has been carried out in accordance with the process outlined in National Planning Practice Guidance (NPPG)<sup>10</sup>

42.A scoping report to assess the topics to be referred to in the report was agreed with statutory consultees Natural England, Historic England and the Environment Agency.

43.The report describes the environmental baseline position, highlighting areas of special value and designation and identifies the main threats. The process also included a review of how existing plans and programmes may impact on the Plan environment.

44.The report then appraises the Plan objectives, reasonable alternatives and proposed policies in accordance with the recommended framework. It concludes the objectives will have “largely neutral or slightly positive effect “. Reasonable alternative policies are examined in relation to the proposed settlement boundary and the identified locally important green spaces. No reasonable alternatives to these policies are identified.

45.The report further assesses the impact of the policies on the recommended SEA objectives. It largely concludes that the policies will have slight positive environmental effects but two recommendations are made for extra policies and policy amendments. These recommendations are incorporated into the Plans policies. A further policy is included to protect the Lindisfarne SPA from sewage pollution due to further development. A policy is amended to provide protection of flood defences on account of potential climate change.

46.The conclusion states “the Plans vision, objectives and policies should, on the whole help to avoid significant environmental impacts arising from development in the future, and the policies will, to a limited degree, serve to mitigate some of the potential adverse effects.”

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<sup>10</sup> Paragraph: 033 Reference ID: 11-033-20150209

47. The statutory consultation bodies Natural England, Historic England and the Environment Agency have not raised an objection to these findings and the submission Plan.

48. Following the screening determination, an HRA was undertaken to assess any impacts on European designated habitats. The assessment considered the impact on 12 sites either in the Plan area or within 10 kilometres of it. Potential threats were identified from recreational disturbance from human activity and impacts from nutrient enrichment of water from sewage and agricultural fertilisers. However the assessment concludes there is adequate mitigation in the policies. Policy 15 provides mitigation for recreational disturbance impacts particularly on the Lindisfarne SPA/Ramsar, Northumbria Coast SPA/Ramsar and the North Northumberland Dunes SAC. Policy 16 provides mitigation for nutrient enrichment/water quality impacts on the Lindisfarne SPA/Ramsar and the Berwickshire and North Northumberland Coast SAC.

49. It is concluded that there are no likely adverse effects upon the integrity of any European site either from this Plan or in combination with other plans or projects. Natural England supports this finding.

50. I support the findings of the HRA.

51. I do not consider the Plan raises any issues under the European Convention and the Human Rights Act 1998. In terms of the Article 6 of the Act and the right to a “fair hearing” I consider the consultation process has been effective and proportionate in its efforts to reach out to different groups potentially affected. Neighbour responses have been considered in a satisfactory manner during the processing of the Plan.

## CONFORMITY WITH NATIONAL AND LOCAL STRATEGIC POLICIES

47. The parish council states in the “Basic Conditions Statement” that the Plan takes into account national planning policies and guidance in the National Planning Policy Framework, July 2021 (NPPF) and National Planning Practice Guidance (NPPG) and is in general conformity with local strategic planning policies.

48. The Statement in table A also analyses all the plan policies, in detail, against relevant national policy guidance in the NPPF and the local strategic planning policies. This is done in appropriate detail and illustrates close alignment with the national guidance and general conformity with strategic policies.

49. I have made some recommendations below to alter or exclude certain policies which mainly repeat or misinterpret strategic policies. This is necessary in order to be clear and unambiguous and ensure the policies have a genuine local dimension and do not merely duplicate local plan policies and national guidance.

## GENERAL MATTERS IN RELATION TO BASIC CONDITIONS

50. I have made recommendations below, which will allow the plan to conform to various of the “basic conditions”. Where I am suggesting modifications, I have given reasons. In cases of minor grammatical or formatting issues, I have simply highlighted the need for correction without explanation.

51. I have considered all aspects of the representations received during the Plan process. In most cases, these do not require specific reference as they do not, in my view, effectively raise a concern that the Plan does not conform to basic conditions. I can only consider matters relating to conformity with the basic conditions in relation to the policies proposed. It is not the remit of this examination to include new policies covering issues which consultees may consider should be included.

52. In some cases, I have referred to NCC due to the specific and detailed nature of its representation and its particular relevance to “basic conditions”.

53. It is also not my role to comment on the aspirational elements and the community projects in the Plan which have no bearing on its planning policies. These involve essentially non-planning matters which do not relate to land use and cover matters, such as, future lobbying e.g. for improved train services or matters which do not need planning permission. Government advice is that these aspects of the plan should be clearly distinguished as separate from the formal policies. I am satisfied subject that the Plan achieves this in the manner in which the policies and aspirations are presented and formatted.

54. A recurring issue is the need for policies to be drafted with appropriate clarity. The National Planning Practice Guidance (NPPG)<sup>11</sup> requires that *“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence”*. I have therefore suggested some modifications in the interests of greater clarity and meeting this guidance.

55. I have explained my recommendations in accordance with the order and format of the Plan and expressed them in bold type at the end of the various sections.

