

**CONSULTATION STATEMENT
BELFORD NEIGHBOURHOOD PLAN - SUBMISSION
VERSION (2023 – 2036)**

March 2023

Belford Parish Council

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1.0 Introduction

- 1.1 This Consultation Statement has been prepared to fulfill legal obligations set out in the Neighbourhood Planning (General) Regulations 2012 and subsequent amendments. These Regulations require that when a qualifying body (in this case, Belford Parish Council) submits a neighbourhood development plan to the local planning authority, they must also provide a Consultation Statement. Regulation 15(2) describes what is required in a Consultation Statement. It must:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how those issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.2 This Consultation Statement sets out a brief background to the preparation of a neighbourhood plan for Belford and sets out consultation events undertaken during the Plan preparation period. It includes details of those organisations and people consulted about the Plan at the various stages of Plan preparation and the extent to which efforts were made to ensure the Plan was prepared with support and input from the local community. The Covid-19 pandemic reduced the ability of the Working Group to hold public meetings more recently and caused a significant delay to the production of the Plan.
- 1.3 A very few responses were received during the Regulation 14 consultation, and the Plan was amended accordingly. Appendix A contains a copy of the initial consultation brochure that was sent to residents in the Neighbourhood Area in September 2016. Appendix B contains an analysis of that consultation, which informed the final drafting of the Plan. Appendix C contains a list of organisations who were consulted at Regulation 14 stage.
- 1.4 The methods used and outcomes achieved from engagement have resulted in the submission of a plan that, in the opinion of the Parish Council, best meet community expectations expressed during the various stages of plan preparation.

2.0 Belford Neighbourhood Plan – Background

- 1.1 A Neighbourhood Area application was submitted under the Neighbourhood Planning Regulations 2012 (part 2 section 6) to Northumberland County Council who approved the application on 22nd September 2015. At that time the Neighbourhood Area comprised the civil parishes of Belford and Middleton, along with the Warenton Ward which together, for the purposes of local government administration, were formally organised and managed as 'Belford and Middleton Parish Council. However, following a

local parish boundary review in 2020, the geographic extent of Belford civil parish was extended to include the parish of Easington. A modified Belford Neighbourhood Area was subsequently designated by Northumberland County Council on 20th May 2021 to replace the previous designation. This area now covers the whole of the new parish of Belford. Copies of the Neighbourhood Area designation documents are available on the Northumberland County Council website.

- 2.1 Since that time, various consultation events have taken place; the progress of the Plan has been hampered somewhat by the Covid-19 pandemic, and the make-up of the Steering Group has changed a little over the years meaning that it has overall taken some time to finalise and submit the Plan.
- 2.2 Following the approval of the designated area, there followed two consultation events with the local community prior to the Regulation 14 consultation. The first one was a broad consultation event (see below), and the second one was a more detailed consultation on a proposed 'vision' and a set of objectives and policy areas for the Belford Neighbourhood Plan, including site specific matters such as Local Green Spaces and the proposed settlement boundary.
- 2.3 In order to keep an accurate and comprehensive record of the whole consultation process, the Parish Council website has had publicly accessible records of all documents which are summarised below:
 - Latest working draft of the Neighbourhood Plan;
 - Latest consultation letter and details of how to respond to the consultation;
 - All background evidence reports consisting of a series of reports covering all aspects of the Plan
 - Information about consultation exercises carried out
 - Minutes of all Neighbourhood Plan Steering Group meetings held
- 2.4 These documents are all available online at the address below:

<https://northumberlandparishes.uk/belford/documents/neighbourhood-plan>

3.0 Consultation and Engagement Timeline

- 3.1 In general terms, local residents and businesses were kept informed about progress through the Neighbourhood Plan website hosted by Belford Parish Council, the village newsletter ('What's On in Belford') and public meetings.

2013

- 3.2 The first public meeting in relation the Belford Neighbourhood Plan was carried out in December 2013. This meeting was carried out with representatives from community groups, the County Council and Belford Parish Council, to consider whether it was

sensible to pursue a neighbourhood plan for the area. This meeting considered matters such as the boundaries for the Plan Area (and whether it should seek to include adjacent areas with no parish council), composition of a proposed Steering Group, and how to engage the general public, through public meetings and information.

2014

- 3.3 In January 2014 there was a meeting with residents in the parish and community groups, including Belford Community Group and Belford Hall Committee. The outcome of this meeting was that there was overall support from within the community to produce a neighbourhood plan, although there was some concern expressed about who would do the work, and what resources were available.

2015

- 3.4 A Steering Group was established by the Parish Council to oversee the development of a Neighbourhood Plan for Belford, and area designation was applied for and approved. In February 2015 there was a public meeting held at the Community Club in Belford. There were over 50 attendees at this meeting, and many of the attendees left e-mail addresses so that they could be contacted with updates on the progress of the neighbourhood plan. Attendees included businesses, landowners and some residents of adjoining parishes, as well as 7 Belford Parish Councillors. A planning officer from the Council also attended, and spoke about the strategic planning context, and a representative from the Northumberland Coast AONB also attended. The (then) County Councillor also spoke at the meeting.
- 3.5 The meeting had presentation boards, and asked broad questions, such as ‘What do you like about Belford? What would you change in Belford? Where would you be happy for development to happen? (see below). Attendees were given green and red dots to stick on maps to denote support (or otherwise) for development in different areas of the parish.
- 3.6 On 26th March 2015 a full Parish Council meeting was held at Bell View and was attended by a number of residents. The purpose of the meeting was to finally decide whether to proceed with the production of a neighbourhood plan. Attendees voted in favour, and the area designation application was submitted.

2016/2017

- 3.7 A more detailed questionnaire was produced, which included a ‘vision’ for the neighbourhood, and a number of proposed objectives. This vision sought to reflect some of the key issues that had been identified in the initial consultations. A further consultation event was held in relation to the vision and objectives in October 2016. A copy of the questionnaire is contained in Appendix A, and a copy of an analysis of

responses is contained in Appendix B. Over 52 responses were received to that questionnaire

3.8 In summary the main broad planning issues raised were:

- Community facilities were highly valued; support for these and the development of more facilities was needed;
- Local green/recreational spaces were highly valued;
- The landscape in the area around the village was highly valued;
- More houses for local people/affordable housing were needed, support for self-build;
- Conserve historic character and role of Belford Village Centre

3.9 At the same time as the meetings with residents were taking place, other meetings were held with local businesses in the Plan Area. A meeting was organised for 29th February 2016. Four of the larger employers in the Plan Area attended; cumulatively those four employers were responsible for employing over 60 people in the area. A note of the meeting was posted on the Belford Parish Council Website. The main outcome of that meeting was:

- The plan needed to promote business in Belford: the employment prospects and prosperity of the village depended on it. Although there were other important employment sites identified in the draft core strategy, Belford's location adjacent to the A1 gave it significant potential.
- For this reason, the plan should indicate sites where commercial development would be supported.
- Recruiting skilled and semi-skilled workers was a perennial problem. For this reason, additional housing ideally for permanent use and suitable for family occupancy should be encouraged in the plan.

2019

3.10 In 2019, a detailed Housing Needs Assessment focussing particularly on the need for affordable housing for older people was carried out by the Bell View Centre in Belford. Bell View has an interest in promoting the supply of accessible and affordable housing to enable older people to remain in the community of their choice and creating 'age-friendly' communities. A copy of the assessment is included in the evidence base documents on the neighbourhood plan website. The report was aimed at looking at the need for older people's housing and helped inform the relevant planning policy in the neighbourhood plan.

2020

- 3.11 Production of the Neighbourhood Plan was held up during 2020 due to the Covid-19 pandemic. Most work on the plan stopped for a considerable amount of time. Although a screening opinion was sought at this stage under HRA and SEA regulations, and the work on the SEA was begun with the help of Northumberland County Council. In 2021 the Council sent a letter to all Parish Councils to inform them that due to the Covid outbreak, consultation on the Regulation 14 version of the Plan should be paused (letter attached in Appendix G). This meant that all worked stopped on the Plan for a while.

4.0 Pre-Submission (Regulation 14) Neighbourhood Plan consultation (1st July 2022 until 15th August 2022)

- 4.1 Following a delay in the preparation of the Plan due to the Covid-19 pandemic, the Parish Council commenced their pre-submission Neighbourhood Plan consultation. The consultation took place for a period of 6 weeks, and a list of consultees is contained in Appendix C.
- 4.2 Notices were placed on the Parish Council website and the individual statutory consultees listed in Appendix C were written to or e-mailed with information about how to view and respond to the plan.
- 4.3 The Plan was available to view on the internet, and hard copies were made available for those unable to access the online versions. The Plan was advertised through the local leaflet 'What's On in Belford'.

Statutory Consultees' Responses:

- 4.4 A full and detailed response was submitted by Northumberland County Council and is included in Appendix G. Many of them related to minor changes or additions to policy wording and criteria and almost all of the comments were incorporated into the final version of the Plan.
- 4.5 There were 6 responses received from statutory consultees (including from the County Council) and these are referenced in Appendix E. All changes requested by the County Council were incorporated into the final version of the Plan. Other responses received from the statutory consultees were broadly supportive or had no comment, so no further changes were made.

Responses from landowners

- 4.6 There were no responses received at this stage from local landowners, although verbal dialogue was had with landowners at initial meetings.

Responses from residents

- 4.7 There were no written responses received from residents.

5.0 Habitats Regulations Assessment

- 5.1 A Screening Opinion was sought as to whether Habitats Regulations Assessment would be required. The Plan was screened out following amendments made to policies (incorporation of policies 16 and 17); a copy of the full screening opinion is submitted with the Plan.

6.0 Strategic Environmental Assessment

- 6.1 The plan was screened to see if a Strategic Environmental Assessment would be required. The plan was screened in. The screening opinion is included in the submission documents, as is the full Environmental Report. The recommendations set out in that report were all incorporated into the final version of the Plan.

7.0 Conclusions

- 7.1 The Submission Plan is the outcome of nearly seven years of work on the part of the Belford Steering Group, with a hiatus during the Covid pandemic which halted work on the Plan. There has been significant community engagement in various forms in the early stages, through open events, questionnaires, and other surveys carried out by individuals in the Steering Group and external consultants.
- 7.2 The Parish Council believe that the Belford Neighbourhood Plan (Submission version) is a fair reflection of the views expressed by the local community throughout the various stages of plan preparation.
- 7.3 All legal obligations regarding the preparation of neighbourhood plans have been adhered to by the Parish Council. The Submission Plan is supported by a Basic Conditions Statement and by this Consultation Statement both of which adequately cover the requirements set out in the Neighbourhood Planning Regulations 2012 [as amended]. The Parish Council has no hesitation in presenting the Plan as a policy document that has the support of the majority of the local community who have been engaged in its preparation.
- 7.4 This Consultation Statement demonstrates that publicity, consultation and engagement on the Plan has been meaningful, effective, proportionate and valuable in shaping the Plan which will benefit communities across the Parish by promoting sustainable development.

APPENDICES

Belford's Plan



Photo courtesy of Bellview, Belford

Information gathered at Public meetings in Belford suggested that the community considered the following were important issues for the Belford plan area:

- Affordable Housing
- Increased employment opportunities:
- Sustainability – more shops and facilities

The steering group investigated these areas and the issue of affordable housing was discussed with Ian Stanners from NCC, who has previously worked with a Housing association and a member of the Homefinder team. The information they supplied confirmed there is still a need for affordable housing.

The 3 areas of concern are interlinked:

- There is a need for **affordable housing** to encourage people to stay in Belford or relocate to Belford.
- There is a need for identified 'employment' land. Increased **employment opportunities** will create growth in the village - additional employment will require additional housing
- Increased employment and housing opportunities will help create **greater sustainability** for Belford.



Photo courtesy of Steve Newman, Belford

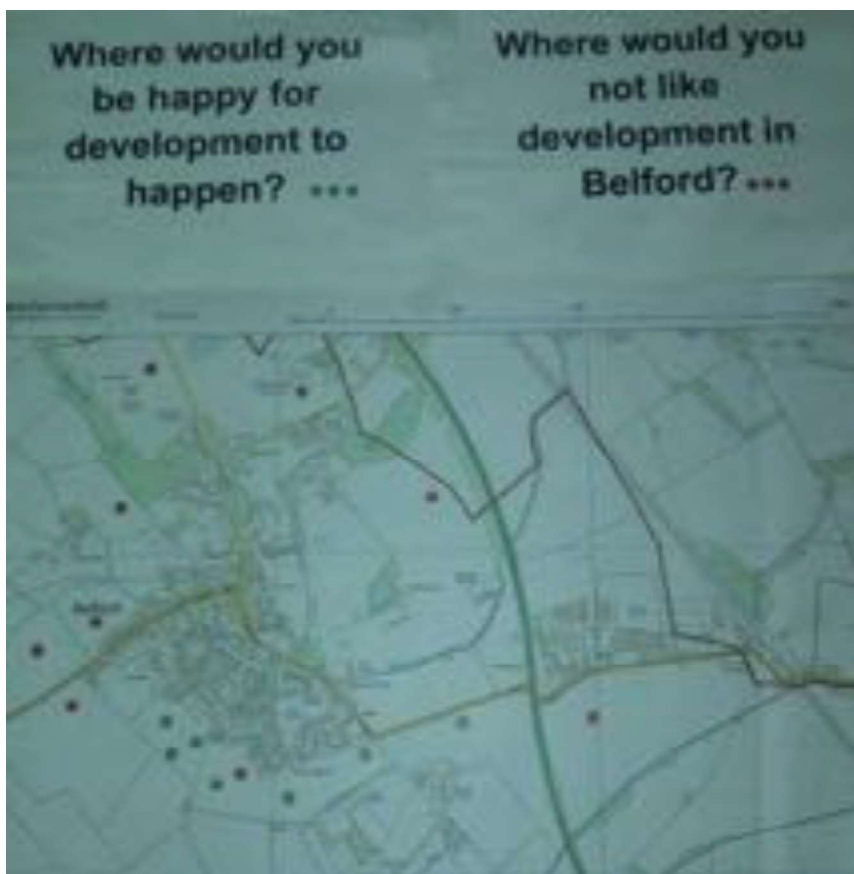
Other areas of interest at the public meeting were:

- Historic buildings and conservation area in Belford



Belford Hall Photo courtesy of Steve Newman, Belford

- Where development was preferable:



- Transport – including cycling and walking



Photo courtesy of Ruth Stanton

- Improved youth provision
- Encouraging tourism



Photo courtesy of Steve Newman, Belford

What do you think?

A plan could include:

- Designation of a boundary for preferred future housing development
- Development within the countryside should include re-use or diversification of redundant farm buildings
- Designation of a preferred area for commercial development.
- Designation of preferred land for employment?
- Would you support houses in the High Street to be returned into retail?
- Community Assets - a list of specific buildings and land to be created to protect them within the plan area?
- Protection of Green Open Spaces including school and sports fields?
- A policy to cover the Conservation Area of Belford - do residents want a Conservation Area policy or guidance notes for the Conservation Area?
- Can a neighbourhood plan be used to help increase tourism to the area? Dark sky approach to attract visitors or by developing a cycling hub
- Youth provisions – what new facilities are needed?

- Transport: including bus services, stopping trains, car parking, safety aspects such as:
 - ❖ For bicycle users - perhaps new developments should include cycle paths?
 - ❖ Footpaths for pedestrians - should future development be within a reasonable walking distance to the centre of Belford?
- Improvement of A1- whilst this is aspirational and outside a neighbourhood plan remit recent proposals could assist our vision in the Neighbourhood Plan.
- Proposals for the Belford railway station platform

Local organisations, such as churches, schools, community groups, health services, businesses, interest groups and others who may have an interest will be consulted during the preparation of the plan.

APPENDIX B: Neighbourhood Plan Public Meetings

Belford Neighbourhood Plan
Meetings with Belford Parish Residents

1. December 2013

Meeting with representatives from Belford community groups, Cllr John Woodman, David English NCC and BPC to consider whether residents would be interested in a Neighbourhood Plan:

- The meeting considered boundaries; whether other parish councils would want to be involved in a plan – Adderstone with Lucker and Easington (some legal issues; no parish council).
- Composition of a steering group – community group, businesses, parish council, Bell view...
- Public meetings; how to involve residents...
- A Neighbourhood plan should consider demographics, retaining schools, housing needs, (including availability, affordability, cost, type and second/holiday homes), improving employment opportunities - all of these issues are interlinked
- Car parking, industrial estate/businesses, high street improvements, shops were also considered
- Improvements to the A1 and the development of the station platform could improve links to Belford.

1. January 2014

Meeting with other Belford Parish residents and groups, including a representative from Belford Community Group and Belford Hall Committee:

- Similar views were expressed to the earlier meeting
- There were some concerns about who would 'do' the work.

2. February 2015

Summary of Neighbourhood Plan Meeting **At Community Club, Belford,**

This note summarises the recent meeting to discuss a possible NP for Belford and in particular the feedback given by attendees. It describes what has been done afterwards.

50+ were present at the meeting and many left e mail addresses, so that they could be contacted with updates. They included residents, businesses, local landowners and residents of adjoining parishes. Seven Belford Parish Councillors were present and there were two apologies. Jonathan Nicholson represented NCC and was available to speak about the Core Strategy as well as Neighbourhood plans and Jessica Turner represented the AONB – which includes part of the parish and lies close to the remainder.

John Woodman, 'our' County Councillor spoke about a Neighbourhood Plan for Belford; experience gained at the Coastal Group; guidance available to communities wishing to make a Plan; benefits for a community with a Plan and described it as a Community Plan 'with teeth' that could determine how development would go ahead; it would give power to the community. Some areas of local concern could not form part of a plan, such as stopping development of a wind farm or housing development. He advised those present that it would take time, skill and energy, so it was important to make sure that a Neighbourhood plan was necessary.

Peter Rutherford, a Planning Officer with NCC, followed with a presentation that gave more detail about the production of a plan:

1. A parish council can produce a neighbourhood plan in consultation with the community
2. A plan can set out a local spatial vision
3. It can cover any matter important to the local community that can be enshrined in planning policies – not strategic matters.
4. It must last a reasonable time (say 15 years)
5. It must meet a set of basic conditions
6. A boundary must be set
7. It should inspire innovation and creativity and incentivise communities to support growth
8. It can include themes such as affordable housing, employment land, environment, sustainability
9. It should have a good clear reason to start

10. The final plan is submitted to NCC; submitted to qualified examiners; subjected to a local referendum and if it passes at all stages, it becomes part of the Development Plan

Questions followed about cost, sustainability, who would do it, who could be involved, the links between employment/housing/schools, the benefits if a Neighbourhood Plan was produced– if it passes all of the tests then the Community will have some financial benefit and the community will have some control over future development...

Roy Dodd (BEST), spoke about proposals for an Anaerobic Digester in Belford and asked if there was support in the Community – a show of hands indicated that it would have support. Peter Rutherford said this was an area that Planning Officers would not have included in a plan, so there were areas where the local community could be imaginative and innovative.

Finally a show of hands indicated that those present were interested and would support the development of a Neighbourhood Plan.

This information was sent to all attendees of the meeting at the Community Club in February, who provided an e mail address.

What happened next?

A Some attendees responded to 4 questions on the boards at the side of the room. These responses were ‘analysed’ – summary below, more on other sheets in ‘book’.

Q1 What do you like about Belford?

The comments left on post it notes (35) were copied and sorted into groups:

1. Architecture and buildings – 4 comments
2. Shops/retail – 2 comments
3. Services -12 comments
4. Community – 14 comments
5. Development - 2 comments
6. Countryside.

Q2 What would you change in Belford?

The comments left on post it notes (39) were copied and sorted into groups:

1. Activities/ Leisure - 4 comments
2. Children – 1 comment
3. Development - 4 comments
4. Maintenance – 7 comments
5. Roads/Signage - 7 comments

- 6. Shops/retail - 6 comments
- 7. Transport – 3 comments
- 8. Parking -4 comments
- 9. Young people– 3 comments

Q3 Where would you be happy for development to happen?

This was indicated by green dots on the map:

6 green dots were placed in the area to the south of Belford – from Raynham Close to Sunnyhills Farm Shop (adjacent to current development area)

1 to the South of the Golf Course between B6349 and South Farm

Q4 Where would you not like development in Belford?

This was indicated by red dots on the map:

1 was placed in the current development near Rogerson Road

1 was placed in the field to the East of Belford Hall

1 was placed in the field to the south of B1342 to the south of the Industrial Estate

6 were placed around the perimeter of Belford to the North and West of the Village

B The Council received an offer of help to develop the plan from an architect.

C An attendee sent a detailed e mail suggesting entrepreneurial activity could help.

D John Woodman and Brenda Stanton attended a meeting with Jonathan Nicholson and Charlotte Colver, NCC Planners involved with Neighbourhood Planning, to discuss the meeting and results.

Many comments were Community based and not concerned with Planning issues, so could not be included in a Neighbourhood Plan but could form the basis of a Community Plan.

The exact boundary of the plan area will need to be determined and submitted to NCC.

Comments made during the meeting at the Community Club, and subsequently, show there is an interest in issues that could be included in a Plan such as housing, employment land, nature of future development, sustainability and the possibility that ANOB guidelines could be used in determining where development was appropriate.

3. 26 March 2015

Meeting with residents

A Parish council meeting was held at Bell View on 26 March at 7pm to discuss whether or not to produce a plan.

An invitation was sent to all attendees at the Public meeting in February. A small number of residents attended.

After some discussion about the content of the plan and community issues, it was decided that the Parish Council should proceed with the Neighbourhood Plan.

Evidence was collected about issues that could be included together with community projects and aspirational ideas.

Several new issues were raised:

- Communication with the residents should be good – a website, use of existing newsletters and 'What's on in Belford' were suggested
- Tourism is significant to the economy of the area and should be addressed stimulated if possible by the plan

APPENDIX C: Belford Vision and Objectives Consultation

The Neighbourhood Plan Vision

The Neighbourhood Plan vision is an overarching statement which describes what we want the Belford Neighbourhood Area to be like by the end of the Plan period. The vision should be concise, locally distinctive and cover what we all hope the area will look like, what it will be like to visit and to live and work here.

The Belford Neighbourhood Plan Vision is:

“Based upon its central, strategic location in north Northumberland and connectivity to the A1 Trunk Road, Belford will be a thriving rural hub serving the needs of local residents, businesses and visitors, growing its role as a springboard to the Northumberland Coast Area of Outstanding Natural Beauty and the Northumberland National Park as well as wider rural destinations.”

Do you agree with our draft vision for the Belford Neighbourhood Plan?