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<sup>11</sup> NPPG Paragraph: 041 Reference ID: 41-041-20140306

## COMMENTS ON INTRODUCTION and NEIGHBOURHOOD PLANS: THE “BASIC CONDITIONS”

56. These introductory sections set out a basic summary of the Plan process including an overview of the consultation process and the “basic conditions” to which a neighbourhood plan must conform. This is helpful and accurate.

57. Greater clarity can be achieved in paragraph 2.9 by highlighting European legislation has been effectively transferred into UK legislation.

### **RECOMMENDATION 1**

**In paragraph 2.10, amend the first sentence as follows**

**“Various European Union (EU) Directives and associated European legislation has been transferred into UK legislation to seek to ensure .... etc.”**

## BELFORD: A BRIEF HISTORY and PORTRAIT of the PARISH

58. This helps to set the context for the Plan.

59. In paragraph 3.10 the use of the acronym SRN has potential to be confusing as it is only used once elsewhere in the Plan text. I recommend it be deleted and replaced with the full term.

60. I support the NCC’s comment that it is not certain that farming is the major activity in the area and recommend tempering this statement.

### **RECOMMENDATION 2**

**In paragraph 3.1, last sentence after “patronage” insert “of”.**

**In paragraph 3.10 delete “(SRN)”. In paragraph 4.19 replace “SRN” with Strategic Road Network”.**

**In paragraph 3.14 first sentence delete “the”, insert “a”.**

## THE VISION and OBJECTIVES for the BELFORD NEIGHBOURHOOD AREA

61. This section sets out the vision and objectives and the evidence and context for these. This provides an explanation for the development of the policies.

62. In paragraph 4.5 the use of the acronym ‘NLP’ is confusing as it is not used in previous text, nor subsequently and should be deleted.

63. There is reference to the Berwick-upon-Tweed Local Plan in paragraph 4.22. This Plan has been superseded by the Northumberland Local Plan which should be clarified.

### RECOMMENDATION 3

In paragraph 4.5 delete “NLP” replace with “Northumberland Local Plan”.

In paragraph 4.22, amend the second sentence as follows;

**“The Berwick-upon-Tweed Local Plan (1999) designated the area to the west of Belford village known as the Kyoie Hills and Glendale, as being of High Landscape Value. The area to the east was designated as of Intermediate Landscape Value. This Berwick-upon-Tweed Local Plan was superseded by the Northumberland Local Plan on 31<sup>st</sup> March 2022.”**

### POLICY 1: NEW HOUSING DEVELOPMENT

64. The policy delineates a settlement boundary in order to give clarity to the development strategy for the Plan area.

65. The submitted “Settlement Boundary Methodology and Background Report”, provides a justification for the delineation of the settlement boundary based on the Local Plan’s housing target for the Plan area, extant planning permissions and significant boundary features. There is no need to allocate further sites beyond those with planning permission.

66. The policy provides guidance for the location of housing development and refers to the scope for exceptions to allow housing in the countryside area. This is consistent with national and strategic policies aimed at providing sustainable housing provision catering for local needs and protecting areas of countryside, particularly those of high value such as in the Plan area.

67. The settlement boundary excludes a site, south of Rogerson Road, with permission for 37 dwellings. The “Settlement Boundary Methodology and Background Report” states;

*“Having regard to the parish council’s concerns about the proposed development at land south of Rogerson Road, for which planning permission was granted recently (ref. 19/01346/OUT), it is proposed that this site is not included within Belford village settlement boundary. The site has outline permission for 37 dwellings. That permission will remain in place until it is either implemented or it lapses. Should the permission lapse prior to implementation, and having regard to the current housing supply data, there would remain a supply of **143 additional dwellings**. This is comfortably in excess of the housing requirement for the Parish.”*

68. This has provoked an objection from the site owners, submitted by Lichfields at the final consultation. The outline permission ref:19/01346/OUT was granted in May 2021 and there is a current reserved matters application ref:22/04529/REM awaiting determination. It is submitted that although the Northumberland Local Plan was adopted following the grant of outline permission, development of the site is still acceptable in principle. The objection states the site is within the built form of the village and is separated from open countryside to the south by the South Meadows Caravan Park. Furthermore, it will substantially help meeting the housing needs of the area providing a range of housing including affordable homes and provide further planning gain, including contributions to education provision, drainage strategy and health-care contribution. The submission states further that the parish council's observation that the development "is unlikely to commence for some time" is wrong, as since the outline permission, the developer has bought the site and proceeded with a detailed reserved matters application, which implies an intent to commence the development.

69. The objection states the settlement boundary should be revised to include this site. It is stated:

*"This would provide greater certainty for the local community that housing is proposed to come forward in this location (particularly following the grant of the OPP), facilitated by the provision of affordable housing, family housing, and bungalows for older people. Amending the settlement boundary to include our clients land would also reflect boundaries delineated on-the-ground. Excluding our client's land which has OPP within a sustainable location and in an area not identified as high landscape value does not represent a sound or positive approach."*

70. It is also submitted that this permission meets the objectives of the Plan more effectively than other permissions which are retained within the settlement boundary. It provides a greater number of units, built to more modern standards of building regulations and sustainability criteria.

71. The NPPG advises<sup>12</sup>

*"Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies."*

72. In this context, during the examination I sought the views of NCC whether including the site in the settlement boundary and the potential to exceed the housing target of 120 dwellings for the Plan area, would make the Plan not in "general conformity" with strategic

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<sup>12</sup> NPPG Paragraph: 103 Reference ID: 41-103-20190509

policies, relating to the housing and spatial settlement strategy in the Northumberland Local Plan. In these respects, I noted the Local Plan was adopted in March 2022, after the grant of planning permission for application ref: 19/01346/OUT in May 2021. NCC responded that it “does not consider that the delivery of housing above this figure would result in any issues with the neighbourhood plan being in general conformity with the Local Plan in this regard”. NCC responded further that it is not aware of any planning constraints to the development of this site.

73., During the examination I asked the parish council to further justify why it wished to exclude this site from the settlement boundary and whether it knew of any constraints to development of the site. It responded;

*“Although a settlement boundary does not preclude all development beyond the boundary , it does give clarity as to where new development should be directed and where it is likely to be acceptable in planning terms.”*

*A number of exceptions are defined in the National Planning Policy Framework including 'rural exceptions' housing sites, some business and employment related activities and some tourist development in the countryside.*

*Therefore, not including the site within the settlement boundary does not automatically stop development, rather it restricts it to only the most beneficial development to the community. ”*

74.I consider that exclusion of the Rogerson Road site within the settlement boundary would create uncertainty regarding the settlement boundary, particularly if the Rogerson Road development were to be implemented within the current permission time limits. I note the parish council’s statement that it does not preclude development and directs development to those exceptions which are in the community’s wider interests but this does not override the confusion as to the immediate status of the site and the settlement boundary, particularly considering the developer’s stated imminent intentions to commence. If the development commences the settlement boundary as intended by the Plan will lack coherence in physical terms. Furthermore, the development will deliver affordable housing and will align with the national guidance to exceed housing targets when possible. I support the view of NCC that inclusion of the site in the settlement boundary whilst potentially increasing the housing supply beyond the 120 dwellings target in the Local Plan would not mean the Plan was not in general conformity with the Local Plan.

75.The policy makes general references to the need to comply with “development plan” policies i.e. the Northumberland Local Plan. This is necessary but in the case of affordable housing, rural exception sites and self-build or custom-build dwellings there are relatively detailed, specific policies in the Local Plan which should be specified in the interests of clarity in accordance with advice in the NPPG. The policy in criteria 2 and 3 relating to general proposals in the countryside, affordable housing and first-homes exception sites does not offer any extra guidance and indeed is less detailed than local plan policies. Whilst neighbourhood plans should add to local plan policies in



this case there is value, in the interests of clarity, of referring to certain specific local plan policies affecting the overall housing strategy as it affects the Plan area. I therefore recommend adding reference to the specific Local Plan policies **HOU 6 Affordable housing provision (Strategic Policy)**, **HOU 7 Exception sites** and **HOU 8 Isolated residential development in the open countryside**.”.

76.Criterion 2 of the policy contains locational criteria, relating to development outside the settlement boundary, so it is not necessary to repeat the reference to “isolated dwellings” in the final sentence of the Plan policy criterion 3.

77.Criterion 4 of the policy relating to “self-build or custom-build dwellings” provides some further definition to Local Plan policy **HOU 7 Exception sites**, criterion 3. It is however necessary, in the interests of clarity, to refer to this Local Plan policy specifically.

78.Respondent 1 to the final public consultation is concerned that the policy does not include a criteria relating to adequate service infrastructure to accept new development and points out that in areas of the Parish there is pressure on water supply, electricity and sewerage facilities. These are matters which can be dealt under a range of policies in the Local Plan relating to infrastructure provision and the proposed policy is in conformity with the strategic settlement policies.

#### **RECOMMENDATION 4**

**On the Policies map amend the settlement boundary to include the site at Rogerson Road, granted planning permission ref: 19/01346/OUT in May 2021.**

**In criterion 2 at the end of the text add “and Northumberland Local Plan policy, HOU 8 Isolated residential development in the open countryside.”**

**In criterion 3 at the end of the penultimate sentence add “particularly Northumberland Local Plan policies, **HOU 6 Affordable housing provision (Strategic Policy)** and **HOU 7 Exception sites**.”**

**Delete the last sentence in criteria 3 i.e. beginning “Isolated residential development ....”**

**In criterion 4 end the first sentence after “supported”, delete the remainder of that sentence. Create a new second sentence as follows;**

**“This is subject to compliance with the relevant policies in the development plan, particularly Northumberland Local Plan policy **HOU 7 Exception sites** and policies relating to design, highway safety, biodiversity impact, amenity impact and the need to give great weight to the conservation and enhancement of landscape and scenic beauty in the Northumberland Coast Srea of Outstanding Natural Beauty”.**

**In the “Settlement Boundary Methodology and Background Report” the paragraph 5.9 should be re-positioned immediately after 5.8 and paragraphs 5.7 and 5.8 re-numbered accordingly.**

## **POLICY 2: AFFORDABLE and COMMUNITY LED HOUSING**

79.This policy is in accordance with policies in the NPPF <sup>13</sup> and the Northumberland Local Plan policy HOU7 Exception sites. It does not add anything to these policies and is less detailed than policy HOU7.

The NPPG states<sup>14</sup> that neighbourhood plans “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*”.