If you **agree** with the draft vision please let us know. If you **do not agree** please tell us what needs to be changed so that the vision represents how you would like the area to be by 2031.

What are Neighbourhood Plan Objectives?

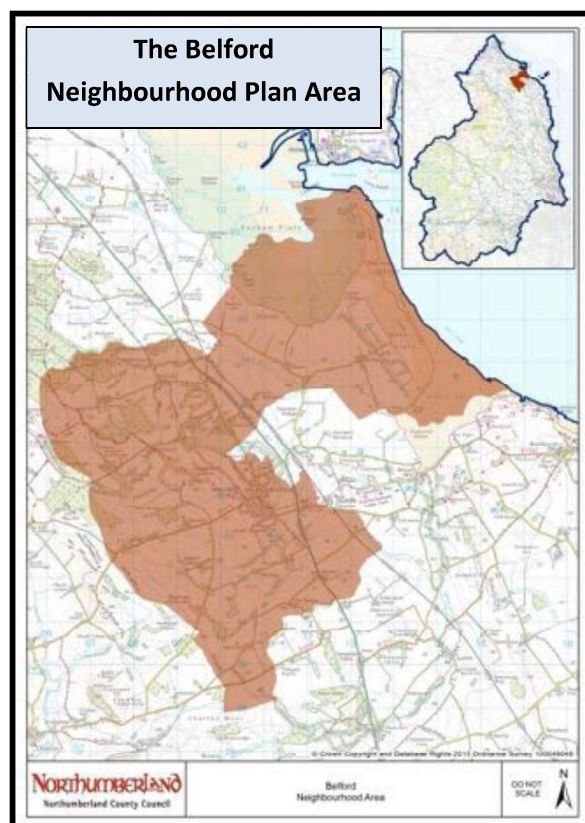
The Neighbourhood plan objectives describe the changes we think are necessary to help to deliver the vision for the Neighbourhood Area. The objectives need to relate to land use issues and should be broad statements of intent. They should clearly be linked to the issues we are seeking to address through the Belford Neighbourhood Plan. The objectives are shown on Page 3 of this consultation brochure.

Do you agree with our draft objectives for the Belford Neighbourhood Plan?

If you **agree** with the draft objectives please let us know. If you **do not agree** please tell us what needs to be changed so that the objectives represent how you would like the area to be by 2031.



Bellview Resource Centre - Meeting venue for the Neighbourhood Plan Steering Group



Belford Neighbourhood Draft Plan Objectives- Tell us what you think

Neighbourhood Plan Theme 1– ‘Village Life’

Objective 1a: To increase the existing number and quality of shops and services to reduce the need to travel out of the village to meet needs.

Objective 1b: Deliver both sustainably located new housing of an appropriate character which sustains the village population and a diversified employment base to maintain opportunities for local employment.

Neighbourhood Plan Theme 2 – ‘High Street rejuvenation’

Objective 2a: To rejuvenate the high street by designing and implementing a comprehensive programme of highway improvements to prioritise the needs of residents and pedestrians and visitors to create a destination of interest and identity.

Objective 2b: To work in partnership to protect and enhance the original character and function of the high street, encouraging opportunities to improve the streetscape and its overall attractiveness.

Neighbourhood Plan Theme 3 - ‘Doing Business’

Objective 3a: To overcome obstacles which currently prevent Belford from having a vibrant and enterprising economic environment by building upon Belford’s improved physical and Information and communications technology connectivity.

Neighbourhood Plan Theme 4 – ‘Improving Connectivity’

Objective 4a: To promote and encourage investment and improvement in active travel routes which promote walking and cycling within the village and its hinterland.

Objective 4b: To improve important public transport connections which enable sustainable travel to other areas.

Neighbourhood Plan Theme 5 – ‘Protecting our heritage and embracing the future’

Objective 5a: To proactively protect and manage the Belford conservation area to maintain its integrity and enhance its potential to underpin the visitor economy.

Objective 5b: To recognise and promote opportunities elsewhere within the village for innovative sustainable and energy efficient design that adds to the architectural richness of the townscape.

Belford Neighbourhood Plan Draft Vision- Tell us what you think

Please provide comments on the draft vision in this comments box.

Belford Neighbourhood Plan Draft Objectives- Tell us what you think

Please provide comments on the draft objectives in this comments box.

Cut off and return this page

Submitting Comments

Email: bpc@belfordneighbourhoodplan.co.uk

Submit comments directly via our website:

www.belfordneighbourhoodplan.co.uk/contact-us

Or write to us and submit your comments at either: Paper Shop on the High Street, Co-op, Middle School, Sunnyhills Farm Shop or the Community Trust Shop.

The consultation runs from **Monday 10th October 2016** and all responses should reach us by **4pm on Monday 31st October 2016**.

Your Name:

Address:.....
.....

Email:

Belford Neighbourhood Plan Consultation Brochure



Vision and Objectives Community Consultation

The Neighbourhood Planning Process

Belford Parish Council is taking the lead in creating a Neighbourhood Plan which will cover the parishes of Belford and Middleton. Neighbourhood plans allow local people to shape decisions about how land is used and where development should take place in the future.

The Plan will aim to support the enhancement Belford village and the surrounding neighbourhood area as a place to live, work and visit up until 2031 which will be the end of the Plan period. The Neighbourhood Plan policies, once adopted, will be used by Northumberland County Council as the basis for determining planning applications.

Neighbourhood Plan Update

A Steering Group, chaired by County Councillor John Woodman, was set up by Belford Parish Council to manage preparation of the Plan. The Group includes parish councillors and local residents.

The Steering Group has prepared a draft vision statement and plan objectives which will form the basis for subsequent planning policies. The vision and objectives are based on the issues you told us were most important for the future development of Belford.



What will Belford look like in 2031?

Further information is available on our website: www.belfordneighbourhoodplan.co.uk

Consultation on the Vision & Objectives

The Parish Council are now consulting local residents, businesses and stakeholders on the draft vision and objectives. Consultation will run from **Monday 10th October 2016** until **Monday 31st October 2016**. During this period we will be contacting local community groups, residents and businesses to raise awareness of the draft vision and objectives for the Plan. Comments submitted during the consultation period will be analysed and, if appropriate, will be used to amend the draft vision and objectives for the Plan.

WE WANT TO HEAR WHAT YOU THINK

Submit your comments on the back of this consultation brochure

APPENDIX D: Analysis of consultation responses

Belford Neighbourhood Plan Vision and Objectives Consultation

Report and Summary of Representations



10 March 2017

**Belford Neighbourhood Plan Vision and Objectives Consultation:
Report and Summary of Representations**

Introduction and Methodology

1. The purpose of this report is to collate and provide some initial analysis on all of the written representations received in response to consultation on the Belford Neighbourhood Plan draft Vision and Objectives. A Consultation Brochure was prepared and sent to all residents and businesses in the Parish. This included a response form which could be completed and returned to the Parish Council. All 'consultation bodies' were also notified about the draft Vision and Objectives. Written representations were invited during a consultation period running from Monday 10th October 2016 until Monday 31st October 2016.
2. The Consultation Brochure, a copy of which is provided at **Appendix A** to this report, set out a draft Vision for the Plan, five 'Themes' to be covered in the Plan and 9 Objectives related to those Themes. The Plan Themes were defined as follows:
 - Theme 1 'Village Life';
 - Theme 2 'High Street Rejuvenation';
 - Theme 3 'Doing Business';
 - Theme 4 'Improving Connectivity'; and
 - Theme 5 'Protecting our heritage and embracing the future'.
3. A total of 52 separate written representations were received, comprising completed Consultation Brochure response forms, letters and emails. The comments made in all of the representations have been transcribed and are presented in **Appendix B** to this report (Stage 1 analysis). This shows the specific representations made to the draft Vision and to each of the draft Objectives presented within their respective Themes from each respondent. The names of all respondents are shown in Appendix B and comments that were made in 14 anonymous representations are identified separately.
4. The representations have been separated into categories showing where **support** was being provided; where there was **objection**; and where **modifications** were being suggested. This is presented in **Appendix C** which sets out a second stage of analysis showing comments in relation to the Vision and the Objectives grouped into their respective Themes.
5. An initial analysis of the general themes emerging from this consultation is presented in the conclusions below:

Conclusions and Summary of Responses

- Overall the Vision is well supported. Of those respondents who made comments about the Vision, 28 indicated their support. Only four respondents indicated any form of direct objection to the Vision.
- Comments indicating support or objection to each of the Objectives is less apparent. This is likely to be as a result to the way in which information was sought. The questionnaire did not offer a straightforward way to indicate whether the respondent supported each Objective. Nevertheless, the comments that have been made indicate general support for the majority of the Objectives.
 - **Village Life:** There is clear support for the growth of business and employment opportunities. However, there are concerns that this may be difficult to achieve without significant growth in the population. There are mixed views about the need to increase housing numbers significantly. There is general support for affordable and family homes.
 - **High Street Rejuvenation:** There is support for rejuvenating the High Street, but it is recognised that the economic circumstances in the village may make this difficult to achieve. In part this is linked to the acknowledgement that growth and rejuvenation would most probably be associated with more housing development. One of the main comments raised in response to these Objectives is the desire to create additional car parking, and to manage the space within the highway better for all users.
 - **Doing Business:** This Objective attracted few specific comments. Encouragement is given to including the need to invest in skills within the Plan; and to support the creation of a Chamber of Commerce. The need for car parking is mentioned again in the context of supporting business.
 - **Improving Connectivity:** The need to make improvements to all forms of connectivity is recognised in responses. Particular support is given to the desire to re-open Belford railway station to passengers. It is also clear that there are concerns about local bus services. Support is given to the desire for improved internet access.
 - **Protecting our heritage and embracing the future:** There is support for the proper management of development within the Conservation Area. A suggestion is made about fostering a local sustainability philosophy. Concerns are expressed that supporting innovative design may not be appropriate.
- Many of the comments made provide more detailed suggestions about matters that may be included in the Neighbourhood Plan either through planning policy or through the creation of an action plan comprising a range of activities not necessarily related to land-use planning. All of these comments have been captured in the appendices to this report and can provide the basis for further analysis on those matters to be included in the Plan.

Next Steps

6. Consultation on the draft Vision and Objectives for the Belford Neighbourhood Plan has provided a reasonable and useful response from the local community. It is apparent that there is support for the Vision. There is also generally a majority of support for the Objectives, although there are conflicting opinions about the scale and merit of growth, particularly housing growth.
7. Consideration will now be given to all of the comments recorded in this report with a view to:
 - identifying any modification to the Vision and Objectives arising from the representations;
 - differentiating between land-use planning matters and non-planning matters raised in the representations;
 - identifying potential **planning policies** that could be created in response to the representations to support the modified Vision and Objectives;
 - identifying potential **community actions** that could be created in response to the representations to support the modified Vision and Objectives
8. Once this analysis is complete it is intended that a first draft pre-submission neighbourhood plan will be prepared. This will be presented to the Parish Council prior to arrangements being made to consult on the draft plan.

APPENDIX B

Analysis: Stage 1

Please see footnotes and the summary below the table.

Comments on the Vision	Comments on Obj. 1a and 1b. – ‘Villagelife’	Comments on Obj. 2a and 2b – ‘High Street Rejuvenation’	Comments on Obj. 3a – ‘Doing Business’	Comments on Obj. 4a and 4b – ‘Improving Connectivity’	Comments on Obj. 5a and 5b – ‘Protecting our Heritage and embracing the Future’
<p>“I would fully endorse your vision for the village.”</p> <p>“I agree with the vision stated.”</p> <p>“We are in broad agreement with the Vision and Plan.”</p> <p>“The plan has no vision to attract some more wealthy residents who would hopefully invest in the Belford area or develop more</p>	<p>“St. Mary’s Church is now desperately short of burial plots a [new] cemetery [] would keep relatives remains within the heart of the village.”</p> <p>“Ask the Belford Football Club to consider re-locating to the Golf Club driving range which is now largely deserted [] The released land, currently the football pitch etc., could then be sold by the football club for mixed housing.”</p> <p>“Designate more house building along South Meadows Road all the way to</p>	<p>“There are empty cottages and shops that need tackling [on] the high street [...] this looks shabby.”</p> <p>“I think you should be concentrating on developing the high street [and] renovating houses that are falling into disrepair.”</p>	<p>“A small car park could be located behind ‘The Neuk’ which is only a small step from Belford’s High Street and would give the anticipated growing number of visitors the opportunity to park close to the village’s amenities.”</p> <p>“All of the vacant land to the north of the Coastal</p>	<p>“Re-open Belford Railway passenger platform”.</p> <p>“Get full High-Speed Broadband to [the] whole of Belford Village”.</p> <p>“The bus service is shocking especially outside of the summer. We have family members and friends who don’t drive and can’t come to the area because of the poor local [public] transport.</p>	<p>“Include something about fostering a local sustainability philosophy in which everyone’s contribution counts and everyone can take pride in. A reputation for having an ethical/sustainable approach to community life can attract visitors, new residents and provide new business opportunities.”</p>

business and create more employment.”	Toll House – this would be ‘infill’ housing not ‘ribbon development’.”	“I think Theme 2 – High Street rejuvenation is quite vague [] what is the actual proposal?”	Grains and the industrial units through to the Easington Level Crossing road should be designated for industrial and commercial development.”	Taxis are extortionate and you can’t even get a bus direct to Holy Island and back.”	“The character of the historic elements of Belford must be maintained; e.g. Georgian shop fronts and indeed more made of them.”
“Agree with draft vision.”	“It is suggested that pressure should be applied [to the Environment Agency] to have Belford’s floodplain plan reviewed because of the significant reduction of risk due to the installation of the ‘leaky dams’.”	“I agree that better/renewed street furniture would go a long way to improving the overall ‘feel’ of the high street.”	“It would be good to see something about investment in local skills as part of the ‘doing business’ theme.”	“Re-open Belford Station for links to Edinburgh and Newcastle.”	“Careful review of any ‘modern’ buildings to ensure village character is maintained.”
“Your vision is very good and positive. [In the Objectives] you have addressed everything that makes a village like Belford move forward.”	“Sadly the village feels like it is in demise. There are hardly any shops, there are units standing empty or badly presented. There are no restaurants or pubs that would be appealing enough to draw visitors in.”	“Parking is a major problem – need parking areas!”	“How about a Chamber of Commerce? Too many empty properties on the High Street – many of them listed buildings – too many restrictions on what you can and can’t do.”	“Open Railway Station!”	“5 a - OK. 5b is too vague - opens the way to any idiosyncratic architect.”
“Fair enough - typical mission statement, but OK. Could perhaps mention encouraging local business.”	“As this is about regeneration, have you consulted local businesses? I have spoken to a few local business owners and they have not been consulted on your plans. Can’t you bring them on board early on and share ideas?”	“2a -Highway improvements usually restrict parking as well as speed. We need parking.”	“[Should] make it easier to get to such places as Wooler by bus. Trains stopping at Belford Train Station”.	“4a - Railway station? Most elderly residents rarely walk or cycle - parking?” 4b - station and improved bus services essential.”	“Create a traffic management plan within the Conservation Area.”
“I agree with the draft vision. Belford needs to be promoted to attract more businesses to the village.”	“I believe it would be a huge mistake to build more housing	“2b OK, but note the need for parking”	“3a OK”	“How about opening Belford Station with car parking – this has been talked about for decades.”	“Seek ‘Market Town’ classification for Belford.
“I agree with this draft vision.”					

<p>"I agree with the draft vision statement – concise and to the point."</p> <p>"Gobbledegook, insultingly fatuous, could only be dreamt up by local government pen pushers."</p> <p>"Agree with draft vision."</p> <p>"Sounds perfect."</p> <p>"[Agree] but we need to keep Belford's sense of community."</p> <p>"Very good plan and objectives."</p> <p>"Agree".</p> <p>"Vision agreed."</p> <p>"Agree with the draft vision."</p> <p>"I agree with the vision, I agree with</p>	<p>without dealing with what we already have in Belford."</p> <p>"We need independent food shops and services."</p> <p>"You need to attract employable people to the area."</p> <p>"We do need jobs. People wanting to open businesses should be encouraged and welcomed."</p> <p>"[Need] more employment for the young people, or the village will be a retirement village. The older residents are well catered for."</p> <p>"A number of retail units have struggled to survive in recent years therefore without either a larger population or greater visitor numbers, or preferably both, the objective to increase retail units will not be sustainable."</p> <p>"This could be done by building some high quality larger houses. One potential</p>	<p>"The High Street needs new life brought to it to attract more businesses and people to it."</p> <p>"Rejuvenating the High Street would be good; 'Highway Improvements' should not prevent parking along the High Street, or it will become dead like Berwick."</p> <p>"Try to rejuvenate the High Street yes, but implementing a comprehensive programme of highway improvements would depend on what you had in mind. If a free car park was placed at the edge of</p>		<p>"Technology connectivity essential. Many outlying farms have very bad broadband signal, preventing the buildings being [used for] offices/ businesses."</p> <p>"School needs a car park."</p> <p>"[Should include] construction of a south-west radial bypass route [for B6349] to help alleviate HGV traffic on High Street."</p> <p>"Access is good and [the village] is easy to find. Would be beneficial; for Belford Railway Station to reopen."</p> <p>"Safe places for people to cross roads – no pelican crossings. [...] Better</p>	<p>"Provide a 'Civic Trust' Design Guide for conservation area. Preserve village character through built form and materials."</p> <p>"Encourage energy efficient buildings/ high insulated/ airtight construction utilising 'renewable energy.'"</p> <p>"With respect to the protection of Community Assets and Green Open Spaces, we agree with the sentiment of wishing to protect such aspects of the village. We feel that these assets do have a big role to play within the village, however we feel that buildings should not be listed if it</p>
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your objectives which are entirely sensible."	site has never been mentioned for house development is the field opposite the Quarry on the left hand side going down the woody bank before the A1."	the village I think this would encourage visitors to stop and walk through the village."		cycle lanes. Speed cameras please."	means that they are redundant. Similarly, we would only wish green spaces to be protected if they are adequately used and maintained. We support the retention of the Conservation Area as we feel that this helps to maintain the existing traditional setting of the High Street."
"Commendable aspirations."				"Active travel routes work best when designed to be convenient rather than simply 'healthy'.	
"I think [the Vision] has excellent ideas and potential. It is important the village has a say in the direction of its own development whilst maintain the historic image of the village itself."	"I would certainly shop in the village more if there was more variety, [] such as a butcher's".	"Parking must be improved. The derelict building at the co-op should be demolished."		"We agree that the improved public transport connections will be beneficial both to many residents of Belford and to those individuals visiting the area. We would welcome plans to reinstate the railway station.	
"I agree with the draft vision."	"[Agree with housing provision], but only sufficient to help keep young people in the village – affordable houses."	"Unfortunately having empty shops and a handful of buildings in need of some TLC does not give the right impressions of a thriving town. High Streets can still retain their traditional identity with some careful planning and professional expertise."		"We question what is deemed to be a 'reasonable walking distance'.	Anonymous comments: "Perhaps installing electric charging points on the rejuvenated High Street?"
"We agree with the draft Vision [] there is a lot of potential to turn Belford from a great place to a fantastic place."	"Must address the issue of affordable housing – reduce the number of second homes and B&B's. If the younger generation can't live here [the village] will die."			"We agree with the suggestion to improve the A1."	
"Very admirable and appropriately ambitious [although] how can the village attract more businesses to locate	"Agree that more shops would encourage local residents to shop in Belford. Independent specialist shops are popular with tourists. High street rejuvenation imperative. Lots of litter everywhere."			"We would support the improvement of all forms of	