80.The NPPF <sup>15</sup>also emphasises that plans should “*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).* “

81.I do not consider the policy is distinct in providing local nuanced guidance. Also, as it is less detailed it could cause confusion in interpretation of the respective development plan policies.

82.I recommend the policy be deleted but in the interests of providing a comprehensive policy context it is worthwhile retaining some of the supporting text with some additions.

## **RECOMMENDATION 5**

**Delete the text relating to POLICY 2.**

**Retain the title and supporting text in paragraph 5.10, delete paragraph 5.11 and add the following further paragraph;**

**“The Parish Council is keen to encourage this concept and supports the Northumberland Local Plan policy HOU7 Exception Sites, aimed at supporting Community-led housing schemes that meet an identified local need on small sites within and on the edge of the village outside the settlement boundary, subject to various conditions.”**

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<sup>13</sup> Paragraph 78

<sup>14</sup> Paragraph: 041 Reference ID: 41-041-20140306

<sup>15</sup> Paragraph 16 f)

## HOUSING FOR OLDER PEOPLE

### POLICY 3 ACCESSIBLE AND ADAPTABLE HOUSING

83.This policy seeks to support proposals for older persons housing which is accessible and adaptable in accordance with the optional standards in Part M4(2) of the Building Regulations 2010. This is based on evidence in “The Bell View Report (October 2017)”, the “Bell View Housing Needs Study(2019)” and other recent surveys of a strong demand for housing for older people. The Northumberland Local Plan policy HOU 11 Homes for older and vulnerable people (Strategic Policy) supports provision of older persons accommodation but subject to certain criteria including that 20% of new open market dwellings and 50% of affordable dwellings will be required to meet or exceed the enhanced accessibility and adaptability housing standards in compliance with the Building Regulation Requirement M4(2) subject to some exceptions. These criteria are aimed at ensuring development can be viable and come forward to meet the housing needs of older and vulnerable people.

84.The parish council acknowledges that the current Building Regulations and policy HOU11 will unlikely deliver sufficient adaptable accommodation for older persons. It suggests the Building Regulations should be amended and proposes a policy which simply supports housing that conforms to part M4(2) of the Building Regulations. This is contrary to the limitations in policy HOU11 relating to 20% threshold on open market dwellings and 50% on affordable. Furthermore , the policy is not clear as to whether proposals which do not provide this standard of housing will be resisted.

85.Policy HOU11 is a strategic policy and I consider the proposed policy is not in general conformity with it. Furthermore, it is vague creating uncertainty and contrary to advice in the NPPG<sup>16</sup> that “*A policy in a neighbourhood plan should be clear and unambiguous.*”

86.I recommend therefore the policy be deleted. The commitment to this type of housing can still be expressed in the Plan by retaining the supporting text with some amendment.

### RECOMMENDATION 6

**Delete the text of policy 3.**

**Retain the supporting text but amend paragraph 5.16 final sentence, as follows;**

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<sup>16</sup> NPPG Paragraph: 041 Reference ID: 41-041-20140306

**“However, until such national policy and legislative changes take place and in order to encourage the delivery of more accessible homes, particularly for older people, the Parish Council will support this provision via policy HOU11 in the Northumberland Local Plan.”**

#### POLICY 4 COMMUNITY FACILITIES

87.This policy seeks to retain community facilities which are viable and make a valuable contribution to the sustainability of the local community. This is consistent with national guidance and Northumberland Local Plan policies INF2 Community Services and Facilities and INF3 Local village convenience shops and public houses which offer protection for these facilities provided they are well used, economically viable, no equivalent facilities and in accessible positions.

88.The proposed Plan policy provides local definition by identifying specific facilities which is the role of neighbourhood plans.

89.The Northumberland Local Plan Policy INF2 describes community services and facilities as those *“that provide for the health and wellbeing, social, educational, spiritual, recreational, leisure or cultural needs of the community”*. It also states in its Glossary that *“Local services and facilities are those that benefit the community such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”* I am satisfied that the facilities specified in the proposed policy are consistent with the Local Plan.

90.There are some subtle differences in the degree and type of protection offered by the Local Plan policies and proposed Plan policies. The Local Plan differentiates between community services and facilities and local village convenience shops and public houses whereas the proposed policy does not. The Local Plan policy states loss of shops and pubs can be supported if “equivalent accessible provision is available locally” whereas the proposed policy states support will be given if the facility “will be replaced by an equivalent facility in no less convenient location”. The Local Plan has a slightly different approach to loss of local services and facilities, which can be supported if *“appropriate alternative provision is made”*.

91.These differences in words can lead to different interpretations and confusion contrary to advice in the NPPG.<sup>17</sup> I recommend therefore that criteria 2 in the policy be deleted and replaced with a cross-reference to the relevant policies in the Local Plan.

92.The reference to loss of “Assets of Community Value” in the proposed policy is misplaced as there is a different statutory procedure for those. This should not therefore be the subject of the text of this policy but clearly defined as a separate consideration.

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<sup>17</sup> NPPG Paragraph: 041 Reference ID: 41-041-20140306

93. Criterion 3 provides more local criteria to the Local Plan policies concerned to promote new community facilities, convenience shops and pubs by confirming these should be within the settlement boundary. This is acceptable local definition of the strategic policy.