<p><i>here, shops and services and tourism and become a 'rural hub' [?]. This requires innovative thinking investment and the commitment of the whole community."</i></p> <p><i>"The draft vision is appropriate. How are we going to get there? What is the Action Plan?"</i></p> <p><i>"Very noble vision which I hope will be important for all residents. Good objectives. If there is any way I can help please let me know. Andy (Co-op)".</i></p> <p><i>"Vision and Objectives are excellent!"</i></p> <p><i>"Belford should above all meet the needs of the of the local community, not becoming a town</i></p>	<p><i>"Belford would greatly benefit from more independent and quality shops. It would attract more visitors as well as reducing the need for residents to shop elsewhere. Another dentist surgery – currently have to travel to Alnwick."</i></p> <p><i>"I think it is important to develop housing within the [settlement boundary] of the village."</i></p> <p><i>"Unfortunately, as we are nearly all guilty of internet shopping, it is extremely unlikely that small shops in the High Street would be viable. Those properties were all originally just homes [] they should therefore just be allowed to return to the homes they were built as."</i></p> <p><i>"[Suggest adding;] Attract young people and families to live here, increase employment opportunities (not just in tourism and service</i></p>	<p><i>"Revise design of High Street to reduce traffic speed, promote pedestrians and cyclists. Increase footpath widths. Create a walkable village. Stimulate street life."</i></p> <p><i>"We would strongly support the rejuvenation of the High Street as envisioned. [] sensitive enhancement of the streetscape to make it a more accessible environment on foot is to be welcomed."</i></p> <p>Anonymous comments: <i>"The High Street is empty of people but lined with parked cars."</i></p>		<p><i>connectivity for Belford. This can only serve to enhance the lives of all living and working in the community and encourage commercial growth."</i></p> <p>Anonymous comments: <i>"Maintain public transport for younger people to access employment and education."</i></p> <p><i>"Provision for Belford Railway Station."</i></p> <p><i>"All good, but what about the opening of the railway station."</i></p> <p><i>"Better transport to Newcastle/Berwick/ Alnwick."</i></p>	
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<p><i>which is used mainly for temporary holiday makers at certain times of the year with street accommodation left empty at the end of the season. Large housing estates, frequently bought by retirees from outside, spoil the country feel of the village. The High Street will only become more vibrant with more shops and organised parking. What we do not require is a place that whilst catering for tourists, walkers, cyclists etc., is 'dead' or 'empty' at the end of the season like so many seaside towns in the area."</i></p> <p><i>"Vision is OK but remember the village is only viable if people continue to live there. Affordable housing for young</i> </p>	<p><i>industries), policy for dealing with empty properties."</i></p> <p><i>"1a OK. 1b - what does sustainably located mean?"</i></p> <p><i>"I don't think we should have more housing until we've got more amenities on the High Street."</i></p> <p><i>"Encourage shops, services and businesses. Concentrate high density housing in village core. Resist development of large low density executive style housing on village perimeter."</i></p> <p><i>"Would be great to rejuvenate the High Street and make it a great place for locals and visitors. Would be nice to see people spending money on activities and shops in the village. Good ideas, however: 1 If population is increasing, problem of anti-social behaviour needs addressing; 2 local businesses should work together not try to shut each other down, success encourages success."</i></p>				
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<p><i>families to keep the school and GP services is necessary too"</i></p> <p><i>"In creating a "thriving hub" it will be necessary to meet the needs of local residents, businesses and visitors alike [] embracing all three will generate a self-fulfilling prophecy as each will be mutually supported by the others.</i></p> <p><i>"The vision of Belford as a 'springboard' to the AONB and National park is an appropriate and effective description. We believe that Belford has a key role to play in allowing the continued enthusiasm for rural Northumberland. There now upwards of 90,000 visitors a</i></p>	<p><i>"We agree that the number and quality of shops in the village centre need to increase and improve.</i></p> <p><i>"We agree that housing must be sustainably located [] however, care needs to be exercised in the context of a village settlement as interpretations will be many and varied.</i></p> <p><i>"Success of the plan will, in our opinion, rely on the village creating and maintaining a certain critical mass to sustain commercial viability.</i></p> <p><i>"We would very much support the return of high street houses to retail units if the business was deemed to be viable.</i></p> <p><i>"We feel that thriving local businesses will be of great importance in the rejuvenation of Belford. We understand that youth provisions may be helpful within Belford and would be</i></p>				
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<p><i>year to the coastal villages such as Bamburgh. We feel it is important to the success of the Neighbourhood Plan for Belford to be seen to provide an offering to attract a larger proportion of these visitors to the village."</i></p> <p>Anonymous comments: <i>"I agree with the Draft Vision."</i></p> <p><i>"How are you going to get businesses here? Bakers, Butchers, wet fish, Chinese? All mentioned for years – nothing."</i></p> <p><i>"As far as I am concerned this village is one big housing estate."</i></p>	<p><i>interested to hear more of the residents" views and preferences in respect of this."</i></p> <p>Anonymous comments: <i>"Make more houses/flats for Belford people."</i></p> <p><i>"There are no jobs. What about the cemetery?"</i></p> <p><i>"More jobs to attract families. Do we really need more houses; the village is great as it is."</i></p> <p><i>"Objective 1a; Increasing the number of shops. Can't see that happening considering the vacant shops are being made into living accommodation."</i></p> <p><i>"Someone should ensure that local people get preference when council houses come up for grabs [] locals are pushed to one side and houses given to people from all over."</i></p> <p><i>"Lots of activities during the day. How about a few during night classes for people [who]</i></p>				
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<p><i>"An exciting time and hope most of the plan works."</i></p> <p><i>"Not sure what your vision is, needs to be made more clear, more simple."</i></p> <p><i>"[I] don't think the 'Vision' actually says what you are thinking of doing, I'm no further forward after reading it."</i></p>	<p><i>work? Local people should get priority [for council housing] why should you have to go private and pay loads more than all the weirdos that seem to get housing no problem?"</i></p> <p><i>"Local youths end up moving away as they can't get a council house [...] yet a lot of unsavoury people get housed and cause no end of problems."</i></p> <p><i>"The High Street without shops is a soulless area now. Smaller villages have more shops than Belford. Shops create a hub, a social, moving, working place. It's sad that housing development gets priority, creating more out of town people who can afford the prices, but contribute little to the village centre. [] No more housing please without services and shops."</i></p>				
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Written representations were received from the following organisations and individuals:

Bellview Community Group (Bellview Trustee's)	Valerie Glass	Chris Ormerod
Bamburgh Parish Council	Margaret Ling	M.H. Stanton
Mr J R Jackson	D. Condron	S. Spillett
Octon	W. Richardson	Alastair Nixon
L Wilson	Claire Jarmain	P. Tansley & S. Norris
J. Sroczyriska	Anthony & Emma Finn	Michael McKenzie
Ian Graham	A&K Monnelly	S. Mckie
Heather Westcott	Janet West	Charles Bayne
John Harris	Gladstone	Denise Hiscox
Andy Maddock	Julie Poole	Shona Dixon
G. Leyland	Blaire Johnson	
Dennis Cromarty	Jane Bowen	
Nicci Forshaw	Pauline Tucker	
Alyn Spillett	G.W. O'Connell	

APPENDIX C

Analysis: Stage 2

The Vision:

Support for Vision	Objections to Vision	Suggested Modifications
<ul style="list-style-type: none">• A significant majority of respondents agree with the vision and that it is a way to improve Belford.• Many respondents suggest that Belford does need to be promoted in order to attract more businesses.• The vision is described as having commendable aspirations, appropriately ambitious and is concise and to the point.• The vision will seek to encourage the needs of local residents, businesses and visitors to be met. Embracing all three will help to provide the circumstances for a self-fulfilling prophecy as each will be mutually supported by the others.	<ul style="list-style-type: none">• Need a strategy in the vision to attract more wealthy residents who would invest in Belford and create more business opportunities.• Insultingly fatuous, not related to the needs of the residents of Belford.• Vision doesn't state what the intended actions are for improvement.• Unsure how Belford will attract more businesses and services to become a 'rural hub'.• Don't want to cater for tourists, if it leaves Belford empty at the end of the season.	<ul style="list-style-type: none">• A statement to encourage more local businesses.• More Optimism• Vision needs to be simpler, clearer and less technical.• Need to keep Belford's sense of community.• Need more information about how the vision will be achieved - suggestion for an Action Plan.• Need a way of attracting and retaining more visitors by creating a better offer.• Reassurance needed on how Belford will attract more businesses.

The Objectives:

	Support	Objections	Modifications/ Suggestion/ General Comments
Village Life	<ul style="list-style-type: none"> • Need for more jobs and businesses has been recognised. • Housing provision is necessary. Especially within the settlement boundary. • More shops would encourage local residents to shop in Belford. • Providing more employment opportunities is positive- good mix, not just in tourism and service industries. 	<ul style="list-style-type: none"> • Village in demise, limited shops, restaurants and pubs. • Local Businesses have not been consulted with. • Huge mistake to build more housing. • Objective to increase retail units will not be sustainable. • Village is only viable if people continue to live there. • Extra small shops in the high street is unlikely to be viable - vacant shops are being turned into housing now. 	<ul style="list-style-type: none"> • Need a new cemetery. • EA need to review Belford's floodplain plan. • Relocated Belford FC to golf club driving range- to release land and create mixed housing. • Designate more housing along South Meadows Road all the way to Toll House. • Build higher quality large homes. • Provide more affordable housing for young people and families. • Need to retain school and GP services. • Local people should get priority for council housing • Reduce amount of B&B's and second homes. • Policy for dealing with empty properties needed. • Need to attract young people and families to live here.

	Support	Objections	Modifications/ Suggestion/ General Comments
High Street Rejuvenation	<ul style="list-style-type: none"> High street does need improving, especially houses that are falling into disrepair. Agree; Better street furniture would go a long way to improving the overall 'feel' of the high street. 	<ul style="list-style-type: none"> High street rejuvenation- Vague; What is the actual proposal? Good as long as parking isn't restricted along the high street. 	<ul style="list-style-type: none"> Empty cottages and shops need improving on the high street. Parking is a problem- need designated parking areas/zones. Improving highways depends on what programme is put in place. A free car park at end of village would encourage visitors to walk through the village. Derelict building at the co-op should be demolished. Revise design of High Street to reduce traffic, speed, promote safe use by pedestrians and cyclists. Sensitive enhancement of the streetscape to make it more accessible.
Doing Business	<ul style="list-style-type: none"> Optimism about the future and increasing visitor levels. Very positive, but could add a statement about investing in local skills. Make reference to Belford's listed buildings. 	<ul style="list-style-type: none"> Needs rewording in order to be clearer. 	<ul style="list-style-type: none"> Need for high speed broadband in the whole village. Create a small car park behind 'The Neuk'. Vacant land to the North of Coastal Grains should be designated for industrial and commercial development.

	Support	Objections	Modifications/ Suggestion/ General Comments
Improving Connectivity	<ul style="list-style-type: none"> • Very positive, but depends on how likely this is to happen. • Access to Belford is already very good. • Agree with the suggestion to improve the A1. • Support the improvements of all forms of connectivity which should encourage commercial growth. 	<ul style="list-style-type: none"> • Clarify what a reasonable walking distance is. 	<ul style="list-style-type: none"> • Re-open Belford railway station for passengers. • Improve links to Newcastle and Scotland. Especially important for young people to access education. • Need for a more reliable and frequent bus service. • If Broadband is improved outlying farms could be used for offices/ businesses. • Construct a south-west radial bypass route for B6349 to help alleviate HGV traffic on High Street. • Safe places for people to cross, better cycle lanes and new speed cameras.
Protecting our Heritage and embracing the future	<ul style="list-style-type: none"> • Very positive to include wording supporting the use of energy efficient design- add materials, renewable energies. • Agree that Community Assets and Open Green Spaces should be protected. • Very supportive of retaining the Conservation Area- helps to maintain the existing traditional setting of the High Street. 	<ul style="list-style-type: none"> • Objective 5b Is too vague and would encourage idiosyncratic architecture. 	<ul style="list-style-type: none"> • Suggestion to foster a local sustainability philosophy in which everyone's contribution counts and everyone can take pride in. A Reputation for having an ethical/ sustainable approach to community life can attract new residents and provide new business opportunities. • Historic elements of Belford must be maintained. • Need a careful review of any new 'modern' buildings to ensure they are in keeping with Belford's character. • Need a traffic management plan. • Seek Market Town classification. • Electric charging points on the high street.

			<ul style="list-style-type: none">• 'Civic Trust' Design guide for conservation area.• Buildings should not be classified as listed if it makes them redundant.• Green spaces need to be utilised and maintained.
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Appendix E: Neighbourhood Plan Consultation Bodies for Belford Parish Council
Neighbourhood Plan 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), Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF Tel: 01670 623619 Email: david.english@northumberland.gov.uk Email: sarah.brannigan@northumberland.gov.uk
Local Planning Authority	Northumberland National Park Authority	Email: planning@nnpa.org.uk (If relevant, i.e. if the Neighbourhood Area extends in to the NNIP)
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, YO1 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 Carlol 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
	Virgin Media Limited	Virgin Media Limited, Unit 2, Network House, New York Way, New York Industrial Park,

Consultation Body	Organisation	Contact
		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
	Northern Powergrid	Northern Powergrid, Records and Information, Manor House, Station Road, Penshaw, Houghton le Spring, County Durham, DH4 7LA
Any person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989.	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
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

Consultation Body	Organisation	Contact
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 0191 419 6767
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 0191 419 6767
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	All local authorities, including parish councils, that adjoin the neighbourhood area	Bamburgh Parish Council Adderstone with Lucker Parish Council Chatton Parish Council Lowick Parish Council Kylloe Parish Council Holy Island Parish Council Parish council contact details are available from Northumberland County Council website http://www.northumberland.gov.uk/Councillors/Parish-Town.aspx
Adjoining local authorities (If applicable location)	Northumberland National Park Authority	Northumberland National Park Authority, Eastburn, South Park, Hexham, Northumberland, NE46 1BS. Email: planning@nnpa.org.uk
Voluntary Bodies some or all of whose activities benefit all or any part of the neighbourhood area		Belford Community Group email: belfordcommunitygroup@gmail.com Belford Museum email: email: karon.ives@hotmail.co.uk Belford Arts Festival email: jodi.larder@gmail.com Belford Christmas Lights email: corillas@icloud.com Belford Woodland Group email: brianrogers.uk@gmail.com Belford PPG (Belford Dr's) emmamiller2@me.com Belford WI audrey.thomson3@btinternet.com

Consultation Body	Organisation	Contact
		Belford Mothers Union cmharris@dircon.co.uk Belford Show wimclaren@btinternet.com Fourth Action - defunct Outdoor Care- defunct
Bodies which represent the interests of different religious groups in the neighbourhood area		To be identified by the Parish Council St Mary's PCC email: jaynorris93@gmail.com
Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area		To be identified by the Parish Council None identified
Bodies which represent the interests of persons carrying on business in the neighbourhood area		To be identified by the Parish Council None identified
Bodies which represent the interests of disabled persons in the neighbourhood area		To be identified by the Parish Council Bell View Centre email: bellviewbelford@hotmail.co.uk
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@theatrestrust.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 F: COPY OF CONSULTATION LETTER SENT TO ALL CONSULTEES

Dear Consultee,

BELFORD NEIGHBOURHOOD PLAN

Neighbourhood Planning (General) Regulations 2012: Regulation 14 consultation and Publicity

Consultation under Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004

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

For the purposes of the Neighbourhood Planning Regulations, you are identified by the Parish Council as a consultation body whose interests may be affected by the policies contained in the Draft Plan.