94. Criterion 4 seeks to provide guidance for new community facilities outside the settlement boundary. This raises fundamental aspects of the spatial and settlement strategy of the Local Plan and the need to ensure development is sustainable in accordance with national guidance. The criterion requires new community facilities to be “sensitive to their surroundings”, “not have an unacceptable impact on local roads” and “must demonstrate how all opportunities have been taken to make the location of the development more sustainable including through improving the scope for access on foot, by cycling or by public transport”. These requirements are vague and open to interpretation and do not clearly interpret the strategic policies in the Local Plan to have a settlement hierarchy and ensure development in the countryside, outside the settlement boundary is tightly controlled. The requirement to demonstrate how all opportunities have been taken to improve access could be disproportionate in the case of smaller proposals.

95. Local Plan policy STP 1 Spatial Strategy together with other policies, including INF3, provide more explicit detailed criteria which are to an extent obfuscated by the proposed criteria 4. I recommend that criteria 4 be amended to simply make a cross-reference to the Local Plan. This requires some changes to the supporting text in the interests of clarity of the policy context to explain the broad approach to this type of development.

## **RECOMMENDATION 7**

**In paragraph 5.18 delete “other” in the first sentence.**

**Delete criteria 2 in the policy text and replace with the following;**

**“2. Proposals for the redevelopment of these buildings or a change of use which would result in the loss of these facilities will be considered in relation to policies in the Northumberland Local Plan INF2 Community Services and Facilities and INF3 Local village convenience shops and public houses.**

**Delete criteria 4 and replace with the following;**

**“Proposals for new community facilities and the expansion of existing facilities in the countryside beyond the settlement boundary will be considered in relation to the Northumberland Local Plan policies in particular STP 1 Spatial Strategy, INF2 Community Services and Facilities and other policies in this Neighbourhood Plan.”**

**Delete paragraph 5.21 and replace with the following;**

**“Policy 4 also supports the limited development of new community facilities in the countryside beyond the settlement boundary. This development must meet the requirements of national guidance, the Northumberland Local Plan policies STP 1 Spatial Strategy and other policies in the Local Plan and this Plan, particularly in terms of highway safety and the amenities of residents.**

#### **POLICY 5 RECREATIONAL OPEN SPACE**

96.This policy protects important recreational spaces and accords with the NPPF chapter 8 to promote healthy communities and Local Plan policy STP5 Health and Wellbeing.

97.The two spaces proposed are adequately evidenced in the Belford Parish Neighbourhood Plan: Protecting Open Space Background Report (March 2021).

98.There is protection of these spaces from alternative development and adequate criteria to allow scope for improvement and appropriate redevelopment which protects residential amenities.

#### **POLICY 6 LOCAL GREEN SPACE**

99.This policy conforms to the NPPF guidance<sup>18</sup> and the NPPG regarding local green space designation. In the Belford Parish Neighbourhood Plan: Protecting Open Space Background Report (March 2021) each space is assessed against the NPPF criteria and fully evidenced.

100.The supporting text in paragraph 5.24 is misleading as it states each space meets “at least one of the attributes required by national policy”. The evidence indicates the spaces meet all the criteria which should be corrected in text

101.The requirement to protect flood defences in two of these areas is supported by the NPPF.<sup>19</sup>

#### **RECOMMENDATION 8**

**In paragraph 5.23, after “.... as Local green space”. Insert ‘The NPPF requires..... in order etc.’**

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<sup>18</sup> Paragraph 102

<sup>19</sup> Chapter 14

**In paragraph 5.24 delete “have at least one of the attributes”, replace with “meet the criteria”.**

## **POLICY 7 BELFORD VILLAGE CENTRE**

102. This policy defines a village centre which seeks to retain business uses which maintain the vitality and viability of the centre. This is not in accordance with Local Plan policy TCS 1 Hierarchy of centres which defines Belford as a “Service Centre”. This should be corrected in the reference in criterion 1 of the policy. The proposed policy builds on Local plan policy TCS 3 Maintaining and enhancing the role of centres.

103. The centre is defined on the Policies map.

104. The policy in 1c requires new uses of these units must generate employment locally. This is a rather vague term which may cause confusion in the case of low employment creation, for example, a charity use. The important element is that the new use contributes to the sustainability, vitality and viability of the centre, which is covered by criteria 1a and b. I recommend therefore that 1c be deleted.

105. The policy provides clarification that loss of business ground-floors to residential or tourist accommodation on ground floors of premises in the centre is generally not supported. This aspect of the policy is justified as pressure for residential use in rural villages is common.

106. There is a typing error whereby criteria 2 and 3 are almost the same. I am concerned that the criteria 2 or 3 are vague as to the process to seek to demonstrate exceptional cases when residential may be acceptable. This could be the case when it has been proven not possible to acquire an acceptable use after extensive marketing over a period of time. Criterion 3 makes reference to use of similar criteria to policy 4 relating to loss of designated convenience shops/pubs and community facilities. This is appropriate but it should be made clear that this process relates to all shops etc. in the centre, not just those listed in policy 4. The criterion 3 is also vague in reference to “relevant criteria” elsewhere in the policy 4 and it needs to be made clear these are aspects relating to residential amenity and highway safety.

107. The policy also provides criteria for consideration of design issues and measures to improve car and cycle parking.

## **RECOMMENDATION 9**

**In the policy text, criteria 1 first sentence change “Village centre” to “Service Centre”.**

**Delete criterion 1c.**

**Delete criterion 2 in the policy text.**

**In criteria 3 after “...will only be supported..”, replace with the following;**

**“if the tests in Policy 4, criterion 2 are applied in each case and there is an adequate standard of residential amenity and no detrimental impact on highway safety”.**

## **POLICY 8 BROADBAND INFRASTRUCTURE AND TELECOMMUNICATIONS**

108. This policy supports Local Plan Policy ICT2 New Developments which is concerned to provide new businesses and residential developments with high quality communications infrastructure. It provides a local dimension with reference to the need to minimise the visual impact in certain areas covered by the Plan.

109. Local Plan policy ICT2 only requires this infrastructure to be considered in new business and residential proposals which is proportionate to the demand for this type of facility. The proposed Plan policy should do the same.

110. It is necessary to add reference to the Local Plan Policy ICT2 in the interests of a clear, comprehensive explanation of the policy context.

111. The policy text is rather clumsy and requires refinement to make it easier to interpret.

112. Lichfields make a representation that the policy should be aligned with the Local plan policy in respect of the requirement for new ducting to serve more than one service provider in cases where this is “possible”. The current text requires this in all applications for new developments which is too presumptive.

## **RECOMMENDATION 10**

**In paragraph 5.34 insert a new sentence after the first sentence as follows;**

**“The Northumberland Local Plan Policy ICT2 New Developments requires all new business and residential proposals be provided with the infrastructure necessary to allow the development to be served by high quality communications infrastructure.”**

**Replace criterion 1 of the Policy text as follows.**

**“**

**1. Proposals which secure the expansion of electronic communication networks and high-speed broadband along with improvements to connectivity will be supported in accordance with the Northumberland Local Plan Policy ICT2 New Developments.**



**Applicants should demonstrate that;**

- a) opportunities have been explored to erect apparatus on existing buildings, masts or other structures,**
- b) the number of radio and telecommunication masts is the minimum necessary for optimum operation of the network**
- c) impacts are minimised on the character and appearance of the AONB and other valued and designated key qualities of the landscape and Belford Conservation Area .**

**In criterion 2, after “should”, insert “where possible”.**

## **POLICY 9 RURAL BUSINESS DEVELOPMENT AND TOURISM**

113.This policy seeks to support business and tourist development within the settlement boundary and sustainable forms of business in the countryside. The intent of this policy is in conformity with national guidance and the Local Plan.

114.However, there are detailed policies in the Local Plan which cover these issues. These policies are Policy ECN 11 Employment uses in built-up areas and home working, Policy ECN 12 A strategy for rural economic growth (Strategic Policy), Policy ECN 13 Meeting rural employment needs (Strategic Policy), Policy ECN 14 Farm / rural diversification and Policy ECN 15 Tourism and visitor development.

115.The proposed Plan policy does not add to these policies and is less detailed. This will create confusion and most of it should be deleted. The reference to the settlement boundary should be retained as that has been introduced by this Plan and its implications for business and tourist development made clear. There should be cross-reference in supporting and policy text to the Local Plan policies.

## **RECOMMENDATION 11**

**In paragraph 5.36 add a new second sentence as follows;**

**“The development plan contains policies which are concerned to promote rural businesses and tourism. These policies are in the Northumberland Local Plan and include the following; Policy ECN 11 Employment uses in built-up areas and home working, Policy ECN 12 A strategy for rural economic growth (Strategic Policy), Policy ECN 13 Meeting rural employment needs (Strategic Policy), Policy ECN 14 Farm / rural diversification and Policy ECN 15 Tourism and visitor development.”**

**Create a new paragraph from the remainder of paragraph 5.36. After ‘Policy 9 provides’, insert “further”.**

**In paragraph 5.37 delete the last sentence and replace with the following; “The Northumberland Local Plan supports sustainable tourism and leisure development where this respects the character of the countryside.”**

**In criterion 1 delete all text after “supported” and replace with “subject to compliance with Local Plan **Policy ECN 11** Employment uses in built-up areas and home working.”**

**Delete the remaining criteria 2 and 3 in the policy text. And replace with the following;**

**“Development outside the settlement boundary will be considered in relation to the following policies in the Northumberland Local Plan; Policy ECN 12 A strategy for rural economic growth (Strategic Policy), Policy ECN 13 Meeting rural employment needs (Strategic Policy), Policy ECN 14 Farm / rural diversification and Policy ECN 15 Tourism and visitor development.”**

#### **POLICY 10 BELFORD INDUSTRIAL ESTATE**

116.This policy seeks to safeguard the industrial estate as a location for businesses and as a potential hub for the creation of new businesses on adjacent land. This is in conformity with the Local Plan but there needs to be cross reference to the relevant policies in the interests of clarity.

117.The policy would benefit from reformatting criteria 1 and 2 to form a single criteria in the interests of clarity.