The Regulations require that consultation must take place for a period of not less than six weeks starting on the date the Draft Plan is first publicised. Written representations are therefore being invited on the Draft Plan for six weeks, commencing Friday 1st July 2022 and ending at 5pm on Monday 15th August 2022.

In addition, Northumberland County Council has confirmed that Strategic Environmental Assessment is required for the Belford Neighbourhood Plan. An assessment has been undertaken and an Environmental Report has been prepared. This report considers the impact that introducing the policies in the Plan may have on the environment. In accordance with the SEA Regulations, Belford Parish Council must make the Environmental Report available for consultation.

The Plan plus supporting documents, and the Environmental Report can be viewed on the Belford Parish Council website at [Documents](#).
[Belford Parish Council \(northumberlandparishes.uk\)](#)

Hard copies of the Plan, policies maps and supporting documents will be available to inspect at the Bell View Centre, 33 West Street, Belford, Northumberland, NE70 7QB between 9am and 5pm Monday to Friday and will be available from Friday 1st July 2022.

Representations must be made in writing either by email to belfordpc12@gmail.com or by post to: Belford Parish Council, Morven, 11 Springhill Lane, Berwick-upon-Tweed, TD15 2QN

We would be pleased to receive any written representations you may wish to make on the Plan plus supporting documents, and the Environmental Report before 5pm on Monday 15th August 2022.

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

Yours faithfully

Guy Renner-Thompson
Chair, Belford Parish Council

APPENDIX G: CONSULTATION RESPONSES TO REGULATION 14 CONSULTATION

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
Historic England	None	<p>Overall, we broadly welcome the vision and objectives set out in the draft plan in so far as they affect our area of interest, but have the following comments to make:</p> <ul style="list-style-type: none"> We suggest Objective 5 should be slightly reworded. Regarding the conservation area, change “maintain its integrity” to “maintain its special interest”. In relation to landscapes and green spaces, change “maintaining the integrity” to “protecting and enhancing the intrinsic character and beauty”. These terms better reflect the relevant legislation and national policy. Reference in Policy 1 to enabling development is unnecessary. Enabling development is reserved for those exceptions “which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset” (NPPF para 208). It is not meant to be a ‘go to’ for a positive strategy for the historic environment. We suggest either removing the relevant criterion or, if wanting to retain a criterion on optimum viable use, then amend it <p>and the public benefits of the proposal outweigh any harm caused;”</p> <p>The first two paragraphs of Policy 13 appear to go little further than repeating national policy in the NPPF and, in attempting to shorthand that policy, may not accurately reflect it. This might make Policy 13 redundant in that it might not be regarded as distinctly reflecting and responding to</p>	<p>Specific suggestions for change have been incorporated. Objective 5 has been re-worded, and reference to enabling development has been removed from Policy 1.</p> <p>Amendments have been made to Policy 13; however, without an appraisal or appropriate evidence it has been difficult to incorporate too much detail into Policy 13. Part 7 contains an aspiration to commission a conservation area appraisal for Belford.</p>

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p>the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared, nor be sufficiently concise, precise and supported by appropriate evidence (Ref ID: 41-041-20140306 of the Planning Practice Guidance). Rather than re-writing existing higher level policy, Policy 13 should add local depth to its application. For example, it could set out specific themes, characteristics or features to be protected, or it could set out what measures would be acceptable to mitigate the impact of development that higher level policy might allow. The final paragraph of the policy and the bullets in para 5.47 of the supporting text begin to do this but, as the draft plan points out, there may be insufficient evidence on the special interest of the conservation area for Policy 13 to go into enough detail. It is important that your plan is based on proportionate, robust evidence which, for a conservation area, would normally suggest the need for a character appraisal. Preparing your plan could be an important opportunity to get an appraisal in place, to clearly set out its special architectural and historic interest, thus informing your policy to protect and enhance it. Without this, it might be difficult to prepare a suitable policy. More information is given in our advice note, and a comparator neighbourhood plan forms one of the case studies on our website (see below): Odiham & North Warnborough, which rephrases conservation area analysis into policies to direct developers and decision-makers on how to apply higher level policy for each conservation area in the plan area.</p> <p>General advice follows</p>	Advice noted.
National Highways	NEA	Having considered the Belford Neighbourhood Plan - Pre-Submission Draft Plan (April 2022) and associated supporting information, we find no issue	

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p>with the overarching aim and objectives. We also identify no issues with the principles of the policies.</p> <p>However, the Neighbourhood Plan does make reference to the A1 without recognition of National Highways' role and responsibilities and we recommend amendments to the wording of the Neighbourhood Plan to address this, as outlined below.</p> <p>Para 3.19 identifies: <i>"The Parish Council supports the upgrading of the A1 carriageway and the reopening of Belford Railway Station to provide a passenger rail link to Newcastle. The Parish Council will actively engage with Northumberland County Council to pursue both projects..."</i></p> <p>We would note that, being located north of Ellingham, Belford is beyond the extent of National Highways' current A1 in Northumberland: Morpeth to Ellingham scheme and an extension of the scheme north of Ellingham is not identified within the Department for Transport's (DfT's) RIS3 pipeline.</p> <p>Notwithstanding this, we recommended that the wording within the Neighbourhood Plan be modified to recognise that the A1 forms part of the SRN and, therefore, is the responsibility of National Highways, not the Council.</p> <p>The A1 is first identified within the Neighbourhood Plan at para 3.10, we recommend an additional paragraph be added after 3.10 which identifies that:</p>	

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p><i>The A1 in Northumberland forms part of the Strategic Road Network (SRN) and, as such, is the responsibility of National Highways, the government company which plans, designs, builds, operates and maintains England's motorways and major A roads.</i></p> <p>Regarding para 3.19, notwithstanding clarification provided above regarding the absence of proposals to upgrade the A1 to dual carriageway within the vicinity of Belford within DfT's RIS3 pipeline, we recommended that the wording of para 3.19 be modified as follows:</p> <p><i>The Parish Council will actively engage with Northumberland County Council to pursue both projects, and National Highways in relation to any proposals with an influence upon the A1.</i></p> <p>Para 4.19 identified: <i>"The area could be made more accessible by public transport, walking and cycling thereby reducing the need to travel for both people and goods. More off-road cycle ways, bridleways and paths would help. There is passion in the community to support the creation of a new underpass for walkers and cyclists that would go under the A1 and improve safer access to the coast..."</i></p> <p>Whilst National Highways have no 'in principle' objection to such proposals, we would have it noted that National Highways currently have no funding to contribute to any such proposal and, equally, would be unable to accept any liability regarding maintenance. Any such infrastructure would need to be the responsibility of the Council.</p>	

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p>For reference and information, the Council would represent the Technical Approvals Authority (TAA), but with the structure designed and constructed to the latest Design Manual for Roads and Bridges (DMRB) standards, designed to be maintained in accordance with Construction (Design and Management) (CDM) regulations and the DMRB standards. The design would need approval from National Highways' Safety, Engineering and Standards (SES), to ensure the most appropriate design and delivery is achieved, and the necessary Road Safety Audits (RSAs) would need to be undertaken and approved.</p> <p>As a 3rd party scheme, National Highways would also need to enter into an agreement with the Council to enable works within their land, as well as to undertake design reviews and a watching brief once construction started. Traffic Management would need to be closely managed by National Highways, to ensure any closures are kept to a minimum and there are no conflicts. This would all need to be at the cost of the Council.</p> <p>Therefore, extensive liaison and agreement would be required with National Highways, not only in relation to technical matters (including design, land, technical approvals etc) but also liability and contributions towards traffic management associated with inspection, maintenance etc.</p> <p>We recommend that an additional paragraph be added after 4.19 to the above effect:</p> <p><i>The A1 in Northumberland forms part of the SRN and is the responsibility of National Highways. National Highways currently have no funding to contribute to any such proposals and, equally, would be unable to accept</i></p>	

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p><i>any liability regarding maintenance. Any such infrastructure would need to be the responsibility of Northumberland County Council. Extensive liaison and agreement would be required with National Highways, not only in relation to technical matters but also liability and contributions towards traffic management associated with inspection, maintenance et cetera.</i></p> <p>There is further reference to the A1 within paras 5.43, identifying it as, “a substantial barrier, and a means of crossing the A1 for cyclists and walkers by way of an underpass, would open up opportunities”. But, subject to the above recommended additional wording being included within the Neighbourhood Plan, we do not consider it necessary recommend para 5.43 be modified. However, it is recommended that recognition of the above matters be included within the wording of the Policy itself through inclusion of the following additional paragraph:</p> <p><i>The A1 in Northumberland forms part of the SRN and extensive liaison and agreement would be required with National Highways to deliver these proposals.</i></p> <p>The A1 underpass is also identified within Section 7 – Community Projects under CP2 Walking and Cycling Infrastructure.</p> <p>We recommend that the wording of CP2 be amended as follows:</p> <p><i>The Parish Council will work with Northumberland County Council as Transport Authority and as Highway Authority for the local road network to pursue opportunities for the implementation of improvements to the walking and cycling infrastructure throughout throughout the Parish, and</i></p>	

Respondent	Comment on SEA	Comment on Reg.14 draft	Response from Parish Council
		<p><i>specifically the creation of a safe and convenient cycling and walking underpass that links Belford with the coast by crossing the A1. The Parish Council will work with Northumberland County Council and National Highways, as Highway Authority for the Strategic Road Network, in relation to any proposal that has with an influence upon the A1.</i></p> <p>Subject to the above recommended modifications recognising National Highways role and responsibilities regarding the SRN and matters that influence the A1, we would have no objection to the Neighbourhood Plan.</p>	
Northumberland County Council	None	Full comments made are shown in APPENDIX G	All suggested alterations have been incorporated into the final version of the Plan
Natural England	None	No specific comments	No changes
Coal Authority	None	No specific comments on the Plan. Information about coal situated in the Neighbourhood Area	No changes
National Grid	None	None – information about assets provided, but no comments on the Plan	No changes

APPENDIX H: CONSULTATION RESPONSE FROM NORTHUMBERLAND COUNTY COUNCIL (Regulation 14)



Mrs. Isabel Hunter
Parish Clerk
Belford Parish Council

Enquiries to: Chris Anderson
Direct Line: [REDACTED]
E-mail: [REDACTED]

By email only

Date: 15th August 2022

Dear Isabel,

Belford Parish Neighbourhood Plan Response to consultation on pre-submission draft plan

Thank you for consulting the County Council on the Pre-Submission Draft Belford Neighbourhood Plan. Firstly, I would like to congratulate the Parish Council and their Steering Group on reaching this stage in plan preparation and for creating a well-considered draft plan for the future of Belford Parish.