#### **RECOMMENDATION 12**

**Delete criteria 1 and 2 and replace with the following;**

**“1. Development proposals to expand businesses and proposals to create new units within and adjoining the Belford Industrial Estate will be supported provided they are in accordance with policy 9 in this Plan and policies in the Local Plan, particularly Policy ECN 12 A strategy for rural economic growth , Policy ECN 13 Meeting rural employment needs and Policy ECN 13 Meeting rural employment needs and do not lead to an unacceptable impact on the amenity of nearby residents or on highway safety.**

**2. When it is necessary to achieve effective screening, proposals must include sufficient, appropriate and effective structural landscaping using native species.”**

#### **POLICY 11 OVERNIGHT TOURIST ACCOMMODATION**

118.This policy seeks to promote tourist accommodation. It has a number of criteria seeking to control the type of accommodation which is acceptable but these do not entirely match those of the Local Plan policy ECN 15 Tourism and visitor development.

For example, the policy is vague on the control of new build development in the open countryside whereas the Local plan policy states *“the development of new build, permanent buildings for holiday accommodation of any sort should be small scale and form part of a recognised village or hamlet;”*

119.The policy adds nothing to the Local Plan policy ECN 15 and therefore creates confusion. The various criteria (a-f)in the policy are either vague or are covered in national guidance or other Plan or Local Plan policies. Development relating to appropriate existing infrastructure is vague and precludes technical solutions. Highway safety and residential amenity are established development management principles and protection of landscape and heritage assets are covered in Local plan and national guidance.

120.I therefore recommend that this policy and all the supporting text be deleted. It would aid clarity if there was a reference to the relevant Local Plan policy in the supporting text to policy 9.

### **RECOMMENDATION 13**

**Delete Policy 11 Overnight Tourist Accommodation and all the supporting text.**

**Add the following paragraph after paragraph 5.37;**

**“Local Plan policy [Policy ECN 15](#) Tourism and visitor development promotes tourism development which is sustainable and protects the environment.”**

### **POLICY 12 PROVISION AND IMPROVEMENT OF WALKING AND CYCLING ROUTES**

121.This policy is in accordance with national guidance to improve accessibility and encourage active travel and Local Plan [policy TRA 1](#) Promoting sustainable connections.

122.The reference in the policy text to the need for an agreement with “National Highways” is inappropriate for inclusion in a policy and should be transferred to supporting text.

### **RECOMMENDATION 14**

**Delete the last sentence in the policy text. Insert the following sentence after sentence 3 in paragraph 5.43;**

**“The A1 forms part of the strategic road network and agreement would be required with National Highways to deliver these projects.”**

### **POLICY 13 BELFORD CONSERVATION AREA**

123.This policy is in accordance with national guidance and Local Plan policies Policy ENV 7 Historic environment and heritage assets and Policy ENV 9 Conservation Areas. These are detailed policies which should be directly referenced in the supporting text. The proposed policy to an extent repeats of the Local Plan policy but it does add a local nuance with a reference to the need to protect shop fronts. The repetitive elements of the policy help support the reference to shop fronts and so, in this case, I recommend they be retained.

124.A respondent to the final public consultation expressed concerns that there was insufficient protection of heritage assets from measures to address climate change. I consider that the policy as drafted together with Local Plan policies offers adequate protection.

## **RECOMMENDATION 15**

**Paragraph 5.47, last bullet amend to “High Street”.**

**In paragraph 5.48 insert a new second sentence as follows;  
“This policy also supports Local Plan policies Policy ENV 7 Historic environment and heritage assets and Policy ENV 9 Conservation Areas which have detailed criteria for the consideration of development in the Conservation Area.”**

## **POLICY 14 DESIGN IN NEW DEVELOPMENT**

125.This policy is in accordance with national guidance and a number of Local Plan policies in its “Quality of Place” chapter. The policy provides a locally distinctive extra degree of design guidance.

126.The opening paragraph in the policy text refers to “all” new developments “must” adhere to these design principles which is too prescriptive. Whilst this design advice applies to most forms of development it may be difficult to reasonably apply it to every development and I recommend the term “all” is deleted and ‘must’ is replaced with “should”.

## **RECOMMENDATION 16**

**In the opening paragraph in the policy text delete “All” and replace “must” with “should”.**

## **POLICY 15 PROTECTED HABITATS AND SPECIES**

127.This policy accords with national guidance concerned to protect ecology and encourage biodiversity and is in general conformity with Local Plan policies Policy ENV 2 Biodiversity and geodiversity and Policy ENV 5 Northumberland Coast Area of Outstanding Natural Beauty.

128. The Marine Management Organisation is concerned to protect and improve the ecology of the coastal area and has produced the North East Marine Plan which is also relevant

129. These policies should be referred to in the supporting text in the interests of a comprehensive reference to the policy context.