I have consulted colleagues throughout the County Council on the draft plan and have received a number of comments from various service areas. The County Council's comments are presented in the schedule that follows this letter.

Comments have been made about both the supporting text, which sets the context for the policies, and on the policies proposed for inclusion in the Plan.

There are a number of areas where we have identified concerns in terms of how well the Plan currently meets the 'basic conditions'. We would hope that you will see these comments as critical support. They are intended to inform modification to the Plan so that it best meets the expectations of the Parish Council in terms of the future determination of development proposals, and, crucially, that the Plan can proceed to independent examination once it has been submitted, with a greater expectation of a positive outcome.

I hope the comments made by the County Council are helpful in reaching a conclusion to plan preparation. We will, of course, continue to support the Parish Council and Steering Group with advice as necessary and with practical support on any modifications required to the Plan once you have had a chance to review all of the representations received in response to the current consultation.



David English, Planning Manager, Neighbourhood Planning and Infrastructure
Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF
T: 0345 600 6400 E: [REDACTED]
www.northumberland.gov.uk



Finally, I would advise that the comments made by the County Council in response to this consultation on the Pre-Submission Draft Plan do not constitute a formal opinion about whether the Plan as currently drafted meets the 'basic conditions'. The County Council is not required to issue a decision statement in respect of that matter until the independent examination has been completed. We would therefore reserve the right to make further representations as necessary following the submission of the Plan to the County Council.

Yours sincerely

Chris Anderson
Neighbourhood Planning Team

General Comments

When suggestions are made for the revision of text, text shown in red strikethrough (~~example~~) is suggested for removal, and text shown red underlined (example) is suggested for addition.

General:

We suggest any references to superseded development plan documents in the background papers should be updated to reflect the adopted Northumberland Local Plan, March 2022.

For ease of reference when using the policies, we suggest numbering the paragraphs and using numbered / lettered bullet points.

Para 2.3	<p>We suggest the last sentence of the paragraph is removed as the Northumberland Plan has been adopted since this version of the Plan was being drafted.</p> <p>The County Council adopted the Northumberland Local Plan in March 2022. The Neighbourhood Plan must be in general conformity with strategic policies contained in the Northumberland Local Plan. The Northumberland Local Plan has recently been examined and found to be consistent with national planning policy. It is therefore expected that the Plan will align with national and local strategic policy.</p>
Para 4.5	<p>This suggests that the NP policies may need to be reviewed in light of updated Census data on second and holiday homes. The Census 2021 data isn't now expected until around the end of this year. Belford is now combined with the former Middleton and Easington parishes (the NP area was amended in Apr. 2021 to reflect that), both of which were well over the 20% threshold referred to according to the Census 2011 data on households with no permanent residents (44.5% Easington / 37.9% Middleton), and for which the NLP Policy HOU10 primary occupancy restriction applies. While not directly comparable, internal analysis of Council Tax and Business Rates data suggests that Belford (with Middleton and Easington) has risen from around 17.0% in 2011 to about 18.9% now, so is certainly on the cusp of the 20% threshold, but it remains to be seen what the 2021 Census data for households with no permanent residents shows and whether it will indeed hit that 20% threshold and thus come within the realms of NLP Policy HOU10.</p> <p>We suggest Para 4.5 is re-written to reflect the most up to date Local Plan policy position in the newly designated Belford neighbourhood area (April 2021) as referred to in the above text.</p>

	<p>Para 4.5 would read easier as follows:</p> <p><u>In the case of locations within or close to the north Northumberland coast, which is a popular holiday destination, it is likely that empty dwellings will include second homes and holiday accommodation. Where the proportion of empty dwellings in a parish exceeds 20% it is widely considered that this begins to point towards an imbalance in the housing stock which is likely to contain significant numbers of second homes and holiday accommodation. A diminishing resident population associated with such changes can impact the viability of local businesses, community services and facilities. Belford is now combined with the former Middleton and Easington parishes (the NP area was amended in April 2021 to reflect that), which were both well over the 20% threshold referred to according to the Census 2011 data on households with no permanent residents (44.5% Easington / 37.9% Middleton), and for which the NLP Policy HOU10 primary occupancy restrictions apply. It remains to be seen what the 2021 Census data for households with no permanent residents shows and whether it will hit that 20% threshold taking Belford within the requirements of NLP Policy HOU10. the available data from the previous census appears close to that tipping-point and will monitor changes over time. This may lead to a review of the planning policies currently proposed in the neighbourhood Plan if it is thought appropriate to control the future occupation of new housing in the Parish.</u></p>
Para.4.10 and 5.5	<p>The paragraph says that the settlement boundary has been drawn to accommodate most of the existing permissions for housing development. The settlement boundary background paper includes a table listing the extant permissions (as at end May 2021) with some notes about their expectations for delivery of those permissions, but there is no map to clearly illustrate how the proposed settlement boundary takes account of which ones have been included and whether any around the edges of the settlement have been notably excluded. We feel the background paper should be updated to include this part of the methodology and to reflect the adoption of the Northumberland Local Plan. Officers would be pleased to support the Parish Council to do this.</p>
Para.5.7	<p>The paragraph refers to entry-level exception sites. While currently still in the NPPF, the Written Ministerial Statement on First Homes last year (and associated PPG) states that since 28 June 2021 entry-level exception sites have been superseded and replaced by First Homes Exception Sites.</p> <p>We suggest the paragraph is updated to reflect this.</p>

	<p>The Parish Council recognises that certain local housing needs will need to be met during the plan period. Policy 1, and subsequent policies in the Plan therefore support the provision of affordable housing, including that delivered through community-led projects, in the countryside beyond the defined settlement boundary where these meet the nationally prescribed definitions for 'rural exception sites' which provide general local needs affordable housing; and 'entry-level exception sites' 'first homes exception sites' which provide affordable housing for first time buyers or people looking to rent their first home.</p>
Para.5.8	<p>The paragraph says that new self/custom-build developments in the rural hamlets will only be supported for 1 dwelling. We have addressed this issue in detail in our comments in Policy 1.</p>
Para.5.10	<p>We suggest the interpretation of what is regarded as community-led housing could be expanded. Community-led housing does not just have to be affordable housing and can include market housing where supported/initiated by the local community to help meet identified local needs. However, it does not prevent the BNP specifically supporting community-led Affordable Housing schemes in Policy 2.</p>
Para.5.12	<p>The paragraph mentions a community project being proposed in relation to older people's housing, but nothing is mentioned in this regard in the list of community projects in section 7 of the plan.</p>

Policy 1: New Housing Development

The third paragraph includes reference to entry-level exception sites. These are no longer applicable, and we suggest the reference is amended in accordance with the national Written Ministerial Statement policy requirements and PPG for First Homes and its provisions for First Homes Exception Sites.

We would also like to highlight to the Parish Council that these sites cannot be within AONBs and other designated rural areas. The Written Ministerial Statement and PPG also requires development plans (incl. neighbourhood plans) that include policies for affordable housing to set out that at least 25% of affordable homes should be First Homes.

The fourth paragraph including bullet points regarding isolated homes in the countryside appear to be consistent with NPPF paragraph 80 (and NLP Policy HOU8), but neighbourhood plans need not repeat national policy or policies in the Local Plan. We would suggest the policy would read better by saying isolated residential development in the countryside will only be supported where in accordance with policies in the development plan and NPPF.

The last paragraph of the Policy supports the development of single dwelling, self-build or custom builds in the countryside. The policy supports these types of development in the hamlets, clusters of buildings and farm steadings across the Parish. To better align with the strategic policies in the NLP we would suggest the policy supports development in only the hamlets of Ross, Elwick, Low Middleton, Middleton, Detchant, Easington and Waren Mill and names these hamlets in the policy. These settlements would then become classified as 'other settlements' as the NLP classifies them. We would suggest that clusters of buildings and farm steadings are removed from the policy unless there is evidence to identify their name, location, and character as an "other settlement"

The last paragraph of the policy is more permissive than the NLP in the respect of support for dwellings within **and adjacent** to these named hamlets. The NLP in Policy STP 1 part (f) states *development in other settlements not identified as Main Towns, Service Centres or Service Villages will be limited to that within the built form of the settlement, and the conversion, extension or redevelopment of existing buildings.*

Neighbourhood Plans are allowed to provide for more development than the Local Plan and this approach seems to provide for this in the Plan. The policy however seeks to control the number of new dwellings to a maximum of 1 which is more restrictive than the NLP approach which does not set a maximum number of dwellings within the built form of an 'other settlement'.

Without specific evidence as to why a maximum no of 1 has been chosen for these locations we feel it should not be included in the policy. We would suggest support for small-scale self-build custom-build housing in such locations in accordance with other policies in the development plan, rather than restricting it to just single-dwelling developments

We would welcome further working with the Parish Council to discuss and agree any necessary changes and for Policy 1 to be updated or restructured.

Policy 2: Community Led Housing	<p>We would suggest checking the intention of this policy to make sure the Parish Council are happy with it. The policy as written would not allow someone to build their own house due to the requirement of it having to be 'affordable' Is this what the policy aims to achieve?</p> <p>We would welcome further working with the Parish Council to discuss and agree any necessary changes and for Policy 2 to be updated or restructured.</p>
Policy 3: Accessible and Adaptable Housing, second part, and paras. 5.13 to 5.16	<p>The BNP is seeking to go beyond the requirements of NLP Policy HOU11 (part 2) and require all new housing to meet the higher M4(2) accessibility and adaptability standards of the Building Regulations. The BNP considers the NLP requirement will not have a significant effect on local supply and do not go far enough. However, these optional technical housing standards can only be introduced through development plan policy where there is clear evidence of local needs and that it would not adversely impact on development viability. While there is evidence of local need in Belford, there has been no assessment of viability to justify this enhanced local policy requirement over-and-above the viability assessment evidence of the NLP - the BNP, in para.5.16 recognises it may have some limited development viability implications but consider the local needs to effectively outweigh that impact. We feel this may not satisfy the national policy requirements for introducing these higher standards. We would suggest the second part of Policy 3 is therefore unjustified in the absence of commissioning a detailed viability assessment to show that there would not be any adverse impacts on development viability in the BNP area. We suggest the BNP refer to the requirements already set out in the NLP.</p> <p>On a positive note, the Government have now decided to make the M4(2) accessibility and adaptability standard mandatory as part of the Building Regulations but at this stage of the BNP process it is subject to further consultation.</p>
Policy 4 - Community Facilities	<p>We are pleased to see that specific facilities of value to the community are listed and numbered. For clarity, we would suggest adding a business description, where necessary.</p> <p>For example, change:</p> <p>"CF12: The Salmon, 31 High Street" to</p> <p>"CF12: The Salmon Public House The Salmon, 31 High Street"</p>