## **RECOMMENDATION 17**

**In paragraph 5.52 alter the sentence after the first bullet points as follows; “The Plan area also contains the following ancient woodlands:”.**

**Insert a new paragraph after paragraph 5.52, as follows;**

**“National guidance is concerned to protect the ecology of sensitive areas and the Local Plan policies [ENV 2 Biodiversity and geodiversity](#) and [Policy ENV 5 Northumberland Coast Area of Outstanding Natural Beauty](#) provide protection and must be closely observed. Furthermore, the Marine Management Organisation is concerned to protect and improve the ecology of the coastal area and has produced the North East Marine Plan which is also relevant.”**

**At the end of paragraph 5.54 add the following;**

**“Detailed advice on the application of the CMS and financial contributions is contained in [Appendix H4 Coastal Mitigation in the Local Plan](#).”**

## **POLICY 16 DEVELOPMENT AND WATER QUALITY**

130. This policy seeks to address the problem of nitrogen pollution of water courses in the Plan area which, in turn, damages important sensitive areas of coastal waters which are variously designated for their ecological importance. It is in accordance with national guidance seeking biodiversity net-gain from development proposals and Local Plan policies [WAT 1 Water quality](#) and [WAT 2 Water supply and sewerage](#).

131. The policy is also in accordance with current NCC development management practice and advice in its planning application validation guidance that nutrient budgets are required for development that could exacerbate nitrogen levels in the Lindisfarne SSSI and SPA through increases in sewage discharges.

132. The policy should have more precision in its text to establish these requirements relate only to development affecting sewerage increases in the catchment of the Lindisfarne SSSI and Special Protection Area. Furthermore, it is not entirely clear which type of development the policy relates to. The NCC planning application validation guidance and its document “The introduction of nutrient neutrality for Lindisfarne SSSI and Special Protection Area Guidance for applicants on completing a nutrient budget” are valuable guides for developers, which could usefully be included in an appendix to clarify how and when this process is applicable.

## **RECOMMENDATION 18**

**In the first sentence of the policy delete “Any new residential development, tourism accommodation or any other type of development that will increase” and replace with the following**

**“ Developments that could increase nitrogen levels in the Lindisfarne SSSI and SPA through increases in foul water discharges must be accompanied by a nutrient budget and a plan to offset any increase in nitrogen levels entering the SSSI and SPA. Planning permission will only be granted where this nutrient budget shows that there will be no net increase in nitrogen entering the SSSI and SPA.”**

**In paragraph 5.57 delete the final sentence.**

**Adda new paragraph as follows;**

**“The Northumberland County Council has produced guidance to illustrate the type of developments to which this policy applies and how the nutrient budget is calculated. This information is contained in appendix 1 to this Plan. Further advice can be obtained from the County Ecologist at Northumberland County Council.”**

**Attach a new appendix 1 to the Plan which contains the NCC document “The introduction of nutrient neutrality for Lindisfarne SSSI and Special Protection Area Guidance for applicants on completing a nutrient budget” and the relevant extract from the NCC “Planning Application Validation Checklist”.**

## **POLICY 17 VALUED LANDSCAPES**

133.This policy seeks to protect the special landscape character in the area including in the AONB and safeguard certain iconic views within the Plan area. The policy is fully supported by evidence in the background paper “Belford Parish Neighbourhood Plan: Valued Landscapes Background Report, December 2022”.

134.The policy accords with national guidance seeking to protect valued landscapes and is in conformity with Local Plan policies [ENV 3 Landscape](#) and [ENV 5 Northumberland Coast Area of Outstanding Natural Beauty](#).

135.I consider in the interests of clarity and application of the policy, the consideration of impact on key views should be qualified by reference to preserving the “landscape character” within those views.

136.I agree with the comments made by NCC that in criterion 2 of the policy that the reference to an “area of higher landscape sensitivity” is confusing. The area referred to

is not within the area delineated as “valued landscape” but it is an area where it is intended to preserve the landscape character in the views of it. I recommend, therefore, the reference to the “area of higher landscape sensitivity” is replaced by “these key views”.

## **RECOMMENDATION 19**

**In criterion 2 of the policy text delete “this area of higher landscape sensitivity” and replace with “the landscape character of these key views.**

**In criterion 3 after “....on the iconic features”, insert, “,the landscape character”**

## MONITORING AND REVIEW

137.This is a useful summary of the monitoring arrangements.

## COMMUNITY PROJECTS

138.These are correctly distinguished from the land use planning policies in the Plan and do not affect the consideration of “basic conditions”. I therefore do not intend to comment on this chapter.

## GLOSSARY

139.This is a very useful guide to the Plan.

## SUMMARY

140.I have completed an independent examination of the Neighbourhood Development Plan.

141.The parish council has carried out an appropriate level of consultation and shown how it has responded to the comments it has received. I have considered the further comments received as part of the consultation under Regulations 14 and 16 of the Neighbourhood Planning Regulations 2012.

142.I have recommended modifications to the policies in order to satisfy the basic conditions particularly to ensure that they provide a clear basis for decision-making in accordance with the NPPF and Local Plan policies.

143.Subject to these modifications, I am satisfied that the plan meets the Basic Conditions.

144. I am also satisfied that the Plan meets the procedural requirements of Schedule 4B of the Town and Country Planning Act 1990.

145. I am required to consider whether the referendum area should extend beyond the Neighbourhood Plan area, and if it is to be extended, the nature of that extension.

146. There is no evidence to suggest that the referendum area should extend beyond the boundaries of the Plan area, as they are currently defined.

147. I am therefore pleased to recommend that this Neighbourhood Development Plan, as modified by my recommendations should proceed to a referendum.