Policy 5: Recreational Open Space	<p>The Strategic Estates department have raised objections to the two recreational open space areas identified in the BNP:</p> <p>ROS1 - The primary school land is not open recreation space for all to use, it is an enclosed school field and play area. Part of the site for the Middle School is subject to a Community Asset Transfer to the Parish Council, however it is subject to Department for Education approval so we feel it is too early for the designation.</p> <p>ROS2 – we would not want the skate park designated as recreational open space.</p>
Policy 6: Local Green Space	<p>No comments</p>
Policy 7: Belford Village Centre	<p>This Policy seems to allow for shop front uses to move within a range of use classes as long this makes “a positive contribution to Belford Village Centre by maintaining or improving the economic vitality, viability and sustainability of Belford”. If applied to, say “CF3: The Belford Pharmacy, 22 West Street”, “CF4: Belford Newsagents, 22 High Street” or “CF6: The John Dory Fish & Chip Shop, 8 West Street” from Policy 4, this suggests a more flexible approach than Policy 4 itself, which, ostensibly, would want to keep a pharmacy, a newsagent and a fish & chip shop.</p> <p>Is there a need to set out somewhere, the relationship between these two policies? For example, if the Policy 4 test is passed and there is no longer a need for one of the named facility or the facility is no longer viable, (and the building has been marketed), would they still, under Policy 7, be looking for a use that would maintain or improve the economic vitality, viability and sustainability of Belford?</p> <p>It is suggested that the second paragraph of the Policy could be rephrased to provide more clarity to a decision maker:</p> <p><u>“The change of use of ground floor premises within Belford Village Centre currently in Class E, Class F1 or Class F2 uses to residential use, including as overnight or short-stay tourist accommodation will only be supported if relevant tests within this Policy and/or Policy 4 have been satisfied”</u></p>
Policy 8: Broadband Infrastructure and Telecommunications	<p>We suggest a change to the final clause of the first paragraph to make it clearer for a decision maker to apply the policy:</p> <p>“... where it has been demonstrated that the development has been sited and designed, <u>where relevant</u>, to minimize the <u>any adverse</u> impacts on the character and appearance of the AONB, other valued and designated key qualities of the landscapes and/or the Belford Conservation Area.”</p>

Policy 9: Rural Business Development and Tourism	<p>At the end of the first paragraph of the Policy, and before the bullet points, the phrase "...elsewhere in the Neighbourhood Plan and in the development plan..." is used, but the Neighbourhood Plan is part of the development plan.</p> <p>We suggest a consistent reference to the policies in the neighbourhood plan and the development plan as follows:</p> <p><u>Subject to compliance with relevant policies in the Neighbourhood Plan and elsewhere in the development plan.</u></p> <p>In the first bullet point it should be made clear that new buildings should be more exceptional and of appropriate scale. We suggest the bullet point is rephrased:</p> <p>"...the sustainable growth and expansion of all types of business both through conversion of existing buildings and, <u>where this is not possible, through appropriately scaled</u>, well-designed new buildings;"</p> <p>We suggest the use of scale is appropriate to the policy it is being applied in to help a decision maker. For example, "appropriately scaled" is suggested in this policy rather than "small scale", as in the following Policy 10 Belford Industrial Estate, it cross refers to Policy 9, and allows for some extension of employment uses beyond the boundary of the industrial estate. In this case slightly larger than small scale buildings might be appropriate so we suggest adding this to the policy.</p>
Policy 10: Belford Industrial Estate	<p>No comments</p>
Policy 11: Overnight Tourist Accommodation	<p>We suggest the first part of the Policy separates the different types of accommodation, and explains how new permanent buildings, new temporary buildings and conversions will be treated. To make it clearer for a decision make to apply the policy we suggest the following;</p> <p>"Proposals for <u>overnight tourist accommodation will be encouraged, including, support in the open countryside for small scale development, comprising building conversions, such as for bunkhouses, and new moveable temporary accommodation such as</u> chalets, holiday lodges, touring caravan sites, camping sites, glamping pods, or yurts. and similar holiday accommodation,</p> <p><u>Small scale touring caravan sites and camping sites,</u> and the small-scale expansion of existing static caravan and holiday home parks will <u>also</u> be supported. where t</p> <p><u>The</u> occupation of any caravans, buildings or other structures is <u>will be</u> limited by condition or planning obligation to prevent</p>

	<p>their use other than as holiday accommodation, and where it can</p> <p><u>It should</u> be demonstrated that: ...”</p>
Policy 11: Overnight Tourist Accommodation continued...	<p>In the fourth bullet point, for consistency with the Local Plan and the AONB Management Plan, we suggest the phrase “special qualities” should be used as follows:</p> <p><i>“...the development can be accommodated sensitively in the landscape with great weight being given to conserving and enhancing <u>the special qualities of landscape and scenic beauty where development is proposed in the Northumberland Coast Area of Outstanding Natural Beauty, where these would be affected</u>.”</i></p>
Policy 11: Overnight Tourist Accommodation continued...	<p>We feel the penultimate paragraph is overly onerous and should be rephrased in line with the relevant part of Local Plan Policy ENV 3, as follows:</p> <p><u>“All Where the development is considered likely to have a significant impact on the surrounding landscape, townscape or seascape character of the site and/or visual amenity and/or the special qualities of an AONB,</u> proposals must be supported by a Landscape and Visual Impact Assessment prepared by a suitably qualified and experienced person to clearly demonstrate the landscape and visual impact anticipated to arise from the development.”</p> <p>We would welcome further working with the Parish Council to discuss and agree any necessary changes and for Policy 11 to be updated or restructured.</p>
Policy 11: Overnight Tourist Accommodation continued...	<p>We would suggest the final paragraph is overly restrictive and such an approach does not appear to be supported by evidence. It is likely, in any case, we feel that any large scale proposal would be unlikely to meet the criteria set out in the policy (this could be described more fully in the supporting text). We advise deleting this last sentence.</p>
Policy 12: Provision and Improvement of Walking and Cycling Routes	<p>We welcome the aspiration to improve connectivity between Belford and the Northumberland Coast for pedestrians and cyclists. The policy specifically refers to an underpass, which would only be delivered or deliverable as part of a more general improvement of the A1. NLP Policy TRA 3 supports full A1 dualling. We suggest the policy could be less specific than only supporting an “underpass.”</p>
Policy 13: Belford Conservation Area	<p>We support the creation of a Conservation Area policy which includes Belford Hall Registered Park and Garden. We would suggest including text relating to the openness of the area.</p> <p>We would suggest the Policy promotes development <u>that will contribute positively to the Conservation Area, better</u></p>

	<u>'revealing its significance'</u> This aligns with Policy ENV 9 of the NLP.
Policy 14: Design in New Development	<p>We suggest the last bullet point relating to a net gain for biodiversity would be better placed in Policy 15. To better align with legislation, we suggest re-wording as follows.</p> <p><u>"Wherever biodiversity is impacted by development, the proposal must secure a measurable 'net gain' for biodiversity through mitigation, restoration and/or, as a last resort, compensatory measures as necessary."</u></p>
Policy 14: Design in New Development cont'd...	<p>We feel the penultimate part of Policy 14 is too onerous. A rephrasing would read:</p> <p><u>Development that is not well designed will be refused especially where it fails to reflect the criteria in this policy and other relevant policies in the development plan</u></p>
Policy 14: Design in New Development cont'd...	We are pleased to see the inclusion of the policy text "a Sustainable Drainage System (SuDS) has been incorporated or it can be demonstrated why such a system would not be practicable"
Policy 15: Protected Habitats and Species	<p>We have suggested a more up to date wording of this policy to reflect changes in previous neighbourhood plans and to sufficiently refer to the whole of the Coastal Mitigation zone. We suggest updating the policy to the following;</p> <p><u>To ensure that the impacts arising from increasing levels of recreational disturbance on coastal Sites of Special Scientific Interest and European Sites can be addressed, all development within 7km of the coast that will result in a net increase in the number of residential units or tourist accommodation will be required to contribute to the Coastal Mitigation Service or provide alternative mitigation of demonstrable effectiveness. Within a zone, as shown on the Northumberland Local Plan policies map, extending between 7km and 10km from the coast, only major development will be required to make a contribution to the Coastal Mitigation Service, or provide alternative mitigation of demonstrable effectiveness. All financial contributions required in accordance with this policy will be secured by way of a planning obligation under section 106 of the Town and Country Planning Act 1990, or any subsequent amending legislation.</u></p> <p>We advise updating the NP policies map, accordingly.</p>
Policy 16: Development and Water Quality	Given the recent ecological advice, we strongly support this Policy.

Policy 17: Valued Landscapes	<p>To better align with NPPF, which says that policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes in a manner commensurate with their identified quality in the development plan, we suggest re-wording the second paragraph as follows:</p> <p><i>“An Area of Valued Landscape is designated through the Neighbourhood Plan and defined on the Policies Map. Any development that has a significant adverse impact on the important characteristics and or qualities of the landscape in this designated area, as described in the assessment and report ‘Northumberland Sandstone Ridges and Vales – A Valued Landscape’ (January 2021) <u>or other relevant evidence documents</u>, will not be supported.”</i></p> <p><i>In addition, we would suggest including in the policy the key qualities that make this a valued landscape.</i></p>
Policy 17: Valued Landscapes cont’d...	<p>The third paragraph of the Policy refers to key views. It states that these “<i>are defined on the Policies Map</i>”. However, they seem to be defined on separate maps within the document, rather than on the Policies Map. We suggest the Policies Map is updated to include these views.</p>
Policy 17: Valued Landscapes cont’d...	<p>The fourth paragraph of the Policy states that “<i>Major development within the Heritage Coast will not be supported unless it is compatible with its special character.</i>” The fifth paragraph is about the AONB and repeats NLP Policy ENV 5, allowing for major development in “<i>exceptional circumstances and where it can be demonstrated to be in the public interest</i>”. Notwithstanding that the AONB also covers the Heritage Coast within the Neighbourhood Plan area, it does seem possible that there could be occasions when the AONB test is passed but the development would still not be compatible with the special character of the Heritage Coast. Therefore, this part of the Policy can be supported.</p>
Policy 17: Valued Landscapes cont’d...	<p>We feel the final paragraph of the policy is overly onerous. NLP Policy ENV 3 makes clear that, even within the AONB, a Landscape and Visual Impact Assessment (LVIA) will only be required where the development is considered likely to have a significant impact. As such, we suggest the last paragraph of Policy 17 could be rephrased like the phrasing in NLP Policy ENV 3:</p> <p><i>“With the exception of minor extensions to existing dwellings, aAny proposal for development within the designated areas defined or described in this Policy considered likely to have a significant impact on the surrounding landscape, townscape or seascape character of the site and/or visual amenity and/or the special qualities of AONB and/or important characteristics or qualities within the Area of Valued Landscape, must be accompanied by a Landscape and Visual Impact Assessment prepared by a suitably qualified and experienced person to</i></p>

	<i>clearly demonstrate the landscape and visual impact anticipated to arise from the development.”</i>
Other Comments	<p>The Transport Planning Department support the inclusion of sustainable transport themes within the plan outlined in Objective 4, transport and travel.</p> <p>The Climate Change Team would welcome the Neighbourhood Plan considering planning for renewable energy developments particularly community energy projects that may be pushed forward by local groups. This could be considered under section 7 - 'Community Projects'.</p> <p>The team would also encourage the Neighbourhood Plan to consider and recognise the target to become a carbon-neutral county by 2030, as outlined in the NCC Climate Action Plan 2021-2023.</p>